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

Response 918010247

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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)

R H B Ranns

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)

If you are representing someone, please provide their name here:

Croxton Kerrial and Branston Parish Council

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:

4.2.2 and 4.2.21

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)

PARA 4.2.2 Introduces the TAHR which has been prepared by G L Hearn who also prepared the HEDNA. G L Hearn's TAHR it is: NOT Positively Prepared because it: a) departs from objectively assessed development, which was established in GL Hearn's HEDNA, to provide areas for divergence for "Policy On" decisions, without objective assessment of the likely quantitative effect of policy decisions. b) does not provide proper evidence as to why G L Hearn's objective assessment in HEDNA at paras 3.30 to 3.33 and 4.46 (where slower growth was expected) is now to be overturned. Indeed the Employment Land Study by Melton Borough Council has the following at "4.14: Figure 10 summarises the number of inward investments attracted to the LLEP area for the period 1997 to December 2014. These are defined as companies locating in a local authority area as a result of relocation, expansion or first time operations. As Figure 10 shows, the rate of inward investment in Melton has been negligible." At the time that HEDNA was produced the Emerging Local Plan included for 51 hectares of employment land between 2011 and 2036. This has not changed. G L Hearn say in their TAHR at "4.26: GL Hearn consider that the range of local evidence suggests that the Borough's economy could potentially perform more strongly than shown in the HEDNA forecasts". In the future anything could POTENTIALLY happen. There should be objective analysis of the amount of growth and why the same land will now attract greater economic growth and at least upper and lower bounds provided. c) does not explain how the objective assessment in para 5.3 of HEDNA that "Clearly it would be illogical for an area to increase population growth above the levels shown in trend-based demographic projections (and hence increase housing need) through increased in-migration" is now

to be ignored. There are exceptions considered in the objective assessments in HEDNA at 5.4, that do not contemplate an increase of the order of 44%. All areas are subject to ageing population so it would need exceptional demographics to establish any uplift, above that in the HEDNA. To encourage a slightly younger age structure and to support economic growth there must be more than just allocation of employment land. As the LLEP focuses on the west of the County there are currently no incentives for development of this employment land. The other provision is an "area with a known 'shock' to the employment base such as a major new employment site which will generate many more jobs above a baseline forecast position". However the base line of 51 hectares of employment land is in HEDNA so this does not apply. d) does not properly consider or quantify the evidence regarding the two local authorities that have reported that they are potentially unable to meet their targets. GL Hearne should have addressed the "Leicester & Leicestershire Authorities Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing January 2017" which states at "2.8 At present there is no declared unmet need in the HMA but it is recognised that the ability of each local authority to meet its own OAN will vary. Table 1 demonstrates that, theoretically, and with the exception of Leicester City Council and Oadby & Wigston Borough Council, all authorities are able to accommodate their own needs." The only potentially unmet requirements are therefore from the south of the county and from Leicester itself. The data is available to produce a finite figure which has not been done. GL Hearne have not addressed where this would be best located, if it were even deemed suitable to locate it in Melton Borough the furthest borough away from these two. GL Hearne should have considered whether unmet need in Leicester and to the south would be best located in the west of Melton Borough or to the North and East, nearer Nottingham and Grantham. NOT Justified The G L Hearn TAHR should have taken into account, or been permitted to in the brief, the soundness test "Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence". G L Hearn do not provide proportionate evidence in that there are no calculations as to the difference between objective standard in HEDNA and statements of possibility in TAHR. G L Hearn have not been asked to assess the resultant strategy, which lifts the housing requirements by 44% from 170 dpa to 245 dpa and its viability. NOT Deliverable TAHR in the Executive Summary reiterates a statement from the HEDNA "Delivering Affordable Housing for Local People xii. The HEDNA identified an affordable housing need for 70 dwellings per annum across the Borough. Affordable housing delivery is however influenced by residential development viability, after funding for improving infrastructure has been taken into account. If 25% of new homes were delivered as affordable housing, 280 dwellings per annum would be needed to meet affordable housing needs in full." This conflicts with GL Hearn's statement in HEDNA at 12.18 that uplifts of this scale are unrealistic and would not be deliverable and its inclusion as evidence of an upper bound for the Council to consider is unreasonable and unrealistic. GL Hearn's statement in HEDNA at 12.31 was that 15% uplift above demographic growth requirement of 134 dpa is supported for Affordable housing at 20 dpa with a further 16 dpa to support economic growth to give the total of 170 dpa. NOT compatible with Duty to Co-operate See d) above under "NOT Positively Prepared" PARA 4.2.21 Deletes tables 4-7 and replaces them with Table 4. The figures for Croxton Kerrial, whilst changed are still "Not Justified" as the evidence is not proportionate and is incorrect. The population error for Croxton Kerrial which has been identified time and time again in writing, that the census data is for Croxton Kerrial, outlying hamlets and Branston in the pre-submission plan is still there. The reply to the PC's comment to this effect in the Local Plan identifying this was that "the policy of using the census was reasonable", which may be so as an initial attempt, but in other communities the census figure has been adjusted to recognise actual settlement size. Therefore this should apply to Croxton Kerrial.

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

Para 4.2.2 G L Hearn should be given a brief to produce a report which provides quantitative assessments of the issues they discuss and variances between their assessments in TAHR and HEDNA, which are identified above. The revised brief to G L Hearn should include assessment of: 1) the viability of the political decision that 35% of any housing development would be outside Melton, 2) the decision to provide a greater affordable housing provision in rural areas 3) consideration of commuting to new employment sites in the town and sustainability, Para 4.2.21 Correct Croxton Kerrial population figures

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

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

3. FC3 Growth Strategy & Housing and Economic Development Needs Assessment (HEDNA)**2. Do you believe that this policy/section of the Melton Local Plan focused change:**

(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

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)

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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 revision is that "forecasts show that there will be capacity of 18 places by January 2021". Who has prepared this forecast and on what basis? The Croxton Kerrial Primary School C of E Academy has the catchment area as only the fourth ranked criteria for admission. Current pupils are drawn from the villages and hamlets across the borough north east of Melton and parts of Lincolnshire, so any forecast should take this into account.

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

Publish the basis of the assessment of places and align it with the Croxton Kerrial Primary School C of E Academy admissions policy.

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

Please select one item

(Required)

- Yes
- No

Housing site allocations - Rep 2**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)

CROX 1

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

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

Please select one item

(Required)

- Yes
- No

Housing site allocations - Rep 3

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)

CROX 2

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

- Positively prepared
- Justified
- Effective
- 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)

There is no evidence that the landowner has a developer who is actually interested in developing this site with the housing mix and affordable homes requirements set out in the Local Plan. Again, In the consultation on the Pre-Submission Draft Local Plan on 13th December 2016, residents were asked to consider the proposed sites of CROX 1, CROX 2 & CROX 3 (on part of the previously rejected SHLAA site MBC/096/13) as well as the development proposal which came out of the formal consultations in the first quarter of 2016. There was unanimous dissatisfaction with CROX 1, CROX 2 & CROX 3 and 94% support for an extension towards Grantham of CROX 2 for all development. PLANIT-X, on behalf of the Belvoir Estate, has indicated to the Parish Council that there are no plans to develop CROX 2 and that the Estate was not receptive to the proposal to extend CROX 2 eastwards to cater for further housing development. The extension southwards of CROX 2 (due to an alleged drafting error) has not been consulted on. This must be rectified (NOT legally compliant). The reduction in density of housing is welcomed although this may be to avoid Affordable houses on this plot and produce greater CIL returns. Any access road should be aligned with Mill Lane and should include for measures to prevent parking on Saltby Road between the A607 and Mill Lane.

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

Consultation to follow legal process. Confirmation that there is a viable developer who is actually interested in developing this site with the housing mix requirements set out in the Local Plan. Policy CROX2 – Development on site CROX 2 will be supported provided: insert new bullet below Any access road should be aligned with Mill Lane and should include for measures to prevent parking on Saltby Lane between the A607 and Mill Lane.

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

Please select one item

(Required)

- Yes
- No

Housing site allocations - Rep 4

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)

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

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

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)

6.5 Key Evidence The Key evidence economic evidence is in HEDNA and this should be the main source. The two reports (with the same date) quoted draw from this and add no new economic evidence. 6.5.1 These reports are said to form part of the rationale for increasing housing (by 44%) above that recommended in HEDNA. Leicestershire and Leicester Housing and Economic Development Needs Assessment at table 7 allows an uplift from 170 to 186 dpa to cover realistic increased growth as well as deliverable affordable housing. this is a 9.4% rise. The statement is therefore not substantiated. 6.5.2 Within the paragraph the employment land is identified as 30 hectares instead of 51 hectares as listed in HEDNA. This reduction is an anomaly in the light of the aim to increase employment! The change is the addition of the last clause "which will represent a step change from trend based employment growth forecasts". The provisions for land supply and the distributor road, were both in the Draft and Pre-submission Melton Local Plan, and would have been considered by GL Hearn in raising recommendations from 170 to 186 dpa in the TAHR. Without such proof there is no justification to define these matters as being a step change.

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

6.5 Evidence Introduce HEDNA as the key evidence 6.5.1 add that enhanced economic growth would potentially justify an increase in housing provision to 186 dpa 6.5.2 delete addition of "which will represent a step change from trend based employment growth forecasts"

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

6. FC10 - Infrastructure Delivery Plan

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

(Required)