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

Response 255891479

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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)

Carl Powell

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:

Paras 4.2.1 and 4.2.2, Policy SS2, Table 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)

Not positively prepared - assessment of development and infrastructure requirements is not objective, and for the some rural settlements development sought to be achieved is not sustainable development. In particular in Somerby Parish it would not be economically sustainable because employment opportunity has been assumed (without evidence) to be greater than it really is. In June 2017 Somerby Parish Council and Neighbourhood Planners submitted a more accurate assessment titled 'Planning the Future of Somerby Parish'. This contains best evidence on the subject and has not been taken into account. Not justified - not based on proportionate, up-to-date and relevant evidence. HEDNA 2017 is relevant and up-to-date; I endorse its recommendation of 170 dpa for the Borough. TAHR 2017 purports to take in 'wider considerations' and from these MBC arrives at a figure of 245 dpa which is coincidentally the same as they had before HEDNA, based on the now-superseded SHMA 2014. This is unsound; HEDNA already specifically takes into account considerations of affordability, economic growth/stimulus, and inward migration/commuting. The figure of 170 dpa is evidenced and sound, the figure of 245 dpa is not. It appears to be a contrivance.

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

Adoption of the HEDNA recommendation for housing numbers. Rejection of the SHMA and TAHR numbers.

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)

Policy C1 (A), site SOM1

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)

SOM 1 has been wrongly selected as 'suitable' during the SHLAA process. Not justified - evidence of flooding and flood risk from ALL causes in the Leicestershire Preliminary Flood Risk Assessment 2011 was overlooked or disregarded. Instead only the later Environment Agency mapping which considers only surface water flooding was used. Consequently risk of flooding was thought to be LOW when it is HIGH. It floods every year - the occurrence and the reasons were abundantly evidenced in recent planning application 16/00100/OUT. Flood risk

is hardly to discuss - it floods already, and soon after so do adjacent gardens and fields. NPPF Part 10 requires development to be steered to areas at lowest flood risk. This is the area of highest flood risk for miles around - it already floods every year. Not effective - it floods and new development on it will either flood as well or divert water towards houses to the West or Doctor's surgery and houses to the North, thereby increasing flood risk to them. This is not sustainable therefore not permitted.

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

Remove SOM 1 from the housing site allocations and remove it as a SHLAA site (the SHLAA is undergoing 2017 review I believe). SOM1 at present has been refused planning permission by Committe but is under appeal. These removals would help MBC defend the appeal.

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

8. FC7 - Gypsies and Travellers policies

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 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)

Appears to be based soundly on contributing the Borough's fair share of a soundly identified requirement.

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

none

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)

I do not share the belief that more people means more employment will necessarily be created. Construction of 6125 new homes guarantees large population increase when equally large increase in employment opportunity is NOT guaranteed. I note the allocation of land for employment use but, again, there is no certainty that use will be taken up by potential employers. The statement at 6.5.2 "More jobs require an increase in the working age population, which will arise from planned new households" is unsound and actually absurd. Whilst it is indeed impossible for a non-existent person to have a job, the existence of people of itself guarantees jobs only in healthcare, social care, education and emergency services. It is very possible for an existing person to NOT have a job. This high target for population increase risks higher unemployment and lower wages. It is the quality not the quantity of life in the Borough we should be trying to increase. Our Borough already suffers from relatively low wages - on average £3 / hour lower than Market Harborough, for example. Hedna 2017 warns of the risk of higher unemployment and lower wages if its recommended housing numbers are exceeded.

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

Adopt the housing numbers recommended by HEDNA 2017. It contains the most objective and most recent evidence. I appreciate that HEDNA 2017 is 'policy off' and TAHR 2017 is 'policy on' but the distinction is contrived. To be sound, the policy should follow the evidence and the assessment, not the other way around.

FC9 Indoor Sports Facilities

Would you like to submit a representation for FC9 Sport?

Please select one item

- Yes
- No

10. FC9 Indoor Sports Facilities

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 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)

Self-evidently a larger population will require more and preferably better sports and leisure facilities. You aim to provide it.

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

none