

Charity number 1164985



14th August 2017

Melton Borough Council
Planning Policy- Focused Changes
Parkside
Station Approach
Burton Street
Melton Mowbray LE13 1GH

Focused Changes Melton Local Plan Consultation

Dear Sir/Madam

Joyce Noon responded to the Local Plan Pre-Submission Draft Consultation in December 2016 on behalf of CPRE Leicestershire. Joyce has since retired and I have been asked to respond to the 'Focussed Changes' consultation.

We consider that the Focussed Changes documents are difficult to follow; opaque rather than transparent. The Plan has changed substantially and the FC headings are not easily related to the pre-submission draft. Accordingly we feel that the consultation process itself is UNSOUND.

I have attempted several times to reply online using the citizenspace.com link but I have been unable to connect. It appears that there are problems with your server. For this reason I am submitting CPRE's comments in a letter both as an email attachment and by post. I can find nothing on the MBC website which precludes any response other than online but for the avoidance of doubt please acknowledge receipt and confirm that our observations will be taken into account by the Inspector. If citizenspace.com is restored I will attempt to respond online also.

FC1 (Spatial Strategy):

CPRE consider that the provisions of FC1 remain UNSOUND.

CPRE question the reliance on a Melton Borough Council domestic assessment (TAHR) regarding housing need, preferred to the more recent HEDNA assessment which supported a lower housing requirement.

FC1(2) Fails to protect Service Centres, Rural Hubs and Rural Settlements from excessive and non-sustainable development. Regarding new development in open countryside CPRE consider that the statement '*should be restricted*' should read '*will be restricted*' or preferably '*resisted*'

FC2 (Sustainable Neighbourhoods):

CPRE consider that the provisions of FC2 remain UNSOUND.

The conflict between areas approved for development and Areas of Separation has not been addressed. We feel that FC2 fails to meet the requirements of NPPF para 154 & 157.

Regarding Development South of Melton Mowbray we note that the boundaries for development South & East of Melton have been discreetly extended. The substitution of FC.13.1 for the original Fig.7 is easily overlooked and not transparent. As a result, the conflict with policies EN4 and SS4 which seek to preserve Areas of Separation between Melton and neighbouring settlements (Burton Lazars & Eye Kettleby) have been further exaggerated, increasing the threat of coalescence.

The objections of English Heritage concerning the setting and preservation of a Scheduled Ancient Monument remain disregarded.

There is also a conflict between policy SS6 (Alternative Development Strategies) and EN4 regarding the Area of Separation between Melton Mowbray and Asfordby Hill.

The zig zag line used on policy maps to identify areas of separation is unacceptably vague.

FC5 (Housing Mix):

CPRE consider that the provisions of FC5 remain UNSOUND.

CPRE are concerned that HEDNA 2017 projections regarding Housing Mix requirements have been ignored and substituted with MBC's 2016 less robust local assessment.

Para. 5.57 is inconsistent with 5.62. and indicates limited acceptance of HEDNA figures regarding provision for housing the elderly and disabled. We are uncomfortable with the selective acceptance of projections to justify a preferred outcome.

We feel that the Local Plan remains flawed and ask for the foregoing observations to be addressed.

Yours Faithfully

R F Hoyland