

I understand and accept the requirement to provide the details requested in part A since this creates clarity and enables the representation to be processed as valid. My submission is given below.

Personal Details

Name: David George
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Organisation: none

The parts of the Melton Local Plan: Pre-Submission Draft to which these representations relate are referred to within the relevant representations detailed below. I can confirm that all these representations are on the basis that it is considered that the Local Plan is NOT SOUND, and I accept that the Plan is generally LEGALLY COMPLIANT, and COMPLIES WITH DUTY TO CO-OPERATE.

My reasons for considering the Pre-Submission Draft Melton Local Plan November 2016 to be unsound are given below.

I am a resident who lives in the north of the town and I wish to reserve the right to participate at the Oral Examination. I wish to be notified at the email address given above when the Melton Local Plan is submitted to the Secretary of State, when the Inspector's report is available to view, and when the Melton Local Plan is adopted. I also wish to be included in future consultations on the Melton Local Plan.

My comments are as follows:

Background

Melton Borough Council ("MBC") had prepared a Core Strategy to deal with the housing development and associated matters covering future development in the borough which was reviewed by a government inspector in early 2013. The inspector was of the opinion that the strategy was unsound for a multitude of reasons which he highlighted in a letter to MBC dated 11 April 2013. He, inter alia, suggested that when MBC moved forward with the preparation of a local plan that they should address the issues he had raised and that to do so meaningfully with the objective of preparing something which would be sound and sustainable would necessitate starting with a fresh approach since modification of the flawed core strategy would never suffice.

Having utilised considerable resource in terms of time, manpower and cost (rumoured to be £1.7m) in preparing the core strategy this letter would, I suspect,

have been disappointing to the council and all those who had worked on the document. Nonetheless it gave them guidelines, highlighted where they were in error and created a framework which should easily have put them into a position of strength for the task of producing a local plan. It seems that has not been the result.

At the first full meeting of council following the public enquiry highlighting the inadequacy of the core strategy it was readily apparent that there was a feeling of denial. It was suggested that the Inspector had failed and that previously, apparently, there had been positive comments (that may be true but there is nothing in the public domain to justify). It was also indicated that the money spent had not been wasted since it would be of use in determining the content of the local plan which is akin to denying the relevance of what the inspector had said. The suggestion by some councillors was that the core strategy had failed since residents had during the consultation period overstepped their mark by criticising the strategy. A minority of councillors were seeking a review to establish what had gone wrong. That was not a view which was sustained by the council as a whole presumably since there was a reluctance to accept that anything was wrong. Instead a motion was passed to review the formulation of the core strategy with that review being held internally and undertaken by the council's chief executive who in reality would be the top of the reporting line for all those involved in that core strategy and arguably therefore responsible for that document. Nothing of any significance has appeared from that review or not to the extent that it is publically available.

Against that background MBC has produced its proposed local plan and to my mind have produced, yet again, an unsound and unsustainable proposition. The only logical way to learn from mistakes is first to accept that errors are made, then to analyse what went wrong and why and only then it is possible to move to the next stage confident of not making similar errors again. On that analysis there has been severe failure to comprehend the issues and move forward with any positivity.

Before turning specifically to the plan document it is I think worth revisiting the inspector's letter to MBC. The inspector felt there was no evidence to support the proposal of an 80%:20% apportionment between the town of Melton Mowbray and other rural centres/sustainable villages. He inferred that the split was weighted to highly towards the town. In council meetings this split has been discussed and 60%:40% debated and rejected in favour of 65%:35%. Other than discussion at council meetings (attended by a majority living outside the town of Melton Mowbray) there has been discussion at reference groups established to take the views of residents which seem to have more attending from outside the town compared to those living in the town. I am not sure that this can be considered as evidence supporting the split and the split is no more sound than the previous split outlined in the core strategy for exactly the same reasons.

There was concern from the inspector that the higher proportion of new homes being built were not only in the town but that they were compressed into a SUE. The local Plan reduces the proportion in the town but the total housing

delivery over the term of the plan is higher so the relevance on delivery is unaltered. The current proposals suggest two SUEs albeit that each are of a quantum in excess of that initially proposed for the single SUE in the core strategy. The inspector was concerned that there was a significant risk that delivery of the strategy could be jeopardised, in the event, for whatever reason, the SUE cannot be delivered or delivery is delayed. The same dilemma exists within the local plan document capable of being jeopardised by failure of either SUE.

The Northern SUE envisaged by the core strategy was believed by the inspector to be not sustainable as it had unacceptable impact on the landscape, agricultural land and biodiversity. Nothing has changed to improve these matters and the proposal is still to have a northern SUE (now called a Northern Sustainable Neighbourhood) in a similar location but of greater quantum as well as something similar in the south.

The inspector had many issues with traffic and indicated that to generate any meaningful traffic mitigation there needs to be a half or three quarters bypass option. The local plan has no bypass it just alludes to a couple of developer funded roads running across the outer edges of the proposed SUEs. MBC hopes to have central government fund a link between these roads but such funding is not potentially available until at least 5 years into the period of the local plan and at a time after the next general election thus enhancing the uncertainty of delivery. The word bypass is not suggested in the local plan but instead the thought is to have sections of a lesser quality distributor road. The local plan fails therefore to achieve the levels of mitigation which the inspector thought necessary and as such the plan is not sound as it is not sustainable.

The inspector also had issues with the location of housing in the strategy being in different areas to the proposed employment growth areas. This time the latter is focussed to the west and south with most housing in the north and south. The plan makes it clear that there was no consideration whatsoever of housing in the west although if the plan fails it might be considered. Some of the land allocated as employment land in the south has been marketed as such for some time without any apparent success and that land is now being used for residential development. There does not appear to be any evidence of employment growth by new business being established or relocated to the town. The proposals seem to be justified by supply and demand arguments i.e. increasing the population by building more homes increases the labour supply and apparently the demand will appear. Not sure that one can call those hypotheses evidence or anything remotely similar. The arguments of course improve with improved road infrastructure but that is only on the wish list and not included as part of the delivery.

In his final comment the inspector stated the obvious i.e. MBC would need to review and improve/enhance the evidence base with appropriate updating. Against that background I am at a loss to understand why so much of the supporting information used in the core strategy is used again. Particularly as it refers regularly to periods which do not coincide with the plan period referring to housing numbers

which are those being considered previously and not those contemplated by the plan. It cannot be relied on as supporting evidence as it leads to the plan being unjustified and unsound.

The Process

MBC suggested that the process of making representations on the local plan would be straightforward and simple apparently in recognition of comments made by the public in connection with previous consultations. They have singularly failed and made the process complex. Cynically one tends to think they do not want to have representations from the public. The guidance notes run to 6 pages and suggest that the level of supporting information required in respect of any comment is substantial. Each new point needs a new form and where there are more than one point to make in respect of any particular part there is a need to have separate forms. Life is too short to play those games and hence my submission in the traditional format.

At the council meeting "adopting" the plan one village Councillor suggested that the town was ok because it was getting a bypass. This was not challenged which is put simply a total disgrace and an affront to the democratic process.

At the launch of the plan for consultation there was an inference that matters were not quite finalised. Some adjustment was expected and in particular there was recognition that some residents may not be able to access electronic data etc. Summary sheets were to be made available in some villages. I have not seen these and they may or may not be misleading. If they exist they debase the integrity of the process and its legality. It was also suggested that a video was being made to help with the process. That was finalised and appeared on the MBC website after 85% of the consultation period had elapsed which causes similar issues with regard to integrity and legality. One of those speaking on the video is a council member in MBC although not "badged" as such and once again the concept of integrity seems to be flouted. The council leader suggests the funding for a review of the proposition for a link road has only been delivered by central government because of the economic growth which has been delivered by the local plan. In reality the local plan has delivered nothing since it has not been through the inspection process. Even if it had done so there would be no delivery of economic growth until later if at all. The plan just hopes there will be growth based on its blinkered view of economics. Generating mal information is not a secondary route to making an unsound unsustainable plan manifest itself as sound and sustainable. The most horrendous part of the launch meeting put democracy in its place. A council employee badging herself as one of the key generators of the plan suggested the public should engage in the process of making representations and accepted these may be positive or negative. She then warned residents that they should think before making negative comments since if the plan failed examination there would be little control on development within the borough leading to increased building in an uncontrolled fashion. That has to be outside the spirit of democracy and

jeopardises the legal process of consultation making the plan non compliant legally.

Specific issues

I have numerous issues with the proposals which to my mind make the plan unsound. There are too many to debate in detail but I am listing some of the more serious matters albeit not in complete detail so as to keep this representation reasonably short.

Chapter 1:

Page 3 paragraph 1.7.

The Reference Groups were involved in fictional role play encouraging people to think outside their comfort zone on a hypothetical basis. Cannot see why real people were not meant to bring forward those matters of real relevance to them. The make- up was village biased but that is not surprising since the members of MBC seem to display a similar bias.

page 5 paragraph 1.9

There is of course no Neighbourhood plan for the town. A town committee was created formed of those councillors representing town wards but its meetings are poorly attended and they have not produced nor indeed consulted residents on the need for a local plan for the town. Once again has the smell of bias.

Chapter 2

page 11 paragraph 2.2

Given that most residents commute to other employment centres the emphasis on affordable housing seems misplaced as the benefits are outweighed by high transport costs. I attended a meeting where the suggestion from some of those present (namely the leader of the council and the chief executive) was that there was sufficient affordable housing in the town and no more needed. Why are they contradicting the plan and surely that makes representation in connection with the plan somewhat meaningless. there are examples of recent planning permissions in the town where the required levels of affordable housing have been drastically slashed with the quid pro quo being a contribution to the distributor road. Does that mean that negotiations are always available and that the content of the plan in whatever form it may be adopted is open to adjustment. if so why bother to have a plan.

page 12 paragraph 2.3.2

Given the main employment profile it is obvious and no attempts at any type of social engineering will cause any change

page 13 paragraph 2.4.2

This is true and the plan does nothing to improve the situation but will certainly make it worse. Given that there is acceptance of this issue why is there no attempt to mitigate

page 13 paragraph 2.6.2

Not surprising since this is expected given the comments in 2.2 and nothing in the plan focuses on reducing the outflow or indeed encouraging the inward movement by providing housing to suit those particular needs of retirement

page 14 paragraph 2.6.5

There is one surgery in Melton with inadequate parking. It is oversubscribed with patients and scope for achieving an early appointment never mind one on the same day non-existent. The result of adopting the plan policies will only make this worse and there will be additional traffic delays when appointments have been secured. Bus services are not available for many town residents and such services are declining.

Chapter 3

Page 17 Vision

I am somewhat amazed that the plan will reverse the ageing population in Melton thus bucking the national trend. Perhaps just another indication of how incompetent the plan is.

Chapter 4

Page 23 Policy SS1

There is some contradiction between the final sentence on this page and the comments made in "Jacob's Impact Study 13/10/14" which suggests that "mitigation needs to be of demonstrably sufficient magnitude.....growth strategy for the town" "If this is not achieved.....the development cannot be considered sustainable"

page 24 paragraph 4.2.3

The distributor road provides no improved link to the south and will cause yet more congestion in the town centre so there is no joined up thinking here.

page 35 paragraph 4.3.5

The final sentence is nonsense since no development will depend on the Distributor Road per se since there will be alternative access. No real issue here but indicative of the sloppy way this is put together and creates a general concern about the accuracy

of everything else.

page 42 paragraph 4.5.4

Given that the Country Park can have no lighting since it is QE2 Field in Trust I find it difficult to see how the opening sentence can apply and perhaps more importantly on what evidence did MBC rely in making such a statement.. to make things worse the roads mentioned do not improve connectivity to the town centre they are just bits of roads from nowhere to nowhere hoping to grow into something more meaningful in several years time if the government of the day is willing to provide the relevant funds.

page 43 map

I assume the road is merely indicative but suspect it will sit on the northern extreme of the "SUE". It turns the country park into a town park. Presumably this squeezing of park access and surrounding the park with houses is to maximise developer road contribution. Such blatant disregard for the park is not acceptable although consistent with the manner in which the park has been blighted by earlier council planning decisions particularly those off Scalford Road. The plan seems to suggest the wildlife corridor will be no more than the width of the disused railway line.

Presumably no-one involved with preparing the plan knows anything about the regular traffic diversions through Melton entering via Thorpe Road when the A1 has problems in or around Grantham. Equally they cannot be aware of traffic issues on the same stretch of road caused by commuters to Mars at Waltham and they must be oblivious to the fact that Twin Lakes Park is the largest tourist destination in the town creating traffic congestion in the same locality. if they had been so aware then they would not have stopped the distributor road outside Twin Lakes and they would have realised that Melton Spinney Road could not cope with any extra traffic as it is in part little better than a country lane which also has the benefit of flooding if there is a slight amount of rain. The terms unsound, unsustainable, not fit for purpose all fit but the most apt description is unfortunately totally stupid

page44 SS5 Housing

This is not true. The developers will not fund the road and deliver 37% affordable housing. MBC knows that so why not be truthful. Not sure whether knowingly making false statements makes the document unsound but it should do so.

In c2 who decides what is necessary and if everything is so uncertain why include anything in the document

Transport t1 A

In reality this is a road that goes from nowhere to nowhere across the top of a huge housing estate. All the roads it crosses will feel the added burden of congestion. Each part is to be developer funded so there will be gaps as the

developments are phased making this "road" even more meaningless in the early years of the plan. Not sure what **the wider agreed scheme** is and assume that is just wishful thinking since there is no specific detail on that matter.

t1 B

This is a road that is not capable of being delivered by MBC nor indeed by Leicestershire County Council who are responsible for highways. Both these authorities want the road and have been given central government funding to create a business case. At best the consideration of funding the road will be heard in 2022. Work cannot start until later and given various infrastructure issues crossing road, rail and flood plain it is difficult to conceive any road being built and forming the north south link prior to the later stages of the plan period by which time most of the houses are planned to be built. How can this statement be made as there is no certainty of delivery and surely the local plan is meant to be evidence based and not just a list of hopes and aspirations.

t1 D

In recent times the local bus routes have been cut due to cost. The document accepts people work in Leicester which de facto is the location of local employment.. The buses to that city have also been reduced.

t1 E

As mentioned earlier the c

Country Park cannot be lit so this statement is wrong unless like the road people are to walk and cycle from nowhere to nowhere

t2 A

So the buses have been cut and reduced making many areas in the north without any available bus. The services which were cut were running hourly but had little support presumably because of cost. The plan is to encourage the bus providers to increase the service to every 20 minutes. That should be even less profitable for them and no doubt the developer will be asked to pay which probably means even less affordable housing

en1

I suspect we are as residents excited by an improved town edge but may be even more so if the term were defined/clarified

en8

Contrary to MBC belief and apparent data I am sorry to say that Melton Spinney Road floods quite regularly and therefore according to this policy there should be no

built development.

4.5.8 The 1,000 dwellings are mentioned but I could not see any reference to the location

SS6 page 49

This gives MBC power to change things where events have happened even where those events are consistent with the events relating to the UK economy as a whole. This is to my mind unacceptable as there may be no consultation or other method of holding them to account.

Chapter 5

page 71 Policy C9

this does not make sense:

(a) this is too far from town to walk, no lights in Country Park. Roads not wide enough to take a cycle lane

(b) none exist at the moment. roads too narrow

(f) where are these? Most residents work outside the town

(h) Latham House does not cope at the moment and is hampered by lack of parking and several days wait to see the GP. Not sure how this part of the plan can be delivered and did not see any supporting evidence

Chapter 6

page 77 paragraph 6.3.6

This is precisely why the town needs a proper bypass before any new housing development. Without that the plan is unsustainable as alluded to here

page 78 paragraph 6.4.1

Some of these employers, given the nature of their business, employ many at the minimum wage and indeed many provide bus services to transport such employees from larger centres such as Leicester. The plan will not change this.

page 86 paragraph 6.12

not sure how the access is improved by the Distributor Road since the road does not propose joining St Bartholomew's Way with Welby Road and there is no connection to the Leicester Road.

page 89 paragraph 6.15.3

The new businesses mentioned have indeed had a positive effect. Unfortunately this

is countered by the development of the Council Offices at Parkside. This was land for retail and that retail prospect is lost. The impact of users of Parkside parking on Ankle Hill has had a detrimental effect on safety and traffic congestion.

Page 91 Policy EC5

It seems sensible to focus retail growth in the town centre. Why has recent policy been to grant planning for residential conversion. That process makes it more difficult to deliver the stated policy and arguably makes it unachievable

Chapter 7

page 102 policy EN3

The proposed extent of the northern development and associated Link Road is contradictory to this stated desire of protecting and enhancing the Country Park. In the evidence base I found nothing from QE2 Fields in Trust.

page 125 Policy EN11

The town floods and bad areas are the traffic lights at Thorpe Road/Norman Way, Tesco Thorpe Road and adjacent fields towards Thorpe Arnold Hill and Melton Spinney Road including its junction with Thorpe Road. The drain maintenance in these areas is poor and the brook overflows its banks. Any additional development will exacerbate the situation.

Chapter 8

page 131 paragraph 8.1.4

This does not seem compatible with developer funding link roads as that is apparently to mitigate congestion and congestion already exists.

page 131 paragraph 8.2.1

Schedule 4 is devoid of any detail on the northern road but there is considerable detail for the south. The reason no doubt is due to advance conversions with developers in the south but not in the north. Logic therefore suggests that the developers will to a large extent be the arbiters of the road layout. The plan should provide full details as the town cannot be dictated to by developers.

The lack of a link between Melton Spinney Road and Grantham Road will mean that if the North South link is built to give a three quarters "bypass" that there will be a couple of hairpin bends to negotiate. Surely not in the scope of the definition of sustainable.

pages 131/2 paragraph 8.3.1

This is true but building two sustainable neighbourhoods will not solve the problem. Existing roads will not be capable of having cycle lanes they are too narrow. The north development is more than a mile from the town centre. The paths are commonly blocked by parked cars (the roads are too narrow to park on) so wheelchairs, prams buggies etc are not accessible. There can be no lights in the Country Park and yes the building promoted by the local plan will produce traffic congestion. There is no evidence to support the ideals outlined in this chapter although one has to support the concept. Unfortunately it is not sustainable.

page 132 paragraph 8.3.5

LTP3 was produced during the time of the coalition government who had little desire to build roads. The data in the document is a bit outdated insofar that they deal with the time line of the core strategy and the housing quantities proposed by that failed project.

Summary

There are numerous other examples of contradictions and/or anomalies and much of the document is just a well intentioned wish list based on hope rather than evidence and with little underlying understanding of the borough and particularly the town. The plan fails on many counts due to it not being sound or sustainable. Hopefully it will be third time lucky but perhaps like the proposed plan that is wishful thinking.

David G Adams