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05/01/2018

MELTON LOCAL PLAN EXAMINATION

MATTERS AND QUESTIONS

(I have used the same numbers used in the questions to reference and number my paragraphs below)

Matter 1: Legal requirements and the Duty to Co-operate

1.2 No.

1.2.1 A key sustainability issue in the Sustainability appraisal is “The need to ensure that brownfield sites are redeveloped and the developments of greenfield sites are kept to a minimum”. “The NPPF encourages the reuse of previously developed land which may help to ensure some reuse of local brownfield sites. However it is expected that allocating sites which are brownfield where possible through the Local Plan would result in the increased use of these sites” The Council did not fully explore brownfield sites in Somerby, there is a LCC Farm that was previously offered into the SHLAA in 2012 (at that time turned down as Somerby then thought unsustainable for a large site) but this site could have been explored and land owners approached as happened in other greenfield SHLAA sites that were put into the plan.

1.2.2 Key sustainability issue –“To conserve and enhance Melton’s historic environment, heritage assets and their settings.” Two of the proposed sites for Somerby are settings of heritage assets. Melton does not appear to conduct any detailed heritage assessments before allocating these sites to develop. Sometimes development cannot be sympathetic to the existing character of an area, its presence being detrimental. Assessments of this importance cannot be just a tick box exercise.

1.2.3 I put a comment on the consultation “The Policy is not sound or effective because Som3 is on the entrance to the village at the point where the village character is currently defined- the equestrian history of the village and current character is reflected in the Grove Stud, Grove mansion and the paddocks setting and the heritage of this place. This is a key gateway. Remove SOM3 from the proposals.” The response was – “ It is considered that major housing development within settlements can be designed sensitively such that it does not harm settlement character.” Sometimes major housing development in the wrong place cannot but harm settlement character. (the same response given to other commenters in relation to other sites with heritage concerns, this appears to be a stock answer with no consideration of individual circumstances.) Therefore the Key sustainability issue is disregarded.

1.2.4 Regarding lack of Heritage assessment, in response to consultation comments MBC says “ It would be necessary to address these issues at the planning application stage when proposals would be required to demonstrate that the development will not harm the significance of heritage assets or their settings. Whether the proposal had community backing or not would also be determined at the pre-application and planning application stage.” The Local Plan should have already conducted in depth assessments before putting sites forward because the Plan says these sites WILL be developed. Also placing emphasis on Community backing is unsound, local people in general are not experts in Heritage, decisions like this should be evidenced not based on community popularity.

1.2.5 The SA explains “that without a Local Plan, development is more likely to be proposed in areas which may affect the setting of heritage assets” yet the Local plan has proposed sites – SOM2 and SOM3 which do exactly this.

1.2.6 How should it be changed? Independent Heritage assessments should be carried out by qualified people before sites are put forward for development in The Plan and MBC should show how any harm would be avoided or mitigated to fully justify any selection of a site with Heritage issues. Brownfield options should be fully proactively explored by MBC including existing LCC owned farms rather than just waiting for landowners to offer up green fields.

1.2.7 Question 6 in the SA- what level of growth should Melton Borough provide for? Melton has overestimated the housing need of the Residents of the Borough and disregarded the HEDNA evidence. If the HEDNA evidence had been relied upon, the growth in the villages could have been reduced significantly and therefore not put unacceptable strain on limited village services and infrastructure. This has been disregarded because Melton’s overriding priority- the bypass, and money from building in the villages is needed to fund this as large scale development in the town is unlikely to happen until the bypass is built. This is not a sound way of making decisions and the detrimental effect of unsustainable overdevelopment of villages has been ignored.

1.2.8 How should it be changed? Melton should rely on the latest evidence-HEDNA and reduce the site allocations in the villages substantially except where there is an evidenced need and desire for housing by the local community. The reduction of residual requirement in Somerby from 49 to 44 makes no difference when the 2 sites for development add up to 69. (not including reserve). The sites required should have been reduced to one site SOM1 which at 33 is close to the residual requirement. Somerby has provided at least another 16 approved homes since 2016. So, no need to develop more than one site.

1.2.9 Question 7 in the SA: How should Melton Borough grow? I don’t think sufficient consideration was given to the option of single large development on the edge of town due to MBC desire to reduce Melton Mowbray focus, there are more plusses for Melton Mowbray focus in their assessment. Para 4.15 is incorrect where it refers to reduced Melton Mowbray focus having generally more positive effects than Melton Mowbray focus. Small scale development in rural settlements was not sufficiently explored and to try to address it now in focussed changes in SS3 has left open uncontrolled small site development in villages.

1.2.10 Reasons for dismissing the third option of dispersed development are given but not why the Option chosen was chosen over one large development. Transport and infrastructure is mentioned but in almost every Service centre this has been the greatest issue of concern, the Council assumed

that infrastructure would be there already in Service centres, but it is not. This could have been foreseen as a huge problem. Rather than ignoring it, the option of a single large development should have been explored more.

1.2.11 MBC says “New development in the rural areas may not deliver the services and facilities required to support development, however new facilities and employment may also help to revitalise rural communities” this does not make sense the second part of the sentence is ruled out by the first. Putting major development in villages which do not have access to employment (we have evidence this is the case in Somerby, MBC deny this but cannot provide us with evidence) or transport infrastructure, or proper facilities (not just an inadequate village shop) is more likely to turn such a village into a commuter village for those new home owners, not “revitalising” the community. The school in Somerby has limited means to expand, developer contributions will go to other schools around to take the extra pupils, this does not “revitalise” Somerby community, it splits it.

1.2.12 The decision was made to share between the town and villages knowing that the villages would not have the services and infrastructure to support them and limited potential for developer contributions to address that. (ie sites too small to attract enough developer contributions for village bypasses but sites too big for existing infrastructure). MBC say they have selected villages that are sustainable, but this selection has been done on an unsound basis. The criteria for selection were not suitable to enable selection on the basis of sustainability.

1.2.13 How should it be changed? MBC should re visit the option of single large development on the edge of town and or development in large villages with road and transport infrastructure.

1.2.14 Question 12 in the SA: What approach to defining the roles of settlements? Insufficient account of the proximity of some smaller villages close to a Service centre was taken, some development in these close villages (ie Pickwell to Somerby) could help to sustain the smaller village and reduce the risk of over developing the Service centre, this was not explored. The option chosen - to base it on the size of communities and available services sounds good, but MBC initially picked a larger number of key services to identify priority service centres, (Primary and secondary) when villages then made valid representations that they did not fit the priority category, MBC then reduced down the key services to only 4, these do not reflect sustainability of a village but in doing this MBC ensured that the services used were common to all the Service centres they decided they wanted. Also the further method of using size of population to decide on sustainability of a village (and therefore it’s housing allocation) is flawed, a larger population does not necessarily mean greater sustainability. It was at this time that Melton should have questioned their approach and given more consideration to the relationships between communities, allowing development in some of the close satellite villages to share the allocation to Service centres (not in addition to).

1.2.15 How should it be changed? MBC should look again at Key sustainability factors, evidence fully why they are being used in preference to others, and if insufficient numbers of Service centres come out of that process, other options should be explored rather than simply ignoring the evidence and carrying on with declaring unsustainable villages- Service centres and manipulating the process to come out with the same Villages. Also, where small villages are in close proximity to a Service centre, they should be able to share the allocation of a Service centre where development in that village is

desirable, not just to add to the allocated numbers for a Service centre making it even less sustainable.

1.3 No, The Plan includes Policies but the process of site selection ignores the Policies:

1.3.1 A large proportion of new development being placed in villages with poor public transport therefore necessitating vehicle use for new home owners/renters that will need work friendly public transport. This is against Strategic Objective 9. Reduce the need to travel by car and improve access to public transport.

1.3.2 There is no evidence that MBC proactively sought brownfield sites in preference to green fields. Building on green fields increases the carbon footprint of that land. In Somerby there is a farm owned by LCC that was previously offered in 2012 SHLAA, rejected due to Policies at that time not to build outside village envelopes. This site could have been selected in favour of one of the 3 green field sites now allocated. This is against Strategic Objective 23. Prepare for, limit, and adapt to climate change and promote low carbon development

1.4 I do not see how MBC has adequately worked with Rutland in relation to it's very large development on the Somerby side of Oakham. Surely large scale development near to Melton's villages should be taken into account when making decisions about development in those villages. The impact of this large scale development on traffic through the village of Somerby (direct route to Leicester and with no A or B roads) should have been taken into account when making decisions on the sustainability of Somerby and it's ability to take large numbers of housing itself. MBC should have asked Rutland to take some of Melton's housing allocation in the South of the Borough.

1.5 So far, in the few meetings we have had with MBC planners, things are said in one meeting that are denied or changed in other meetings, there are differences of opinion as to what is meant by "In general conformity with the strategic objectives", the relationship between people - NP groups and MBC are more adversary than cooperative. Villages want to deliver the assessed numbers (ie 44 for Somerby) and can do, but in different and less harmful ways than MBC wish to. There seems to be an underlying will by MBC to put as many houses in villages as they can regardless of genuine sustainability or taking into account sufficiently Heritage, character, flooding, wildlife, countryside etc, but still maintaining all the time that they have done this. There needs to be a total shift by MBC to make sure they really work with NP groups to deliver properly sustainable housing.

1.5.1 There is a major difference between the basis of the Plan and Neighbourhood plans which is that NPs are Parish based, Local Plan is Service centre based. If the NP can supply the housing requirement by smaller sites including some other Parish villages, they should be able to do this especially where the housing requirement would be greatly over due to the size of sites put forward by MBC in the Service Centre. This flexibility is needed especially as the process to decide upon the Service centres is wrong and NPs often have much more detailed evidence about the sustainability of their villages.

1.5.2 How should it be changed? MBC should be compelled to proactively engage with NPs and to jointly work to find flexible solutions to delivery of housing allocations numbers. The Plan should build in flexibility to change sites if NPs can deliver on better, less harmful sites.