Focused Changes Consultation Response of Nathan Jones

1. Summary

I object to the following Focused Changes proposed to the Melton Local Plan ("MLP") by Melton Borough Council ("MBC") that affect the village of Hose:

- Increased Allocation of Housing Numbers (this appears to have risen from 57[1] to 77[2]);
- The deallocation of MBC/008/16 (formerly HOS2) and MBC/024/13 & (formerly HOS3);
- The allocation of MBC/010/17 (now HOS2)

Consequently, I consider that:

- The housing numbers should be in alignment with the numbers set out in the Neighbourhood Plan (Clawson, Hose & Harby) Regulation 16 Consultation version ("Neighbourhood Plan").
- MBC/008/16 (formerly HOS2) and MBC/024/13 & (formerly HOS3) should both properly be reinstated to also align with the proposal in the Neighbourhood Plan;
- MBC/010/17 (currently HOS2 in the Focused changes) should be deallocated, and building should not be permitted on this site

I have set out in detail below matters that I consider may not have been properly considered by MBC when proposing the Focused Changes as they affect Hose.

2. Background

In the original draft MLP document that was issued for consultation by MBC the village of Hose was allocated three sites for development (for 57 dwellings). These sites were designated as HOS1, HOS2 & HOS3. There appears to have been minimal responses to the consultation received by MBC, and those responses that criticised the site allocation for Hose appeared to be relatively generic in nature.

Whilst MBC has been progressing the MLP, the Parish has also been consulting on a neighbourhood plan. This plan has now been submitted for "Regulation 16" consultation, the deadline for comments is due to expire on 30 August 2017. It should be noted that there was significant engagement with the Neighbourhood Plan and the allocation of sites was vigorously explored, nevertheless, the conclusion of the local community broadly fitted with the site allocations proposed by MBC in the November 2016 Draft MLP.

At an Extraordinary Full Council meeting on 4 July 2017, MBC has sought to deallocate certain sites (that were previously allocated and consulted on during the full consultation period) and replace those sites with an alternative. The deadline for responses to consultation on the proposed Focused Changes is Midnight on 23 August 2017, which is a significantly shorter window than existed for the original consultation. It is also noted that the Focused Changes are quite far reaching (certainly in so far as they relate to Hose).

In my opinion, the proposed deallocation of sites and allocation of replacement sites by MBC appears to have been based on flawed and incomplete analysis and considerations.

[1] Paragraph 4.2.22 and Table 7 of Pre Submission Draft Plan, Nov 2016 (Chapter 4 / Numbered Page 33)
[2] 13 Appendix 4: Focused Change FC 4.1: Section 5.4 and Policies C1(A and C1(B) - Policy C1 (A) – Housing Allocations (Numbered Page 15)

I further understand that there is likely to be a conflict of interests between what MBC is likely to want (extensive development, undertaken promptly to ensure that MBC meets any targets that might be imposed on it) and the local community (which is likely to favour more restricted development which is sensitively implemented over the duration of the village plan).

Given that MBC has sought to re-use references to properties in the Focused Changes document, for ease of reference and clarity, I have set out below a table of each site with the various references by which each site has been known. For the sake of clarity, I will refer to each property by the allocated name in the left hand column of the table:

References in this consultation return

Site Reference	Detailed site Reference	Ref per Clawson, Hose & Harby Neighbourhood Plan (17 July'17)	Site reference (Focused Changes)	Site reference Draft MLP (Nov'16)
NewHOS-1	15/00944/OUT & MBC/027/17	NPHOS1 & NPHOS1+	HOS1	n/a
NewHOS-2	MBC/010/17	*n/a*	HOS2	n/a
OrigHOS-1	15/00944/OUT	NPHOS1	n/a	HOS1
OrigHOS-1Ext	MBC/027/17	NPHOS1+	n/a	n/a
OrigHOS-2	MBC/008/16	NPHOS2	n/a	HOS2
OrigHOS-3	MBC/024/13	NPHOS3 (reserve site)	n/a	HOS3

3. Increased Allocation of Housing Numbers for Hose

As stated in the summary, the housing allocation for Hose appears to have been increased from 57 to 77.

It appears that there is not overall change in housing requirement for MBC since the November 2016 Draft MLP was issued.[3]

It therefore appears that MBC have been opportunistic in seeking to uplift the proposed housing allocation for Hose. I would contend that this "opportunity" for MBC was a significant driving factor for MBC when proposing that NewHOS-2 should be allocated land in the proposed Focused Changes, and it should be noted that this is in direct opposition to what the local community want.

In relation to the local community's desire for the extent of development, during consultation for the Neighbourhood Plan feedback was sought on whether people wanted the bare minimum development, or whether more extensive development might be more desirable (e.g. to help support local businesses, potentially build a stronger and larger community, etc.). The feedback favoured restricting development to the minimum that could be achieved.

It should be noted that Hose is a small village, and has a unique and strong local community. Any changes to the village are likely to have an impact on the local community. The imposition of a large

[3] Draft Melton Local Plan - ADDENDUM OF FOCUSED CHANGES July 2017 - Table 1: Schedule and Summary of the proposed Focused Changes – FC1.1 under heading "Main Effect of Change"

development (effectively NewHOS-1 and NewHOS-2 can be viewed as one site for development) would have a material impact on the village and could undermine the unique character and community feel of the village.

On the basis of the above points, I object to any uplift in the housing numbers from those stated in the November 2016 Draft MLP. For the sake of completeness, I would support the number of houses allocated to Hose as stated in the November 2016 Draft MLP, and be even more supportive of any reduction in those figures.

4. NewHOS-1

For the record, and on the basis that any development would effectively follow the (draft) Neighbourhood Plan (e.g. sympathetic architecture, ecological and environment concerns and mitigation, etc.), I am broadly supportive of NewHOS-1.

5. Deallocation of OrigHOS-2 & OrigHOS-3 and allocation of NewHOS-2

I have entered in to extensive email correspondence with MBC concerning this. I have asked for further information to enable me to understand why MBC suddenly proposed NewHOS-2 and on what basis MBC considered that NewHOS-2 was preferable to OrigHOS-2 and Orig-HOS3 when it was clear from the draft Neighbourhood Plan that the local community opposed NewHOS-2. The information that I requested has largely not been provided.

My correspondence will be within MBC's records, and can be summarised:

- Email to planningpolicy@melton.gov.uk at 01:12 on 27 July 2017;
- Email from James Beverley (email account: planningpolicy@melton.gov.uk) at 14:26 on 27 July 2017;
- Email to James Beverley (email account: planningpolicy@melton.gov.uk) at 17:24 on 27 July 2017;
- Email from James Beverley (email account: planningpolicy@melton.gov.uk) at 08:09 on 28 July 2017;
- Email to James Beverley (email account: planningpolicy@melton.gov.uk) at 22:20 on 16 August 2017;
- Email from Valerie Adams (email account: vadams@melton.gov.uk) at 08:53 on 17 August 2017;
- Telephone conversation with Valerie Adams at approximately 12:00 noon on 17 August 2017

As you will note from reviewing that correspondence, the clear inference was made that "deliverability" was apparently the key driver for MBC selecting NewHos-2 over the other two previous sites.

You will also note from that correspondence, the fact that NewHOS-2 was put forward to the local community very late in the Neighbourhood Plan consultation process and that, at a meeting to consider the site allocation options, the owners and supporters of NewHOS-2 were provided with a platform to display an (in my opinion) very misleading and "rose tinted" development plan which was (again in my opinion) unlikely to be adhered to. In spite of their best efforts to convince the community that the development of NewHOS-2, using arguably the most attractive utilisation of that land that they could envisage, the Community rejected NewHOS-2 as a development option. The community opted to support OrigHOS-2 and OrigHos-3 and not permit NewHOS-2.

In proposing NewHOS-2, MBC is clearly failing to take in to account the concerns and wishes of the local community and residents of Hose.

I have taken some time to review the evidence (that I can find) that MBC appears to have relied upon to conclude that NewHOS-2 should be allocated in preference to OrigHOS-2 and OrigHOS-3, and I have also found some apparent disparities, errors and/or flawed assumptions in that information.

I have reviewed the relevant pages of "Service Centres: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales – Part 2 of 3 – 30th May 2017" ("the Assessment") that relate to Hose. I note that there appear to be some errors in the report (e.g. numbered pages 157 to 159 (inclusive) are considering NewHOS-1, however the commentary appears to relate to NewHOS-1 and NewHOS-2 in combination).

The following information has been extracted from MBC's papers[4]. In the table below, I have replicated the information that has been provided by MBC and removed lines that relate to other villages (only the Hose lines are retained), and hidden columns where the scoring system used is not in dispute. I have also highlighted (in yellow) the scoring allocation that I believe may be incorrect:

SETTLEMENT	SHLAA REF	FORMER ALLOCATION REF	FOCUSED CHANGES ALLOCATION REF	ADDRESS	Capacity	Meeting identified needs	Heritage Assets(HA) (SMs, listed buildings, CAs, archaeology)	Biodiversity - SSSI / SAC / LWS / Protected habitats and species	Land ownership constraints	Total	Rank
Hose	15/00944/OUT	HOS1	HOS1	Land off Canal Lane	25	2	2	2	2	31	1
Hose	MBC/008/16	HOS2	N/A	Land off Canal Lane	15	1	1	2	-2	25	4
Hose	MBC/024/13	HOS3	N/A	Land at the rear of Ferndale, 41 Bolton Lane	9	1	1	2	-2	23	5
Hose	MBC/010/17	New Site	HOS2	Land west of Harby Lane	35	2	1	1	2	27	3
Hose	MBC/027/17	New Site	HOS1	Extension to HOS1 Land off Canal Lane	17	1	1	1	1	27	2

Reviewing my concerns in detail, I make the following points:

5.1. Meeting identified needs

I am unclear why OrigHOS-2, OrigHOS-3 and (for that matter) OrigHOS-1Ext rank any differently to the other sites when assessing "Meeting identified needs". Given that all of the original sites clearly met the "need" at the time that consultation on the draft MLP commenced, and there is no apparent change in underlying circumstances, it appears that there is an error in this scoring system. It would appear that the sites should all score equally on this basis.

5.2. Heritage assets and archaeology

NewHOS-2 is scored the same as OrigHOS-1Ext, OrigHOS-2 and OrigHOS-3 (score of "1").

It is noted that OrigHOS-2 and OrigHOS-3 are close to the Hose conservation area boundary, although it should be noted that the sites are separated from that boundary by buildings.

[4] From "Service Centres" tab of Excel Spreadsheet obtained from clicking the "Summary of the Results" link on the webpage: https://www.meltonplan.co.uk/site-assessment-report-guidance

There do not appear to be any other heritage assets and/or archaeology that affect these sites.

NewHOS-2 appears to have significant Heritage assets and archaeology, and the scoring applied in this instance appears to therefore be incorrect. In terms of archaeology and heritage the Assessment (numbered pages 172 and 173) states that:

- Whilst the site lies 155m outside of the conservation area "… there is a strong relationship between the site and the north eastern boundary of the conservation area";
- Hose displays much medieval earthworks to the North indicating that it was once a much larger settlement, and there was once Roman farms, a manor house, a monastic grange, watermills and an Elizabethan vicarage
- NewHOS-2 provides "….infilling greenfield land between modern C20 element of the village and the Grade II listed Grange, which is presently detached from the settlement of housing within the village" (the Grange being 75m to the north of the site, with a "wealth of archaeological remains in the vicinity of the grange, including traces of building foundations and a hollow way between the moated site, a scheduled ancient monument (SAM) and a southern route in to the village";
- Development at NewHOS-2 "… will disrupt this historic relationship between the SAM and surrounding area to the village" and "… the setting of the Grade II listed Grange will be substantially altered";
- Significant Roman remains have been identified on the site, and therefore "appropriate archaeological mitigation will be necessary."

On the basis of this information (obtained from MBC) it appears inappropriate that these sites all have the same score. In the circumstances, a score of "-1" would appear more appropriate for NewHOS-2.

5.3. Biodiversity and protected habitats and species

NewHOS-1 has a pond on site that is a known habitat for Greater Crested Newts ("GCN")[5]. A score of "2" therefore appears inappropriate.

NewHOS-2 is situated to the South of a known breeding pond for GCN and the land forms a wildlife corridor connecting the main GCN breeding sites[6]. The Assessment notes that both NewHOS-1 and NewHOS-2 are "GCN Farm wildlife package areas". Clearly these sites are important to the local population of GCN, which is a protected species.

In relation to OrigHOS-2 and OrigHOS-3, there is no mention of GCN, although it does state that there is a "bat roost nearby" (which implies it is not on these sites) and records that as a "strong positive".

[5] See Great crested newt report 27.04.16 attached to the planning application referenced 15/00944/OUT
[6] See numbered page 63 of the "CHH NP Regulation 16 PC approved17-7-17" Neighbourhood Plan

On the basis of the points above, I would have expected that NewHOS-1 and NewHOS-2 have been incorrectly scored and should properly have been scored "-1" or at least "0", rather than "2" and "1" respectively

5.4. Land ownership and constraints

On the basis of my initial email correspondence with MBC it appeared that this was the single largest factor in determining that OrigHOS-2 and OrigHOS-3 should be deallocated, and replaced with an allocation at NewHOS-2.[7]

On a detailed review of the Assessment, MBC advises that "written confirmation from all of the landowners [that make up OrigHOS-2 and OrigHOS-3] has been received to state that the land is available however there is no organised consensus on timescale". [8] MBC's conclusion is that it is expected that this land will be delivered within the next 5 to 10 years.

This contrasts with an expectation that NewHOS-2 will be delivered within the next 5 years.

In scoring OrigHOS-2 and OrigHOS-3, MBC has allocated a score of "-2" (which is the lowest score that it can allocate), whereas NewHOS-1 and NewHOS-2 are given a score of "2" (which is the highest score that it can allocate). Given that MBC is aware that all of the owners of the sites are willing to permit development on their land and that the only apparent difference is the timescale over which these might be delivered, the scoring seems grossly wrong. If it assumed that the original scoring for NewHOS-1 and NewHOs-2 are correct, it would appear to be more than reasonable that OrigHOS-2 and OrigHOS-3 be allocated a score of at least "0" (potentially even "1").

When all of these adjustments are taken in to account the scoring matrix is changed significantly and can now be seen below:

SETTLEMENT	SHLAA REF	FORMER ALLOCATION REF	FOCUSED CHANGES ALLOCATION REF	ADDRESS	Capacity	Meeting identified needs	Heritage Assets(HA) (SMs, listed buildings, CAs, archaeology)	Biodiversity - SSSI / SAC / LWS / Protected habitats and species	Land ownership constraints	Revised Total	Revised Rank
Hose	15/00944/OUT	HOS1	HOS1	Land off Canal Lane	25	2	2	-1	2	28	1=
Hose	MBC/008/16	HOS2	N/A	Land off Canal Lane	15	2	1	2	0	28	1=
Hose	MBC/024/13	HOS3	N/A	Land at the rear of Ferndale, 41 Bolton Lane	9	2	1	2	0	26	4
Hose	MBC/010/17	New Site	HOS2	Land west of Harby Lane	35	2	-1	-1	2	23	5
Hose	MBC/027/17	New Site	HOS1	Extension to HOS1 Land off Canal Lane	17	2	1	1	1	28	1=

As you will note, on the basis of the amended scoring, NewHOS-2 comes out as the least favoured option and should therefore not be an allocated site.

[7] See email of 28 July 2017 at 08:09 from James Beverley
[8] Numbered page 178 of the Assessment

6. Other matters

I have concentrated above on the flaws in MBC's evidence (at least in the evidence that they have made public to enable consultation) which have (currently) led it to propose the Focused Changes that relate to Hose. There are other matters that I consider that MBC might not have properly considered, which include:

- The community in the village has actively engaged in the Neighbourhood Plan (potentially to the detriment of getting involved with the MLP), and the community has concluded that developments should be restricted to NewHOS-1, OrigHOS-2 and OrigHOS-3 and no development should be permitted at NewHOS-2. MBC appear to not want to respect the local community's wishes and decisions;
- MBC appear to be favouring its own agenda of increasing housing allocation in Hose and ensuring that those developments are delivered in the next 5 years (rather than permitting a more organic growth of the village over the duration of the MLP);
- If MBC were to get its way, and NewHOS-1 and NewHOS-2 were to be built out in the next 5 years, it would appear likely that both sites would be developed at once (increased profit margin for the developer through improved economies of scale). Consideration has not been given as to the effect that a substantial building development would have on the village with it all being compressed in to a relatively short time frame (e.g. construction traffic, noise, traffic management, ecological protection, etc.) and the impact that the sudden increase that the village size would have on the local community and "feel" of the village.

7. Conclusion

As stated at the start of this response, I object to the following Focused Changes proposed to the Melton Local Plan ("MLP") by Melton Borough Council ("MBC") that affect the village of Hose:

- Increased Allocation of Housing Numbers (this appears to have risen from 57[9] to 77[10]);
- The deallocation of MBC/008/16 (formerly HOS2) and MBC/024/13 & (formerly HOS3);
- The allocation of MBC/010/17 (now HOS2)

I consider that the case is clear that the developments set out in the current draft Neighbourhood Plan are capable of being delivered and meet the needs of the village / local community. As such I consider that NewHOS-2 should not be allocated (or should be deallocated if already allocated) and OrigHOS-2 and OrigHOS-3 should be reallocated in a manner that is consistent with the Neighbourhood Plan. The housing allocation for Hose should also match the Neighbourhood Plan and should not be increased as suggested in the Focused changes report.

[9] Paragraph 4.2.22 and Table 7 of Pre Submission Draft Plan, Nov 2016 (Chapter 4 / Numbered Page 33)
[10] 13 Appendix 4: Focused Change FC 4.1: Section 5.4 and Policies C1(A and C1(B) - Policy C1 (A) – Housing Allocations (Numbered Page 15)