

FOCUSED CHANGES RESPONSES TO REPRESENTATIONS RECEIVED: FC4 - Bottesford

Representor Name	Focused Change /Policy Ref	Summary of Representation	MBC Response
Margaret Fairhurst	BOT1.	BOT1 will give rise to huge traffic problems in village centre. Suggests provision of more garaging to reduce off street parking.	The capacity of BOT1 has increased from 35 to 41. This is not of itself going to give rise to huge traffic problems cited. This is not therefore a response to the focused changes.
Lilian Coulson, obo Mr & Mrs N J Spick	BOT1	Supports BOT1	Noted.
Michelle Galloway (obo Davidsons)	BOT2	Concern that the capacity of 'BOT 4' has been reduced on flood risk grounds and submission of master plan showing how 40 dwellings could be accommodated on approx. ½ the without infringing flood risk area.	The methodology for this calculation is set out in the Service Centres Update to site assessments, May 2017 and is based on standard published SHLAA methodology against which all sites were considered as follows: Net Site Area & Reason: 1.83ha (62.5% of 2.92ha) Capacity & Calculation Formula: 55 (1.83ha @ 30dph) The site was reduced in area to prevent being impacted by the part vulnerable to flood risk. The 'estimated capacity' is not a policy requirement or a limit, it is a calculation to inform site selection against overall targets
Julie Moss (Bottesford Forum)	FC4	<p>Flooding</p> <p>According to a recent independent report Bottesford has 413 (28% at the time) properties in flood zone 3 and ranks as one of the highest risk villages in the whole of the East Midlands. The Plan states that "sites at risk of flooding can only be allocated for development if there is insufficient land available in areas with lesser or no flood risk". Rectory Farm (BOT4) and Grantham Road (BOT3) and their adjacent areas are subject to flooding and are part categorised as being in flood zone 3b (designed to flood as an alleviation method). Consequently, any development on these sites in particular will increase the likelihood of flooding elsewhere in the village.</p> <p>Questions</p> <p>12. If Melton Borough Council insist on allowing development on areas known to flood what compensation are they prepared to provide villagers whose homes will inevitably flood when the water cannot drain away naturally?</p> <p>13. Similarly, how will Melton Borough Council recompense or resolve the issue of increased house insurance costs or lack of insurance cover for existing residents due to the impact of new developments on the increased flooding risk?</p> <p>14. There are many more sites in Melton Borough with a much lower flood risk than Bottesford. Why does the Melton Local Plan place the most significant rural housing volumes in the highest flood risk areas of the rural part of the Borough, i.e. Bottesford?</p> <p>15. In Spring 2016 Melton Borough Council agreed to investigate if development sites had flood risk problems. Has this been undertaken, what were the results and how has it impacted the Melton Local Plan?</p> <p>16. Has Melton Borough Council taken into account the independent flood survey commissioned by Leicestershire County Council which highlighted the increased impact of flooding caused by climate change?</p>	<p>The updates to site assessments ('Service Centres Update to site assessments' May 2017) has taken into account the latest (October 2016) flood risk assessment which followed the 2016 assessments. https://docs.wixstatic.com/ugd/d246bd_9fa2be80fb3542efa7621222aefd8226.pdf</p> <p>Individual site assessments have been adjusted in terms of both their provisions and capacities to ensure that they can be developed without exposing new development tot flood risk or increasing risk elsewhere. Details are contained within 'Service Centres Update to site assessments' May 2017) and Focussed Change 4, Appendix 1.</p> <p>Development sites are required to incorporate effective drainage (SUDS) which will be designed to 1:100 year standard (the national standard) plus an allowance for climate change which will ensure they are not at risk of flooding or increased flood risk elsewhere. Retention of surface water within sites will assist, rather than exacerbate, issues with run off into water courses.</p> <p>Whilst some parts of and sites in Bottesford are vulnerable, in part, to flood risk this can be effectively managed. Bottesford as an entire location is not at risk and therefore remains appropriate as a location for development.</p> <p>Severn Trent have been consulted at each stage of the Plan and have not objected to the scale of development proposed. Their statutory duties require the provision of sewerage disposal and if this results in an upgrade of existing facilities they are obliged to carry that out. This is financed by statutory charges made to developers. 'Focussed Changes' proposes a reduced level of growth in Bottesford that previous iterations, which can only assist with these issues. Please see above regarding drainage.</p>

<p>Julie Moss (Bottesford Forum) (cont)</p>	<p>FC4</p>	<p>Drainage Concerns regarding the sewage plant running to capacity with serious investment required to cope with demand, not to mention all the other utility infrastructure pressures. Any overflow from newly developed drainage systems will adversely impact the widely known flooding problem in the village. Three serious flood events and a number of more minor events have occurred within the last 20 years. Little has been done to alleviate this risk in respect of culvert sizing or lessening the impact caused by significant housing developments. Question 22. How does Melton Borough Council plan to mitigate the incremental effect of multiple developments having their controlled drainage systems reaching rainwater run-off capacity at the same time, potentially causing and/or exacerbating a flood event in the Bottesford village and immediate area?</p>	<p>Severn Trent have been consulted at each stage of the Plan and have not objected to the scale of development proposed. Their statutory duties require the provision of sewerage disposal and if this results in an upgrade of existing facilities they are obliged to carry that out. This is financed by statutory charges made to developers. 'Focussed Changes' proposes a reduced level of growth in Bottesford that previous iterations, which can only assist with these issues. Please see above regarding drainage.</p>
<p>Liberty Stones (obo Richborough Estates)</p>	<p>BOT4</p>	<p>Plan only delivers 75% of required affordable housing, this is not in line with the NPPF guidance. there is no evidence basis for the reduction in numbers for BOT4 from the November 2016 Pre-Submission Local Plan which allocated the site for 84 dwellings, and the proposed Focused Changes which now reduce the allocation to 55 dwellings.</p>	<p>FC1.1 and FC1.2 – Objectively Assessed Housing Need and Housing Requirement : 245dpa was based on analysis of how the various housing numbers within the range presented by the evidence (170 – 280) contributed to planning objectives within the Plan itself and national policy. Specifically 280 was not considered appropriate due to adverse impacts on sustainability factors within the updated SA, and an unrealistic uplift in housing delivery. FC1.3 – A proportionate approach: Allocations in Bottesford present an exceptionally close fit (324 vs. 334) without account being taken of windfall, etc. Allocations in Service Centres combined exceed requirements by approx. 10% allowing for further flexibility. The 'estimated capacity' is not a policy requirement or a limit, it is a calculation to inform site selection against overall targets. Sites may come forward at quantities varying from this calculation. FC1.2, FC1.3 and FC4.1 – Housing Land Supply: The delivery trajectory is informed by developers themselves, including for the site 'BOT 4' and as such is considered the most reliable source available. The 5 yr HLS statement (June 2017) shows in excess of 7 years deliverable supply which provides sufficient headroom and flexibility above the 5 year requirement, and makes only limited reliance on the Sustainable Neighbourhoods. FC4.1 and 4.2 - Housing Allocations and Local Plan Appendix 1: Site Allocations and Policies : Policy C1 (A) – Housing Allocations BOT4 Land at bottom of Beacon Hill, Normanton Lane The methodology for this calculation is set out in the Service Centres Update to site assessments, May 2017 and is based on standard published SHLAA methodology against which all sites were considered. The site area was reduced to limit the visual impact (Nov 2016 Pre Submission version) , but capacity not initially updated to reflect this. The potential capacity decreased from 84 to 55 on this basis. The site allocation boundary is appropriate to prevent undue landscape impact or protrusion in to the Area of Separation between Bottesford and Normanton. The planning application referred to is not yet determined and it is premature to rely upon the layout and quantity shown. The higher quantity is also based on a site larger than the allocation. The 'estimated capacity' is not a policy requirement or a limit, it is a calculation to inform site selection against overall targets.</p>

Susan Love	BOT1	Ensure no additional flood risk arises from new development and that all residents will still be able to evacuate their homes	The development incorporates flood protection and SUDS to the 1:100 national standard plus an allowance for climate change, and incorporates a safe means of access which will be useable even in flood conditions.
Susan Love	BOT1	41 houses on a site in FZ2 and FZ3 is excessive.	The capacity has been calculated according to a consistent methodology, with constraints such as flood risk taken into account.
Colin Love (Professor)	FC4/BOT3	BOT3 – Heritage Englands comments do not make sense. BOT3 should revert to its original size.	Noted, though it is clear that its eastern edges are close to listed buildings, their settings (especially the Church) and the Conservation Area and as such require special attention under the law.
Colin Love (Professor)	FC4/ BOT1, BOT2	Both originally two adjoining sites have been amalgamated as one site despite different owners and no apparent liaison between those owners. Insufficient consultation and engagement on these issues by MBC with the NDP group.	This approach has featured in 2 rounds of consultation in which the NP Group were invited.
Colin Love (Professor)	FC4/BOT3	BOT3 – Heritage Englands comments do not make sense. BOT3 should revert to its original size.	Noted, though it is clear that its eastern edges are close to listed buildings, their settings (especially the Church) and the Conservation area and as such require special attention under the law.
Lilian Coulson, obo Mr & Mrs N J Spick	FC4	Land adjacent to 8 Easthorpe Road, Bottesford should be included in plan - the EA updated flood risk modelling to be carried out in Autumn/Winter 2017/18 should be brought to attention of LP Inspector, as existing is historic and out of date.	The site has been assessed using the information currently available and is subject to flood risk. It is appreciated this is dynamic but it is not agreed the Plan should be postponed to await the arrival of new evidence. The housing site assessments underpinning Focused Change 4 were based on the most up to date information and data that was available on a comparable basis across the whole of the Borough at the time, for a relevant range of sustainability, suitability and achievability factors. The Council consider this to be adequate and proportionate evidence, as per NPPF para. 158.
Ray Woodcock	Bottesford	Object to some of the proposed sites for additional housing in Bottesford. Rectory farm seems to be fraught with problems of access. It seems to me that Normanton Lane (opposite the sewage farm) would be a cheaper option as the access is easier. This village has grown and grown over the last 30 years beyond all recognition. The volume of traffic along the high street is unbelievable at times. Building any more houses with the resultant increase in traffic and more problematic parking seems insane. Any more housing will have a detrimental effect on our village, but the Rectory Farm option would have the most intolerable.	Developers' submissions have illustrated a potential solution to access problems to the site. The Highway Authority have been consulted at all stages of the Plan and have no objections to the quantity of development proposed in Bottesford. This is of course reduced by the proposals within 'Focused Changes'. The HA further advise that localised traffic issues can be addressed through normal planning application processes - traffic assessments, conditions, s106 s278 highway improvements etc.

<p>Aspbury Planning obo Barratt David Wilson Homes</p>	<p>Bottesford + BOT3</p>	<ul style="list-style-type: none"> • 4.2.21 and Policy C1– should be maximising capacity in larger settlements of Bottesford, Asfordby, through use of sites such as Belvoir Road, Bottesford. Not true that it is incapable of meeting its residual requirement. Site should be an allocation or if not a reserve site. • Rectory Farm – no info in public domain about how this can be satisfactorily accessed. 	<p>The allocation to Bottesford under the 'proportionate approach' relates to its relative sustainability compared to other villages in the Borough and Melton Mowbray. It performs significantly worse than Melton Mowbray and maximising capacity here (or in any other village) would be at the expense of Melton Mowbray and a less sustainable solution. The total need is met by the spatial strategy devised and the distribution within it - with 'headroom' - and it is not considered necessary to add further. All representations will be published on submission as required under the Regs.</p>
<p>Robert Sparham</p>		<p>BOT3 (Initially BOT4). – object due to Flooding, Access (difficult and expensive) and sustainability. No evidence of the sequential tests or comparisons required by the EA.</p>	<p>The site allocation takes account of flooding and addresses the policies in Appendix 1 both in terms of mitigation/protection and impact on capacity. Evidence on the sequential test is found in the Focused Changes evidence 'Melton Local Plan Sequential Test of the Flood Risk of Potential Development Sites' https://docs.wixstatic.com/ugd/c2f881_c867d146141d4106a325ff89abac43f7.pdf</p>
<p>Shelagh Woollard</p>		<p>BOT2 – was previously classed as unsuitable – a tip . Only the roadside was not excavated, but contaminants could have seeped here. BOT4- building across railway line sets a precedent – encroaches on an area of separation to Normanton + potential safety impacts re railway crossing. Improve current car park, not provide a new one.</p>	<p>BOT2 - Previous planning applications investigated ground conditions and provided strategies for mitigation to allow development to proceed (11/00338/OUT refers). Though refused, the ground for refusal at application and appeal stage were not related to ground conditions/contamination, but prevailing planning policy at the time. BOT4 - the impact on the countryside, AoS and safety have been considered in the site evaluation alongside all other criteria and , when considered 'in the round', the site is considered suitable.</p>
<p>Aspbury Planning obo Barratt David Wilson Homes</p>	<p>Bottesford</p>	<p>Barratt Homes object to focused change 4.1 Policies C1(A) on the basis that it excludes their landholding East of Belvoir Road, accessible through the Wickets. Site is deliverable and developable and closer to services than most allocations in Bottesford. Bottesford has a shortfall against residual requirement. No provision for non delivery. Bottesford is most sustainable village in Borough and not positive or justified to deliberately under provide in most sustainable locations where credible sites exist.</p>	<p>The site allocations for Bottesford very closely accord with the residual requirement calculated. There is the prospect that the very small shortfall will be made up by individual site layouts and designs exceeding the calculated 'Estimated Capacities' (see other representations in this section to that effect). All of the sites have been tested for deliverability under the site assessment process Service Centres Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales (30th May 2017) evidence and as such it is considered that additional sites are not required.</p>
<p>Aspbury Planning obo Barratt David Wilson Homes</p>	<p>FC 4.2</p>	<p>BDW object to FC relating to Rectory Farm site. The change relates to updated site assessment work leading to refinement of the site area calculations and developable areas leading to an increase in the capacity of the site. BDW are concerned that at this advanced stage of the local plan process there is so little or no evidence in the public domain indicating how this site can be safely and satisfactorily accessed from the adopted road network and deliver the extent of housing numbers proposed.</p>	<p>The evidence was submitted by the promoters of the site and will be published alongside all other representations to the Plan.</p>

<p>Robert Sparham</p>	<p>FC4.2</p>	<p>Object to the BOT3 site on three grounds; Flooding, Access and Sustainability.</p>	<p>The Council has a duty to report and publish all representations regardless of content, and aslo to submit them to the inspector for Examination in their submitted form. The sequential test is available as evidence as Melton Local Plan Sequential Test of the Flood Risk of Potential Development Sites at https://docs.wixstatic.com/ugd/c2f881_c867d146141d4106a325ff89abac43f7.pdf All sites have been considered under the site assessment process and this was revisited in the Service Centres Update to Site Assessments update May 2017 and allocations reflect the best performing sites measured by the criteria employed. There is no evidence that the geology of the site would mean it cannot be effectively drained. New development is required to be drained by SUDS so as to prevent any greater flow of run off water to the River and result in flooding downstream These are designed to 1:100 flood event level (the national standard) with 40% additional capacity allowance for climate change. The Highway Authority have been consulted at every stage of the plan and have not objected to the allocation, though they do note that normal planning application processes (transport assessments, conditions, s106/278 etc) are sufficient to secure localised highways improvements. The site would be the subject of a planning application where a detailed assessment would take place. There is no evidence that the site is unviable and the site promoters have not sought a 'concession' on affordable housing or other developer contributions owing to infrastructure costs.</p>
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