

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

Full name: Debbie Caroline Adams

Organisation: n/a

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 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:

Chapter One: Introduction

1.7 (page 3) The value added by the reference groups

I attended as many of the Residents' Reference Group and Environment Reference Group meetings as I was able to. Initially thereference groups were well attended but it did seem to some of us that Melton Borough Council (MBC) were going to concentrate discussions on the impact of the Local Plan on the villages possibly to the detriment of the town. I was one of several people who did not like the 'role play' in the second meeting of the reference groups as it did not allow us to put forward what WE would like to see available round us going forward. Whilst I can understand that there needed to be discussions between different 'types' of resident, e.g. young with older, villager with townee, working with retired, it quickly became apparent that by

mixing the groups, the 'type' with the largest number of attendees (the villagers) would prevail every time. As a town resident I was in the minority on my table during each session and so the town lost out in the final list of recommendations from each table at the end of each session. As a result I found it hard to motivate myself to continue to attend the meetings, and I suspect several townsfolk stopped attending the reference groups at this point. The number of townsfolk attending the Residents Group was not large in the first

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place and once several dropped away the imbalance was very pronounced. I thought about attending the Town Centre Reference Group but assumed that was for shopkeepers and town business folk. I was unable to attend several of the sessions as insufficient notice of meeting dates was given.

1.9 (page 5) What are neighbourhood plans and how do they relate to the Local Plan?

Whilst a number of villages took up the idea of neighbourhood plans (and rightly so), there has been a marked lack of commitment on the part of town councillors to attempt one for the town. There was talk earlier this year of starting one for the town but nothing further has been heard. I did say I was interested in helping put a town neighbourhood plan together but no-one has been in touch with me. The apathy of town residents is matched by the apathy of town councillors who have made little or no attempt to galvanise town residents to become interested in the Draft Local Plan despite the fact that the impact on the town will be huge.

Village residents and councillors are of the opinion that the town has all the facilities and infrastructure necessary to take its allocation of 65% of the new housing for the borough in the next 20 years. MBC a year or so ago set up a Town Committee comprising the 15 town councillors. The meetings are rarely attended by more than 6 or 7 of the town councillors. It seems that the Town Committee reflects the general apathy of the town residents. The apathy comes from years of hearing how apparently MBC have been trying to get Melton a bypass, but all townsfolk have seen is worsening congestion with the council still allowing building to take place in areas which are already congested (e.g. Scalford Road opposite John Ferneley High School where several accidents involving school children have occurred as Scalford Road heaves with traffic at the start of and end of the school day, and yet 160+ homes have been allowed to be built there). It is interesting to note though that at a meeting between MBC, Leicestershire County Council (LCC) Highways, LCC's consultants Jacobs, and Melton North Action Group (MNAG) on 27th October last, Highways said that it is only since 2013 that MBC and LCC have seriously started working towards the goal of a Melton Bypass.

Chapter two: Melton Borough Today - A Portrait (page 11)

As is mentioned Melton Borough is a rural area, and it is situated between the major employment centres of Nottingham, Grantham, Leicester and Loughborough. The notion that 4,000 homes of which 37% should be affordable in the town cannot be **justified** as who would want to move to Melton Mowbray if they work in one of the 4 aforementioned employment areas and are on low income? The sensible thing to do is to live closer to work so cutting down on the expense of commuting to and from work. At the moment there are not many job opportunities in Melton, certainly not enough to **justify** the building of 4,000 homes and thereby increasing the town's population by about 30%.

The above would be the reason why there is a suggestion that younger people are migrating out of the borough (see page 13 point 2.6.2). These younger people find it easier to move to Nottingham, Grantham, Leicester or Loughborough where there are more job opportunities 'on-the-doorstep' so to speak.

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It is also acknowledged in the same section that there is an inward migration of people wishing to retire in the area. However there has been a noticeable lack of provision for suitable downsizing and retirement homes for the older generation in the borough and town despite the acknowledgement that the national population is ageing. The Draft Local Plan is **unsound** as it does not attempt to create the right balance of homes that are required in the town and borough. Two and three bedroom homes for starter homes are different to two and three bedroom homes required by the older generation to wish to downsize. Far more bungalows need to be built in both town and borough.

On page 14 in 2.6.5 it says that 10 GP surgeries serve the borough. However only ONE serves the whole of the town (Latham House). It is on too small a site to allow for expansion particularly as the car park is woefully inadequate (about 20 parking spaces). According to page 56 of the *MBC Infrastructure Delivery Plan - October 2016* Latham House and Asfordby surgery between them have 35,600 registered patients with 20 doctors. According to the Infrastructure Delivery Plan Latham House will be submitting an application for S106 funding for an extension. There needs to be a new surgery in Melton preferably at the Melton hospital site rather than trying to cram another extension on to the Sage Cross Street site to relieve the burden on Latham House of another circa 8,000 residents from the 4,000 homes planned for the next 20 years. Such inadequate provision of healthcare facilities for a town population due to grow by 30% makes any large scale development **unsustainable** and therefore **unsound**.

Chapter 3: Vision and Strategic Priorities

On page 17 of the Draft Local Plan the 'Vision' says "*Much new house building, including a significant proportion of new homes suitable for first time buyers, young families and those on lower incomes, will have helped balance the local housing stock and slow down or reverse the trend towards an ageing population.*" To suggest that the national trend for an ageing population should be reversed in Melton is ridiculous, **unjustifiable** and the suggested policy **unsound**, particularly as it is not attempting to address the need for homes suitable for retired people to 'downsize' to in either the town or borough, or to address the fact that there are insufficient employment opportunities in Melton to sustain a 30% growth in the town's population. With the traffic congestion as bad as it currently is, the lack of transport infrastructure in the town is probably having a detrimental effect on encouraging new business to the area.

Chapter 4 - The Spatial Strategy

On page 23 of the Draft Local Plan it says "*When considering development proposals, the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework*". The NPPF however states in point 14 under "decision taking" the granting of planning permission should be given unless "*any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework....*".

In addition Point 177 of the NPPF (regarding ensuring viability and deliverability) states:

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"It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan....."

Because there is no guarantee of Central Government funding to link up a series of developer-built roads in the north and south of the town which go from nowhere to nowhere, to a proper town bypass (or Distributor Road as it is now called), neither the south nor in particular the north sustainable neighbourhood can be considered to be 'sustainable' and therefore the majority of the Draft Local Plan is **unsound** and **ineffective**. The developer contributions to the Melton Distributor Road will be insufficient to avoid vehicles having to enter the town to get from one side of the town to the other. Roads such as Melton Spinney Road and Thorpe Road up Thorpe Arnold Hill

are too narrow and potentially dangerous to take the expected volume of traffic who wish to travel out of Melton Mowbray towards Grantham, or the reverse.

As the wording for the section of road that joins the northern section with the so-called eastern section is somewhat unclear, one can only assume that the obvious link across from Melton Spinney Road to the A607 Grantham Road bypassing Thorpe Arnold Hill is not included in MBC's plans for the Distributor Road. I would like to be proved wrong, but I have no confidence in MBC understanding the complications arising from not building the above mentioned link between Melton Spinney Road (a country lane) to the A607 Grantham Road. I truly believe that in attempting to cut down on costs for the scheme this particular section will not be built in time, if ever!

Funding of circa £2.7million has been received from Central Government for a business plan to be prepared for the Melton Distributor Road. However the business plan is unlikely to be ready in time to be dealt with by the incumbent Government. With today's prices of upwards of £100million being required from Central Government to complete the Distributor Road, there is **NO GUARANTEE THAT THIS MONEY WILL BE FORTHCOMING**. With a change of Government expected in 2020 the odds of Melton getting sufficient funding are even less. There is a very real chance that the 4,000 homes for Melton could be built without a proper Distributor Road and therefore the Draft Local Plan is **unsustainable, unsound, ineffective and unjustifiable**.

Page 42 of Draft Local Plan (Melton Mowbray North Sustainable Neighbourhood (NSN))

The NSN is to have at least 1,500 homes built between now and 2036. There are several points against the NSN and which make it **unsustainable, unsound and unjustifiable**:

1. The sheer size of the development will put untold pressure on the already heavily congested roads in the north of the town. The north of town roads such as Thorpe Road, and Scaford Road are too narrow and with housing on both sides of the roads there is no room for carriage or pathway widening. There is certainly no room for cycle lanes.
2. The Melton Country Park will be virtually shut off from the countryside and the pathetically small strip of land suggested by MBC as the wildlife corridor for the Country Park is totally inadequate. The amount of housing planned to run alongside the Country Park will have a detrimental effect on the wildlife of the Country Park and could affect its status as a QE2 Fields in Trust park. **Indeed has QE2 Fields in Trust been consulted or even approached regarding the implications of the Local Plan to the Melton Country Park?**

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3. Traversing the Country Park can only be done safely during daylight hours as there is no lighting in the Park (a stipulation of the QE2 Fields in Trust). During winter time the route could not be safely used by children going to or from school due to the short daylight hours. MBC thinks they can rely on the Country Park to provide enhanced connectivity to the town centre which shows either a deplorable lack of respect for the Park's QE2 Fields in Trust status, and its importance for local wildlife particularly in the more sensitive northern part of the Park, or a total inefficiency with regards to attempting to address the problem.

4. A complete lack of understanding when it comes to link roads. A senior officer of MBC was heard to comment earlier this year that the proposed link between the Nottingham Road and Scalford Road would ensure that any development between the two roads would have a zero effect on the town. The suggestion being therefore that vehicles coming off the development will only want to travel between Nottingham Road and Scalford Road, having no desire to travel to the west, south or east of the town or even into the town itself. How can a comment like that be **justified**?

5. There is no detail in the Draft Local Plan which is supposed to cover development up to 2036, of how the so-called Distributor Road across the top of the Country Park is meant to be funded particularly as in order to avoid cutting off the Country Park, the section across the north of the Park will have to take the form of a bridge. This will be a costly affair and it is unlikely that developers will be prepared to fund that section (unless of course MBC decides to do a deal with the developers (unbeknown to the local residents) allowing them to build a LOT more homes than the 1,500 mentioned in the Draft Local Plan.

6. The farmland across the north of the town is of a higher quality than the land crossing the south of the town.

7. Most of the employment areas are to the south and west of the town with no direct connection with the north of the town except through the town itself. The largest percentage of people who work outside the borough work in Leicester and its surrounds. There is no direct connection with the south of the town except through the centre itself.

8. Melton Spinney Road is a narrow country lane which has to cope with Twinlakes Park traffic. Twinlakes Park is a highly successful children's theme park and its entrance is on Melton Spinney Road. During school holidays in particular, the high volume of traffic attempting to leave the Park causes tailbacks from Thorpe End in the town all the way back up Melton Spinney Road. Thorpe Road, Melton Spinney Road and Thorpe Arnold Hill struggle to cope with the daily traffic going to and from Grantham. When the A1 is closed (as it frequently is), this can cause tailbacks up the Thorpe Road (A607 Grantham Road) from Thorpe End to a mile out of town near the golf

course. The traffic is further exacerbated by the fact that Mars Petfoods has a major site just outside Waltham-on-the-Wolds and traffic at the beginning and end of the working day is very heavy. The fact that Twinlakes Park has opening hours of 10am to 6pm or 7pm sometimes, means that there are more than two 'peak periods' for Melton Spinney Road and Thorpe Road.

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9. The bus service into town for estates off Thorpe Road and Melton Spinney Road was discontinued by LCC in February 2016 due to lack of funding. The only bus service into the town is the Grantham to Loughborough hourly bus service which does not of course cover the estates. The roads are too narrow for cycle lanes and to walk from town to the current housing line of Thorpe Park on Melton Spinney Road is one mile. In fact for any new development in the north of the town, the walk from its edge into the town will be in excess of a mile.

10. Insufficient regard (actually no regard) has been paid to the fact that during wet weather a stream forms in the fields opposite Twinlakes Park and on Melton Spinney Road. This stream takes a diagonal line down the field and enters a ditch next to 17 Melton Spinney Road and also crosses the road itself for several yards. It eventually finds its way to Thorpe Brook but in the meantime there is a lot of surface water and run off in the area after only about two hours of rain. MBC is in denial that there is a problem with flooding along Melton Spinney Road, Thorpe Road, the Tesco car park and Thorpe Road at the Thorpe End junction. Building yet more houses (600 plus for Melton Spinney Road) would just make the situation worse.

Conclusion

We residents were assured by MBC that lessons had been learnt from previous public consultations with regards to the process of submitting a response which to a lot of people was a somewhat daunting procedure. The council led people to believe that this public consultation would be run along much simpler lines and be more user-friendly to encourage greater feedback from residents. Unfortunately this has not been the case and the process for submitting representations on this latest document has turned out to be even more complicated than at any previous public consultation.

I have not attempted to use the 'Representation Form' . Even the six pages of explanatory notes on how to use the form are hard to follow. Instead I have sent in my submission in the form of an email to planningpolicy@melton.gov.uk . The cynic in me says that MBC do not want to be inundated with submissions - so much for encouraging public participation. This thought was brought home to me when I attended the Pre-Submission Local Plan Launch event at the council offices on 8th November 2016. A member of the council staff warned those present that they needed to think very hard before they submitted any opposing views to the Draft Local

Plan as this could jeopardise the Plan being accepted by an Inspector. Several of us were disgusted with that statement and I wrote to the Chief Executive asking why the staff member was not rebuked for coming out with such a statement. I never had a reply.

Back in 2013 the Inspector Harold Stephens who dealt with the Melton Core Strategy, considered the proposed 1,000 home Sustainable Urban Extension in the north of the town to be unreliable in its ability to "*enhance the existing provision*" (he is talking of accessibility to sustainable transport modes) "*and this would be more expensive, in my view, for the northern SUE because greater effort will be required to bring the provision to an acceptable level. It is also the case that the southern SUE is better related to the existing and proposed areas of employment, the town centre and the railway station.*" (Quoted from his letter to MBC dated 11th April 2013). That could still apply today with the two SNs.

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Mr. Stephens also said in his letter that the northern SUE "*had the highest value landscape around the town...*"; "*In terms of agricultural land, the northern SUE includes substantial amounts of Grade 3A land which is noted as the best and most versatile.....*"; "*The cutting off from the open countryside of the Country Park will also have an adverse effect on biodiversity.*"; "*There is no detailed analysis of the viability of the scheme (the northern SUE) including the provision of infrastructure, the S106 requirements, and the normal site development costs.*" He concluded that "*On this basis I consider the Core Strategy is flawed because there is no certainty that it can be delivered.*"

The above comments are as relevant to the Draft Local Plan as they were to the ill-fated Core Strategy. Clearly the council has not learnt from the doomed Core Strategy of 2013, and in the intervening years it has in the main part ignored or just paid lip service to the concerns of town residents and resident groups about the adverse effects of the emerging Local Plan on the town of Melton Mowbray particularly with regard to the worsening road congestion. To force an increase of 30% population and therefore to increase the vehicle numbers in the town by 30% with no guarantee of anything but meaningless developer-funded sections of road going to nowhere and which do nothing to mitigate a huge increase in the congestion of the town can only be considered **unacceptable, unsustainable, unwanted, unsound, unjustified, ineffective and unforgiveable.**

Debbie Caroline Adams