

# Response ID ANON-13H4-7Y6W-W

Submitted to **Melton Local Plan Pre-Submission Draft**  
Submitted on **2016-12-16 18:15:05**

## About you

### 1 What is your name?

**Name:**  
Catherine J.G. Pugh

### 2 What is your email address?

**Email:**

### 3 Are you responding as an individual, consultee, stakeholder or other?

Resident, Community Group

If Consultee, Stakeholder, or Other, please give details here. :

### 4 Address

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### 5 Age

Please select your age:

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## Chapter 1: Introduction

### 1 CH1Q1: Do you consider that Chapter 1 is?

Do you consider that Policy SS1 - Legally Compliant::

Do you consider that Policy SS1 - Sound::

Do you consider that Policy SS1 - Complies with Duty to Co-operate:

2 CH1Q2: If answered "No" to "2: Sound" please answer the following question. Do you consider that the Policy is unsound because it is not?

3 CH1Q3: Please give details of why you consider Chapter 1 is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Chapter 1 or its compliance with the Duty to Co-operate, please use this box to set out your comments.

Please insert text here. :

4 CH1Q4: Please set out what change(s) you consider necessary to make Chapter 1 legally compliant or sound, having regard to the test you have identified at 2 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this change will make Chapter 1 legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound:

## Chapter 4: Growing Melton Borough – The Spatial Strategy

### 1 CH4Q1: Do you consider that Chapter 4 is?

**Do you consider that Policy SS1 - Legally Compliant::**

**Do you consider that Policy SS1 - Sound::**

No

**Do you consider that Policy SS1 - Complies with Duty to Co-operate:**

**2 CH4Q2: If answered "No" to "2: Sound" please answer the following question. Do you consider that the Policy is unsound because it is not?**

2) Justified, 3) Effective

**3 CH4Q3: Please give details of why you consider Chapter 4 is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of Chapter 4 or its compliance with the Duty to Co-operate, please use this box to set out your comments.**

**Please insert text here. :**

The hamlet of Easthorpe (containing site EAST1) cannot be described as a rural hub since it is and has long been part of Bottesford. Indeed, the census returns for Bottesford place the boundary between Easthorpe and Bottesford along Church Street in the old centre of Bottesford village. Muston was a separate parish until the 1930s and retains its own identity as a community. Easthorpe has no separate services. The classification of Easthorpe as a separate rural hub while Muston is classified as a rural settlement makes no sense and serves to distort the allocation of housing to Bottesford.

**4 CH4Q4: Please set out what change(s) you consider necessary to make Chapter 4 legally compliant or sound, having regard to the test you have identified at 2 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this change will make Chapter 4 legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**Please set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound:**

Muston should be recognised as a Rural Hub. Easthorpe should not be treated as a separate settlement as it is a part of Bottesford. The allocation of housing to Bottesford and Muston should be revised accordingly.

## **Policy C1 (A) – Housing Allocations**

**1 CH5PC1(A)Q1: Do you consider that Policy C1 (A) is?**

**Do you consider that Policy SS1 - Legally Compliant::**

**Do you consider that Policy SS1 - Sound::**

No

**Do you consider that Policy SS1 - Complies with Duty to Co-operate:**

**2 CH5PC1(A)Q2: If answered "No" to "2: Sound" please answer the following question. Do you consider that the Policy is unsound because it is not?**

2) Justified, 3) Effective

**3 CH5PC1(A)Q3: Please give details of why you consider Policy C1 (A) – Housing Allocations is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of Policy C1 (A) – Housing Allocations or its compliance with the Duty to Co-operate, please use this box to set out your comments.**

**Please insert text here. :**

Bottesford and Muston are notoriously prone to flooding. The flooding of the water meadows surrounding the villages was once part of the agricultural system, but with the development of housing estates on the water meadows in the 1960s and 70s the River Devon was effectively canalized, driving the river into much narrower channels which overflow at the 'pinch-points' of Fleming's Bridge (listed ancient monument), the ford on the road to Normanton and Newark and the listed bridge at the Devon Lane ford. Flooding in the villages develops rapidly because there are no upstream overflow areas. We understand that the Environment Agency admits that its existing flood map for the area is inadequate and plans to review it. The extent of the development proposed can only greatly exacerbate the existing flood risk. It seems wanton negligence to plan to almost double the population of a village where flooding already causes distress and financial hardship and has even threatened life.

**4 CH5PC1(A)Q4: Please set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound, having regard to the test you have identified at 2 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this change will make the Melton Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**lease set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound:**

No plan to build 400 plus houses in a flood-risk area can seriously be described as sound. While developers, in their 'consultation' exercises, give assurances that they will deal with the flood-risk on their proposed site, this piecemeal approach only serves to increase the flood-risk elsewhere in the village. There is no coherent flood prevention plan for the whole area. There are many other areas of the Borough at little or no flood-risk. To choose to place such a high proportion of the new rural housing in one of the most flood prone areas seems perverse. Less flood-prone sites should surely be preferred.

**Policy C9 – Healthy Communities**

**1 CH5PC9Q1: Do you consider that Policy C9 is?**

**Do you consider that Policy SS1 - Legally Compliant::**

**Do you consider that Policy SS1 - Sound::**

No

**Do you consider that Policy SS1 - Complies with Duty to Co-operate:**

**2 CH5PC9Q2: If answered "No" to "2: Sound" please answer the following question. Do you consider that the Policy is unsound because it is not?**

2) Justified, 3) Effective

**3 CH5PC9Q3: Please give details of why you consider Policy C9 is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of Policy C9 or its compliance with the Duty to Co-operate, please use this box to set out your comments.**

**Please insert text here. :**

Public transport in Bottesford has been drastically cut in recent years. Services to Newark, Bingham and Nottingham have been cancelled. There is a two-hourly bus service to Melton Mowbray (journey time approximately 50 minutes to one hour), though few people have employment there. There is an hourly bus service to Grantham. There are no evening or Sunday bus services. There is a two-hourly train service to Nottingham until just before 9.00 p.m. It is not possible for Bottesford and Muston residents to visit the Nottingham theatres and concert halls unless they have a car.

Poor local facilities and lack of public transport make car use essential both for employment and leisure, resulting in an increase in congestion on the A52 and worsening air quality in an area where it is a problem.

There are no safe cycle routes in the area, the only route to Bingham or Grantham being along the A52.

The draft plan appears to intend to greatly increase housing, correspondingly reducing access to open space, without making any provision for a commensurate increase in any other facilities.

Although Bottesford had roughly doubled in size since 1960 there has been a decline in services and little improvement in infrastructure. Such amenities as the village possesses are in the High Street and Queen Street area, which are already severely congested. In some parts of the area pavements are uneven or non-existent.

Any examination of the street plan would reveal that there is an S bend at the junction of Belvoir Road and High Street and another at the junction of Market Street and Grantham Road, making the most frequent crossing places dangerous. There are also danger spots at the cross roads of Chapel/Church Street and Market Street/Rectory Lane and a further S bend past the Church, on a road that is already used by lorries from the existing industrial estate and as a rat-run from Newark to the A52, sometimes by heavy vehicles which dwarf the surrounding housing.

**4 CH5PC9Q4: Please set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound, having regard to the test you have identified at 2 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this change will make the Melton Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**lease set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound:**

An influx of newcomers from the proposed new housing could only add to these problems. There is inadequate planning for infrastructure and recreational facilities. The Melton Local Plan proposes the expansion of Bottesford from a village to a dormitory suburb the size of a small town. The village would lose its sense of identity and community. It would be far less healthy place in which to live.

**Policy EN1 – Landscape**

**1 CH7PEN1Q1: Do you consider that Policy EN1 is?**

**Do you consider that Policy SS1 - Legally Compliant::**

**Do you consider that Policy SS1 - Sound::**

No

**Do you consider that Policy SS1 - Complies with Duty to Co-operate:**

**2 CH7PEN1Q2: If answered "No" to "2: Sound" please answer the following question. Do you consider that the Policy is unsound because it is not?**

2) Justified, 3) Effective

**3 CH7PEN1Q3: Please give details of why you consider Policy EN1 is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of Policy EN1 or its compliance with the Duty to Co-operate, please use this box to set out your comments.**

**Please insert text here. :**

Housing built on BOT5 would spoil the precious views of the village which can be seen from Palmer's, or Beacon Hill. At present the view from the top of the hill gives a sweep across the conservation area of the village, clustered round St. Mary the Virgin and its famous spire, to the ridge and Belvoir Castle.

**4 CH7PEN1Q4: Please set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound, having regard to the test you have identified at 2 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this change will make the Melton Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**lease set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound:**

Building on BOT5 would destroy the rural setting of the village and the distinctive character of its landscape and heritage. If Bottesford's famous church is not to disappear into a housing estate this site should not be considered.

## **EN8 – Climate Change**

**1 CH7PEN8Q1: Do you consider that Policy EN8 is?**

**Do you consider that Policy SS1 - Legally Compliant::**

No

**Do you consider that Policy SS1 - Sound::**

No

**Do you consider that Policy SS1 - Complies with Duty to Co-operate:**

**2 CH7PEN8Q2: If answered "No" to "2: Sound" please answer the following question. Do you consider that the Policy is unsound because it is not?**

2) Justified, 3) Effective

**3 CH7PEN8Q3: Please give details of why you consider Policy EN8 is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of Policy EN8 or its compliance with the Duty to Co-operate, please use this box to set out your comments.**

**Please insert text here. :**

The proposed development sites on Belvoir Road, Grantham Road and Rectory Farm are all on land which is covered by water in periods of heavy rainfall. Building on these sites will necessarily mean the water will flow elsewhere. While developers may protect new housing from flooding, for example by constructing a raised platform as they have done already on Belvoir Road, this will inevitably increase the risk of flooding in other areas of the village and on the roads into the village.

A large part of Bottesford is built on what is locally referred to as 'running sand'. This means that buildings, particularly older and listed buildings, are especially sensitive to changes in the water-table. A rise in the water table causes 'heave', a decline subsidence.

Residents have already suffered from severe flooding, partly because the building up of the banks of the River Devon to permit building on the water meadows for the housing developments of the 1960s and 70s was done with little or no regard to the consequences. As a result water was driven into the drains, gardens, houses and streets in other parts of the village. If the extent of the development proposed for Bottesford goes ahead, it would appear that this mistake is likely to be repeated.

**4 CH7PEN8Q4: Please set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound, having regard to the test you have identified at 2 above where this relates to soundness. (NB Please note that any non-compliance with the duty to**

co-operate is incapable of modification at examination). You will need to say why this change will make the Melton Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

**lease set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound:**

'National planning policy requires a risk based sequential approach to flood risk, avoiding high risk areas and steering development to areas at lower risk.' The extensive flooding in Bottesford and Muston in 2201 and 2007 and the frequent closure of roads in the village due to flooding are surely evidence that this is a high risk area and climate change only increases the risk.

The Local Plan states that Melton Borough Council will ensure that 'development proposals do not increase flood risk and will seek to reduce flood risk to others.' The proposal to build over 400 new houses in the area, many on sites which are known to flood already, is not consistent with this promise.

## **Policy EN11 – Minimising the Risk of Flooding**

**1 CH7PEN11Q1: Do you consider that Policy EN11 is?**

**Do you consider that Policy SS1 - Legally Compliant::**

No

**Do you consider that Policy SS1 - Sound::**

No

**Do you consider that Policy SS1 - Complies with Duty to Co-operate:**

**2 CH7PEN11Q2: If answered "No" to "2: Sound" please answer the following question. Do you consider that the Policy is unsound because it is not?**

2) Justified, 3) Effective, 4) Consistant with National Policy

**3 CH7PEN11Q3: Please give details of why you consider Policy EN11 is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of Policy EN11 or its compliance with the Duty to Co-operate, please use this box to set out your comments.**

**Please insert text here. :**

Bottesford is a high-risk village in Flood Zone 3, much of it in Flood Zone 3a. It is one of the least sustainable areas for the kind of large-scale development proposed in the Draft Local Plan. The Plan states that 'Bottesford suffered flooding from canals in 2001, with flooding in Bottesford due to a combination of fluvial and surface water, as well as from the Grantham Canal.' This understates the extent of the problem considerably. Bottesford suffered from flooding in 1999, 2001 and 2007. It goes on to say 'sites at risk of flooding can only be allocated for development if thereis insufficient land available in areas with lesser or no flood risk.' The lack of available land in areas of less flood risk has not been adequately demonstrated.

**4 CH7PEN11Q4: Please set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound, having regard to the test you have identified at 2 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this change will make the Melton Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.**

**lease set out what change(s) you consider necessary to make the Melton Local Plan legally compliant or sound:**

The Draft Local Plan appears to allow for building in high-flood risk areas, by stating that: 'Exceptionally, it may be appropriate to develop land at risk of flooding for sustainability reasons or to avoid economic or social blight in an area.' It is not clear what these 'sustainability reasons' might be, but what is surely obvious that increasing the already significant flood risk in the village will cause both economic and social blight.

## **Examination**

**1 EXQ1: Can your representation seeking a change be considered by written representations or do you consider it necessary to participate at the oral part of the examination?**

Written Representations

**If you wish to speak at examination, please outline why you consider this to be necessary::**

**2 EXQ2: Moreover please indicate if you wish to continue to be involved in the Local Plan (Please tick appropriate boxes).**

If you wish to be notified at the address/e-mail provided when the Melton Local Plan is submitted to the Secretary of State for Communities & Local Government, If you wish to be notified at the address/e-mail provided when the Inspector's Report is available to view, If you wish to be notified at the address/e-mail provided in Part A when the Melton Local Plan is adopted, If you/your organisation wish to be included in future consultations on the Melton Local Plan

## **Acknowledgement**

**1 I understand the above statement and agree I have complied with its requirements**

I agree