

MELTON BOROUGH COUNCIL DRAFT LOCAL PLAN FOCUSED CHANGES CONSULTATION

Representations on behalf of Featherstones PDD Ltd

**Focused Changes: FC1.3 and FC4
(FC1.3, FC4.1 and FC4.2)**

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1.0 Introduction

- 1.1 These representations to the Melton Borough Council Draft Local Plan Focused Changes consultation are made by Oxalis Planning on behalf of Featherstones PDD Ltd.
- 1.2 Featherstones have land interest at Barkestone Lane in Bottesford. These representations are made in relation to the housing delivery for the Borough and the distribution strategy proposed. They also have specific regard to Bottesford and promote a site for consideration for allocation on land adjacent to Barkestone Lane, Bottesford.
- 1.3 We have previously made representations to the Melton Borough Council Local Plan Pre-Submission Draft Consultation in December 2016 which set out our concerns regarding the Soundness of the Plan and the distribution strategy contained within it.
- 1.4 The Focused Changes consultation acknowledges some of the issues in terms of the numbers set out in the previous consultation document. This Representation Statement has regard to these changes and to the Council's direct response to our concerns set out in the Focused Changes Responses document (Chapter 4). However, our concerns regarding the Plan and the overarching distribution strategy remain unchanged.
- 1.5 These representations are made specifically in relation to Focused Changes **FC1.3 (a proportionate approach) and FC4 (housing site allocations and policies)**.
- 1.6 In summary:
- The distribution strategy will result in an unsustainable pattern of development for the Borough.
 - Bottesford is the most sustainable settlement in the Borough outside of Melton Mowbray and should therefore be a greater focus for growth in accordance with the National Planning Policy Framework's (NPPF's) core planning principles and should be required to accommodate more development than is currently being directed toward the village.
 - Land at Barkestone Lane, Bottesford should be allocated in the Local Plan. The site is extremely well related to the village and can deliver sustainable development. It scores well compared to other sites in the village currently proposed to be allocated and is significantly more sustainable than sites proposed to be allocated in many small villages.
 - The Council should seek to address the shortfall in housing, resulting from persistent under delivery over previous years, within the first five years of the Plan in line with national guidance.

2.0 Distribution of Development

- 2.1 The Focused Changes consultation document is consistent with the previous Draft Local Plan consultation document in directing the majority of development over the Plan period to Melton Mowbray (approximately 65 per cent). The remaining 35 per cent of proposed development is then distributed via site allocations through the Service Centres and Rural Hubs.
- 2.2 As per our previous representations, we agree that it is logical to direct the majority of development to Melton Mowbray, because it is the largest and most sustainable settlement (although we still have concerns regarding delivery which are raised later in this submission). However, following this core principle, it should also be logical and sustainable to direct proportionately more of the remaining 35 per cent to the most sustainable settlements below Melton Mowbray in the hierarchy.
- 2.3 It is disappointing that the Focused Changes have not, however, captured this principle in relation to the rest of the Borough and, as a result, the emerging Local Plan is still unsound. We continue to strongly object to the proposed distribution strategy which should direct proportionately more growth (than simply based on the current population size) to the more sustainable settlements outside of Melton Mowbray, in particular Bottesford.
- 2.4 Although the delivery requirements for all settlements outside of Melton Mowbray have been calculated using the current population size, as the main urban area Melton Mowbray has been allocated disproportionately more development. Its population is a little over half of the total population of the Borough, but it is accommodating 65 per cent of the Borough's growth. We believe that this growth strategy, which reflects the relative sustainability of the settlement should also be applied to the distribution in the rural part of the Borough, most importantly to the most sustainable settlement, Bottesford.
- 2.5 As noted in our previous representations, Bottesford contains the only other secondary school in the Borough (outside of Melton Mowbray) and a wide range of other services and facilities which ensures that it is hub of activity. As such it has the capacity to sustainably accommodate a significantly higher level of housing than is currently being proposed over the Plan period. Bottesford currently contains around 7 per cent of the Borough population. If it were to accommodate 10 per cent of the Borough's growth to reflect its relative sustainability (as is the strategy for Melton Mowbray), that would increase its housing requirement to around 600 dwellings (compared to only 419 as proposed in the Focused Changes consultation).
- 2.6 The principle of directing development to the most sustainable locations is well established and a fundamental element of national planning policy. Clear and compelling evidence would be necessary to justify departure from this approach and there is no such evidence as to why Bottesford, like Melton Mowbray (but on a proportionate scale) should not be a greater focus for growth.
- 2.7 The NPPF is clear that one of the core planning principles is that Local Planning Authorities should:
- “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus development in locations which are or can be made sustainable”* (paragraph 17, NPPF)
- 2.8 The importance of development which makes best use of sustainable modes of transport is reiterated at paragraph 30 of the NPPF which states that:

“Encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion. In preparing Local Plans, local planning authorities should therefore support a pattern of development which, where reasonable to do so, facilitates the use of sustainable modes of transport”

- 2.9 The Local Plan does not accord with these key policies of the NPPF. Despite the Focused Changes included in this consultation through FC1.3 and FC4, the distribution strategy still seeks to distribute development across the Borough, outside of Melton Mowbray, through a strategy based on existing settlement population size. Although the levels of services and facilities is acknowledged, we believe that the distribution strategy must give more weight to the facilities and services which the various settlements contain. Including their connectivity to the wider area (as the Plan appropriately does in relation to Melton Mowbray).
- 2.10 Even with the Focused changes through FC4, the proposed distribution strategy still sees a number of smaller and more isolated villages delivering unsustainable levels of growth. Frisby on the Wreake and Long Clawson are two examples:
- Through the Focused Changes FC4.2 Frisby on the Wreake is still allocated 118 new dwellings (despite the removal of the reserve site), but the village has few services and facilities. For example, it does not have a GP surgery and therefore is reliant on other areas for this vital service.
 - Although reduced from the previous consultation, when looking at the Focused Change FC4.2 document, Long Clawson is still proposed to be allocated 172 units (including reserve site), but again the village has few services and facilities and is relatively isolated with poor public transport provision.
- 2.11 Bottesford has the capacity to accommodate significantly more growth than is currently being directed toward the village. Bottesford contains a wide range of services and facilities including retail, health and dental services. It is well-served in terms of employment and education with a primary school with capacity which is forecast to expand over the coming years and the only secondary school in the Borough outside of Melton Mowbray. It is extremely well connected to the wider area, both through proximity to the strategic road network but, significantly in the context of the NPPF, also in terms of sustainable modes of transport. The village benefits from a train station with services to Nottingham and Grantham and bus services to Grantham and Melton Mowbray. As such, Bottesford is an important hub for the surrounding communities. The Plan should, in accordance with paragraph 17 of the NPPF, focus development here.
- 2.12 Paragraph 4.2.21 contained in Focused Change FC1.3 and replacement Table 4 identifies Bottesford as one of the Service Centres that does not meet its residual requirement for housing, stating that *“not all settlements have sufficient allocation with the capacity to meet their residual requirement”*. The paragraph also states that there is enough surplus in allocations in the remaining Service Centres to cover the shortfall and provide a surplus.
- 2.13 However, we disagree that the burden should be placed on the other Service Centres to meet the housing requirement when Bottesford, as the most sustainable Service Centre, has an additional, suitable and sustainable site available in terms of land adjacent to Barkestone Lane. It is a large site with the ability to deliver housing and open space which would help to ensure that Bottesford meets its housing provision requirement, alleviating the pressure of delivery for some of the other Service Centres. Sub-section 4 below sets out the opportunity available.
- 2.14 We set out the opportunity available at land at Barkestone Lane in our previous representations and it is disappointing to see that it has not been included in the Focused Changes consultation document, despite the fact that Bottesford does not have sufficient allocations to meet its

requirement. Bottesford, as the second most sustainable settlement, should be a focus for growth. The need to focus growth here is reinforced when the lack of services and facilities and accessibility of smaller settlements is considered.

2.15 We still consider that the distribution strategy set out in the Focused Changes consultation for the emerging Local Plan is at odds with the NPPF:

- In order for the Plan to be found sound, the distribution strategy needs to be amended to ensure that development is directed to the most sustainable locations in the Borough.
- It is not justified as the most appropriate strategy when considered against alternatives and is therefore not in accordance with national planning policy and it is not consistent because it does not deliver sustainable development across the Borough.
- In this context, the role played by Bottesford needs to be reviewed and the village should be required to deliver a higher number of dwellings over the Plan period.

3.0 Bottesford

- 3.1 As identified above, it is considered that Bottesford is the most sustainable village in the Borough, outside of Melton Mowbray and should accommodate higher levels of development. As a Service Centre the village is clearly already acknowledged as having an important role to play for the Borough providing services and facilities which support communities beyond the village itself.
- 3.2 In accordance with the NPPF, this should be recognised and the village should be a greater focus for growth. It is well served in terms of employment, retail, health and education. It is also well connected to the wider area with sustainable transport links to Melton Mowbray, Grantham and Nottingham.
- 3.3 In this context it is unsustainable and contrary to the core planning principles that Bottesford is not proposed to be allocated proportionately more development than some of the other more isolated and considerably smaller settlements. Through allocating proportionately more development to Bottesford, the pressure on some of these more isolated communities to deliver new dwellings would be alleviated.
- 3.4 Several villages across the Borough are allocated 'reserve' sites which provide flexibility in terms of development opportunities over the Plan period. However, not only does Bottesford not contain a 'reserve' site, it does not contain sufficient allocations to meet its requirement; we believe that this situation should also be reviewed as part of a new development distribution strategy.
- 3.5 It is considered that further land should be allocated in Bottesford to ensure a balanced approach to delivery, in line with the policies of the NPPF.

4.0 The suitability of land west of Barkestone Lane, Bottesford

- 4.1 The land west of Barkestone Lane presents the opportunity to deliver a significant number of houses toward the Borough's housing requirement, alongside the provision of a substantial area of public open space with footpath links to the surrounding countryside.
- 4.2 The attached Development Framework plans at Appendix 1 and 2 shows the site in context with the village and demonstrates the emerging thoughts on how the site could be developed. It illustrates that a relatively small proportion of the site is currently being proposed for residential development which would enable a significant level of public open space to be delivered which could open up footpath connections to the wider area. The site capacity is likely to be between 150 and 300 dwellings, depending on the overall scale of the site and outcomes from detailed assessment and masterplanning.
- 4.3 The site had not been promoted prior to the previous Pre-Submission Draft Local Plan consultation and it is acknowledged that this creates issues for Plan making. However, simply because a suitable site does not come forward early in the process, does not mean it should be excluded at the expense of less sustainable sites and a less sustainable development strategy.
- 4.4 Although the proposals for the site are in the early stages of their evolution, some preliminary assessment work has been undertaken and this work concludes that there are no environmental factors which would preclude the development of the site.
- 4.5 The site is well related to the village and could create a new defined and defensible south-western boundary to Bottesford which would not extend the limits of the village beyond natural and pre-existing boundaries. The site is also outside of the identified 'Areas of Separation' and consequently would not encroach toward other nearby villages such as Easthorpe to the east of Bottesford or Normanton to the north.
- 4.6 The site also scores highly in terms of overall site assessment. The Council undertook a site assessment for the proposed allocation sites within the various villages at an earlier stage in the Local Plan preparation process. At Appendix 3 we have emulated this approach to illustrate how the Barkestone Lane site compares with other proposed allocations; the conclusions find that the site scores comparatively highly in all aspects of the assessment and compares well to other sites in the village currently being proposed to be allocated. Put simply, it is a better related, more sustainable and more suitable site for development.
- 4.7 In terms of access, the size and form of the landholding offers the potential for the scheme to facilitate the re-opening of the Barkestone Lane A52 junction. It is understood that this could alleviate traffic issues in the village currently caused by the necessity for all school traffic to enter the centre of the village first before travelling along Barkestone Lane.
- 4.8 With regard to flood risk, the wider site lies within Flood Zones 1, 2 and 3 with development proposed on areas within Flood Zones 1 and 2. Preliminary assessment work indicates that flood risk matters can be appropriately mitigated. Indeed, due to the land available and the nature of the flood risk in the area there is the potential for flood alleviation work which could better increase the capacity of the site to accommodate development and deliver major benefits to the area by reducing the risk of flooding elsewhere.

5.0 Housing Numbers and Five Year Housing Land Supply

- 5.1 Included in the Evidence Base for the Focused Changes consultation is an updated Five Year Housing Land Supply and Housing Trajectory Position Statement, which sets out the Council's position as at 30th May 2017.
- 5.2 The emerging Local Plan identifies a minimum housing delivery requirement for Melton Borough of 6,125 new dwellings over the Plan period; this equates to the delivery of 245 new dwellings per annum. However, taking into consideration the completions which have taken place between 2011 and 2017, the residual requirement remaining for the Borough is 5,375 dwellings.
- 5.3 The updated Five Year Housing Land Supply Assessment states that the Council has a 7.7 years' supply of deliverable sites.
- 5.4 However, significantly, as per the previous Assessment, the Five Year Housing Land Supply Assessment identifies that the delivery over recent years has been significantly below 245 dwellings. The table below identifies the significant shortfall in delivery since the start of the Plan period:

Year	Completions
2011/12	157
2012/13	64
2013/14	52
2014/15	78
2015/16	141
2016/17	147
2017/18	111 (estimated)

- 5.5 The Five Year Housing Land Supply Statement recognises that this persistent under delivery requires a 20 per cent buffer to be applied in line with the policies of the NPPF. In our previous representations we identified that this shortfall should be dealt with within the first five years of the Plan period, in line with the Planning Practice Guidance.
- 5.6 In the focused response to this issue the Council stated that the uplift in delivery in order to achieve this would require delivery rates which are almost double those seen in recent years. Therefore the Council consider it unrealistic to 'frontload' the delivery into the first five years of the Plan and will continue in seeking to deliver the shortfall over the whole of the Plan period.
- 5.7 However, we remain of the view that the shortfall of delivery should be addressed as early as possible in the Plan period, i.e. within the first five years. In order to make the emerging Local Plan sound the Council needs to address this issue and ensure that there is a five year supply on adoption which includes the identified shortfall in housing from persistent under delivery. Additional sites should be allocated which are capable of contributing to delivery in the first five years of the Plan.
- 5.8 The allocation of additional land will also help to build flexibility and certainty into the Plan, to help ensure that the identified Objectively Assessed Needs are met in full. The current housing supply calculation is partly based on discussions with landowners and agents regarding the

timescales for delivery of sites, including through Workshops held in December 2016. A wide range of sites have been identified including the challenging Melton Mowbray Sustainable Urban Extensions and various smaller sites in many villages. It is likely that some of these will not be delivered, or that delivery will be delayed. In accordance with the NPPF and advice from the Local Plans Experts Group, consideration of a non-implementation allowance should be factored into the supply calculations. The allocation of additional land would help to address this, as well as the five year land supply situation.

6.0 Conclusions

- 6.1 The Focused Changes consultation does not address our previous concerns regarding the distribution of development in the Borough. As such, the emerging Local Plan is unsound as it does not provide sustainable development and is not justified as the most appropriate strategy considered against reasonable alternatives.
- 6.2 As the most sustainable settlement in the Borough outside of Melton Mowbray, Bottesford should be allocated proportionately more development to help deliver the Borough's housing needs. Bottesford should be allocated to deliver growth following the principles established for Melton Mowbray. The village has the capacity to deliver more than it is currently allocated and should deliver a minimum of 10 per cent of the Borough's housing requirement for the Plan period, which would increase its growth requirement from 419 dwellings to approximately 600.
- 6.3 Bottesford is well connected through sustainable modes of transport to Grantham, Melton Mowbray and Nottingham as well as other villages in the Borough. It contains a primary school and, significantly, the only other secondary school in the Borough outside of Melton Mowbray. It is also well served in terms of services, facilities and employment opportunities.
- 6.4 Land at Barkestone Lane, Bottesford, should be allocated for development. It is acknowledged that the site had not been promoted prior to the previous Draft Local Plan Consultation, but this should not preclude it from being considered for allocation, because it provides a sustainable opportunity to deliver housing in a Service Centre which currently does not contain enough allocations to meet its residual requirement.
- 6.5 The size and form of the site will enable it to deliver both new housing and public open space. The site also presents the opportunity for significant flood risk mitigation which could increase the capacity of the site to accommodate development and reduce flood risk elsewhere.
- 6.6 In terms of housing land supply, it is considered that the persistent under supply from previous years should be dealt with in the first five years of the Plan, in accordance with the Planning Practice Guidance.

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APPENDIX 1

Land at Barkestone Lane, Development Framework (Wider Context) Plan

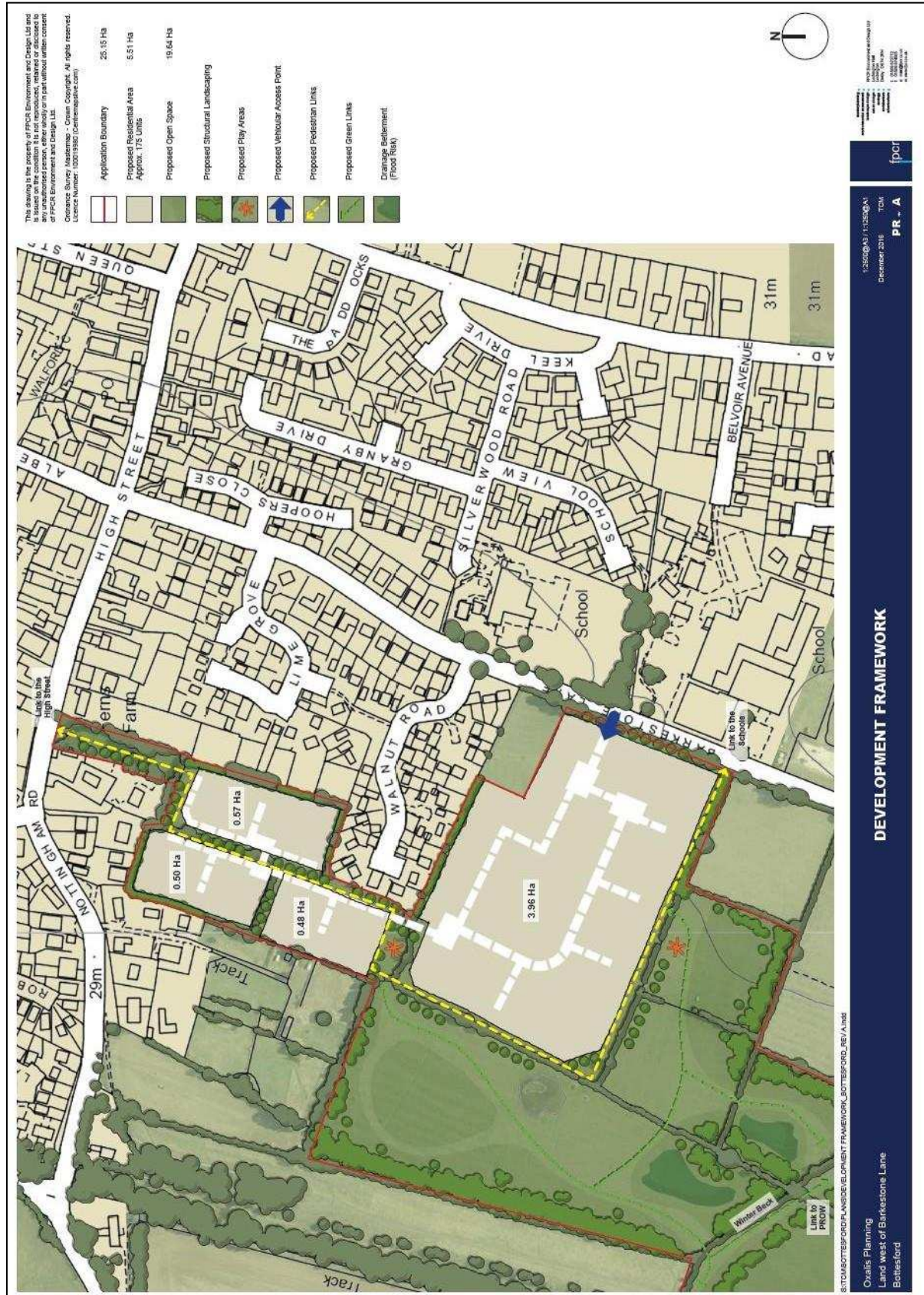
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APPENDIX 2

Land at Barkestone Lane, Development Framework Plan

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APPENDIX 3

Barkestone Lane Site Assessment

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Barkestone Lane, Bottesford – Site Assessment			
Site Details			
Settlement	Bottesford		
SHLAA Ref (if available)	Land adjacent to Barkestone Lane		
Settlement Category (Town/Service Centre/Rural Hub)	Service Centre		
Relevant Planning History	None		
Site Area	Gross Site Area: 25.15 Ha	Net Site Area: 5.51 – 15 Ha	
Site Capacity	Gross Capacity: 150 – 300	Net Capacity: 150 - 300	
Site Assessment			
Planning Merits			
Issue	Comments	Potential Impact: ++ (strong positive); + (positive); 0 (neutral); - (negative); - - (strong negative)	
Meeting identified need	Delivery of market and affordable housing	++	
Relationship/connectivity with host settlement	The site is well related to the existing settlement, its services and facilities. Less than 200m from the village centre which can be accessed via a good quality, established pedestrian and cycle link. Adjacent to both the primary and secondary school. Bus service run regularly through the village giving access to Melton, Bingham and Grantham with train services also going to Nottingham.	++	
Access to services and facilities (by foot ideally 800m)/bicycle (2km) or public transport	The site is to the south west of the centre, within less than 200m distance. The village is served by a regular bus service Monday to Friday	++	

	only.		
Proximity to employment	The site is in close proximity to 2 key employment sites. Within cycling and walking distance of employment opportunities in Bottesford village centre, Winterbeck Industrial Estate, Orson Lane and Longedge Lane and Rectory Lane	++	
Availability of public transport	The no. 24 bus service runs hourly Monday-Friday to Melton Mowbray town centre and Melton train station. The No. 6/X6 Centrebus runs hourly to Grantham Monday to Friday only. Rushcliffe Mainline – Trent Barton runs infrequently to Bingham and Nottingham Monday to Friday only. Bottesford Train Station is managed by East Midlands Trains. There is a regular service running to Nottingham<>Grantham where connections can be made to other cities/places.	++	
Brownfield land	No	--	
Loss of employment or other beneficial use	No.	0	
Site Constraints			
Access/including footpath access	Access to be taken from Barkestone Lane with pedestrian access opportunity to the north onto the High Street. Opportunity to provide additional footpaths linking to existing Public Rights of Way	++	
Major infrastructure requirements (transport schemes etc)	None. Access can be taken from Barkestone Lane, which has sufficient capacity to accommodate the development proposed. Whilst not essential, the scheme has the potential to re-open access from Barkestone Lane onto the A52, using land within the ownership. This could alleviate congestion problems within the village.	++	
Infrastructure capacity (schools/GPs etc)	The GP and Dental Services operate in the village and they have capacity.....? Bottesford Primary school and Bottesford Belvoir High School have capacity	++	

Heritage Assets (SMs, listed buildings, CAs, archaeology)	Listed building within the village to the north of the site. It is not considered that the development of the site would impact on any listed buildings. There are no known other constraints.	+
Flooding/drainage	The village is constrained due to much of it falling within Flood Zones 2 and 3. The site is within Flood Zones 1, 2 and 3 with development proposed in Flood Zones 1 and 2. The size and form of the site means that it has the potential to accommodate flood alleviation work which could increase the capacity of the site to accommodate development and deliver major benefits to the wider area.	+
Biodiversity – SSSI/SAC/LWS/Protected habitats and species	No known constraints. The size and form of the site provides the potential for landscaping and planting which could increase biodiversity and habitat opportunities within the site.	++
TPO/ancient woodland	None	++
Historic Park	None	++
Technical Constraints (contamination/land stability)	None	++
Landscape designation (<i>influence report – designation</i>)	The site falls within a Landscape Character Zone of medium/high importance, but is close to aspects which locally reduce sensitivity including the A52 and schools as well as other built form of the village. The site is outside of any Areas of Separation.	0
Visual Impact	Well related to the existing village and the proposed location for development would have limited visual impact on the village. To the north and east the site is bounded by residential development, with a secondary school also to the east.	++
Agricultural Land Classification	Not known.	0

Noise or other pollutants	None	++
Deliverability Constraints		
Viability	No access or other viability constraints	++
Known market constraints	None. Good market	++
Land ownership constraints	Single owner willing to develop	++
Overall Summary		
<p>Well located to the village with excellent connectivity to the surrounding area. The site presents the opportunity to create new footpath links from the village to existing Public Rights of Way and the surrounding countryside.</p> <p>The size and form of the site enables it to offer significant benefit to the wider area through flood alleviation work which could reduce the risk of flooding elsewhere and through the potential to facilitate the re-opening of the junction from Barkestone Lane onto the A52, which would alleviate traffic issues within the village.</p>		