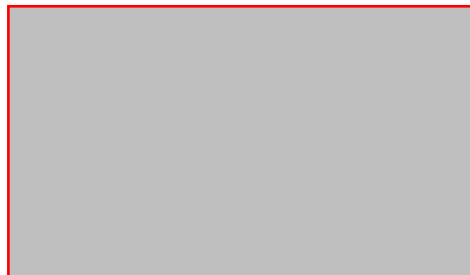


1st August 2017

Mr J Worley
Head of Regulatory Services
Melton Borough Council
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Station Approach
Burton Street
Melton Mowbray
Leicestershire
LE13 1GH

Anthony H Cooper
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Independent Geological Consultant &
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Dear Mr Worley,

Concern that the Melton Local Plan is unsound with respect to Long Clawson site LONG4; (formerly MBC/168/15) and that the views of Historic England have not been considered

The field off Sandpit Lane designated as LONG4 has not been properly assessed and the views of Historic England have not been taken into account. However, the views of the developer have been considered. This makes inclusion of this field in the Local Plan unsound and if not resolved it will be an issue raised with the inspector when the plan goes for examination.

I commented on the Draft Local Plan expressing concerns that with respect to LONG2 and LONG 4 the views of Historic England had not been taken into account. In appendix to item (iv) page 105 you stated *"All heritage assets likely to be affected by any development have been taken into account in the site assessment process"*. Since then LONG2 has been removed from the allocation following the comments from Historic England, but LONG4 is still included.

The LUC Sustainability Appraisal Report prepared for MBC did a tick box assessment of LONG 4 giving the site an amber -? score for Cultural Heritage (page 68 and pages 226-228). This assessment also refers on page 227 to a *further assessment of emerging site* and a downgrading of the ecological assessment from red --? to yellow 0? following a biodiversity assessment for MBC. This appears to be the ecological assessment carried out by the developer as no MBC assessment appears to have been made public. The assessment of this site therefore appears to be influenced by submissions from the developer.

Historic England have replied to MBC objecting to the planning application for this site and to the amber rating given in the LUC Sustainability Appraisal Report. In their letter of February 5th 2016 (their ref P00497592 with respect to Land south of Keystones, Sandpit Lane, Long Clawson) they make several statements contesting the amber rating and the validity of the assertion that development here will not impact on heritage as indicated by the Sustainability Assessment Report.

With respect to the amber rating given in the appraisal report, Historic England say *"Within our soon to be submitted Local Plan consultation response, we will dispute this assertion as it is not considered strong enough in relation to both the limited impacts and the potential for mitigation"* They go on to say *"Development of the site will undoubtedly change its rural character and appearance"* and *"We do not accept that the impact of existing modern development in any way, justifies this proposal. Indeed it will serve to create a cumulative change resulting in greater erosion of the open character of the setting (refer to HE Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets)."*

The letter runs to 5 pages setting out the NPPF position on heritage assets and concludes: *"We are not convinced the available supporting information demonstrates that the degree of harm is justified in terms of potential benefits and we do not agree that the extent of previous development along Sandy lane (sic. this should be Sandpit Lane) provides a precedent or justification for addition housing development in closer proximity to the designated heritage assets. Therefore we believe this proposal represents unjustified harm to heritage assets of great significance."*

The views of Historic England are very clear on this site. It is difficult to understand why this site is still ranked as amber and still included in the housing land allocation, when there is such strong representation from Historic England. Thankfully LONG 2 has been removed from the allocation, but LONG4 which has equally strong heritage arguments has not been removed.

Via the MBC web site on January 19th 2017 I requested confirmation about the representation from Historic England, but James Beverley on January 20th just referred me to online documentation, which did not include anything from Historic England with respect to the Local Plan consultation. Where is the information that Historic England refer to as their "*soon to be submitted local plan consultation*"?

When the planning application was put in for development of LONG4 I raised concerns through the planning system that the surface drainage from this field was the source of water supply for the historic Manor Farmhouse Pond. The developer reassessed the drainage and concurred with my assessment, they then suggested an alternative drainage strategy. I replied to this and local residents also commissioned an independent hydrological survey by Dr Paul Garrad, consultant hydrologist, which also showed that the field is the source of the water feeding the pond. The developers have not shown that the field can be developed without impacting the Manor Farmhouse Pond and have suggested an inadequate proposal. What they suggest threatens the input and quality of water to the pond and they have not considered any downstream effects of flow through the pond. Furthermore, they have not considered the intersection of surface overland drainage (as opposed to roofs and hardstanding which are modelled in SuDS) and how this would impact the pond.

I am greatly concerned that the views of Historic England have not been considered and I am greatly concerned that the hydrology of the field is such that any development will adversely impact on the Manor Farmhouse Pond and the setting of the heritage asset.

The inclusion of LONG4 in the Melton Local Plan is unsound and I am relieved to see that it has been excluded from the emerging Neighbourhood Plan on the grounds of heritage and landscape impact. Please may I ask that Melton Borough Council considers this site in the light of Historic England's views?

I will present this letter, with copies of the Historic England letter, at your Local Plan consultation event in Long Clawson. I will also e-mail it to you and request your response.

Yours sincerely,

A rectangular box with a red border, used to redact the signature of Dr Anthony H. Cooper.

Dr Anthony H. Cooper