

Overview

I wish to object to some of the contents of this Draft Melton Local Plan. This objection relates to the methodology of allocation of houses with particular reference to the Urban-rural split and the distribution of houses in the rural settlements.

As I live in Bottesford the proposals as set out in the Draft Melton Local Plan have a particular significance for me.

If the proposed allocation for Bottesford plus those houses built since 2011 and an element of the windfall construction are taken into account, the total build within the Parish could reach 500 dwellings and increase the size of the Parish by 33%.

The location of Bottesford in relation to Melton and in particular, the flood risk to the Parish seems to have been largely ignored.

I fully accept that an element of house building is necessary and was content with the figure of 300 new dwellings up to 2036. However, this increase to 447 is unacceptable. Reducing the number to that which has been put forward by Melton Borough Council in the Emerging Options, namely a residual requirement of 300 dwellings to be built in the Plan Period to 2036 would be acceptable. This figure is higher than the number allocated to any other village in the Borough. Given the flood risk to the Parish this is a more than reasonable maximum number.

I fully recognise that it is in the interest of Melton Borough Council and all Parish Councils in the Borough that a Local Plan should be successful and the ramifications should it fail. I am not a Planner so I hope you will not think this presumptuous of me but would be happy to discuss the contents of this with you if that would be helpful.

I have looked at each chapter of the Draft Melton Local Plan and comments made where appropriate. There is a lot of good in the Plan and I have made clear where I support the proposals but the area of my objection cannot, on balance, be consoled by those points.

I object to the plan on Soundness alone:

1. Process of Allocating Housing (Soundness)
2. Inadequacy of Consultation (Soundness)
3. Service Inadequacy in Bottesford (Soundness)

Process of allocating housing

The process used in allocating houses across the Borough lacks the strategy that one would expect over a 20 year Plan.

The numbers split between Melton Mowbray and the rural areas seems arbitrary and without foundation. The numbers allocated to Melton Mowbray are inadequate to complete the infrastructure that is required. Additional housing in the town will not only allow the improvement in facilities but will allow MBC to meet their objectives and make the town more competitive with surrounding larger towns. A minimum of 70% of housing development should be in Melton Mowbray town.

The allocation of new homes to each village needs refining and is again largely arbitrary. Villages are classified into *service centres*, *rural hubs* and *rural settlements* on the basis of the simple existence of services regardless of their adequacy. Bottesford has a number of constraints not least Flood Risk and the allocation does not appear to recognise this fact.

The allocation of housing to only 19 of the 74 villages in the Borough without a thorough investigation of the adequacy or utilisation of the facilities is not in line with sustainable development. Moreover allocating such small numbers to windfall developments will be insufficient to fund any improvements to facilities in order to make those locations more sustainable. With extra houses through windfall they will become less sustainable.

In the initial allocation based on population it was discovered that 5 villages did not have enough sites identified in the SHLAA to deliver their allocation. The deficit of 162 homes was reassigned to other villages, again on the basis of population. There is a reserve site at Melton and this should have been considered for use rather than re-allocate to the rural areas which are far less sustainable than Melton Mowbray.

There are reserve sites for over 540 dwellings identified in Policy C1(B) It is unclear why some of these sites should not be used to address any shortfall.

There is certain logic to putting all the rural housing at the larger villages but there is also a need for smaller communities to grow to maintain services, for example, to prevent the loss of a village school. In effect, the process prevents the emergence of new sustainable communities. It must include a recognition that some communities are already near to their optimum size and others could grow more in order to attract more services and facilities.

There is no strategy to minimise car miles by concentrating building at locations closer to Melton Mowbray which is by far the most sustainable location in the Borough. This would also support the plan to provide more employment

opportunities in the area where all the business expansion in the Borough is to take place. Some villages close to Melton have reserve sites which could be used.

In addition, Bottesford is remote from Melton Mowbray, and apart from taxation it contributes little to the Borough's economy. Bottesford residents use Grantham, Bingham, Newark and Nottingham for employment, leisure and retail rather than Melton Mowbray.

Bottesford has seen an increase in the allocated housing of almost 50% from 300 dwellings as the residual amount calculated from the Emerging Options document (January 2016) to a figure of 447 in the November 2016 Draft Melton Local Plan. In addition the numbers on the Rectory Farm site at Bottesford were reduced without real justification and contributed to the increase in the number of sites necessary in the Parish from 2 to 9. (BOT2 and BOT3 are each comprised of two separate sites)

If the 147 additional homes proposed for Bottesford were reallocated to Melton Mowbray Town it would have far less impact on the Borough and would actually help in funding the infrastructure requirements.

There is an error in the population figure for Bottesford. Whereas each of the four villages is considered separately the total population of the Parish has been credited to Bottesford village and this used for the allocation of houses. This is almost an 18% increase in the housing allocation and needs to be rectified.

A number of sites rejected at the Emerging Options stage have reappeared as potential sites spread across Bottesford and Easthorpe. As an example, sites located in Areas of Separation between Bottesford and Easthorpe and Bottesford and Normanton have been proposed for development in the *Draft Plan*. Given the sound principles in the *Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study 2015* these proposals are difficult to understand and I object to the erosion of the Areas of Separation in this way.

The SHLAA process is too coarse to allow villages to grow in a planned way rather by what land is available and deliverable. Greater assessment in terms of village planning needs to be carried out on SHLAA sites and this should be a role for MBC.

I have contributed to the Bottesford Parish Neighbourhood Plan and I know that some of the sites put forward in the DMLP have found little favour in the village. It is a shame that more attention had not been paid in this DMLP to local views and wishes.

I find the above process NOT SOUND

Inadequacy of Consultation

The process of consultation during the development of the *Draft Plan* was lacking or inadequate in the ways listed below.

The Emerging Options (published January 2016) indicated that the residual number of houses allocated to Bottesford was 370 over the Plan period, the residual being 300 new dwellings. When the Draft Plan was published this number was increased to 447 without any consultation.

The *Draft Plan* also allows for windfall developments and these could result in even more homes being built in Bottesford.

There will be no public consultation meeting on the *Draft Plan* scheduled for the Parish during the consultation period. This is totally unacceptable given that Bottesford was allocated the largest number of houses of any village in Melton Borough. Failure to give people a local meeting, to help them understand the reasons for the Plan contents, weakens the consultation process.

Reference Groups met in Melton Mowbray this made it was easier for town residents to be involved in them; was there an adequate check that rural areas of the Borough were adequately represented?

At later meetings of the Reference Groups, Developers and landowners attended and were not required either to identify themselves and/or to declare any financial interest. This is unacceptable. The influence of builder and developer interests was unclear and might have been excessive. There was a Barratts' manager there who had already expressed a particular interest in building at Bottesford and he was even allowed to speak for his table!

The two Bottesford Ward Councillors, one as Chair of the Melton Plan Working Group and the other as Mayor, were unable to represent the views and interests of their constituents. The Working Group Chairman has fervently expressed her desire for more housing in Bottesford, contradicting the views of residents as expressed in responses to the November 2015 Survey/Questionnaire carried out by Bottesford Parish Neighbourhood Plan Steering Group. Bottesford Parish therefore had no objective representation at the Working Group or Full Borough Council. Perhaps that is why Bottesford ended up with so many extra houses.

Paragraph 2.2.3 of the *Draft Plan* states that, for housing, Bottesford relates more closely to Nottingham and Grantham than Melton and Leicestershire. Building at Bottesford is therefore likely to contribute far less to MBCs strategic objectives than places closer to Melton Mowbray.

There are substantial housing developments planned for Bottesford's neighbouring Districts. Both Grantham and Newark have very large schemes near the A1 and Rushcliffe has a large house building program to the west of Bottesford. The reports of meetings with these authorities seem sparse in the supporting information but I would hope that contrary to this adequate consultation **has** taken place otherwise I would have to find this not legally compliant. However on this you have the benefit of the doubt.

I find the consultation process NOT SOUND

Service Inadequacy and constraints in Bottesford.

I find the Draft Melton Local Plan 'Melton Centric'. There is a lot of work identified with infrastructure at Melton Mowbray but when half of the Borough's population live in the villages there appears to have no attempt to identify what facilities are necessary to ease the proposed increase in housing in each of the rural settlements.

Although Bottesford is the second largest settlement in the Borough the sustainability of an enlarged Bottesford is questionable. The possibility of the services in the centre of Bottesford is severely restricted by land availability, the historic street pattern and the Conservation Area. Meeting the needs of an increased population would be difficult in the village centre and I suspect a lot of the new residents would shop elsewhere.

Flooding is the major constraint to development in Bottesford, much of the village being in Environment Agency Flood Zone 3. There was a major flood in 2001. Flooding affects the centre of Bottesford, and has a serious effect on village services. Bottesford is one of the lowest areas of the Borough and has a number of waterways through the villages and is also affected by the two large reservoirs at Knipton and Denton. Paragraph 7.22.3. of the *Draft Plan* states: "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". There are many other sites in Melton Borough with a lower flood risk than Bottesford.

The location of the schools and no direct access from the A52 causes substantial congestion and appreciable pollution from the queued elderly buses at the narrow Barkestone Lane / High St crossroads. This can only get worse with the proposed increase in population, can something be done to alleviate it?

The two Doctors' Surgeries are confirmed as being at full capacity. Both have outgrown their current premises. One surgery does not offer open appointments, and the other has had to restrict the number that can be seen on an open

appointment. In the Emerging Options there were plans for 180 square metres of building space for a GP Surgery. I could not locate this in the DMLP or the supporting information.

Bottesford is predominantly a commuter village with a high proportion of the residents being employed at locations outside of the Parish. Increased population in the village will result in more people travelling to work. This is not consistent with the sustainability objectives of the Plan.

Public transport within the Parish, and connecting the Parish with larger centres, is poor. The train service for Bottesford is inadequate at present, and would not support the level of growth being proposed, being two-hourly for much of the day and no trains in late evening. Other Local Authorities on the Grantham to Nottingham line, which are also required to provide additional homes in their local plans, are in discussion with the rail franchise holder, East Midlands Trains, on improving their service. Has Melton Borough Council undertaken similar discussions to enhance the service for Bottesford, the only station in Leicestershire on this line. The danger is that other communities on the line will get an improved service at the expense of Bottesford, where fewer trains may stop. There is already a reluctance of train operators to permit more trains to stop at Bottesford because of timetabling difficulties.

Bus services are also deficient and would not support the level of growth being proposed; the route to Melton is tortuous and takes so long that it would not be preferred to the car option. Former routes to Bingham, Nottingham and Newark are virtually non-existent. The bus service to Grantham is reasonable, but is limited in the evening and does not run on Sundays. The situation is unlikely to improve because of the unavailability of additional County Council subsidies for rural bus services.

At the public meeting in April 2016 in Bottesford Village Hall, MBC stated that constraints and service issues, absent in *Emerging Options*, would be considered before, and included in the *Draft Plan*. This has not occurred.

Easthorpe, Muston and Normanton do not have the retail and other facilities to support sustainable housing development.

I find the process NOT SOUND

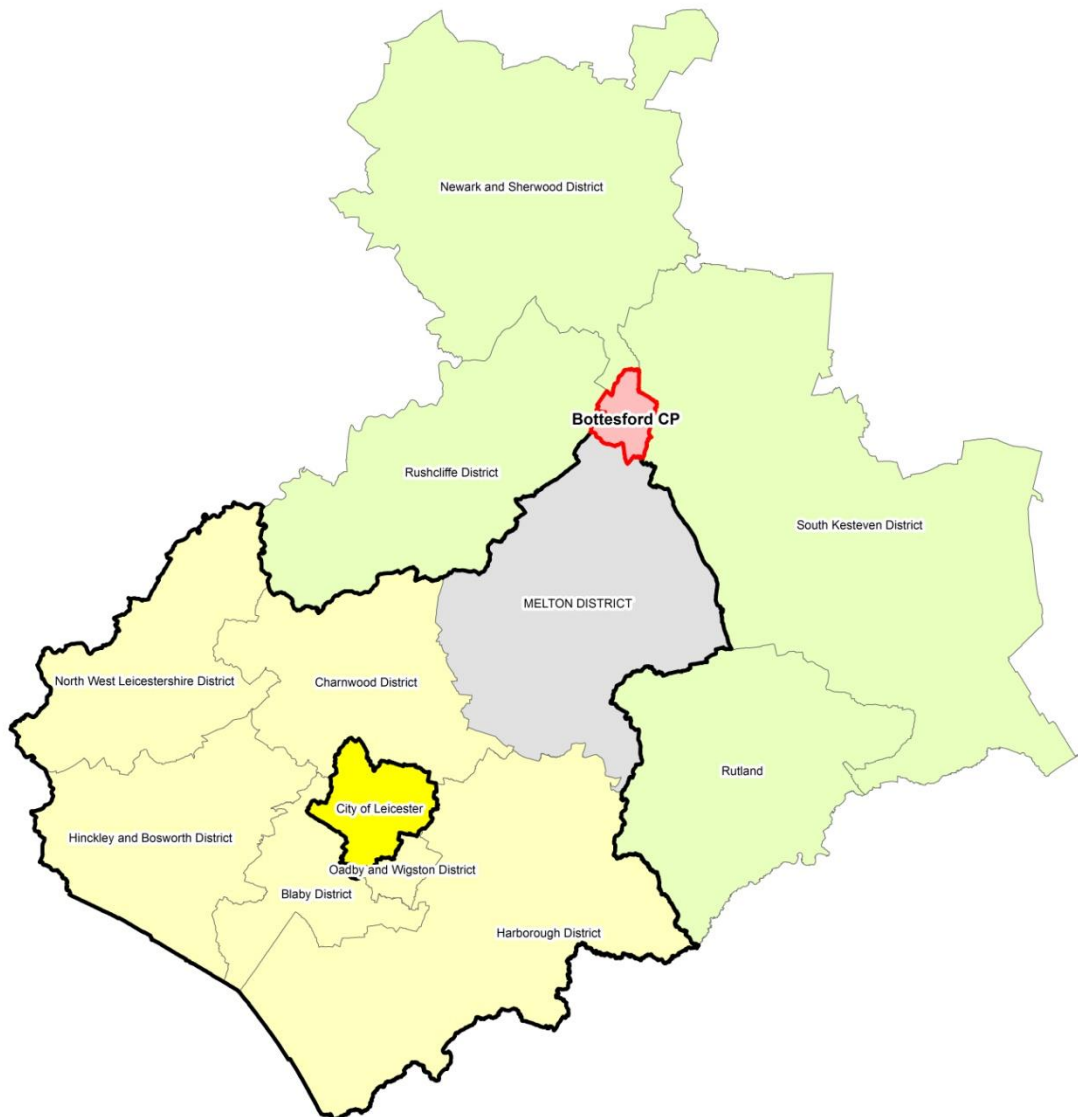
Chapter 1: Introduction

The contents of this chapter are mainly factual as would be expected and set out the background to the Draft Melton Local Plan in a clear manner.

Within the Borough Bottesford is the Parish furthest from Melton Mowbray sitting on a salient that has South Kesteven to the East and forming the parish's longest boundary, Rushcliffe to the west and Newark and Sherwood to the north. The plans for these Districts have a substantial impact on Bottesford and it is crucial that the Duty to Cooperate is undertaken fully to understand the implications of the development in those areas in relation to those planned for Bottesford. It is known that there are substantial house building programs in each of these Districts much of it in towns that are far more sustainable than Bottesford.

1.10.2 Indicates that '*Melton Borough forms part of the Leicestershire and Leicester Housing Market Area*' and this is reinforced by Fig 3 in the DMLP. However The *Leicestershire and Leicester Strategic Housing Market Assessment* in the Evidence Base for the Plan places Bottesford in the Nottingham Strategic Housing Market Area.

This indicates that while Bottesford is clearly in Leicestershire and Melton Borough, the remoteness of Bottesford Parish to Melton Mowbray means that the contribution that can be made to the Melton Borough objectives will be limited.



Scale (A4):
1:500,000



Melton Borough Council License Number 100019651 [2015].
Contains Ordnance Survey data © Crown copyright and database rights [2015].

Chapter 2: Melton Borough Today - A Portrait

This is a factual chapter and I broadly supported the content. In 2.2.1 it gives the numbers of houses in each category, it indicates a substantial shortage of properties available for those that cannot afford to buy and the need for good quality dwellings available for rent.

The balance of housing type suggests that affordable housing should be a priority in early years of the plan if this Strategic Objective (Housing Objective 1) is to be addressed effectively.

2.2.3 Melton Borough is located within the Leicester and Leicestershire Housing Market Area..... However, parts of the area, e.g. ... Bottesfordrelate more closely to Nottingham and Grantham.

Again, while Bottesford is clearly in Melton Borough, the remoteness of Bottesford Parish to Melton Mowbray means that the contribution that can be made in assisting the achievement of the Strategic Objectives will be limited.

2.3.1 Melton Mowbray is the main service and employment centre.business start-ups are increasing, particularly in the rural parts of the Borough, where a growing trend for home working is matched with an attractive environment.

These smaller villages should be encouraged to grow and be more 'sustainable' so that residents would not require daily transport or retail facilities.

Home working, internet shopping and communication can alter the idea of sustainable locations particularly in relation to smaller villages, housing choice is relevant here, people would not choose to live where access to facilities might be a problem.

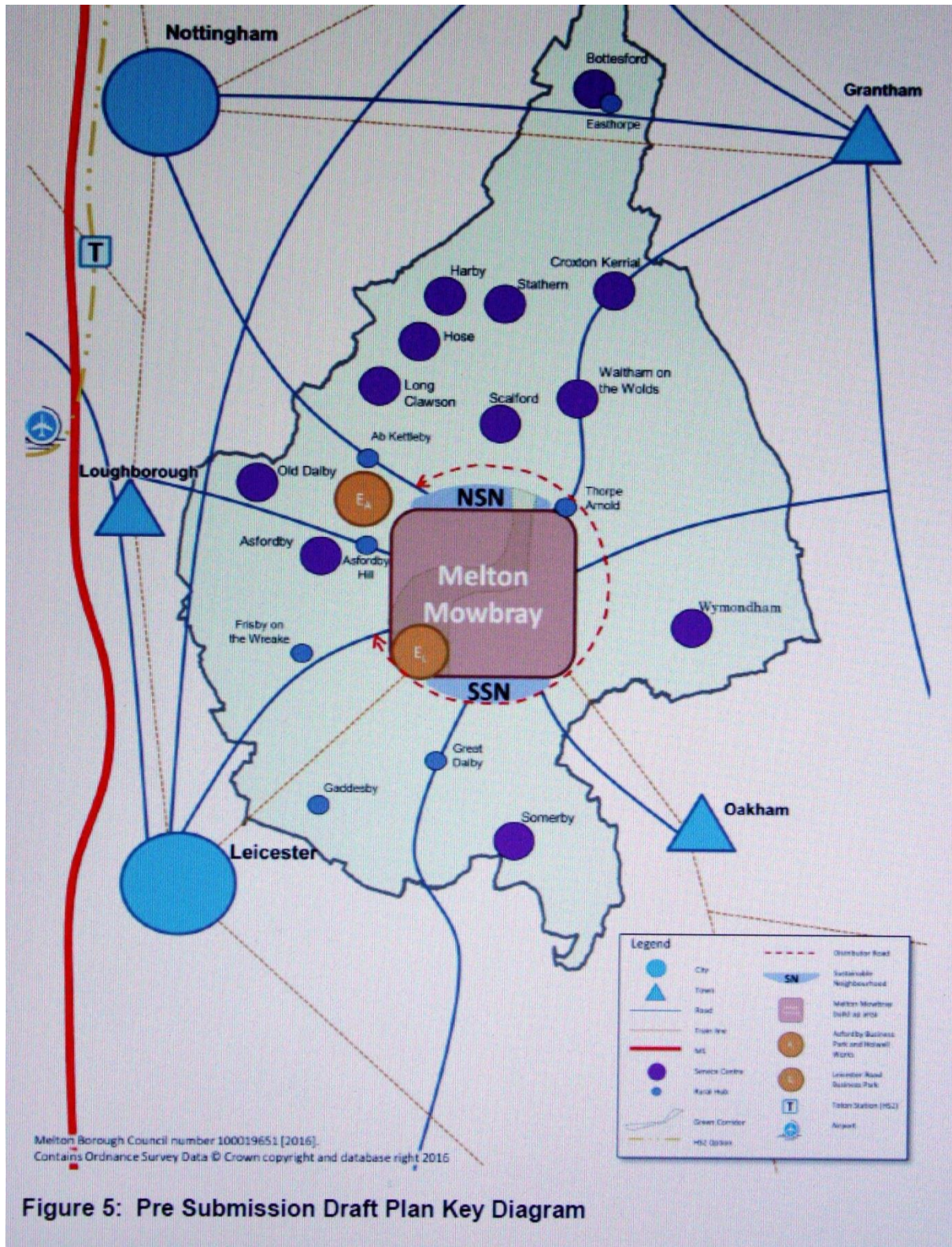
With CIL groups of small villages could pool the funds to provide needed facilities or infrastructure to improve their sustainability.

2.3.2This gap in skills reflects the relatively low skilled jobs that are available in the town and represents a significant challenge for the economy, particularly in providing a labour force to service industry.

Need for development at Melton Mowbray to attract a wider range of businesses as in Chapter 6. Need for suitable housing in and around Melton Mowbray for employees.

In 2.3.5 Outside Melton Mowbray, Asfordby, Bottesford, Long Clawson and Waltham on the Wolds act as the local service centres, although other larger villages, particularly to the south of the Borough, also perform a similar role.

Looking at Fig 5 the map shows the number of other Service Centres that are closer to Melton Mowbray, these settlements are smaller than Bottesford and should be considered for expansion to improve their facilities.



2.4 Accessibility and Transport

2.4.1 Bottesford station is on the Nottingham to Skegness line, with a good connection to Grantham.

Bottesford is the only Leicestershire station on this line and Parish Councils in other towns along the line are actively negotiating for a better service. If there is no action from Melton Borough Council on this matter their so called 'good connection to Grantham' may become history

2.4.2 Peak hour traffic flows at key junctions and sections of road in and around the Town Centre are at capacity.

This is clearly a need for sufficient development in Melton Mowbray to fund the complete ring road and suitable connections. This is identified as a Strategic Issue and a Strategic Objective yet the number of new houses planned for Melton Mowbray may be sufficient to support this objective and Government funding will be required to complete the scheme.

2.6.1 there are pockets of deprivation, particularly in and around Melton Mowbray.

Need for good quality, rented housing as identified in 2.2.2 Suitable employment in and around Melton Mowbray requires a range of housing types.

2.6.2 ...This suggests that younger people are migrating out of the Borough for higher education opportunities and employment, and there may be an inward migration of older people seeking retirement homes.

This is further evidence for enlarging Melton Mowbray and improving the quality and quantity of employment in and around the town. Only by improving the quality of the employment offer will entice graduates and other qualified and skilled people back to Melton Mowbray for appropriate jobs and attractive salaries.

Older people will always migrate towards towns with conveniently placed services.

2.6.5 The Borough is served by 10 GP surgeries located in the town and larger villages. Secondary schools are located in Melton Mowbray and Bottesford and 19 villages have a primary school.

Part of the strategy should be to work with **Leicestershire CC Education Department** to improve the capacity of existing and consider new school locations to support sustainability (Objectives 5,12 and 13)

2.6.6 The hospital at Melton Mowbray has maternity facilities as well as a ward that provides general rehabilitation and palliative care. There is both a leisure centre with a swimming pool and a sports village in Melton Mowbray, and there are two libraries, one in Melton Mowbray and another in Bottesford.

Most services are at Melton Mowbray and are remote from Bottesford, Maternity services at Melton are under threat as is the A and E Dept at Grantham.

The 'Community' library at Bottesford is only there through voluntary help and on a reducing funding support from Leicestershire C.C.

2.6.10 Facilities at Melton Mowbray are remote from Bottesford and the attractions to the west, east and north of Bottesford are more convenient.

2.7 Environment

2.7.3 Melton Mowbray is situated in the centre of the Borough and is a large, well contained market town on rising ground above the Wreake Valley.

2.7.4 ...*The main waterway is the Grantham Canal.*

The canal and the associated reservoirs present a substantial flood risk to Bottesford Parish.

2.7.5 Bottesford was seriously flooded in 2001 and received a further Environment Agency Flood Warning in 2012

Chapter 3: Vision and Strategic Priorities

3.1.2 Given that Reference Groups met in Melton Mowbray, it was easier for town residents to be involved in them; there is therefore no guarantee that rural areas of the Borough were adequately represented.

At later meetings of the Reference Groups, representatives of commercial concerns were not required either to identify themselves and/or to declare any financial interest. This is not what is now considered to be good conduct, and is unacceptable. The influence of builder and developer interests was unclear and possibly excessive.

Strategic Objectives

Housing Objectives

1. Help provide a stock of housing accommodation that meets the needs of the community, including the need for affordable housing

Prioritise affordable housing and Local Authority housing for rent. Again suitable housing should be prioritised where there is adequate and appropriate employment.

2. Develop a housing stock to provide for the future aspirations for the local Economy

There is an existing high proportion (41%) of detached houses in the Borough which if released by providing well-designed and well located housing for people wishing to downsize could provide the basis for this objective. Furthermore building good quality, freehold homes for the elderly/empty nesters will encourage them to release family homes.

Again suitable housing should be prioritised where there is adequate and appropriate employment. The existing balance of housing types suggests that affordable housing should be a priority in the early years of the Plan along with supplying the identified need for higher paid work in the Borough

Jobs and Prosperity Objectives

3. Enhance the vitality and viability of Melton Mowbray town centre

Prioritise development in and around Melton Mowbray to successfully compete with larger neighbouring towns. All the surrounding towns are much larger than Melton Mowbray and Loughborough has an appreciable Industrial and Technology based heritage.

4. Provide sufficient land to meet current and future employment needs

The proposals for this are good but all of the expansion is in and around Melton Mowbray so this is where the future expanded employee housing should be located.

5. Help regenerate the rural economy

The nature of the distribution of houses will not permit most of the settlements in the Borough to become more sustainable and able to contribute to this objective.

6. Promote the tourism potential of the Borough through its food, equestrianism and heritage assets creating a Melton Borough "brand" Supported

7. Create a mixed economy with increased knowledge-based jobs and wages

Again suitable housing should be prioritised where there is employment and where future employment is planned. It is clear that most of the employment will be in and around Melton Mowbray and for maximum sustainability new housing should be near employment.

8. Provide better training opportunities and increase educational attainment Supported

Accessibility and Transport Objectives

9. Reduce the need to travel by car and improve access to public transport Public Transport

In the rural areas Public Transport is poor, slow and inconvenient which means that many journeys are made by car.

Lack of support by Leicester County Council leads to situations where, for example, the bus from Bingham (which provides a connection to Nottingham) terminates in Orston, the adjacent village to Bottesford but it is in Nottinghamshire. There is no support for it to travel the extra mile or so into Bottesford, a much bigger village and a potential good source of custom. The lack of a bus to Bingham and with a connection on to Nottingham is a regular complaint from Bottesford residents.

10. Reduce traffic congestion in Melton Mowbray.

Funding from adequate development in and around Melton Mowbray is necessary to secure road infrastructure improvements. The previous Local Plan suggested 80% development at Melton Mowbray. It should be higher than the current 65% to secure the necessary funds and avoid the need for Government funding to complete the scheme.

Safety and Protection Objectives

11. To improve community safety, reduce crime and the fear of crime

Supported

Community Development Objectives

12. Improve access to services and facilities, including health, schools, social care, jobs, recreation, sport and education, broadband.

This is clearly planned to occur in Melton Mowbray but the pattern of housing allocation in the rural areas will not support this aim.

13. Promote sustainable communities

The pattern of housing allocation in the rural areas will not support this objective neither will it allow new sustainable communities to be formed.

14. Improve facilities for all the community

This is clearly planned to occur in Melton Mowbray but the pattern of housing allocation in the rural areas will not help to achieve this objective.

15. Improve the health of the Borough and reduce health inequalities within the community.

Supported

Environment Objectives

16. Promote high quality and innovative design which is visually attractive, reflects local context and distinctiveness, and, contributes to a safe and accessible environment, to make places better for people

Supported

17. Conserve the historic environment and Melton Borough's heritage assets

Supported

18. Protect the rural character of the Borough

Supported

19. Reduce the risk of flooding and avoid development in areas prone to Flooding

Issue - Flooding There is a significant flood risk in some areas of the Borough. This arises from fluvial flooding, run-off from hillsides, groundwater flooding, flooding of sewers and drains and blockages to artificial drainage systems.

Unless this can be mitigated viably, this will act as a significant constraint on new development.

Bottesford has been identified as the most low-lying area in Leicestershire and thus a High Risk area having already experienced serious flooding in 2001 which affected Bottesford, Muston and Easthorpe. Belvoir Rd and the retail and service centre of Bottesford was particularly affected. There was a further Environment Agency Flood Warning in 2012.

20. Protect and enhance the natural environment and biodiversity

Supported

21. Reduce pollution

Supported.

At school start and finish times there is heavy pollution from school buses standing, waiting to turn at the Barkestone Lane / High St crossroads

22. Protect and manage the use of natural resources and mitigate activities that cause their loss or degradation

Supported

23. Prepare for, limit, and adapt to climate change and promote low carbon development

Supported

24. Minimise the use of energy and promote forms of renewable energy in the correct locations

Supported in Principle

25. Ensure that the reuse and recycling of waste is maximised

Supported

Adequate recycling centres to reduce car journeys and minimise inappropriate disposal of waste. See 8.9.1

Chapter 4: Growing Melton Borough – The Spatial Strategy

Policy SS1 - Presumption in favour of Sustainable Development

The adoption of a policy such as this makes it imperative that the proposals in the MLP are correct at the outset.

The *Leicester and Leicestershire Strategic Housing Market Assessment, June 2014* table 85 p186 showed a range of possible housing needs for Melton Borough of between 195 and 245 homes per year (4875 and 6125 respectively over the Plan period). The Plan, in 4.2.1, claims that the higher build rate was 'objectively assessed' to cover maximum growth. This decision was at a time when adequate land for building at this rate and meeting the 5 year land supply target was not available. The figure of 6125 over the plan period is a maximum at the moment but could have been reduced for the first 5 years so that there was a reduced 5 year land supply figure until there was some clarity about development sites, their constraints and deliverability.

Policy SS2 – Development Strategy

This is not supported.

The system is not evidenced based and appears to be purely arbitrary. The 65% 35% split of the 6125 houses, to be delivered up to 2036, is discussed in connection with a 70-30 split in 4.2.11 but then appears as 65-35 in Policy SS2. A higher ratio than 65-35 would give more funding support to the Melton Mowbray ring road. In addition the additional houses would benefit Melton Mowbray far more than splitting the balance across the rural settlements that are clearly less sustainable than Melton Mowbray.

The population of Melton Mowbray is approximately 25000 (25K), making it relatively small compared to surrounding towns and cities, for example, Loughborough (57K), Grantham (41K), Nottingham (306K) and Leicester (330K). Expansion of the town will enable it to compete more effectively with these centres and better able to meet the set strategic objectives.

The 'windfall' site strategy seems equally arbitrary and while the Rural area takes 322 houses there is no limit on the numbers that can be allocated at any given settlement. The numbers of dwellings are given for developments on unallocated sites- Service Centres (10), Rural Hubs(5) and Rural settlements (3)

Policy SS3 states...where it has been demonstrated that the proposal enhances the sustainability of the settlement(s) to which it relates and, through repeated application, will not result in a level or distribution of development that is inconsistent with the development strategy.

How will 3, 5 or even 10 dwellings enhance the sustainability of a settlement and how many times could this be repeated before it failed to be consistent with the strategy?

SS3 - Sustainable Communities. (unallocated sites)

This is not supported

SS3 is titled Sustainable Communities but these windfall house numbers are for sites that have been deemed unsustainable and have no allocation

In addition to the issues on the Windfall strategy covered under Policy SS2 the numbers permitted in any one development do not allow for an element of affordable dwellings to be expected, that is, unless they are specified. For an element of affordable properties a development of 11 dwellings minimum is cited in Policy C4.

If the allocations were increased to 11, a limit on windfall house numbers could be set for each village for the plan period? This increase in numbers would not enhance the sustainability of a community but there would be more housing choice and it would help to address the shortfall in affordable housing in the Borough, which is a key objective.

There are clear statements throughout the document that growth in villages so that they can become more sustainable is supported by MBC, for example 4.2.6 and

4.2.11... but that this should not be at the expense of allowing some of the Borough's villages to grow, to become more sustainable and add to housing choice and delivery opportunities.

Whereas the settlement classification is understandable and may be considered 'fair' (4.2.15) the allocation of houses thereafter is unreasonable and illogical. Of the 74 settlements across the Borough, 55 have no housing allocation whatsoever. The bulk of the house numbers are then allocated on the basis of current population, there is no assessment of any relevant constraints that might limit the use of the settlement, and one such in Bottesford's case is flood risk.

Neither does it consider the adequacy of current facilities at any location.

By choosing this route large villages will become larger and smaller villages will still be unsustainable but may have more houses from windfall making them even more unsustainable. The quantities of houses permitted will not support improvements in facilities. Over the 20 year period Bottesford will still be the largest village and due to its location and transport links will be of little support to Melton Mowbray except as a source of taxation. It is difficult to identify the strategy here.

By taking those 55 settlements out of any allocation Melton Borough Council have actually limited their chance to grow and given up any chance of applying

an overall strategy to the Borough. This would seem to go against 4.2.6 and 4.2.11.

4.2.21 Out of 74 settlements 19 are identified for allocations, of these 5 cannot meet those allocations with land that is available. Rather than overload communities, use some of the identified reserve land. Using the 240 reserve at Melton Mowbray will have far less impact on the town than the method used in the rural areas and that is without the use of the 1000 house strategic reserve which could be phased in as necessary to balance any shortfalls elsewhere. Building more at Melton Mowbray will enable more funding to be directed towards the necessary infrastructure and will be far more sustainable. Expansion of the town will enable it compete more effectively with the larger towns and cities and better able to meet the set strategic objectives.

2.1.2 of the DMLP states

...there are some 70 attractive villages spread across all parts of the Borough...

The village list given in Appendix 2 of the Emerging Options document shows 74 villages in the Borough and this figure has been used above.

Tables 4 and 6 both give a population figure of 3525 for Bottesford. This figure is the total for the Parish and includes the residents of Easthorpe, Muston and Normanton, each of these settlements is considered separately in the Plan. It is evident that the figure for Bottesford, on which the allocation and redistribution was based is some 18% too high.

This needs to be corrected and the allocations adjusted.

Bottesford, which has a substantial flood problem, is allocated an increase in house numbers far larger than any other rural centre in the Borough.

SHLAA Sites in Bottesford Parish

BOT1

This site already has planning consent and is probably about 50% complete. The design and density of the built space is poor and out of keeping with the village, The SuDS scheme lacks amenity value and the route to the outflow on the Winterbeck has increased the flood risk to Belvoir road and the village centre. I hope that the positive policies included in this document prevent such a development ever being repeated.

BOT2

The selection of the Daybell's Barns site which provides housing in the centre of the village I would also support. The intention is that some properties suitable for the elderly/disabled would be included in the development.

The adjacent site to the Daybells site I would accept if it was found to be as

flood resistant as the Daybells site has proved to be and the development was in line with the anticipated quality design of the Daybells proposal.

BOT3.

Potential Reserve site

This site is a long way from the village centre and there are no current, convenient footpaths. The distance outside the village centre would encourage car use. The Clay Pits site could be considered a reserve with a low density house model offset by a reduced affordable housing ratio. The low density and effective green screening would match adjacent housing and be appropriate for the outskirts of the village. I reject the adjacent site unless this could also be of low density.

BOT4

Rectory Farm Supported

The use of the full Rectory Farm site will facilitate good connectivity with the village centre through cycle and footpaths and enable the provision of much needed parking space for the Methodist Church.

It will also provide a publicly accessible green corridor along the north bank of the River Devon which links through Devon Lane to a riverbank path from St. Mary's Church to the bridge at Grantham Rd.

Use of the full site area will be more viable than the reduced site, as proposed by MBC, it will therefore be more likely to adhere to the excellent DMLP D1 "Raising the Standard of design" criteria.

The site is well contained.

I believe this reduction in housing numbers to 150 is unjustified and although strip of land has been sold to an adjacent factory there is still space for approximately 200 houses.

BOT5

I reject this site.

This site is outside a natural boundary to the village and in an Area of Separation.

It is on the approach to the village and would have a detrimental effect on the view of St Marys Church (the Lady of the Vale) from the Beacon. The land appears to be good quality arable land and is always under crops.

EAST1

I would reject this site but I believe that consent may already have been given.

EAST2

I reject this site.

Although Easthorpe is deemed a Rural Hub this site in conjunction with EAST1 is too great an expansion of Easthorpe. The site is on the Area of Separation and is partially affected by a flood zone. Easthorpe is prone to external flooding from local watercourses and building here could impact on adjacent properties. Flood

Zone 3 covers the entire western boundary of the site and the site proper shows that FZ 2 and 3 cover 50% of the site.

Church Lane, Muston

Supported

This site is on the SHLAA list but not included in the site options in the DMLP presumably because it exceeds the planned numbers for Rural Settlements (3 houses). From initial drawings this shows a development of 10 houses in a near linear arrangement matching the existing properties. On the basis that the drawing reflected the intended build this would be a good option. There is a possibility of increasing it to 11 and gaining some affordables which might be useful in this rural settlement.

An element of windfall development will complete Bottesford's requirement to meet the target of 300 dwellings set in the Emerging Options document.

I reject the other sites that were rejected by MBC in the Emerging Options and now in the DMLP.

I support the *Melton Borough Areas of Separation, Settlement Fringe Sensitivity and Local Green Space study 2015*.

Policy SS4 – South Melton Mowbray Sustainable Neighbourhood (Strategic Development Location)

Supported

This clearly has all the advantages and is with the North scheme the most sustainable in the Borough. It ticks all the boxes, opportunity for living and working in the same area, public transport and walking and cycling routes. It also funds a great deal of the necessary infrastructure.

Policy SS5 – Melton Mowbray North Sustainable Neighbourhood

Supported

This also clearly has all the advantages and is with the South scheme the most sustainable in the Borough. It ticks all the boxes opportunity for living and working in the same area public transport and walking and cycling routes. It also funds a great deal of the necessary infrastructure.

Policy SS6 – Alternative Development Strategies and Local Plan Review

Broadly supported subject to further definitive information.

Chapter 5: Melton's Communities – Strong, Healthy and Vibrant

5.4 Housing Allocations

5.4.1 In accordance with Policy SS2 – Development Strategy the Local Plan will allocate a range of sites for development across the Borough.

The current sites in Bottesford are unacceptable in number and many not acceptable in location. The number of houses allocated to Bottesford Parish is in excess of the sites available. The number of potential sites has gone from 2 to 9 in less than a year since the Emerging Options. (BOT2 and BOT3 are each comprised of two separate sites)

5.4.2 To identify the preferred housing sites, the Council carried out a systematic assessment of a wide range of potential housing development options which were mostly identified through the Council's Strategic Housing Land Availability Assessment (SHLAA)...

This might be the recognised way of obtaining development land but it does not necessarily deliver the best locations in terms of town or village planning. The reasons for landowners or developers putting land into the SHLAA are rarely because they will be ideal sites to expand a settlement. There needs to be more MBC input in planning even if that means an independent survey.

5.4.3 The assessments have provided the site options available to meet the housing requirement for each location. The assessment ranks sites according to their suitability, with availability and possible alternatives also being taken into account. This has had a role in the 'redistribution' exercise (i.e. making provision where a location has insufficient sites).

The population figure for Bottesford is the total for the Parish and includes the residents of Easthorpe, Muston and Normanton, each of these settlements are considered separately in the Plan. It is evident that the figure for Bottesford, on which the allocation and redistribution was based is some 18% too high.

This needs to be corrected and the allocations adjusted.

5.4.5 The Council needs to demonstrate that the plan will deliver a rolling five year housing land supply and that this supply is deliverable and realistic. In order to demonstrate a 5 year land supply, the sites have been identified taking into account their deliverability.

5.4.7 ...The Plan therefore includes 'reserve sites' to offer this flexibility and additional resilience.

5.4.8 It is proposed to include 'reserve sites' in the Plan to offer this flexibility and additional resilience.

Why not use the reserve sites to get an initial lead on house building with the aim for other sites to come on stream later in the plan period

Policy C1 (B): Reserve Sites

There are over 540 houses potentially identified on reserve sites including 240 at Melton Mowbray. Sites for Large numbers of potential dwellings are being sat on while some locations are 'overwhelmed'. The 162 dwellings, re allocated due to lack of sites in some villages, could be located on the Melton Mowbray reserve site with far less impact than in the rural areas. This would also increase the funds to support the Melton Mowbray ring road

5.5 Housing Mix

5.5.1 Melton has a very distinctive mix of housing, with few smaller 'entry level' properties such as terraced houses or flats and a large proportion (40%) of larger, detached houses.

5.5.2 A limited offer in terms of housing mix has implications for affordability and demand for affordable housing.

The windfall housing numbers, 10 for Service Centres, 5 for Rural Hubs and 3 for Rural Settlements are insufficient to provide an element of affordable housing as the minimum house number for this is 11 dwellings. (Policy C4) Whereas Service Centres will get affordable housing through larger developments and Rural Hubs may also benefit from housing in the adjacent Service Centres, Rural Settlements will not have any affordable housing unless it is specified and shown to be viable. The numbers of houses in windfall developments should be increased to ensure an element of affordable housing and a ceiling placed on development within the plan period so that the smaller settlements are not overwhelmed.

5.5.3 Furthermore, Melton has an ageing population, (over the 2011-36 period the number of people aged 65 and over is projected to increase by 92% with a higher (192%) increase in the number of people aged 85 and over), with many households residing in large and potentially unsuitable properties, increasing the need to provide smaller homes suitable for downsizing households. This in turn would release existing family housing stock back into the market.

Houses for the elderly and empty nesters need to be freehold and in a range of sizes to suit all needs. If only small houses/bungalows are provided, house blocking will occur.

5.5.4 The Local Plan aims to ensure that the new housing provided in the Borough over the next 20 years best meets the changing needs of the population. An appropriate mix of housing is necessary to secure mixed and balanced communities where people's needs and aspirations for new housing are met. The policy seeks to provide greater choice in the housing market. The allocation method results in 51 out of the 70 villages in the Borough having no housing allocation and relying on windfall alone.

How will this give location housing choice?

The numbers permitted in the smaller locations do not allow for affordable housing, how will this give an appropriate mix of housing?

5.5.5 To offer a mix of housing suitable for a wide variety of housing needs and to balance the current stock, the Melton Local Plan will encourage a mix of property types on developments of 10 or more dwellings.

As mentioned above the small settlements with only 3 or 5 house developments permitted, as proposed, will not meet this requirement.

5.5.6 Melton Borough Council's Housing Needs Study which examines the housing needs of the Borough at a detailed ward level, shows that the greatest need for both market and affordable housing is for two and three bedroom houses and bungalows. The low proportion of smaller homes currently available in the Borough makes it difficult for older people who want to downsize, those on low incomes and benefits, and younger people who want to find their first home. There is still a need for some medium and larger family homes, although we expect to see less of these types of homes than in the past. We also need to ensure that the design of new houses addresses the different needs of people in our community, including older people and those with disabilities.

The Housing Needs Study for different wards should be reflected in the housing proposed for those areas. For example Bottesford tends to command higher house prices than much of the Borough and given the generally low paid employment opportunities in the Parish there is a higher need for both affordable housing and smaller open market dwellings for first time buyers. This was reflected in the HNS for Bottesford.

Policy C2 – Housing Mix

Supported in Principle – subject to comments above

Policy C3 – National Space Standard and Smaller Dwellings

Supported

Policy C4 – Affordable Housing Provision

All the small developments permitted off-plan will not provide affordable housing so there will be no affordable housing in the smaller villages, where the maximum development is 5 or 3 houses, unless specifically requested. Given the clear and identified urgent need for affordable housing this should be brought forward on individual development schemes as soon as possible and methods identified that permit this to happen. Deferring the affordable housing where there is a specific requirement (5.8.16) should be avoided wherever possible.

5.9 Rural Exception Sites

Supported

Policy C5 – Affordable Housing through Rural Exception Sites

Supported

Policy C6 – Gypsies and Travellers

Supported

Policy C7 – Rural Services

Supported.

Policy C8 – Self Build and Custom Build Housing

Supported.

Policy C9 – Healthy Communities

Supported

Chapter 6: Melton's Economy – Strong and Competitive

Policy EC1 – Employment Growth in Melton Mowbray

Supported

Most businesses will be in Melton Mowbray

For sustainability most housing should be in Melton Mowbray as it is the 'main economic centre for the Borough' (6.1.1, 6.8.1, 6.15.1)

Some employees will choose to live in the Satellite villages around Melton Mowbray which given their proximity to the town's facilities may not require a large increase in services and retail to become sustainable.

In 6.8.1 *The Spatial Strategy seeks to use new development to enhance Melton Mowbray's local and sub-regional role but also allows villages to develop sustainably.*

This statement should be altered to '*but also allows **the larger** villages to develop sustainably.*

There is nothing in the strategy that allows all or even most villages to develop sustainably. This is unfortunate as some villages or groups of villages may wish to gain some additional facilities.

Policy EC2 – Employment Growth in the Rural Area (Outside Melton Mowbray)

Supported

The same principles apply in rural locations as in Melton Mowbray. The jobs available must be met by suitable housing and the available employment must be suitable for most of the working age population if travel, particularly by car, is to be avoided.

In Bottesford most of the work available is semi-skilled or unskilled. Much of the working population of Bottesford is professional, qualified or skilled and so many work outside the Parish and indeed outside of Leicestershire. The public transport system is inadequate and most people opt to use a car for work. So although Bottesford might approach sustainability in its services it fails on the matter of sufficient employment of the right type and travel.

Policy EC3 – Existing Employment Sites

Supported

Policy EC4 – Other Employment and Mixed-use Proposals

Supported

Policy EC5 – Melton Mowbray Town Centre

Supported

Policy EC6 – Primary Shopping Frontages

Supported

Policy EC7 – Retail Development in the Borough

Supported

In the case of Bottesford this is severely limited, there being no spare plots and the retail offer is within the Heritage area

Policy EC8 – Sustainable Tourism

Supported

Chapter 7:

Melton Borough's Environment –Protected and Enhanced

Policy EN1 – Landscape

Supported

Policy EN2 – Biodiversity and Geodiversity

Supported

Policy EN3 – The Melton Green Infrastructure Network

Supported

Policy EN4 – Areas of Separation

This policy is strongly supported as it provides the vehicle to protect areas between settlements. It was very disappointing to see in the Draft Melton Local Plan that there are already proposals to erode and downgrade both of the Areas of Separation identified near Bottesford.

Policy EN5 – Local Green Space

Supported

Policy EN6 – Settlement Character

Supported

Policy EN7 – Open Space, Sport and Recreation

Supported

Climate Change Mitigation

7.16.6These differences are likely due to the rural nature of the Borough where opportunities to use sustainable modes of transport are generally fewer than in more urban areas. This emphasises the importance of a spatial strategy which concentrates growth around Melton Mowbray where existing sustainable transport infrastructure can be utilised and expanded (Chapter 4).

There also tends to be lower winter temperatures in rural areas leading to higher heating energy requirements.

This is critically important for Bottesford where the 'travel to work' distance is the furthest to Melton Mowbray and public transport provision is of very poor quality and is likely to continue to be poor and even reduced. Thus, a strong argument that Bottesford is NOT good in terms of environmental sustainability. (See comment on Policy EC2)

Trees and Woodland

7.16.10 Modern high density developments seem to leave little space for trees and gardens so this might be a challenge.

Policy EN8 – Climate Change

Supported

Policy EN9 – Ensuring Energy Efficient and Low Carbon Development

Supported

Policy EN10 – Energy Generation from Renewable Sources

Supported in principle

However a survey carried out in November 2015 demonstrated a local resistance to Wind Turbines in the Vale of Belvoir particularly when they impacted on the environment or quality of the views, particularly of Belvoir Castle or Church Steeples. This is particularly true if St Mary's Church in Bottesford, known as the 'Lady of the Vale' is affected.

There was also a substantial resistance to Fracking in the area certainly with regard to the lack of experience on the impact of such schemes in a relatively highly populated area like the UK.

The use of Solar panels received the best result in terms of local acceptance. In the factors to be reviewed on a proposed scheme, Efficiency and Utilisation also needs to be considered.

Policy EN11 – Minimising the Risk of Flooding

Melton Borough Council will ensure that development proposals do not increase flood risk and will seek to reduce flood risk to others.

The Borough Council will follow a sequential approach to flood risk management with the aim of locating development on land with the lowest risk of flooding (Zone 1). For development in Flood Zones 2, 3a & 3b, the exception test will be applied...

Proposals for development located adjacent to the Grantham Canal will need to consider the residual risk in the event of overtopping and/or breaches of the embankment due to culvert collapse or animal burrowing.

The extent of the Flood Zones 2 and 3 in Bottesford Parish is the greatest restriction to development in the area. An extract from the Environment Agency Flood Map is shown below and that organisation rates Bottesford as one of the highest flood risks in the East Midlands. The flood of 18th July 2001 is etched on the memory of all those who had flooded houses. There was a further Environment Agency Flood Warning in 2012.

The map shown in the supporting information as *Bottesford and Easthorpe - Proposed Submission Policies Map* shows an even wider area of flood risk in the Parish, and the area in Flood Zone 3b has increased, this has been noted. This would appear to be of a later issue than the EA map shown below.

Bottesford Parish is crossed by four watercourses, the River Devon, the Winterbeck, the Rundle and the Grantham Canal. There are two reservoirs in the area but outside the parish,

Denton Reservoir is 9.8 Ha in surface area and 65 metres above sea level (ASL)
Knipton Reservoir, 20.6 Ha in surface area and 85 metres ASL.

There are a further two lakes, total area 9.6 Ha, in the grounds of Belvoir Castle.

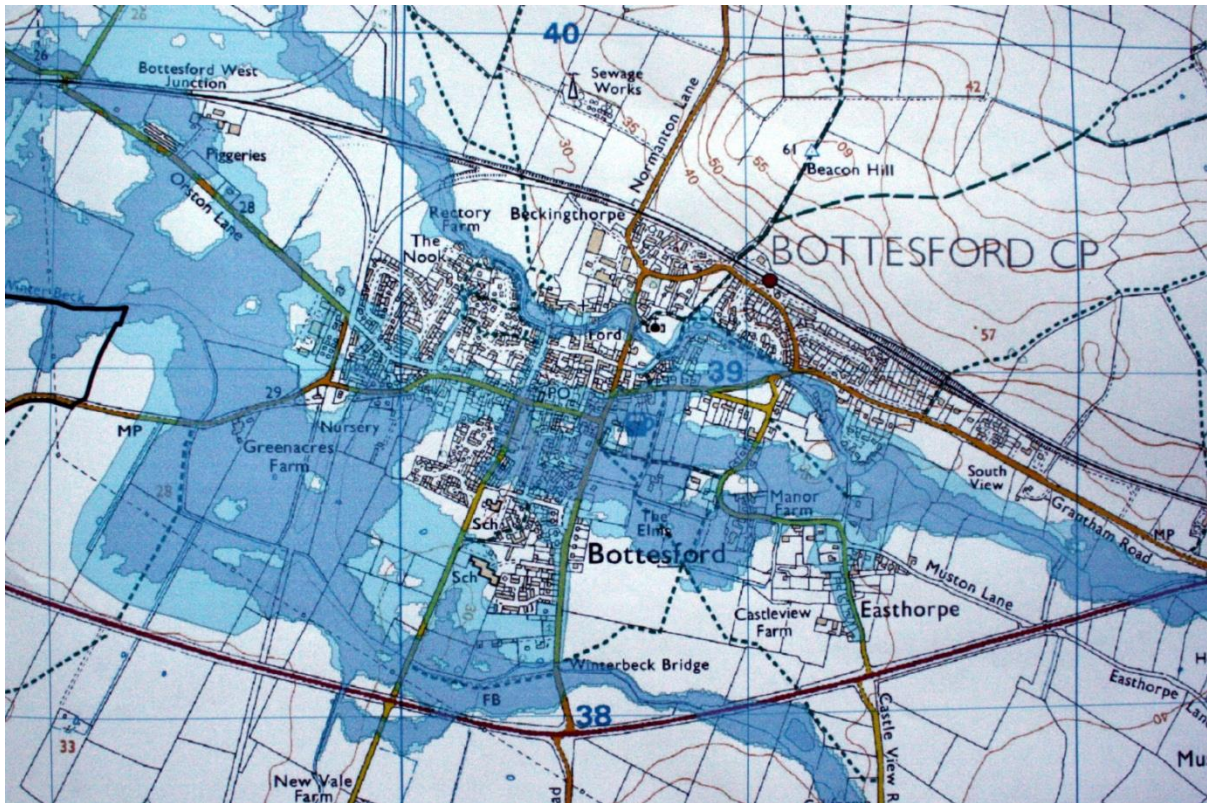
The water from the Grantham Canal and Winterbeck, to the south of Bottesford caused areas of the village to flood that would not normally have been affected by high water levels in the River Devon. Parts of the villages of Muston and Easthorpe were also affected.

The Environment Agency Flood map of the Parish (see below) shows substantial areas at risk. In a presentation by the Environment Agency to the Bottesford Parish Neighbourhood Plan Steering Group they confirmed that Bottesford was one of the highest flood risks in the East Midlands and that, subject to funding, they intended to undertake a thorough survey of the area in 2017.

Concern by the residents of the parish was confirmed when in a survey undertaken in late 2015 posed the statement:

Building should only be permitted in places that do not flood and in places that would not cause other parts of the village to flood

...resulted in 98% of respondents agreeing with this statement.



The main sources of flood risk in the parish are:-

The River Devon - runs through Muston, Easthorpe and Bottesford and each of these areas were flooded in 2001.

The Winterbeck – This is stream to the south of Bottesford with a number of restrictions to the flow which can cause flooding. In 2001 water from both the River Devon and the Grantham Canal passed into the Winterbeck causing it to overflow and run into Bottesford flooding a large number of properties and the retail centre of the village in the process.

The Grantham Canal – The River Devon passes under the canal by means of a siphon. If the flow is too great or the siphon is partially blocked, water from the R. Devon can pass into the Canal, flooding the latter so the water overflows the banks and can run into the Winterbeck.

The Rundle - An open drainage ditch starting in Easthorpe and going underground to pass through the High Street until it becomes an open ditch again to the west of Bottesford. Restrictions in this drain can cause water to back up and come out of the drains in the High Street.

In periods of heavy flow these can interact, as indicated above, causing flooding in areas not normally expected to flood. The whole is exacerbated by the clay

that exists just below the soil surface over wide areas of the parish which can cause run- off as soon as the soil above the clay is saturated.

Protecting the parish relies on four main areas-

- a) Identifying and managing a flood area to the south of the villages - to hold excess water so that it can flow at a safe rate through the villages.
- b) Maintenance and monitoring the waterways so that water released by the southern reservoirs and flood areas can pass freely through the villages.
- c) Ensuring that there is control the amount of additional water flowing into the Devon, Winterbeck or Rundle by wetland use, SuDS or similar devices.
(extensive use of water butts and other storage devices)
- d) Identifying and managing a flood area to the north of Bottesford – in order to prevent any restriction downstream of Bottesford causing a flood condition.

I am advised that the flooding in the area, although potentially damaging, is generally of short duration. This indicates that fields, even those sown with crops can be used to hold water until the levels and flow rates subside. Short term inundation has a limited impact on crops whereas longer term flooding will cause increasing loss of yield with time.

Ensuring that water flow rates can be attenuated in the Devon, Winterbeck, Rundle and Grantham Canal requires additional storage capacity in areas to the south of the parish which requires MBC assistance to effect.

Consideration should be given to installing weirs in the reservoirs at Knipton, Denton and the lakes in the Belvoir Estate so designed as to maintain a level of additional capacity in those bodies of water. At present weirs consist of a simple sill or dam that has one level of control, installing a weir with additional weep holes will allow the water flow into the watercourses to be maintained while providing additional storage in the event of heavy or prolonged rainfall. Naturally the weep holes will have to be kept clear.

A regime of maintenance is necessary in those reservoirs and lakes to limit the impact of silt accumulation.

Melton Borough Council has increased the housing allocation in Bottesford well aware of the Flood Risk. The sequential approach to flood risk identified in Policy EN11 does not appear to have been followed neither are there any proposals to protect Bottesford Parish from further flood events.

Policy EN12 – Sustainable Drainage Systems

Supported, however the flood risk described above cannot wholly be avoided by simple forms of Sustainable Drainage Systems as the flood water arises externally to the villages and a more thorough approach is necessary *'through the creation of ponds and wetlands near the watercourses'*.

Modern drainage systems with swales and underground tanks should be preferred to the unattractive 'pit and pipe systems' which have no amenity value and are more suitable for industrial locations.

Policy EN13 – Heritage Assets

Supported

Chapter 8: Managing the Delivery of the Melton Local Plan

Policy IN1 –Transport & Strategic Transport Infrastructure

Supported

8.9 Waste

8.9.1 Potentially one large site could be delivered in Melton Mowbray for all of Melton Borough...

Is this to replace all the local waste sites such as the one in Bottesford?
If so that is completely impractical and would lead to substantial car miles, fly tipping or inappropriate disposal in the collected waste.
Why not consider forming an East Midlands Region Waste Authority linking up with Derby, Nottinghamshire, Rutland and Lincolnshire and get economies of scale and shared resources.

Policy IN2: Infrastructure Contributions and Community Infrastructure Levy

Supported

Policy IN3: Broadband

Supported

Chapter 9: Managing Development

Policy D1 – Raising the Standard of Design

Supported and to be commended

Policy D2 – Equestrian Development

Supported

Policy D3 – Agricultural Workers' Dwellings

Supported

End

