

Dear Mr Kemp,

I wish to provide this representation regarding Matter 5 of the submitted MLP.

Kind regards,

Dr J Warwick

Frisby on the Wreake

MLP Matter 5

5.1 Overall, has the allocation of the sites in Policy C1(A) been based on a clear, robust process of site assessment and informed by sustainability appraisal?

The tick-box approach to evaluating suitability of sites within the MLP is utterly misleading and internally inconsistent with scoring sites. For example FRIS2 is given:

- + for railway noise (EHO measured night noise of 94dB); **suggested score - -**
- + for being part-Flood Zone 2 and requiring sequential test; **suggested score - -**
- + for the bus service - though the 128 service is described extremely inaccurately. It is actually two-hourly (not hourly) and does not run at all on Sundays or after about 6pm (last service back from Leicester is at 5:15pm). It is a 1.25km walk to the most frequent bus service on the A607 from this site; **suggested score 0**
- ++ for biodiversity – true it is not part of an SSSI, but within 100m of controlled discharges and also woodland Priority Habitat drainage **suggested score +**

There is no mention of the mineral rights constraints for gypsum and sand & gravel covering this site.

There is no mention of the site access being only 35m from the level crossing.

5.2 Overall, will the allocations provide sufficient flexibility to help deliver the spatial strategy?

There is little or no flexibility once a site has been allocated in the MLP. Any site in the draft Local Plan that also has a Planning Application which contains the allocated area, is automatically given Planning Consent by the Planning Committee. Even before the MLP was submitted for examination, this was already occurring. Members simply assume that the analysis of sites in the production of the MLP was sufficiently robust and vote to Permit. This trust in the robustness of site selection in producing the MLP is utterly misplaced in some, or even many, cases.

Prior to inclusion in the MLP, many of the sites would not have been given Planning Approval where viable objections could be applied. Therefore, inclusion of a site in the MLP constitutes **pre-determination** – implicit in a statement such as this relating to FRIS2, taken from the five year supply documents:

FRIS2	Water Lane	22	Standard SHLAA Methodology	16/00740/OUT submitted for 30 dwellings pending	N/A	No	N/A	LS - B	07/12/2017	Site promoter has confirmed there is significant housebuilder interest in the site but the sale of the land cannot progress until planning permission is in place. Expected that the site will deliver by 2020. To allow more gradual dwelling delivery in the village this site has been delayed in the trajectory by 2 monitoring years from 2021/22 to 2023/24	More cautious by 3 monitoring years	2023/24
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This site is contained within a larger Planning Application area and has yet to be decided by committee. The initial, unedited SHLAA notes for this site note the degree of noise mitigation necessary, the flood risks and the effect on the settlement character, and are summarised in a

statement saying the site is **undeliverable**. Yet it is included in the five year supply and “...Expected that the site will deliver by 2020...”

This impression of pre-determination can be supported by various records of Planning Committee meetings involving several sites across the Borough.

5.3 Are the specific policy requirements for the site allocations in Appendix 1 justified and effective? Together with the Plan policies as a whole, is there reasonable assurance that the development of the allocations will be sustainable and in accordance with national planning policy?

The specific policy requirements are justified but not necessarily effective and there are not always enough to cover the many aspects of preventing harm by developing some sites.

Again, using FRIS2 as an example, the specific policy requirements are:

FRIS2 : Development at FRIS2 will be supported provided: • it is demonstrated by means of a noise assessment that noise from the railway to the north of the sites can be adequately mitigated. • local educational capacity is available, or can be created through developer contributions, to meet the needs of the site; • flood mitigation measures have been put in place and the drainage infrastructure is available to accommodate the surface water from this site.

Amongst policy requirements that are missing is first and foremost the requirement for the sequential test requested by the EA because of flood risk from four sources. Also, there are no specific policies relating to discharges towards Frisby Marsh SSSI, or to safety measures required due to dangerous proximity of the proposed access to the level crossing.

Jacqueline Warwick