

Melton Local Plan

Matters and Questions for the Examination

Bottesford Forum Matter 5

Other Housing Allocations

The Inspector has tabled a number of questions relating to Policy C1(A) and Appendix 1 regarding Housing Allocations outside Melton Mowbray and Policy C1(B) relating to reserve sites.

Detailed question 5.1 relates to the process of site assessment and appraisal and sets out four subsidiary issues which are dealt with in turn.

- i) Bottesford Forum consider the process to be flawed. At earlier stages in the Plan process, sites were identified by the Council without detailed assessments of such matters as highway access and transport issues and the views of the Environment Agency on drainage and flood risk. This did not give Forum members much confidence in the process of identifying and appraising sites being undertaken by the Council. Representations of objection were made particularly on site BOT3 Rectory Farm, Bottesford to the Council on several occasions pointing out that there were flood/drainage, highway and other issues that seriously questioned the appropriateness and viability of the site as a development site.

In our FOCUSED CHANGES RESPONSES on the site we wrote:-

“With regard to the Sustainability and Access areas of my objection, the BOT3 section notes that there is poor site access at present. The plan to remedy this, involves creating a new road along the former railway track which once led from Bottesford to Melton. I have been advised that the cost of building this road would be very high and would involve the developers in many additional costs. These costs can only be passed onto the prices of the new dwellings in order to make the development economically viable and therefore the new houses would probably be at the upper end of the price bracket. Use of the existing railway bridge, (if it is technically possible), would add considerably to these costs as it would involve a large extension of the new roadway to be built plus the construction of two inclines to allow access to the higher level of the railway bridge and line.”

The Service Centres Update to site assessments Chapter in the BOT3 section has the following Sustainability Appraisal summary on P59

“Potential significant positive effects were identified for this site in relation to SA objectives 1: housing, 3: transport, 9: social inclusion, 10: poverty and deprivation and 15: energy efficiency. A potential significant negative effect was identified in relation to SA objective 5: landscape. The site has medium to high sensitivity to residential development given its small scale character and the presence of intact historical landscape elements. This would be dependent on design and layout however.”

“We submit that the SA objectives of 9: social inclusion and 10: poverty and deprivation would be unlikely to be met by the construction of a large number of high end properties. Other sites in the Parish particularly those to the south of Bottesford such as around the newly completed Wickets site off Belvoir Road could provide access at a fraction of the cost of BOT3 Rectory Farm and therefore be far better placed to address those objectives. Does it make any sense to spend far, far more than has to be spent on access in the hope of addressing the problems of social inclusion, and poverty and deprivation?”

The Council’s response to this section these objections reads as follows:-

“All sites have been considered under the site assessment process and this was revisited in the Service Centres Update to Site Assessments update May 2017 and allocations reflect the best performing sites measured by the criteria employed.”

Service Centres Update to Site Assessments update May 2017 on BOT3 Rectory Farm actually has four sections which discuss Access, however none addresses the questions of the inferiority of the access to this site to that provided by the reserve site around the Wickets, nor do they actually describe what the solution to the access issue actually is beyond saying that the developer has one which will become clear in the future. The four sections read:-

P51 Overall Summary

“Site reasonably well related to settlement. An access solution has been provided by the agent and the Highways Authority have reviewed it and removed the objection previously raised on the lack of an access point. Heritage impact, wildlife and flood risk constraints will limit the developable area of the site. Flood risk mitigation would also be required in order for the site to come forward and the agent is progressing an update to earlier flood risk assessment work at present.”

P53 Access / including public footpath access;

“Limited access point to site. Currently farm access to western edge of poor quality. No access possible to south east/east of the site.”

Response

“December 2016:

The site does not abut the public highway and has no suitable access.

09/01/2017 –Access details have been sent to Highways for comment.”

P60 Deliverability**Access**

“There are considerable issues to overcome but there are potentially solutions to these issues. The overall viability of the project will be dependent upon the acquisition of third-party land.”

David Wilson Homes in their Objections to Focused Changes made a similar point to the Forum’s when they wrote:-

“BDW are concerned that at this advanced stage of the local plan process there is so little or no evidence in the public domain indicating how this site can be safely and satisfactorily accessed from the adopted road network and deliver the extent of housing numbers proposed.”

Again the council’s response was to say that there are proposals which will be published in the future.

“The evidence was submitted by the promoters of the site and will be published alongside all other representations to the Plan.”

- ii) The Forum considers that the methodology has not been consistently applied for the reasons in that the Council admitted at a public meeting in the village in 2015 that they had yet to undertake detailed appraisal of the sites so over the Plan preparation period little methodology and appraisal has been applied. Whilst the Forum has raised quite detailed comments on site BOT3, as above these have never been fully addressed by the Council.

The Forum considers that the Council has not been clear or sufficient in their arguments for the selection of sites particularly with regard to sites in Bottesford and specifically site BOT3. The Appendix 1 comment for BOT3 by the Council puts its own interpretation on the study findings of the work undertaken by the Environment Agency with regard to drainage/flood risk in the Bottesford area. Parts of the settlement of Bottesford have been flooded and the development of BOT3 will

exacerbate the risk of flooding in the settlement. The Forum pointed out to the Council that vehicular access to the site would require highway improvements in the village but the Council considers that a detailed highway/transport assessment can await the planning application stage if the site is selected through the Local Plan process yet there is an issue of land that may be required to tackle the remote highway works that may not be in the ownership of the Council, the Highway Authority or the site owner/developer of BOT3.

- iii) Bottesford Forum cannot see how a reasonable balance can be struck given the comments made on Issue 2 and the attitude/approach of the Council with regard to the issue of flood risk/drainage.

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

Bottesford Forum considers that there will be problems with regard to the Bottesford area given that the largest site - BOT3 - will require additional development costs (the construction of the bridge being a major abnormal development cost) which would be front end loaded and will probably mean that the site if allocated and implemented will be developed over a shorter time period because of those development costs and probably developed with fewer less profitable affordable housing. This would then put pressure on other sites in the area to meet affordable housing targets.

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 some reasonable assurance that the development of the allocations will be sustainable and in accordance with national planning policy?

The Forum for the reasons given for the other questions considers that policy requirements for BOT3 in particular are not effective. With regard to sustainability, the Forum is concerned that development could adversely affect flood risk in the settlement and this would be contrary to national planning policy.

5.4 Is the identification of reserve sites in Policy C1(B) appropriate in principle?

Bottesford Forum has noted this policy and considers that it is appropriate in principle for reserve sites to be identified in this manner. The Forum has not examined the details of the Policy but notes that if the BOT3 site is removed from the Plan, the reserve sites are there to meet any housing shortfall. The reserve sites are likely to be in parts of the Borough which are in the Leicester and Leicestershire housing market area. Bottesford in contrast has much stronger links to the housing market areas of Grantham and Rushcliffe/ Greater Nottingham.