



17 August 2017

Mr J Worley  
Melton Borough Council  
Parkside, Station Approach  
Burton Street  
Melton Mowbray  
LE13 1GH

Dear Mr Worley,

Re: Response to Melton Borough Council Local Plan - Focussed Changes

I have tried to enter these comments on-line but this has proved extremely difficult so I hope these comments will be added manually?

**Object to the Melton Local Plan on the grounds of Unsoundness.**

**The reasons for this decision, are set out below. However, it seems to me that MBC have carried out ‘the letter’ of consultation but not the ‘spirit’. A failure to hear what has been presented as clear evidence appears to reflect a predetermined and subjective assessment of the sustainability of Long Clawson over many years, and this has resulted in an unsustainable level of development.**

**In Section FC1,FC2, and FC3, Policy SS3 - Melton Borough Council sets out its basis for rural development figures.**

*It proposes that, “In rural settlements outside of the main urban area, the Council will seek to protect and enhance existing services and facilities and will support sustainable development proposals which contribute towards meeting local development needs, contributing towards the vision and strategic priorities of the plan, and improving the sustainability of our rural areas”.*

Unfortunately, the Council has not delivered on this proposal as far as the Parish of Clawson, Hose and Harby is concerned and has chosen to ignore hard evidence presented by residents showing the impact of the scale and speed of development proposed, which undermines the sustainability of the three villages, particularly Long Clawson. The proposals in the Local Plan for Long Clawson also ignore significant feedback from residents in both written feedback to draft plans as well as oral feedback at ‘Consultation Events’. Even simple errors on service levels, transport services, and landscape view descriptions have not been amended.

In the most recent Consultation Event, you were asked why the description of the village made no mention of the traffic issues or the inadequate public transport for working persons. You answered that it was news to you. However, when I pointed out that the residents had met with Mr Pat Reid and presented a Sustainability Appraisal for the village with information on traffic, congestion, flooding and drainage, schools, services, you said this was “anecdotal”. Clearly the information had not been taken seriously or into account despite the Appraisal having a professional report commissioned by MBC on the flooding of the village that highlighted the inadequate culverts; the results of the Leicestershire

County Council (LCC) Speed Watch Scheme; a hydrologists analysis of the flooding; LCC assessment and figures for the school. Only the school data has been considered by MBC and is now recognised as being 'over capacity'.

**Melton Borough Council sets out its expectations of what criteria sustainable development should meet.**

***For example: "The Council expects proposals to meet the following criteria: The development provides housing or economic development which meets a local need as identified in a Neighbourhood Plan or appropriate community-led strategy, housing or economic needs assessment; and/or"***

**The implementaion of this Policy is unsound.**

- a. Currently MBC is planning to bring forward all the proposed sites for development for the Long Clawson, one day prior to the completion of Regulation 16 of the Parish Neighbourhood Plan. This is a clear attempt to circumvent the Neighbourhood Plan or to ignore the views of residents expressed in the Plan. The Local Plan fails to meet its own above criteria by failing to take account of the needs identified in the Neighbourhood Plan.
- b. The Parish Council consulted MBC on whether Long Clawson, Harby and Hose should each produce Neighbourhood Plans, given that the Borough Council was treating them differently, and were advised that there must be one Neighbourhood Plan for the three villages of the Parish. However, MBC continue to treat the three villages as separate entities to its own advantage. For example, an over delivery of housing in Harby does not benefit the other two villages.
- c. Residents are fully supportive of meeting their own residential needs and this has been well researched and presented in the Neighbourhood Plan. However, it seems patently unjust that whilst Asfordby, Bottesford, Croxton Kerrial and Scalford do not currently meet their own 'residual requirements', the Parish of Clawson, Hose and Harby should be called on to take the lions share of this capacity requirement. In the original allocations the Parish was expected to take 309 new homes (LC 128, Harby 109, and Hose 72). Under the reallocation this rises to 410 (LC 141 plus 53 in reserve, Harby 139 and Hose 77). The reallocation of 101 (out of 119) homes to one parish is totally unjustified and unsound from a sustainability perspective. This is also NOT A PROPORTIONATE APPROACH as set out in **FC1.3**:
- d. In addition, given that this is a 25 year plan, villages that currently do not have land available most likely will within the timescale of the plan. It is unnecessary to over populate villages where landowners have put forward land merely to meet a target in the first 5 years of a 25 year plan.

***A further Criteria for development states: "The development will be served by sustainable infrastructure and or provide new infrastructure or services to the wider benefit of the settlement; and"***

**MBC has NOT met this criteria for development in Long Clawson for the following reasons and is unsound**

- a. As has already been mentioned above, the infrastructure in Long Clawson is already extremely stretched and the school overcapacity. The village centre and Claxton Rise regularly flood due to the inadequate drainage culverts for the water running off the escarpment. A report commissioned by MBC and subsequently 'shelved' recommended new culverts. Western Power have said that the electrical capacity is nearing its limit and that further industrial activity proposed in Harby will bring it to capacity, even before housing is built. The village surgery serves 23 surrounding villages and has to handle the traffic this generates each day - often blocking the only road through the village. This is NOT sustainable infrastructure. Without investment in the infrastructure of the village services, further housing is not sustainable. No infrastructure improvements have been planned other than to increase the size of the school.
- b. In addition it is worrying to see mentioned in the assessment of sites in Long Clawson that, "A solution has been found to increase capacity of Long Clawson Primary School". This is a gross misrepresentation of the facts as a decision has yet to be taken by the Governors and the school is awaiting a new head teacher. Whilst it may be that the Governors will approve plans, they haven't yet and so it is premature at best to put it in the Local Plan as being resolved.

*The further Criteria for development states: "The development respects ecological, heritage and biodiversity features and where appropriate, provides mitigation to prevent any potential harm; "*

**MBC has NOT met this criteria for development of LONG 4 in Long Clawson for the following reasons**

- a. In the assessment of LONG 4 in Long Clawson (Sandpit Lane) it mentions there is "Some impact on heritage assets and landscape". However, POLICY LONG 4 states that a heritage assessment is required and acknowledges that the land is adjacent to the Conservation Area of the village, two Grade 2\* buildings (Church and medieval Farm Manor House) and an Ancient archeological Monument. This proposed development does not respect the views of Historic England on the 'harm' such a development will bring when there are alternative sites available and does not support MBC's above criteria to 'respect heritage'. The site development will potentially also affect the water quality and levels of the Manor House Pond where Great Crested Newts are found and which is an integral part of the historic building and landscape. By pushing for this site MBC have continually chosen to ignore local views, those of specialist hydrologists, and Historic England.
- b. MBC also has chosen to ignore its own Criteria for development on LONG 4 *for loss of agricultural land*. Sandpit Lane is agricultural grazing land - part of the history of the village, and why it is a Stilton producing village. Development here would be the loss of good grazing land and destroy a visual window from the village to the escarpment and a place of tranquility for the cemetery,
- c. MBC also state in the Criteria that *a development does not increase the risk of flooding, in accordance with Policy EN11*. Two hydrologist reports clearly show that the water run off has been incorrectly calculated by the Developer and that building on this land potentially increases the risk of flooding both in the centre of the village and at Claxton

Rise, and may also affect the quality of water at Manor Farm pond or lead to it drying up.

**The subjective interpretation and selection of data has led to the reinforcement of views about Long Clawson held by MBC Planning Department from the outset of the development of the Local Plan. Such views I believe were based on erroneous information that still persists. As one councillor told me, “There is a mindset in the Council on Long Clawson that will not be changed” and one feels after two and a half years of consultation that the data is selected to fit the answer and the process undemocratic.**

**MBC’s failure to meet so many of its own sustainability criteria for development shows the unsoundness of the Plan.**

### **Section FC2.1.AFFORDABLE HOUSING**

There appears to be a need overall for 15% affordable homes but on grounds of ‘affordability’ 30-35% will be built in rural area and only 5-15% in the town? This is truly astounding and is based on financial viability assessment with developers having to contribute so much to CIL for the ring road that it is only viable for them to build affordable homes in villages. This is irrational and illogical for the reasons below.

- a. Para 5.8.5 states that *‘house prices in Melton are outstretching average earnings’*. However, houses in the villages are more expensive, even those deemed as ‘affordable’ therefore what justification other than money for a ring road would place such homes in villages (other than those for local people)? Such homes will be even less affordable in villages and people more over-stretched.
- b. Long Clawson, according to the 2011 Census already has 16% affordable homes - far higher than Melton and about the national average. Some of these social housing units have remained vacant for long periods. The Neighbourhood Plan supports affordable housing and starter homes but the village also needs 2-3 bedroomed semis for growing families and bungalows for older residents to move to. This is all set out in the Neighbourhood Plan and should be taken note of. Where is the need locally for 33%?
- c. *Policy t2 states the Council’s intention to ‘shift away from private car use’*. Placing people that can’t afford a home in to a village with an inadequate bus service will force them to be isolated and unemployed or to buy a car they can ill afford. Despite contrary evidence, Melton Borough Council still insists that people living in Long Clawson, Harby and Hose have ‘good transport options’. There is only the No 24 bus that runs hourly between Melton Town and Bottesford from 8am to 6:30pm Monday to Saturday. People without a private vehicle would not be able to work shifts or Sundays, nor could they work in Old Dalby, Langer, Asfordby (as stated by MBC in the Local Plan) - in fact anywhere other than Melton, Bottesford, Long Clawson and Harby. The bus would not connect with buses or trains in Melton or Bottesford to enable commuting for normal hours in Nottingham or Leicester. There is no alternative to having a private car.

The lack of public transport is demonstrated by 52% of the residents having 2 or more cars and the majority of residents commute to work in the cities of Nottingham, Derby and Leicester. Putting such a high percentage of affordable homes in the village may help MBC

achieve it's ring road, but it far surpasses the local need for such homes. Currently residents in the social housing are often moved in from large towns and Leicester, and without private transport they become isolated from hospital services, social services, council services, supermarkets, leisure and sporting activities in the Town as well as access to the Catholic Church and resources such as Storehouse and Sure Start . There is no infrastructure in a village to support young families.

It has been suggested that workers could walk to work or cycle to work or leisure. Long Clawson is 7 miles from Melton and 2.8 miles from the nearest A road. The roads are delimited rural roads, unlit and with no pavements or kerbs. South of the village the road climbs up a steep hill to the top of the escarpment. This road carries HGV and speeding traffic taking short cuts to the A46 and A52, and it is a health and safety risk to cycle or walk on any of these roads.

By pursuing a strategy that directly encourages car ownership, MBC goes against its own t2 Policy and against the NPPF guidance on sustainable development.

**In summary, the proposals for development in Long Clawson are unsound and fail to meet Melton Borough Council's own criteria for Sustainable Development.**

Yours sincerely,

Chris Larson

[REDACTED]

[REDACTED]

I am happy for my views to be made public.

email copies to Jim Worley, James Beverley, Cllr Byron Rhodes