Response ID ANON-BHRP-4H1P-9

Submitted to Emerging Options
Submitted on 2016-04-03 17:40:30

About You

1 Please provide your full name

Name:

Tom Parry

2 Are you acting as an agent on behalf of someone else?

No

If yes, please provide details:

3 Are you responding on behalf of an organisation?

Yes

If yes, please provide the name of the organisation:

Barkestone Plungar & Redmile Parish Council

4 Please provide your address

Please provide your address:

1 Middle Street Barkestone-le-Vale Nottingham

Please enter your postcode:

NG13 0HB

5 What is your email address?

Email:

tomsparry@aol.com

CHAPTER 4: OVERVIEW -THE SPATIAL STRATEGY

1 If you would like to comment on this chapter as a whole please do so here.

Add comments about the whole chapter:

We gather from Reference group meetings, direct discussions with Melton Borough Council and comments made at the Parish meetings we have held, that it is agreed that the Spatial Strategy as set out is based to some extent on incorrect evidence, and that major changes are expected to be made. We are asked however for comment on the plan as provided for consultation.

We disagree with the criteria used to arrive at the split of housing between Melton and the rural area, and with the allocation of housing in the rural area to Rural Supporters and Rural Settlements, both fundamental aspects of the strategy. We believe that the current strategy is unrealistic in terms of the required housing proposed to be built in these villages in a sustainable manner, and that it is not supported by the comments in the Settlement Roles and Relationships Report, which recognises that higher housing development in Melton would enhance the growth objectives of the town and the viability of the bypass, while development in the smaller settlements would be unlikely to create new infrastructure or sustainability. Other recent Local Plans in nearby boroughs/districts have taken a different approach, directing new development towards sustainable locations, which we consider to be much more robust and realistic in the context of the NPPF.

- Policy SS1 Presumption in favour of Sustainable Development
- 1 Do you support this policy?

Support

Comments:

We support the principle of the policy, but please see our other comments on this chapter regarding our view on the Spatial Strategy as a whole.

2 What changes would you like to see made to this policy?

Comments:

- Settlement Roles and Relationships

1 Do you think the approach to settlement roles and relationships is right?

Yes

2 Please explain why you think this, including any changes you think should be made to the approach.

space for comments:

The NPPF requires development to be actively directed to the most sustainable locations and not to the least sustainable places. The Local Plan therefore needs to identify and rank the sustainability of settlements, and this requires a detailed and robust hierarchical appraisal.

The current rankings are based on inaccurate evidence (the points scoring system used in rankings appears at Appendix 2 of the Draft Plan) and omits factors such as broadband provision and the quality of local infrastructure. It also fails to weight the quality of local facilities depending on their size sophistication etc. We believe that more differentiation between villages rather than less would if anything be preferable.

3 Do you think these villages are Primary Rural Service centres?

Primary Rural Service Centres - Asfordby:

support

Primary Rural Service Centres - Bottesford:

support

Primary Rural Service Centres - Long Clawson:

support

Primary Rural Service Centres - Waltham on the Wolds:

support

4 Please explain why you are supporting or objecting

space for comments:

We support Asfordby, Bottesford, Long Clawson and Waltham as Primary Rural Service centres, on the understanding that they are the larger rural settlements with the most facilities. Long Clawson might be differentiated further since although it has employment opportunities, it has fewer transport links (especially compared to Bottesford's very good transport links with neighbouring boroughs).

suggest other villages which should be included as Primary Rural Service Centres:

5 Do you think these villages are Secondary Rural Service Centres?

Secondary Rural Service Centres - Asfordby Hill:

Object

Secondary Rural Service Centres - Croxton Kerrial:

Object

Secondary Rural Service Centres - Frisby on the Wreake:

Object

Secondary Rural Service Centres - Somerby:

Object

Secondary Rural Service Centres - Stathern:

Object

Secondary Rural Service Centres - Wymondham:

Object

6 Please explain why you are supporting or objecting

space for comments:

While we have put that we object, this is mainly because we cannot support the current designation of the Secondary Rural Service Centres since there are material inaccuracies in the facilities data on which the selections were made. We believe that if this data is re-examined the conclusions might be different.

Suggest other villages which you think should be included as a Secondary Rural Service Centre:

- Policy SS2 Development Strategy
- 1 Do you support the strategy set out in this policy?

2 Please explain why you are supporting or objecting

space for comments:

The strategy is based to some extent on historic growth patterns in rural locations. The historic growth did not arise from a sustainable planning policy and has in fact led to unsustainable communities while depriving Melton of much needed development. The new Local Plan provides an opportunity to direct growth in a positive and sustainable manner with benefits to all.

The original studies indicated a 70:30% split as appropriate but the draft plan suggests 65:35%. The allocation of the 5% difference to the Rural Supporter group (below the level of settlement currently seen as sustainable) does not appear to have any rationale and runs contrary to sustainability principles.

The 15% proposed development in Rural Supporters and Rural Settlements is excessive and probably not achievable given the recognition in the evidence base that most current available sites in these villages could not be used for sustainable development.

3 What changes would you like to see made to this policy?

Comments:

We would like to see the Plan direct development to sustainable communities i.e. Secondary Rural Service Centres and above. Development in smaller communities could be limited to that which would protect the well-being of those communities in term of existing facilities and enhancing buildings under threat e.g. redundant farm buildings.

- Housing distribution following the Development Strategy in policy SS2

1 Do you support this way of distributing the housing needed in the Borough?

Object

Comments:

Please see or other comments on this chapter - we consider the allocation of housing to Rural Supporters and Rural Settlements to be unsustainable and unachievable. We do not consider that such housing would result in better communities and facilities in those locations.

2 What changes would you like to see made to this policy?

Comments:

Development in the rural area should take place in sustainable locations in line with the NPPF. Development in non-sustainable locations should be by exception and only where it provides a clear and specific benefit to the community in that location.

- Policy SS3 - Sustainable Communities

1 Do you support this policy?

Other

Comments:

We accept the principle of permitting small scale development provided that it enhances sustainability.

The proposed wording is open to wide interpretation and therefore brings uncertainty into the planning process. This is particularly so since previous clear policies relating to Protected Open Spaces and Village Envelopes do not exist. The wording may offer flexibility but it may also lead to inappropriate development and frequent referral to committee and inspectorate for decisions.

As it stands the policy could also lead to multiple small site developments on a single location, resulting in over-development as there is no cap. This has been a problem in the past in some villages with an open character (therefore substantial land within the village envelope) owing to the lack of adequate protection from POA/Conservation Area policies.

2 What changes would you like to see made to this policy?

Comments:

Clearer wording – items 1, 4, and 8 in particular are so vague that we do not understand what they are likely to mean in practice.

A form of capping or constraint to prevent multiple small developments in single locations.

A more specific statement that development in the least sustainable locations should only be in exceptional cases, possibly with those cases clearly defined, for example:

- Where it can be demonstrated that a local facility requires additional housing in a location to survive
- Where farm or other buildings are redundant and might become derelict unless developed

CHAPTER 7: OVERVIEW MELTON BOROUGH'S ENVIRONMENT - PROTECTED AND ENHANCED

1 If you would like to comment on this chapter as a whole please do so here.

Add comments about the whole chapter:

While the principles of the policies EN1 – EN6 are supported by us, it appears that most of the protections of the landscape and settlement character of our villages which existed in previous Local Plans have been removed, in particular Village Envelopes and Protected Open Areas. However the open spaces within and around our villages remain of great importance. Conservation Area status or the development of a Neighbourhood Plan appear to be the only way of introducing some of these protections. While two of our three villages which do not currently have CA status were recognised to be suitable for this, and indeed

some progress had been made in designating them, resource at Melton Borough Council meant that this could not proceed. On the other hand, for many small villages the human resources needed to produce a Neighbourhood Plan makes them inappropriately cumbersome. We are therefore concerned that however worthy the sentiments of the policies EN1- EN6 may be, there is likely to be insufficient definition of the areas and character which need to be protected in specific locations.

- Policy EN6 - Settlement Character

1 Do you...

Support with observations

Comments:

We are very concerned at the loss of Village Envelopes and Protected Open Areas. These provided a suitably local level approach to identifying land which has historically defined the settlement character of our villages for years. Neighbourhood Plans and/or CA status may not be possible or appropriate in smaller unsustainable rural settlements, but these locations also need protection under the EN1 – EN6 policies.

2 What changes would you like to see made to this policy?

Comments:

We would like to see Village Envelopes and Protected Open Areas reinstated (and redefined) for small villages for which Neighbourhood Plans are not appropriate (these may be defined as the Rural Supporter/Rural Settlement categories).