

Comments: Melton Neighbourhood Plan

Carter Warburgh Proposal Site: Brownfield or Greenfield ...Who Knows?

First of all I would like to take this opportunity to commend Melton Parish Council (MPC), its members and volunteers for taking on such a tremendous amount of hard work in compiling the Melton Neighbourhood Plan (MNP) proposal on behalf of the Community.

There are however, aspects of the MNP drafting process that could have been conducted in a much better, fairer and transparent manner and not caused so much confusion, utter bemusement and frustration within the Community.

I am referring to the controversial inclusion of the Carter Warburgh Proposal (CWP) site within the MNP, unfortunately consistently inaccurate information has been displayed on the Melton Parish Council website, the MNP website and the monthly delivered Melton Messenger newsletters.

It has been advertised regularly with each CWP update, in excess of THE LAST 2 YEARS; that the CWP is a BROWNFIELD site, this has caused much confusion.

I have copied this from the MNP website today the 7th April 2017 page 4 Progress (<https://www.meltonneighbourhoodplan.co.uk/page4>); the very same page for sending consultation comments to the SCDC neighbourhood plan team.

"New Development Proposal

As part of the MNP we are required to allocate some housing. This is sensible when we have a proven need for a small amount of affordable housing but it is also sensible because it puts us in a stronger position, once the NP is adopted, to argue against large housing applications which the community do not want and on inappropriate sites. The current draft idea is just that - a draft idea. Following feedback from our March events we will look at what improvements we can make. You should be aware of the following when looking at this proposal:

- it is on a BROWNFIELD site which in all previous community consultation over the last 3 years has been identified as the place most people would want to see a small amount of development.
- as a BROWNFIELD site something will eventually be developed there. It is better that as a community we try to shape what this is as much as possible rather than leaving it to fate - we could get something much worse e.g. a lorry park."

In fact the Majority of the CWP site is in a currently designated Special Landscape Area and is GREENFIELD NOT BROWNFIELD and when this was communicated both verbally and in writing at

the 11th May 2016 planning meeting this very important material fact was ignored then, as it has been to the present day.

Since none of the subsequent press releases or news feeds has mentioned this important material fact, I feel very strongly that this has given the Community the perception, wrongly; that this is the most suitable site at the expense of other sites because of its so called "BROWNFIELD" status.

The ultimate choice of inclusion of the CWP in the MNP was made at the May 11th 2016 council meeting by MPC themselves and a very small majority was carried, which in itself is disturbing; it is now very apparent that some of the Councillors at the MPC meeting had no idea of the classifications of the CWP site at the time of this important meeting or indeed have ever visited the top of the CWP site and it brings into question the whole validity of the very decision itself; since only a very small majority were in favour of inclusion.

Despite the remarkable inability of MPC for the last 2 years to inform the Community of the correct land designation of the CWP the following very important policy is included in the MNP proposal....

"POLICY MEL11: SPECIAL LANDSCAPE AREAS

The valleys and tributaries of the River Deben, as shown on the Proposal Map, are designated as a Special Landscape Area. Development proposals must ensure that no development will take place which would be to the material detriment of, or materially detract from, the special landscape quality." **the following was added at the very end of the consultation period in late March 2017 after prompting from SCDC** "where development is considered acceptable, landscape improvements should be included as an integral part of the development proposal. In particular this relates to development proposals at land off Wilford Bridge Road (Policy MEL21)."

Very late in the consultation period and after proclaiming for well in excess of 2 Years that this was a BROWNFIELD site?, now apparently the site has significant SLA land designation.

This is very misleading to the Community and at such a late stage completely unacceptable practice.

Much of the CWP site is currently a designated SLA, part of only ONE such designated area in the Parish of Melton; with undeniably the most tremendous views of the Deben Valley, an Area of Outstanding Natural Beauty; particularly from the Northern footpath boundary and to a lesser extent the Eastern footpath boundary; which are enjoyed each week by hundreds of locals, visitors and even those on horseback since these boundaries are also bridle paths.

This beautiful SLA, part of the very "lungs of the Melton Community", is also a Priority Habitat that would be destroyed due to the nature and scale of development; It has been estimated that approximately seventy to ninety thousand cubic metres (70 / 90,000 m³) of fill materials may be required to sufficiently raise the development and if the CWP was to be considered, be in contravention of Policy MEL11 itself.

It is only again just recently (late march 2017) during this late stage consultation process that MPC has been advised by SCDC that the designated SLA status of the CWP site had NOT been marked on the proposals map and this has finally been corrected. This is at far too late a stage, the Community have been informed for well in excess of 2 years that the CWP site is BROWNFIELD; they will no doubt now be horrified to learn that most of the CWP site is in fact GREENFIELD, a Special Landscape Area with a Designation of County Importance.

In the initial and ongoing MNP survey/ questionnaires the Community was found to be expressly in favour of protecting such habitats and areas with such special views and this has to be respected in any site proposal, which clearly the CWP site does NOT.

In addition to Policy Mel11 we have the following Policy in the MNP....

"POLICY MEL3: VIEWS FROM FOOTPATHS, CYCLEPATHS AND PUBLIC RIGHTS OF WAY

Development proposals will be expected to be designed so that they do not have a significant impact on short distance views (up to 500m) of the Area of Outstanding Natural Beauty and, in particular, the River Deben, from any footpath, cycle path or public right of way."

Because any potential development of housing on the northern half of the site would have to be raised with huge amounts of imported fill materials to satisfy Flood Zone 1 requirements, some areas would require land raising in excess of 3.5 metres due to the low lying nature of the existing land topography.

Coupled with the considerable numbers of 2 storey pitched roof housing units and this substantial land raising, the tremendous views of the AONB would be substantially lost much to the detriment of this SLA, the Community and visitors alike and NOT be in accordance with Policy MEL3.

In Summary:

The inclusion of The Carter Warburgh Proposal Site in The Melton Neighbourhood Plan Is Fundamentally Flawed and Must Be Removed without Delay Since:

1) For well in excess of 2 years and to date MPC has failed to recognise the correct land designation status of the CWP site during the MNP draft process and has communicated to the Community incorrectly that this is a Brownfield site when in fact the majority of the site is

Greenfield with SLA designation and recognised wildlife habitat (with Priority Habitat status). This seriously brings into question the whole validity of inclusion of the CWP site. The MNP has identified that the Community is in favour of protecting wildlife, its habitat and important green spaces.

2) The CWP site is NOT in accordance with POLICY MEL11: SPECIAL LANDSCAPE AREAS

Much of the special landscape quality of the existing site would be lost as a result of land raising, housing and associated access road construction resulting in significant detriment and loss to the current land SLA Designation of County Importance.

3) The CWP site is NOT in accordance with POLICY MEL3: VIEWS FROM FOOTPATHS, CYCLEPATHS AND PUBLIC RIGHTS OF WAY

Land raising and many multiples of 2 storey pitched roof housing would result in significant loss of views of the Deben Valley and Areas Of Outstanding Natural Beauty from the North and Eastern boundary footpaths/bridle paths.

4) The MNP recognises the Community's desire to embrace the few remaining outstanding green spaces that we have in Melton and their importance, not only to our own social well being; but also for the wonderful habitat that thrives in these special places. The MNP should enable and empower the Community to cherish and enjoy these valuable assets for decades to come. With the MNP implementation it is reassuring that future generations may also benefit in perpetuity...

Mr A Mortimer

Melton Resident