

**Land Adjacent to
Market Harborough
and Great Bowden**

**On Behalf of the Trustees
of the Bowden
Settlement**

**Response to Issues and
Matters Questions
8 Site Allocations**

BK Reference:

520923

September 2018

Contact Details

Prepared by: Paul Barton MRTPI

T: 01452 880055

E: paul.barton@brutonknowles.co.uk

Address: Bruton Knowles

Olympus House

Olympus Park

Quedgeley

GL2 4NF

**On the
instructions of the
Managing Agent:**

Philip Cowen MRICS

T: 02476 226684

E: philipcowen@godfrey-payton.co.uk

Godfrey Payton

Old Bablake

Hill Street

Coventry

CV1 4AN

Prepared for: The Trustees of the Bowden Settlement

Date: 6 September 2018

Version: Two

BK Ref: 520923

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Appendices

A . The Inclusive Transport Strategy: Achieving Equal Access for Disabled People'

1. INTRODUCTION

- 1.1 This representation has been submitted by Bruton Knowles on behalf of the Trustees of the Bowden Settlement to address the Matters and Issues raised by the Inspector, in his letter dated 15th August 2018. Our responses are printed in italic text following the specific Issue and Matter below.

2. ISSUES AND MATTER 8 SITE ALLOCATION

2.1 Issue and Matter 8.13

2.2 How many dwellings are already served by Kingston Way and Bates Close?

2.3 *63 dwellings are already served by Kingston Way and Bates Close.*

2.4 Is it sound to expect these roads to accommodate vehicle movements from a further 90 dwellings given their traffic calmed, winding, residential character?

2.5 *It is not sound to expect a 150% increase in housing numbers to be served off the existing roads. The roads in some sections do not have footpaths, have carriageways below 5m in width, are winding, traffic calmed and provide a settled, quiet and safe landscape for residents.*

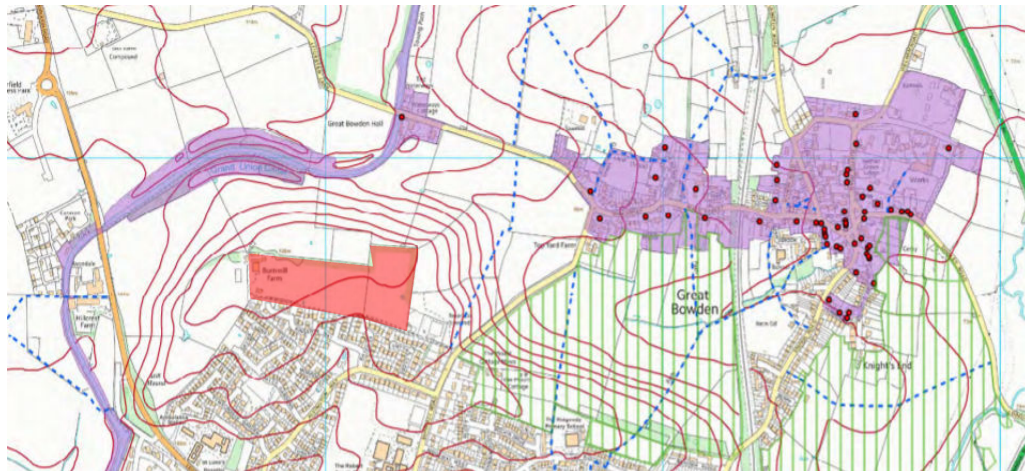
2.6 *Kingston Way utilises shared surface in sections and the Inspector will be aware the Department for Transport (DFT) has recently written to all Highway Authorities requesting they pause the rollout of shared surfaces in light of its 'The Inclusive Transport Strategy: Achieving Equal Access for Disabled People', presented at Appendix A. The document raises serious concerns regarding whether shared surfaces are appropriate in particular for people with disabilities. Therefore to intensify the use of the existing shared surface would be inappropriate.*

2.7 *It would appear that access to the Burnmill Farm site would be through one or possibly two accesses at the end of Kingston Way to include access over shared brick paved drives. Further it does not appear that the overall carriageway has the required width to provide footpaths to ensure there would be no shared surface if a planning application is made.*

2.8 *It is not clear how any allocation from Kingston Way could comply with the DFT's current directive. Clearly this directive was issued after the submission of the draft local plan, and the local authority could not have envisaged its publication at the time the plan was submitted. However it would appear, unless the developer has control of garden land either side of the existing carriageway that the current vehicle movements on the existing shared surface along Kingston Way would be increased unacceptably and the allocation would therefore not comply with current DFT guidance.*

2.9 What effect would the allocation have on highway capacity and on the residential environment?

- 2.10 *Leicestershire County Council's (LCC) Highway Design Guide provides guidance for both 'Residential Roads' (roads with delineation between pedestrians and vehicles) and 'Residential Access Ways' (Roads which have a shared surface). It is considered Kingston Way should only be considered a 'Residential Access Way' given the road contains shared surfaces and has an overall carriageway of less than 6m (LCC's minimum guidance states 7.5m) in places.*
- 2.11 *The recommended housing threshold for a 'Residential Access Way' is only 50 dwellings, and this reduces to only 25 dwellings off a road with a single point of entrance- such as Kingston Way. Consequently Kingston Way is already at capacity.*
- 2.12 *The Inspector will be aware that the May 2016 SHLAA indicated that the Burnmill Farm site "... would have to meet Highway Authority standards which may present a viability issue". In conclusion, the site was confirmed within that document as being "potentially achievable". It was categorised as being "Developable" (as defined within the revised NPPF) within a 6 to 10 year timeframe. By contrast our client's land off The Ridgeway was categorised in the same report as being "..... Deliverable for residential development" (as defined by the revised NPPF) within a 1 to 5 year timeframe. It is material that the Council's assessment of the comparative merits of the two sites as part of the SHLAA process leans in favour of the site at The Ridgeway, but in the light of the subsequent strategic allocation threshold of 50 dwellings per site (as referred to in para 2.39 below), the submission draft of the Plan appears to promote residential development of the Burnmill Farm site ahead of the Ridgeway site despite the considerable highway and local resident safety constraints which might result from that conclusion.*
- 2.13 **Issue and Matter 8.14**
- 2.14 What effect would the allocation have on the wider landscape?
- 2.15 *There are immediate impacts on the existing landscape off Kingston Way, which has the appearance of a settled residential estate within the landscape, with no obvious point of access to the proposed allocation site at Burnmill Farm. Any access would run through what appear as private drives and would considerably alter the physical appearance and safety of the area.*
- 2.16 *There would also be wider impacts when viewed from the north given the land is at the very top of the Burnmill Farm Scarp Slopes.*



Burnmill Farm Allocation shown on Area of Separation Review (2017) (for illustrative purposes only)

- 2.17 *My clients' site is to the north of The Ridgeway and has been removed from the area of separation as it is fully enclosed and has been found to make only an "Incidental" contribution to the openness between Market Harborough and Great Bowden. It is considered that should the Inspector find the Burnmill Farm site not to be sound, The Ridgeway site could readily pick up a significant element of the allocation, in a similar part of Market Harborough. My clients own number 54 The Ridgeway - where access is proposed - and therefore the site is available now and is deliverable as confirmed by the 2016 SHLAA. It does not suffer from any Highway Constraints, has the benefit of a good access and can accommodate up to 50 dwellings.*
- 2.18 *My clients' site is immediately adjacent to Market Harborough's settlement boundary and set to the rear of a row of 1970's dwellings and adjacent to the Ridgeway Primary School. The site is located on long straight roads, providing clear visibility to relatively wide Carriageways which, as it is considered a 'Residential Road', could easily accommodate a further 50 dwellings in keeping with LCC's highway guidance.*
- 2.19 *Since the publication of the Inspector's questions it has become more widely known that the Council's sieving process for strategic allocations is 50 dwellings, and this is likely to be the principal reason why our clients' site was excluded from the allocations despite it's otherwise obvious merits by comparison to a number of the sites which have been allocated for residential development in the Plan. Given the site area of 1.5 hectares, we advised that the site could accommodate 45 dwellings in previous correspondence (based on 30 dwellings per hectare), but at a density of 40 dwellings per hectare the site could readily accommodate at least 50 dwellings*

without any form of detrimental impact on the landscape, and in a manner which does not provide a detrimental impact to local residents whether in terms of highways and traffic, or other matters. It is of material importance that the development of our clients' Ridgeway site would also not compromise the safety and quiet enjoyment which existing residents of that part of Market Harborough are able to enjoy.