

8 January, 2018

Matters and Questions  
Melton Local Plan Examination

Dear Examiner,

Thank you for the opportunity to comment on the Plan in the context of Matters and Questions. I am a Somerby resident and a member of the Neighbourhood Plan there, so when examples are necessary to illustrate my points, I will reference my Parish or village, but I believe observations may also apply for the other rural parts of the Borough.

### **Matter 1: Legal requirements and the duty to co-operate**

1.1 No comments.

#### ***1.2 Sustainability appraisal:***

I don't think the SA has adequately assessed the effects of the Plan, especially environmental effects and in rural areas. More account should have been taken of the different role rural areas play in the Borough.

The Plan results in significant cumulative negative effects on landscape, efficient land use, and biodiversity (positive and significant negative); and I believe the SA and Council has underestimated effects on heritage and the character of villages. Historic landscapes, many attention worthy, play no meaningful role in the SA.

SA Appendix 3, Updated Baseline Information, Historic Environment ( para 3, p.199), indicates a lack of sufficient and local data: *'A wide definition of the historic environment is therefore needed and should include not only areas and buildings with statutory protection, but also areas which are locally distinctive, valued and important.'* Had this been available during plan-making, the scope of SA assessments would have been wider and policies justified with more proportionate evidence.

Nevertheless, the significant negative effect on environment and its social and economic benefits hasn't led to reasonable, alternative ways to grow being examined. Instead, harm to major parts of the environment has been accepted by the SA and the Plan as the price for the very aspirational economic growth target associated with the distributor road. I don't think this trade-off has been justified, or in the end sound.

The SA evidence base may be too limited to guide robust local assessments. There are too many ' ? ' uncertain (no data) scores for rural issues which indicates to me there is insufficient local baseline or specialist data to ensure growth is sustainably planned. Sometimes the Plan did not apply the highest scoring environmental Policy Options, and I think some Site Policies are unsound.

Change:

- Implement Historic Landscape Characterisation for Melton Borough, revise Policies EN1 and 13.
- Consider adding a SEA.

#### ***1.3 Policy s19(1A):***

1.3.1 Natural England considers grassland soils to have 'the largest carbon stock of any UK broad habitat' (point 2.8, NERR043). The Borough is rich in these and their low cost contribution to climate change mitigation should be protected and brownfield development promoted for its environmental contributions. For example, all Somerby sites are greenfield, although brownfield alternatives exists.

1.3.2 35% of Plan growth is in rural areas where sustainable travel is not available, affordable or flexible, especially for work. Car travel is necessary. The ++ Greenhouse Gas scores awarded rural areas misrepresents the environmental impacts of the Plan. The SA is inconsistent, recognizing out-commuting negatives for large rural options, such as Normaton Airfield, but not cumulatively for rural villages as well.

Change:

- Include measurable targets for brownfield development with economic incentives for developers.
- Correct ++ Greenhouse Gas scores for rural allocations to reflect out-commuting for work and services.

#### **1.4 *Constructive engagement:***

1.4.1 I question if the Plan's Duty to Co-operate extends beyond housing to other strategic matters, broadly the environment, and specifically cross boundary historic landscapes and heritage assets with group value, e.g. the historic iron age, early medieval and C17 - 19 parkland landscapes of the Borough.

1.4.2 The south of Melton Borough shares NCA:93 with Rutland and Harborough District, an area Natural England says faces significant challenges to the protection of its character from development. These other authorities use approaches which conserve village settlement patterns and landscapes. In comparison, the Plan allocates 105 houses across three greenfield sites in the Somerby NCA: 93 south-west corner on the border with Harborough, with another 200 only 'currently' omitted.\*

\*It should be noted that a large part of this border area and adjacent Somerby Conservation Area (CA) was the subject of Appeal Refusal APP/Y2430/A/14/2221470, primarily on historic environment grounds, discussed in Matter 5.

Change:

- Adopt a common policy approach and research methodology towards conservation of the historic environment with neighbouring authorities in fringe areas.

#### **1.5 *Strategic Policy Framework for Preparation of Neighbourhood Plans (NPs)***

1.5.1 The Plan now says its 'strategic framework' is formed by all of the content in chapters 1-8 and Appendix 1, and calls for NPs to be 'consistent', the same as, the framework, rather than 'in general conformity'. This is not in line with national policy and disregards the intent of the NPs. There is no process for determining a NPs 'general conformity' or resolving inconsistencies, and the NP policy wording may aim to reduce inconsistencies.

1.5.2 Policy SS2's framework is set out on a village basis whereas rural NPs are developed on a Parish basis. This creates a serious conformance obstacle for NPs when seeking to deliver needed housing in the most sustainable places; especially true where Parish villages are closely related by social, economic, infrastructure and environmental character and share services. The 'village' framework of SS2 has prevented reasonable allocation policy alternatives being assessed, such as Cluster Villages.

Change:

- Ensure the Plan clearly says NP's are to be 'in general conformity' not 'consistent'.
- Clarify what is 'strategic' in the Plan and what is not. Sites in villages should not be strategic policies. Articulate process for resolving inconsistencies.