



**Somerby Parish Council's submission to the
MELTON LOCAL PLAN EXAMINATION.
MATTERS AND QUESTIONS.**

To be read in conjunction with the submissions from Carl Powell &
Mary Ann Donovans. (NP leads for Somerby Parish).



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PREPARED BY LYNNE CAMPLEJOHN, CHAIRMAN
& HOWARD BLAKEBOROUGH, COUNCILLOR.

MELTON LOCAL PLAN EXAMINATION MATTERS AND QUESTIONS

Note 1: It is implicit that in answering the following questions, if respondents identify a soundness deficiency in the Plan (as amended by the Focused Changes) they should make clear how the Plan should be changed.

Note 2: Policy references are to the principal policies at issue but other parts of the Plan may also be relevant.

Matter 1: Legal requirements and the Duty to Co-operate

1.1 No Comment.

1.2 Has the Habitats Regulation Assessment and the Sustainability Appraisal (SA) adequately assessed the likely environmental, social and economic effects of the Melton Local Plan (the Plan)? Does the SA demonstrate that the Plan has been tested against all reasonable alternatives?

No - MBC chose to do a SA rather than the more rigorous strategic Environmental Assessment (SEA).in addition to using a less adequate method of assessment the SA itself has not been applied effectively to a number of options for the spatial strategy, which represents a failure to use proportionate evidence. Some SS option selections in the MLP are therefore unsound. E.g. the option of 245 dpa has a run of (- -?) scores on the environmental grounds and thus strongly suggests should NOT be the option used in the LP but it is!

The SA does not adequately take into account the effect on some rural heritage, environment or geological sites. Nor is there any suggestion of using brownfield sites as alternatives.

Suggested Changes

Carry out SEA, Assign numbers instead of using +or – for impact ratings and each option total will provide a numerical score clearly indicating the “best” option.

1.3 Does the Plan as a whole accord with s19(1A) of the Act by including policies that are designed to secure that the development and use of the land in the Borough contribute to the mitigation of, and adaptation to, climate change?

No -There are too many “large” (over 15) developments in areas where there is little usable public transport which will result in most households requiring 2 cars, adding to climate change effects rather than mitigating them.

Suggested Changes

Reinstate the requirement for access to good public transport (enabling travel to and from work) in the criteria for selecting Service centres.

1.4 Has the Council engaged constructively, actively and on an on-going basis with all relevant organisations on the strategic matters that are relevant to the Plan’s preparation, as required by the Duty to Cooperate?

Other than section 4.7 and Policy SS6 which will be considered under Matter 3, does the Plan provide for effective outcomes in terms of cross-boundary issues?

No - For example in the High Leicestershire area where Melton abuts Harborough district there does not appear to be engagement on the status of this area, where Harborough assigns greater value to the environment and heritage than Melton does. There is no preservation of land designation on the fringe of neighbouring districts.

Suggested Changes

Review the LP of the neighbouring LPA and adopt a similar approach to fringe areas.

1.5 Does the Plan set out a clear strategic policy framework for the preparation of Neighbourhood Plans? How will any inconsistencies between emerging NPs and the Plan be resolved?

- i) *No - The MLP has circumnavigated this issue by describing the majority of it's policies (all except 3!) as strategic! This means that NP's decisions on housing sites (SS2), for example, can not differ from those of the LP and thus is completely unsound and inconsistent with national policy.*

Suggested Changes

Separate strategic policy decisions i.e. Housing numbers (E.g. 245 dpa) from detail (allocating specific sites) giving the power back to NP's to decide upon development sites in their parishes.

- ii) *In addition to this the identification of individual villages as service centres etc. (SS!) where the MLP dictates that developments are allocated on specific sites is totally at odds with the NP being a whole parish plan. The effect of this is that any housing outside of the designated village becomes a "windfall" site for the borough as a whole rather than the parish or designated village.*

Suggested Changes

Replace Service centres and rural hubs with a Parish allocation which will remove the conflict between NP's and the MLP.