

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 2: Overall Spatial Strategy**

### ***2.1 Sound framework for the roles played by various parts of the Borough***

The Plan doesn't simultaneously deliver economic, social and environmental gains for all parts of the Borough, so its framework is not sound.

#### ***i) The Plan's consistency with the vision for rural areas***

i-1) The Plan's vision states 'the strong historic and landscape character of the Borough will be as apparent and cherished as ever', and land use will support a strong rural/agricultural economy. However, protecting and enhancing the natural environment and biodiversity, point 20, is not a strategic priority, which shows in the outcome of the Plan.

Policies SS2 and 3 are not yet consistent with strategic environmental objectives 16 -20 especially in rural areas. Objectives therefore are not reasonably deliverable because the development strategy:

i-1.1) Results in significant cumulative negative effects on landscape, biodiversity and efficient land use.

i-1.2) Alters the character and appearance of historic settlement patterns, loses local distinctiveness and evidential features and uses high value agricultural land by adopting Site Policies which place relatively large 'urban-style' developments (30+) at the fringes of historic linear villages, also inconsistent with NCA:93 conservation principles (in Somerby).

i-1.3) Uses a rural settlement hierarchy, discussed in ii-1, which in essence makes allocations on a population basis which cannot guarantee development in the most sustainable places.

i-1.4) Under-estimates as 'minor negligible' the effect on heritage, does not assess likely effects on historic landscapes, and assumes mitigation is possible without proper evidence, discussed in Matter 5 and 9.

Change:

- As done for Sustainable Neighbourhoods, define a specific strategic framework for rural areas that is consistent with the Plan's vision. Broaden the 'Policies' for rural settlements beyond just housing allocations to include environment, transport and economy policies linked to rural needs and conditions.

#### ***ii) Are roles founded on robust evidence and consistent with the strategic objectives***

ii-1) To be robust in terms of the Plan's vision and strategic objectives 16-20, an additional dimension or level of environmental evidence should be used when developing the rural spatial strategy and settlement hierarchy. For example, roles should have taken account of strategic conservation objectives (SOE's) set out in Natural England's NCAs. This may or may not have affected the number of houses required, but would have provided a way to robustly assess Site Policies for the environmental soundness of their specific locations and scale.

ii-2) Emerging Options Service Centre roles were based on a verifiable facility audit. Somerby consultations showed, when inaccuracies in the audit, and completions and deliverable supply were corrected, the village fell below the Service Centre growth and scale threshold.

The criteria was then changed to be less discriminatory (broadband, a school, civic building and employment

opportunity), plus a population allocation yielding even higher requirements. Sustainable travel was dropped as a criteria. The Plan's revised settlement hierarchy cannot deliver strategic objectives 9 (Accessibility), 12-13 (Community Development) or 16-20 (Environment).

I believe the revised hierarchy was not positively prepared, justified or is sound certainly for Somerby. The decision to revise the methodology when it didn't produce the needed result has undermined confidence in the process.

Changes:

- The decision to revise the original Settlement Hierarchy and growth requirement assessment methodology has produced a serious flaw in the sustainable delivery of the Plan across all villages in rural areas.

It was not a sound or reasonable response to the minor shortfall the original methodology revealed and has allowed the much higher and unjustified Site Policy allocations in villages to be seen as sustainable which they are not. It also contributes to the negative effects of the Plan on the environment, and its negative effects on infrastructure haven't been recognized. It has created a house of cards.

I recommend returning to the broader criteria based (corrected) facilities audit, with additional environment criteria, allocating growth to Parishes versus villages and not dictating size/scale of individual developments, just the target number. More reasonable alternatives to make up any shortfall, perhaps through Policy SS6, should be considered.

ii-3) Rural employment opportunities are not based on current evidence or perhaps any at all. The NP submitted evidence for job opportunities based on consultations with local employers ('Planning the Future of Somerby', (1/06/17)) but this was not reflected in site policies. For instance, John O Gaunt is not an 'industrial estate' and doesn't justify the site policies for 105 houses in Somerby.

*Please note that Melton, in Focussed Changes has labelled the Planning the Future Of Somerby document 'biased' because it presented data in a form [and depth] 'not comparable to other parts of the Borough'. This comment undermines the role, benefit and weight of well researched NP's; but also shows the Council in the short term is not taking account of NPPF 158 and using the most up to date information.*

Changes:

- It is possible to justify realistic employment opportunities (not just people employed) for settlements and the Plan should do this and amend the employment scores in the SA and Evidence Base. If not, it should increase negative scores for Greenhouse Gas emission which will result from unsustainable travel to work.

ii-3a) A distinctive part of Somerby's economy, its thriving equestrian tourism, is not in the economic assessment at all. With six liveries and an estimated 100 horses depending on season, equestrian tourism contributes to other local businesses such as the shop, pub, feed providers, farriers and vets.

All three Somerby policy sites are land parcels used for grazing horses. Therefore, their development will lose benefits for the local equestrian economy and associated employment, not assessed by the SA, and is inconsistent with strategic objective 6 (Equestrian Tourism).

Change:

- Loss of benefit and efficient use of land scores should be more negatively scored in the SA and Evidence Base as well as employment opportunities for all Somerby sites.

### **iii) The role of Table 4**

The role is clear but because Policy SS2 doesn't soundly discriminate sustainable locations by facilities, employment opportunities, environmental or tourism contributions, allocations by population are not sufficient to ensure sustainable development.

Change:

- Revise the Settlement Hierarchy to be more criteria based, including environmental criteria.

## **2.2 Policy SS3**

No, this Policy is not effective in providing guidance for development on the edges of rural settlements, particularly Service Centres, because there are no upper limits on growth. It is clearly inconsistent with the NCA:93 conservation objective to preserve the settlement patterns of historic villages and in conflict with NP remits to establish evidenced 'limits to development' based, in many cases, on environmental reasons.

This Policy may be aiming to counter-balance the 'sustainable/unsustainable' village concept embedded in the settlement hierarchy. There is a better way to do this better, such as adopting an evidenced Cluster Village policy allowing housing requirement (not allocation) to be met across all closely associated Parish villages sharing services.

Change:

- Eliminate Policy SS3 from the Plan and adopt a Cluster Village Policy for Service Centre requirements based on a Parish, not village, requirement for growth. This likely will result in higher but more sustainable growth in relation to environment and infrastructure and better meet local housing need.