

- [REDACTED]
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MATTER 2: Overall spatial strategy

2.1 Does the Plan provide a sound framework for the roles that will be played by various parts of the Borough in meeting development needs over the plan period?

No - the MLP does not provide a sound framework for the roles to be played by various parts of the Borough. In particular:

i) and ii) Settlement hierarchy.

No - the settlement hierarchy and apportionment of growth are not based upon sound and robust evidence:

The early 2016 village facility audit for the MLP applied about 40 broadly-based sustainability criteria to Melton's rural settlements (school, public transport, shop, etc.) These were then assessed and totalled to give a score and settlement roles and housing allocations followed. However, when some of the scores were challenged MBC failed to revise those scores or reconsider the sustainability of the affected villages. Instead they discarded what they had previously considered valid criteria and replaced them with only four, these are:

- *A primary school*
- *Broadband – not superfast broadband, just 'broadband!'*
- *a community building*
- *employment opportunity*

The outcome was that the same or more villages were deemed 'sustainable'. The criteria were modified to ensure that villages already selected for housing development stayed selected, and to defeat objections. This was a case of changing the test to get the desired result, which is unsound because it wilfully disregards relevant but 'inconvenient' evidence.

Certainly, it is unlikely to be disputed whether a settlement has a school, community building or broadband. These are yes/no questions. Although, I believe the question or criteria should be superfast (>30mbps) not just 'broadband, as anyone with a landline or mobile signal can get broadband! However, 'employment opportunity' is not so straightforward:

Employment Opportunity and settlement hierarchy

In December 2016, the Somerby NP Group asked MBC for their data supporting presence of 'employment opportunity' in Somerby and received the following reply:

Dear Mr Powell,

We used the following for consideration on our assessments for housing allocations (I'm assuming that a similar approach has been followed for setting the sustainability of the village in terms of employment):

- 800m from the closest employment site: positive value*
- Between 800m and 2km: medium-positive value*
- 2-5km and Public transport: medium value*
- Over 5 km with Public transport: medium-negative value*
- Over 5 km: negative value*

John O'Gaunt Industrial Estate (Public Transport Available, line 113) is identified as the closest one according to the Employment Land Study final report July 06. It is at 4.5km of the edge of the village (5 minutes driving) and qualified as a good quality employment site (medium size - general industry). However, Burrough Court is even closer and within a walkable distance (12min, 0.6miles) from a bus stop (Melton Lane).

In terms of the number of employed people, unfortunately we don't hold that information, especially on areas that include several businesses as any industrial estate. Employers don't usually share information.

According to our Local Plan records we don't have any other (reasonable large) employment site within the Parish. However, I've sent an email to our Economic Development team requesting any sort of information related with the Employment on the Somerby Parish. I hope they can be of any further help but I'm not sure if they manage that level of detail.

As soon as I receive an update from them, I'll let you know.

*Kind regards,
Jorge Fiz Alonso*

This was followed shortly, as promised, by the following from MBC Economic Development Team:

Dear Mr Powell,

I've just received a reply from our Economic Development Team:

'Truth is that these kinds of databases are hard to get and keep updated, which is one of the reasons why we don't really have much information on that outside of the town centre. There are companies that charge a fair amount to give access to such directories, so you can imagine how many resources it takes (for example, <http://www.businesslistsuk.com/>).

I can refer him to the Melton Times business directory, although personally I don't know how updated they keep it. He can take a look and maybe it'll be of help:

<http://findit.meltontimes.co.uk/search/somerby%2Cmelton-mowbray%2Cleicestershire>

I know that this is not too much, but I hope it is of any help.

*Kind regards,
Jorge Fiz Alonso*

This is no evidence at all of 'Employment Opportunity' in Somerby. It indicates that MBC has almost no evidence. Perhaps they have more for other settlements, but the words suggest not. Nevertheless, MBC changed its position on employment opportunity in Somerby between The Melton Settlement Roles and Relationships Study, Melton Borough Council, 2015 states where it stated in Appendix 1 that Somerby had no employment, and then a year later in Appendix B of the September 2016 review of Settlements document they stated that Somerby had employment opportunities.

Furthermore, there is no footpath between the village of Burrough-on-the-Hill and the employment sites at Burrough Court and John O'Guant. Recent advice received from MBC in respect of sustainability stated that a footpath was required in order to link a settlement to services in order to satisfy the sustainability criteria; however, that is clearly not the case here.

In the evidence-gathering stage of the Somerby Parish Neighbourhood Plan research was done on economy and employment in the Parish and a document produced in April 2017, '**Employment and Employment Opportunity in Somerby Parish**'. MBC have been provided with the document. The document concludes that although Somerby Parish enjoys relatively high employment it actually has very low employment opportunity. Key findings are that 82% of parishioners work outside the parish, job density is low at 0.61, the largest employers in the parish do not recruit locally, and average distance travelled for work one-way is 26 miles.

Somerby therefore fails the test of 'employment opportunity' and so is incorrectly categorised as a Service Centre. By MBC's own criteria Somerby has 'Negative Value' for employment opportunity. The settlement role is unsound therefore so are the housing allocations that follow. I struggle to understand how criteria can be used to determine the hierarchy when MBC do not have evidence to qualify their determination.

Suggested change: Somerby is just an example. The criteria should be reconsidered, broadband should be replaced with Superfast Broadband, and the plan should be changed to really exclude as 'service centres' settlements with poor employment opportunity – this is not new, I merely suggest that MBC reassess settlements against their own criteria once the evidence has been gathered.

iii) Is the role of Table 4 clear? Is its evidence base sufficient for its purpose?

No. Whilst the *intended* role of Table 4 is quite clear, the evidence base is **not** sufficient for its purpose. This is primarily because the overall housing target is arbitrary and un-evidenced (**Matter 3**) and secondarily because of inaccurate and arbitrary settlement roles (notably assumptions about 'employment opportunity' based on no evidence – point ii) above).

2.2 Does Policy SS3 provide effective guidance for development proposals on unallocated sites in/on the edge of existing rural settlements? (repeated application etc.)

No, the guidance is ineffective.

SS3 was a Pre-submission Draft and Focused Change policy intended to assist in the creating and maintaining sustainable, non-service centre, settlements. However, as the Examiner correctly identifies the potential weakness, which is risk of a series of applications for 'small' developments year after year which achieve a 'large' development by stealth. The policy does require that the proposal 'will not result in a level or distribution of development that is inconsistent with the development strategy' but this is not sufficient because the development strategy contains no upper limits of any kind.

I am in favour of the policy in principle; however, there are no or little constraints to protect against cumulative development or safeguards against fringe development. Similarly, the Somerby Parish Neighbourhood Questionnaire demonstrates 80.6% support for meeting Somerby's housing requirement through small developments of 10 houses or less.

Suggested change: Strengthen the policy to require review, and accounting for, the settlement's progress, or better still the Parish's progress, towards its housing requirement (not housing allocation) when an application is made under SS3.

[REDACTED]

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