

Melton Local Plan Examination

Matters and Questions

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

1.5 There has never been a clear strategic policy framework in preparation of Neighbourhood Plans. This is due to a complete lack of proper consultation and response from MBC in providing evidence and reasoning for the allocation of housing numbers throughout the parishes within the borough. As I am a Somerby resident I have focused my attention on the Somerby Parish and have no evidence to say that the same policy framework has not been carried out throughout the borough.

The following points have been established and brought to MBC attention by the Somerby Parish Council and Neighbourhood Plan Steering Group and I have attached a copy to support my comments.

1.0 It has been concluded that housing development within the Somerby Parish on the scale and of such concentration would be unsustainable development.

2.0 Evidence gathering has been completed by NP within the Parish from residents and businesses.

3.0 Historic and continuing housing growth in Somerby Parish

4.0 Sustainable Housing development, the need has been over estimated.

5.0 Settlement Role Criteria

6.0 Environmental Sustainability

7.0 Social and Environmental Sustainability

8.0 Economic Sustainability and Employment Opportunity

9.0 Conclusions

The purpose of this email is to engage with the inspector and look at the Melton Local Plan and housing allocation for Somerby Parish and expose the lack of evidence from MBC for that housing allocation.

To: Melton Borough Council
From: Somerby Parish Council and Neighbourhood Plan Steering Group (NP)
Date: 18th June 2017

Subject:

Planning the future of Somerby Parish

1.0 Purpose of this paper

This paper addresses a number of issues arising from the draft Melton Local Plan Pre-Submission Draft, November 2016 (MLP) housing growth targets and the spatial concentration of sites which were allocated in that plan. It compares them to the findings of the emerging Somerby Parish Neighbourhood Plan (NP) and argues for reconsideration of both numbers and distribution.

These issues all fall under the headings specified in the National Planning Policy Framework 2012 (NPPF) Paragraph 7, as dimensions of sustainability for planning purposes – environmental, social and economic. Local and Neighbourhood plans must therefore deal with them and they are important material considerations when deciding individual planning applications.

NP evidence indicates that further consideration of heritage and landscape, community facilities, infrastructure and employment is necessary for the MLP to be a sound plan for sustainable development. This becomes even more significant and urgent when considering the potential for about 130* new houses in Somerby village driven by planning applications ahead of the MLP and the NP. We conclude that housing development on this scale and in such concentration would be unsustainable development.

This paper will observe the broad headings of environmental, social and economic sustainability but housing will first be discussed separately as it bears on all of them.

**130 new houses: SOM1: 31, SOM2: 42, SOM3: 32, 16/00146/OUT: 12, 15/00149/FUL: 4, 17/00396/DIS: 7, Single houses: 4, = 132.*

2.0 Status of the Somerby Parish Neighbourhood Plan

Evidence gathering for the NP has been completed, including the household and business questionnaires, the local environment inventory, key stakeholder and facilities consultations and extensive background research.

Response to the NP questionnaires was very high. 60.2% of Parish households (397 respondents) and 30 businesses participated, representing very serious engagement of residents in the future of the Parish.

Somerby NP policies have been drafted and are currently under professional review. At this stage therefore the emerging NP does not carry weight, but the evidence gathered for it does. This evidence is the most comprehensive and detailed available for the Parish therefore MBC should take it into account where their plans will affect the Parish. Such an approach is

required by NPPF para 158: *'Each local authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.'*

3.0 Historic and continuing housing growth in Somerby Parish

NP data shows that between 1991 - 2016 housing stock in Somerby Village alone grew by about 56 dwellings or 35%. Nearly half of this growth, 25 houses, took place between 2011 - 2016.

This growth was achieved organically by infill and high density conversion of existing commercial or agricultural buildings. This very respectable increase in housing provision has taken place with minimal harm to the character of the Conservation villages, historic landscapes, and community cohesion. The success of this approach should inform future planning.

This productive and sustainable approach is continuing into the future; already in 2017 planning approval has been granted for a 12-house development and two single dwellings in Somerby and a 6-house development in Pickwell.

The revised MLP Settlement Role (01/09/16) increased Somerby's allocation from 36 to 49 new houses. However, taking into account current planning applications and the remaining SHLAA site (SOM 2), development could result in about 130 new houses in the very near future in Somerby Village alone.

This number greatly exceeds the plan allocation and would result in a 62.3% increase in Somerby village households before any windfall. We consider this would be unsustainable development and will explain why in detail. Furthermore our opposition to potentially 130 houses is conservative, as there is no expressed maximum to the number; a larger number would be proportionately more unsustainable and we would oppose it more strongly.

4.0 Sustainable housing development - housing need has been over-estimated

In the context of Somerby Parish we have evidence for this perhaps surprising conclusion from four main sources:

First, the Leicester and Leicestershire Housing and Economic Needs Assessment 2017 (HEDNA). The most recent pre-submission draft of the MLP 01/09/16 sought to achieve a target of 6,125 new dwellings for the Borough by 2036 or 245 dwellings per annum (dpa). This target was derived from the Leicester and Leicestershire Strategic Housing Market Assessment 2014 (SHMA). Even if many people considered the numbers too large the arithmetic was at least sound and is described very well in the Melton Authority Monitoring Report 2016.

However, the SHMA 2014 is now superseded by HEDNA 2017 and the next draft of the MLP must start from a very different assessment of housing need. Even after adjustments upwards to support affordability and economic growth, the target is reduced to 4,250 or 170 dpa, only

69% of the previous target. HEDNA advises against exceeding this number as likely to drive population above employment opportunity, risking higher unemployment and lower wages in the Borough. This is one risk we identify in building 130 new houses in Somerby.

Second, the draft MLP itself. This derived housing allocations for different categories of settlement by applying a simple formula to the SHMA 2014. Applying the same formula to the reduced HEDNA target would reduce the Somerby Village's housing allocation from 49 to 34. Significantly HEDNA deals with the period 2011 – 2036; in Somerby village about 25 new dwellings have already been built since 2011. It is apparent that any reasonable target for this parish is already well on course to being achieved long before 2036.

Third, the Somerby Housing Needs Survey 2016. This identified only 10 Somerby residents who stated housing needs locally over the next five years, 5 for open market and five for affordable rentals or shared ownership. Additionally 9 people who were at that time on the Melton Housing Register stated a local connection and a desire for affordable rental accommodation there. This totals 19, far short of a need for 130 houses or even for 49.

Fourth, the Somerby NP Questionnaire. Residents clearly expressed their preferred strategy for the type and amount of housing growth which is necessary and acceptable. Amongst 397 respondents:

- 93% wanted less than 51 houses in the next 20 years and 67% wanted less than 26
- 58% strongly disagreed/disagreed with building outside current village boundaries
- 78% strongly agreed/agreed building should reflect existing densities
- 90% strongly agreed/agreed that housing design should reflect existing surroundings
- 75% strongly agree/agreed that developments should be of 10 or less houses
- 72% strongly disagreed/disagreed with developments of 25 houses or more

Only 10% wanted no new houses at all. There is acceptance and even support for new housing development spread over time but not for a number as high as 130, not for them all being built quickly, and not for large developments of 30+ houses. These responses support our view that housing development should take the form of small-scale developments (about 10 houses) spread across the south of Melton Borough over the life of the MLP and the Parish NP. Such applications may attract local support, unlike the almost unanimous opposition being attracted by larger, faster proposals. This may bear on deliverability if opponents identify valid planning objections.

Depending on the weight given to each of these sources of information on housing need they support the building of 19, or 34, or 50 houses in the Parish over the next 20 years. They certainly do not show a need for 130 in the next year or two or for a number without limit.

5.0 Settlement Role Criteria

In the early 2016 village facility audit for the emerging MLP, Somerby met only 12 of 43 broadly based sustainability criteria and fell below the Service Centre threshold when data for the Post Office, bus service and tip were correctly scored. Had these criteria shaped the MLP, Somerby would have lower targets for housing numbers or no target at all. Growth of 130 or more new houses would be considered unsustainable, as well as out of character with the Conservation village.

The revised settlement role criteria from 01/09/16 (broadband, school, civic building, employment opportunity) are considered too narrow to assess services for the scale of growth now proposed in Somerby. With the exception of broadband they do not reflect the services most used and necessary in this rural community to minimize car travel, which were better addressed by the abandoned criteria. To consider them individually:

Broadband whilst important is becoming something of a 'given' for all settlements thanks to national and county-level initiatives. It is not a valid means to differentiate settlements.

Somerby has a school and a civic building. However, the settlement criteria attach too much importance to them as indicators of sustainability. The NP Questionnaire shows the most frequently used services to be the shop, footpaths and bridleways, followed by the pub and the tip. Neither the school nor the village hall are among the most-used.

Only a third of the 39 pupils at Somerby School are from the Parish and many parents in Somerby choose to send their primary-school age children elsewhere such as Oakham or Whissendine. Above primary school age all pupils must of course travel elsewhere. Of the 49 questionnaire respondents who visit a school, 12 live in Somerby village, 12 drive to it from in or near the Parish, and the rest travel an average of 7.4 miles.

Concerning employment opportunity, the assumption by MBC that Somerby has a lot of it is based on no evidence. NP evidence is that it has very little employment opportunity, as will be discussed in detail at section 8.0 below.

These four criteria chosen arbitrarily from the many which could have been used are neither broad nor precise enough to construct a hierarchy of settlement suitability, such that one settlement should be preferred for development over another.

6.0 Environmental Sustainability – Sensitivity of landscape and heritage and the extent of flood risk have been under-estimated.

Somerby and environs is part of NCA 93 High Leicestershire Hills, an area of very important historic built and landscape character facing significant challenge from development, and which Natural England urges the LPA to protect for both its intrinsic value and benefits to the broader community. So far in 2017 Melton has approved development in the setting of the Grade I Church, in an historic parkland and in a sensitive historic landscape previously refused in an Appeal decision. These approvals have cumulatively begun to erode the historic environment and the potential SHLAA sites SOM 2 and 3 should be viewed as a further and greater threat.

At the root are the environmental appraisals adopted by the MLP which do not adequately document relevant and local heritage, especially historic landscapes and un-designated buildings.

Historic England's comments to the LPA in the 2016 Pre-Submission Plan Sustainability Appraisal support this criticism. The NP natural and historic environment inventory provides a more comprehensive analysis and so should be utilized in future decision making.

6.1 NP inventory of environmental and heritage assets in Somerby village

This inventory is more comprehensive and reliable than that in the draft MLP which does not identify them all and does not take into account as it should the settings of the assets.

In total there are 13 listed buildings, 22 un-designated built, and historic landscape assets of importance, including 4 designed historic parks and gardens, many veteran trees, 7 extensive areas of ridge and furrow, the newly discovered significant earthworks of a medieval village, and panoramic views of importance to three Scheduled Ancient Monuments. These assets should have been considered by every site appraisal; because they were not, sensitivities have been overlooked and environmental sustainability overestimated.

6.2 Appeal Decision APP/Y2430/A/14/222/470

86 new houses, nearly half the existing village stock, would be concentrated at the south and west of the village in an area which this Appeal Decision characterized as sensitive, with significant landscape and heritage value. Development for a single wind turbine was refused due to adverse impact on these surroundings. The impact of a house is less than that of a wind turbine, but the impact of 86 of them would be greatly more. This Appeal Decision must therefore weigh heavily against their approval.

Melton Planning Officers objected to the wind turbine development for its adverse effect on this landscape under Policy OS2, and site SOM3 has also been previously refused development for environmental reasons (drainage and heritage character).

6.3 SHLAA sites - SOM 1, 2, 3 and site appraisals

The three SHLAA sites, each of 30 plus houses together with infrastructure, are located at the edges of Somerby, and would result in significant change to the Conservation village's character, its spatial relationship with the countryside and historic landscapes. In addition, sites SOM1 and 3 have geological conditions which cannot be changed and mean that housing development there would increase flood risk to existing buildings, including a listed building (Vinery at The Grove). At the time of writing the planning application for SOM 1 has been refused on the grounds of flood risk, but an appeal is likely.

The NP has conducted appraisals for SHLAA sites SOM1, 2 and 3 using the MLP method adjusted for Somerby's Conservation village status. The NP appraisals recorded features which were not all reflected in the MBC appraisals and the MLP environmental support documents. They are:

- An historic designed landscape and gardens, veteran trees, a Grade II listed building, un-designated heritage buildings, archaeology and a historic village gateway (SOM 3)
- Significant earthwork remains of medieval and post-medieval Somerby (SOM 2)
- Two rare and un-designated cruck houses (SOM 2)
- High levels of inter-visibility between one or more of the developments at the south and west with the settings of Somerby Conservation Area, a Grade I church, four other listed buildings, un-designated heritage buildings and historic park land (SOM 2 and SOM 3)

- Badger setts (SOM 2) a pipistrelle bat foraging corridor (SOM 3) a Great Crested Newt breeding pond and bat roosts (SOM 1)
- Existing flooding (SOM 1) flood risk and drainage issues (SOM 3)

MBC site appraisals should be corrected to include and recognise the significance of these assets and environmental sensitivities.

6.4 Importance of environmental considerations to residents and local businesses

Both the household and business questionnaires confirmed the importance of the local environment and heritage as a positive reason for living and doing business in the Parish, and there is strong direction from residents to include effective policies in the NP to protect and enhance the natural and historic environment:

- The most positive features of the Parish are its rural nature, tranquil environment and easy access to the countryside. Responses on ‘most used’ facilities also reflect this.
- Out of 397 respondents the vast majority consider the following environmental assets to be important/very important items for protection by NP policies: landscapes (362), views (358), conservation areas (302), historic buildings and settings (356) and rights of way (346).
- Residents recognize both the recreational and economic value of an attractive rural environment to the local economy with 82% supporting the growth of tourism in the Parish.
- Only 7 businesses said the attractive environment and tourism were important to their business but for these they were crucial including the pubs, shop and bed-and-breakfasts.

7.0 Social and Environmental Sustainability – essential travel

A further 130 houses in Somerby would generate significant traffic movement where evidence shows the need to travel cannot be minimized or sustainable transport modes maximized, which would conflict with the Leicestershire Transport Plan (LPT3, 2011-36).

The NP questionnaire surveyed the distances residents regularly travel for key purposes:

| Purpose | Responses | Average distance (miles, one-way) | % travelling more than 5km/3 miles |
|------------------|------------------|--|---|
| Work | 242 | 26.5 | 83.3 % |
| Grocery shopping | 288 | 6.7 | 95.8 % |
| Leisure | 198 | 12.5 | 95.8 % |
| Healthcare | 191 | 5.6 | 48.7 % |
| School | 49 | 4.5 | 74.8 % |

Travel to Work we will discuss in more detail under Economy and Employment at para 8.4. All other travel purposes we discuss here.

For shopping, destinations are mainly Oakham and Melton, followed by Syston and

Leicester. Although Somerby Village Store is much valued, almost no-one can meet their grocery shopping needs there due to its small size and limited product range. There may be potential for increased use of home delivery in the Parish.

Leisure travel showed strong clusters of mileage. The 61% travelling 4 to 10 miles tend to indicate Melton or Oakham as the destinations, or else enjoyment and use of the local countryside – which is after all why most people choose to live here. There was also a noticeable spike of 14% of people around 20 miles which might indicate Leicester.

In Travel for Healthcare returns about 51% referred to Somerby Surgery as their main healthcare destination, about 31% to Oakham or Melton, about 4% probably to Market Overton, and 14% probably to Leicester. The usefulness of Somerby Surgery is obvious both for the healthcare it provides and for reducing distances travelled by parishioners. Having said that, there are limits to what a local surgery can provide and half of all respondents rely on more distant facilities. This might not be much different in Melton or even a large city.

Travel for School attracted 49 responses but they are difficult to interpret because most respondents share children. Average mileage was 4.5 excluding two who go so far away it must be to boarding school. 24 respondents travel a short enough distance that they must be going to Somerby Primary School but of course that doesn't indicate a number of children. We know that only about 13 children there live in Somerby village or parish. The most important observation is that 'school' altogether represents very little of the total miles travelled in the Parish compared to work, shopping or leisure. This is unsurprising because not everybody has children.

Only 4 of 397 Parish respondents state they don't have access to a car and these findings of the Questionnaire show that village facilities cannot meet basic family needs without high levels of travel, which argues against Somerby's Service Centre designation.

Given an average 1.77 cars per household, 130 new houses would produce a minimum of 237 additional cars in Somerby each making 600 trips per year (National Travel Survey 2015). The above data shows these would be 'long' trips from Somerby, undesirable for reasons of carbon emission and road safety.

Other findings on the sustainability of travel in Somerby include:

- Residents list over-development and traffic volume / parking problems as the two major 'negatives' of Somerby village.
- The local 113 bus service is considered too infrequent, inconveniently timed and costly for regular use to Melton and Oakham for work or shopping.
- Somerby Primary School reports major problems with parking and road safety even at present pupil numbers, and that children have fears when crossing the High Street. The school has requested level crossings but these would worsen existing congestion at peak times.

No comprehensive Traffic Assessment has been done for the cumulative effect of 130 or more new houses on traffic mobility or road safety in Somerby. Highways continues to assess each application separately, without considering the whole. This piecemeal approach is neither relevant nor adequate when so much new housing is being considered so soon.

Overall the evidence shows that the great majority of parishioners have to travel quite long distances for work and to access services.

8.0 Economic Sustainability and Employment Opportunity

These figure importantly in the NPPF and the MLP settlement role criteria respectively and the NP has obtained much evidence about them. This evidence discloses relatively low employment opportunity.

In December 2016 we asked MBC for their evidence of employment opportunity in Somerby Parish but they could supply very little, only naming Burrough Court Estate and ‘John o’ Gaunt Industrial Estate’. They added that ‘these kinds of databases are hard to get’ and ‘employers don’t usually share information’. The NP therefore undertook to obtain it ourselves by studying the published sources referenced at the end of this paper and asking the employers themselves which realistically MBC could not be expected to do.

The NP Business Questionnaire has so far consulted 30 businesses in or near the Parish (including all the largest employers) and the Household Questionnaire achieved an impressive 60.2% return rate. We therefore believe we have the best evidence base on the economy of the Parish currently available.

8.1 Demographic background

In 2011 the Parish had a population of 812. The population is slightly older than average at 44 compared to about 42 for the Borough and 40 for the UK but the percentage of population of normal working age (16-64) is actually slightly higher than in the Borough or UK at 67%. This is not a ‘parish of pensioners’. Retirees make up 17% of the population which is in line with the Borough and National average. About 75% of parishioners are economically active (employed or self-employed) which is the same as the rest of the Borough and 5% higher than the UK. About 17% are self-employed which is almost double the regional and national averages.

Unemployment was low at 3% in 2011 and of Questionnaire respondents only 1.2% were unemployed. In matters of economy, employment and population the NP will seek to maintain and if possible improve the ratio of employment to population.

8.2 Employment sites for Somerby Parish

Low unemployment in the Parish does not translate into high employment opportunity for people living in it. Here is the evidence:

Burrough Court is by far the largest employment site in the Parish. Approximately 250 people (full-time equivalent) consider it their main place of work but there are significant limitations on the site as an employment opportunity for the Parish. First, although it lies *within* the Parish it is not the exclusive opportunity *of* the Parish. Twyford, Thorpe Satchville and Great Dalby all lie as close as or closer than Somerby Village and Tilton is only about 500m further away. Second, it is not accessible by public transport nor feasibly on foot along the unlit road

without a pavement from any bus stop. Third, it is an employment site but not an employer. Businesses there hold leases of up to 8 years, they come and go and are all in varying degrees potentially temporary. Fourth, the 29 employers there rarely recruit staff locally, instead bringing trained employees with them from elsewhere.

Gates Garden Centre is the second largest site (actually outside the parish but within 5km). About 70 people (full-time equivalent) work there. Again however there are limits on its employment value for Somerby parish. Firstly as well as Somerby it lies within 5km of Cold Overton, Langham, Knossington, Braunston, and a large part of Oakham. They share the employment opportunity. Secondly although Gates' has a management structure like any other business most employees are on minimum or low wages not sufficient to afford the 'rural premium' on housing or transport associated with living in Somerby. Anecdotally we know of almost no parishioners who work there.

'John O' Gaunt industrial estate' is a misnomer. MBC may have been referring to two businesses there, Redd Europe Limited and John O' Gaunt Rural Industries. About 30 people work there between them. They are outside the Parish but just within 5km of Somerby Village.

The Neighbourhood Plan has consulted some 30 other businesses employing about 80 people in the Parish. Although this is not quite every employer we are confident to have spoken to all the largest ones which employ between 3 and 15 people. Only one business (employing 10 people) reported plans to possibly employ more, and none report difficulty obtaining labour or a shortage of it. Overall these employers are land-based and require employees with the corresponding skills and inclinations which are different to those of the wider population.

8.3 Job Density

Job Density is a measure used by the Office for National Statistics and sometimes by MBC. It is defined as the number of filled jobs (including self-employment) in an area divided by the number of working age people living there. It is not an employment rate, *it is an indication of demand for labour*; in other words the extent to which additional labour supply is or is not required by the economy of that area. This is very relevant to any discussion of future housing development and population increase.

Although the Job Density value cannot be used to calculate a strict 'deficit' or 'surplus' of labour in an area it is an indicator, particularly in comparison with other areas. A low number indicates out-commuting for work and a high number indicates attraction of workers from outside the area. Some sample Job Density figures from 2014 are:

| | |
|----------------------|---------------------------|
| England & Wales 0.78 | Leicestershire 0.74 |
| Melton Borough 0.76 | Rural Leicestershire 0.64 |

In order to obtain a figure for Somerby Parish to compare with these, we totalled all the employment opportunity in the Parish, then added Gates Garden Centre and John O' Gaunt. We obtained or carefully estimated the number of working-age people in all relevant villages (within 5km of the employers who are in turn with 5km of Somerby) and did the arithmetic.

We calculate the Job Density of Somerby Parish to be about 0.61.

If we overlooked a few jobs in the Parish, this is more than offset by us not including the large part of Barleythorpe and Oakham's population which lives within 5km of Gates'. 0.61 is a low figure, even for Rural Leicestershire. It indicates low demand for additional labour in the Parish, so any new population is likely to have to travel out of the area for employment (or be unemployed). This accords with what local employers have told us (they are not short of labour) and our data on 'distance travelled to work' described next. These are all indicators of relatively low employment opportunity in the Parish.

8.4 Distance regularly travelled for work

We discuss this separately from other purposes of travel because it is by far the largest component of private car use and bears on both environmental and economic sustainability.

The Household Questionnaire was very informative attracting 242 responses from the 252 who were employed or self-employed. Key findings were:

- 79% of them travel to work by private motor vehicle which is higher than the Borough and much higher than the country. Half of the remainder work at home.
- About 82% of them work outside the Parish.
- Average distance regularly travelled for work (one way) is 26.5 miles. No figure for comparison is available from the 2011 Census but in 2001 the figure was 15 miles showing that parishioners are travelling much further for work than they used to.
- Only about 16% of respondents travelled less than the 5km / 3 miles considered desirable by MBC and that includes homeworkers.
- Spikes at certain mileages strongly suggest that Melton, Oakham and Leicester are where more than half of economically active parishioners work, and another third travel further than that including about 10% to London or a similar distance.

In combination with the low job density figure of 0.61 this travel data shows that employment opportunity in the Parish is not high and is falling in the long term, probably reflecting increased mechanization and use of contractors in the land-based sector.

Somerby is substantially a commuter village where it is difficult to achieve a reduction in travel or a modal shift away from car use. As such housing development on the scale of 130 (or more) would fail the Leicestershire Local Transport Plan (LPT3) by increasing the carbon footprint of the County.

9.0 Conclusions from this paper. Recommendations and requests to MBC.

Preparation for the NP has provided the broadest, most detailed and most current evidence available for Somerby Parish. This evidence addresses the environmental, social and economic dimensions of sustainability as defined by the NPPF and the settlement role criteria used by the draft MLP. As such it is the best evidence available and should be afforded corresponding weight, so as to comply with the NPPF para 158.

It is recognised and understood that where a LPA has no up-to-date Local Plan and no five-year housing supply, NPPF para 14 and the presumption in favour of sustainable development applies. There will be new houses but it is incumbent on MBC not to recommend or approve housing development which is *unsustainable*. Therefore this paper

relies on the NPPF not policies from the draft MLP which, whether we agree with them or not, have little weight.

Evidence shows that at the SHLAA and draft MLP stages the suitability of Somerby Village and indeed Somerby Parish for large-scale housing development was over-estimated.

Environmental – many landscape and heritage assets and their settings were not identified at all therefore could not have been taken into account. Their social and economic importance was overlooked as was their sensitivity. Flood risk also was not always identified.

Social – choice of settlement role criteria was arbitrary and does not reflect the real utility or importance of various community assets, as expressed by local people now that they have been asked by the NP. In particular, life in Somerby requires frequent and quite long car journeys to meet basic needs

Economic – key data are a low job density of 0.61, 82% of residents working outside the parish, only 16% working within 5km, and an average of 26.5 miles travelled regularly for work. Consultation with businesses confirms low employment opportunity within the parish. There is no reason to believe increased population would improve this situation and simple supply and demand (more people and no more jobs) suggests it would make it worse in terms of carbon emissions, road safety and work-life balance. HEDNA 2017 advises against trying to ‘boost’ the local economy with new housing development above the levels it recommends, as this would tend towards higher unemployment and/or lower wages.

Fortunately there are several opportunities at this time for re-assessment and improvement:

- HEDNA 2017 has superseded SHMA 2014 with a housing target 69% of what it used to be. This potentially allows a more selective approach to housing development.
- Leicester and Leicestershire have commissioned a new Strategic Flood Risk Assessment.
- The Melton SHLAA is undergoing its annual review.
- The MLP is being re-drafted.
- The Somerby Parish NP is being written.

We request, recommend and to some extent require that MBC do the following:

- Adopt the lower housing target for the Borough contained in HEDNA 2017 and meaningfully incorporate it into the 2017 SHLAA review and the next draft of the MLP. If there are to be housing ‘allocations’ for the villages then make proportionate downwards adjustments for the lower Borough target.
- Comply with 2014 government guidance on the SHLAA process and plan preparation by consulting us: *“The following should be involved from the earliest stages of plan preparation, which includes the evidence base in relation to land availability...[several listed] ...local communities...**Parish and Town Councils and neighbourhood forums preparing neighbourhood plans**”* (Para 008 Reference ID: 3-008-20140306)
- Consider a spatial strategy for housing that seeks to distribute small developments across many settlements in the Borough rather than concentrating large developments on a selected few. These would be proportionate in scale to those settlements and in

the case of smaller villages especially, full consideration would be given to capacity and significant environmental issues. In the context of Somerby Parish (and Ward) our Cllr Leigh Higgins has referred to this as the ‘southern strategy’ but we defer to him on the detail of his idea.

- Take into account the evidence gathered in preparation of the Somerby Parish NP. This would be at SHLAA review, site appraisals, the LP process and individual planning decisions. It is the best evidence available for this parish. We have more of it in quantity and detail than is contained in this paper and will be happy to contribute it to meaningful consultation.

This paper contains a robust combination of hard data and informed local opinion. Whilst planning policy is not a referendum, it remains true that a plan which is based on the evidence and perhaps even popular is more likely to succeed than one which is not.

We ask to be told, with a rationale, how our requests and recommendations are accepted or rejected. That is the meaning of consultation.

Thank you for your attention

Signed,

For Somerby Parish Council:

Lynne Camplejohn (Chair), Howard Blakeborough, Pat Fynn, Colin Marlow, David Vurley.

For the Somerby Parish Neighbourhood Plan advisory group:

Mary-Anne Donovan (Chair), Tom Allen, James Brown, Mel Davies, Angela Fisher, Ros Freeman, Carl Powell.

Sources:

The National Planning Policy Framework 2012

The National Census 2001 and 2011

Leicestershire Rural Economy Evidence Base 2014

East Leicestershire Rural Workspace Demand Study 2014

Somerby Neighbourhood Plan household questionnaire January 2017

Somerby Neighbourhood Plan business questionnaire January-March 2017

Somerby Parish Neighbourhood Environmental Inventory 2016- 2017

'In the Right Place: A strategy for the organisation of school and other learning places in Leicestershire': 2014-2018

National Travel Survey 2015

Leicestershire Local Transport Plan (LPT3 2011-2036)

Natural England: LCA: 93 High Leicestershire and all MBC Landscape Appraisals, Areas of Separation, Fringe Sensitivity and Local Green Space Study

Melton Pre-submission Plan Sustainability Appraisal 2016

Somerby Housing Needs Survey 2016

Leicester and Leicestershire Strategic Housing Market Assessment 2014

Leicester and Leicestershire Housing and Economic Development Needs Assessment 2017