

Somerby Parish Neighbourhood Plan

Regulation 16 consultation - comments and responses

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Stakeholders

Anglian Water

General comments

Thank you for the opportunity to comment on the consultation on the Somerby Submission Neighbourhood Plan. The following comments are submitted on behalf of Anglian Water. The Parish of Somerby is located outside of the area served by Anglian Water. We serve part of Melton Borough but not Somerby Parish. As such we have no comments to make in relation to the Neighbourhood Plan. The views of Severn Trent as water and sewerage undertaker for the Parish should be sought on the Neighbourhood Plan. I would be grateful if you could confirm that you have received this response. Should you have any further queries relating to this response please let me know.

SPC response:
Noted.

Coal Authority

General comments

Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it.

SPC response:
Noted.

Environment Agency

General comments

Hello, thank you for giving the Environment Agency the opportunity to comment on the Somerby Neighbourhood Plan - Regulation 16 consultation. Having reviewed the submitted information we have no adverse comments to make on the proposed Plan.

SPC response:
Noted

Ernest Cook Trust

SPC response (general):

ECT's comments are addressed one-by-one in the following pages. On this page is an over-arching response to all of them:

It is suggested by ECT that the NP is not in conformity with the Local Plan because it fails to reference the Local Plan residential allocation SOM2. The Parish Council does not agree that lack of reference at some particular points results in failure to be in general conformity with the Local Plan; it is acknowledged at many points (see response to ECT's first comment below). There are many Local Plan policies that are not referenced in the NP – it is not a requirement to repeat Local Plan policies.

The Ernest Cook Trust state that the NP is not in general conformity with the Local Plan because it does not allocate further sites for residential development. This decision is for the Parish Council to make. Neighbourhood plans are not required to allocate sites for development and failing to do so therefore does not result in it failing to be in general conformity with the Local Plan.

The respondent appears to be suggesting that the NP does not conform to the Local Plan because it designates Limits to Development where the Local Plan does not. However, it is then suggesting that the Limits to Development are adjusted to include the representative's land to support its future development. The designation of limits to development is a commonplace element of neighbourhood plans, whether the Local Plan has such boundaries or not. This has happened routinely in Melton Borough subsequent to their removal through the Local Plan. It is a matter of detail and within the remit of a NP and not, therefore, in conflict with the Local Plan strategic policies. The Limits to Development were drawn with regard to a methodology that is described on pages 28 and 29 of the Submission Version of the NP. It is inappropriate to amend them in line with the respondent's wishes to promote development on land owned by the Ernest Cook Trust.

Comments are made in opposition to two proposals for Local Green Spaces in Policy ENV1 (SG1.1 Manor Farmhouse Green, Somerby and BG1.3 Kings Lane Paddock, Burrough) and in support of one (BG1.1, Goose Field, Burrough). These sites were selected following a comprehensive assessment of open spaces within the Parish and the Parish Council does not agree with the opposition views expressed by the respondent, which were addressed in the responses made at Regulation 14 consultation.

The respondent objects to the identification of two parcels of land as Important Open Spaces in Policy ENV3 (CYP-1 Children's Playground and PP-1 Football Pitch, Somerby) but gives no justification for doing so. There is also an objection to policy ENV4 'Local Non-Designated Heritage Assets' because of the impact on the allocated Local Plan site SOM2, yet the respondent says that they are fully aware of the findings of a detailed site investigation undertaken on the site and will take measures in accord with those findings. This is fine on the understanding that the NP policy is also adhered to.

Submission Plan, page 26, Section 5.2, Paragraph 044

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

The Melton Local Plan allocated SOM2 for residential development. This paragraph and statements in Sections 5.0, 5.1 and 5.2 appear to ignore the adopted Local Plan

Please provide your suggestions below:

The Local Plan's allocated sites SOM1 and SOM2 should be acknowledged as sites that will come forward for residential development.

SPC response:

Para 044 does not ignore SOM2 or the adopted Local Plan. SOM2 is one of the sites referred to in this para as '*allocated in the Melton Local Plan*'.

The Local Plan's allocated sites SOM1 and SOM2 are acknowledged most explicitly throughout the draft Neighbourhood Plan at points including:

- Chapter 4.0 para 032 – Melton Local Plan - third bullet: '*Strategic policies: Policy C1(A) and C1(B), and therefore sites SOM1, SOM2 and SOM3 are strategic policies in the Local Plan and part of the Development Plan*'. This statement precedes sections 5.0, 5.1 and 5.2. and it is not necessary to repeat it in them.
- Chapter 5.0 Housing and Renewal para 037 '*Where suitable policies already exist in the Melton Local Plan or NPPF they are not duplicated in this Plan*'. Policies C1A and C1B are such 'suitable policies' and so are not duplicated.
- Section 5.3 – Limits to Development – para 055, policy HR2 '*Development proposals within the Neighbourhood Plan area will be supported on sites within the Limits to Development as identified in Figure 3 where they comply with the other policies of the Development Plan*'. SOM1 and SOM2 are policies of the Development Plan, and so supported.
- Figure 3.4 – Somerby – Limits to Development – SOM1 and SOM2 are inside the Limits to Development and labelled there.

Absence of the words 'SOM2' in para 044 does not mean the Neighbourhood Plan ignores SOM2 or is outside general conformity with the Local Plan.

No amendment required.

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

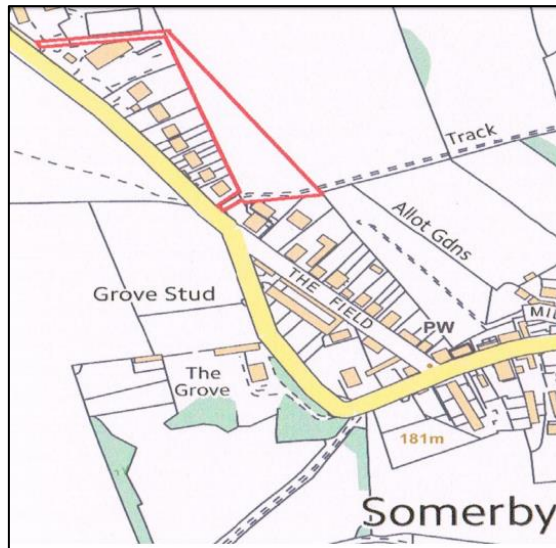
Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

An alternative reserve site within Somerby was put forward during the preparation of the Neighbourhood Plan.

Please provide your suggestions below:

It is considered that this site (plan attached) would be more sustainable as it is within the village of Somerby and would have minimal impact on the character of the village itself, as represented to the Neighbourhood Plan Group during the preparation of the Plan.



SPC response:

This suggestion was made by Ernest Cook Trust at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comments 11 and 13.

The site was not at that time described by ECT as an 'alternative reserve site' but only a 'potential development site', however this does not affect the NP response.

No amendment required.

Submission Plan, page 28, 5.3 Limits to Development Principles and Policy HR2

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

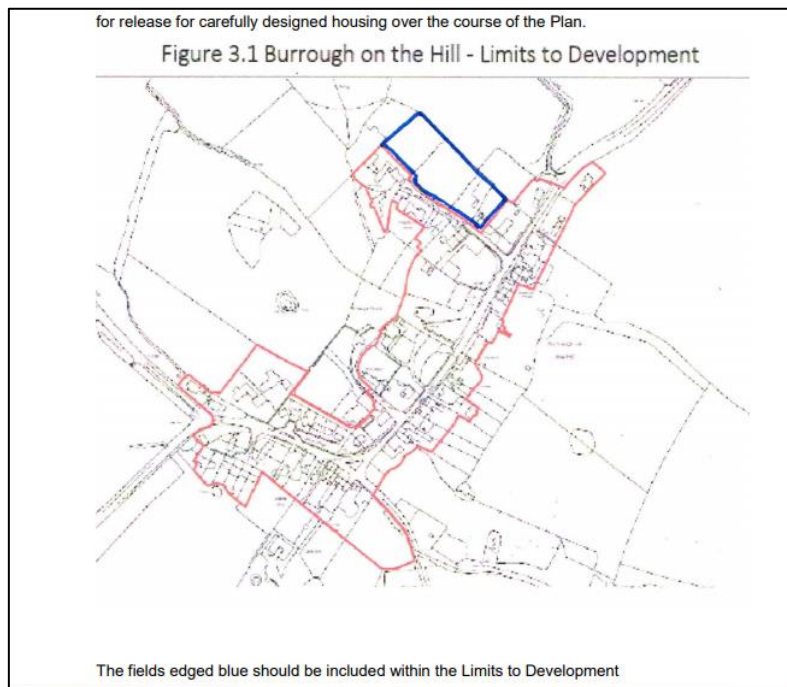
Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

The Melton Local Plan does not identify Settlement Boundaries, but the Neighbourhood Plan has designated limits to development. Some of these boundaries are drawn without recognising the possibility of appropriate development

Please provide your suggestions below:

The land to the north east of Kings Lane in Burrough on the Hill (outlined in blue on the attached plan) should be included within the 'Limits to Development' as it would be suitable for release for carefully designed housing over the course of the Plan.



SPC response:

Section 5.3 (Limits to Development) and Policy HR2 are in general conformity with the strategic policies of the Melton Local Plan. See Para 052 for Limits to Development Methodology including c) *Scope has been provided within the limits to allow for future expansion to meet the need for housing and business growth over the Plan period*.

Parts of the land outlined in blue (described in the NP as King's Lane Paddock) have been identified by a process of objective scoring as:

- Local Green Space (Section 7.1, Figure 7.2 feature BG1.3, Policy ENV1).

(At the Reg. 14 stage the Trust objected to designation of King's Lane Paddock as a Local Green Space. Comments and response can be seen at Appendix 2m (Regulation 14 Comments and Responses) Comment 4.

- Site of Environmental Significance (Section 7.2, Figure 8 features BH-01 and P25, Policy ENV2).
- Important Views (Section 7.9, Figure 16 feature BV3.2, Policy ENV9).

The Trust do not suggest that any of these features are wrongly characterised in the submission Plan, only that they would prefer the land to be available for development. This is not grounds to deviate from the Limits to Development Methodology applied to all the parish settlements during plan preparation. No amendment required.

Submission Plan, page 28, 5.3 Limits to Development Principles and Policy HR2

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan <input type="checkbox"/>	Support this policy/part of the plan subject to modifications <input type="checkbox"/>	Object to this policy/part of the plan <input checked="" type="checkbox"/>	Neither support or object to this policy/part of the plan <input type="checkbox"/>
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Please provide your comments here:


The Melton Local Plan does not identify Settlement Boundaries, but the Neighbourhood Plan has designated limits to development. Some of these boundaries are drawn without recognising the possibility of appropriate development.

Please provide your suggestions below:

The sites edged red on the attached plans are brownfield sites with broadly redundant and dilapidated farm buildings which have limited use in modern agriculture. They have every opportunity for redevelopment in a sustainable way, as represented to the Neighbourhood Plan Group during the preparation of the Plan.

(maps on next page)

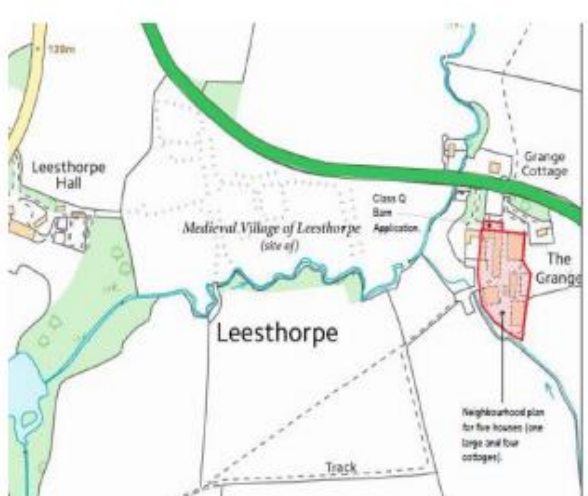
Land at Leesthorpe:



The map shows the location of the site in Leesthorpe, Leicestershire. It features a red-outlined area representing the proposed site, situated between Leesthorpe House Farm and Leesthorpe Hall. A green line indicates a wildlife corridor, and a blue line shows a track. The map also labels the Medieval Village of Leesthorpe (site of) and Leesthorpe. A caption below the map reads: "Promp image of Site Location — site outlined in red".

This site could provide 10 to 12 residential units. It is appreciated that the wildlife corridor in Policy EN2 of the Melton Local Plan traverses the site but it would be possible to integrate it into or as part of any development in order to promote a sustainable development.

Land at The Grange:



The map shows the location of the site in The Grange, Leesthorpe. It features a red-outlined area representing the proposed site, situated between Leesthorpe Hall and Grange Cottage. A green line indicates a wildlife corridor, and a blue line shows a track. The map also labels the Medieval Village of Leesthorpe (site of) and Leesthorpe. A caption below the map reads: "Neighbourhood plan for five houses (one large and four cottages)".

This site could provide 5 residential units: one house and five cottages

SPC response:

We have no reason to believe that Section 5.3 (Limits to Development) and Policy HR2 are not in general conformity with the strategic policies of the Melton Local Plan, including its spatial strategy and housing allocations.

Land at Leesthorpe: This suggestion was made by Ernest Cook Trust at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comments 11 and 12.

No amendment required.

Land at The Grange: This is a new suggestion not made at any earlier stage in Neighbourhood Plan preparation. However, the NP response at Reg.14 consultation to 'Land at Leesthorpe' (above) applies equally to this one. Furthermore, the location is not in or even near a settlement so the Melton Local Plan

identifies it to be in open countryside and/or an unsustainable location. For the NP to make a housing allocation there, or draw limits to development around land which is not a settlement at all, would be outside general conformity with strategic policies SS2 and SS3 of the Local Plan.
No amendment required.

Submission Plan, pages 36 – 39, Chapter 6 and Policy CD1

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:
(None)

Please provide your suggestions below:
(None)

SPC response:
Comments noted. No amendment required.

Submission Plan and Appendix 5, page 48, Local Green Spaces Policy ENV1, SG1.1

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

The Trust is not in agreement with the designation of the entirety of Manor Lane Paddock (Manor Farmhouse Green SG1.1) being designated as Local Green Space.

Please provide your suggestions below:

As part of the development of Melton Local Plan's allocation SOM2 the Trust (which funded the original provision of the Playground on Somerby High Street) would consider relocating it in part of the Manor Lane Paddock which is in the trust's ownership. This would provide a safer location closer to the school.

SPC response:

This comment was made by Ernest Cook Trust at Reg.14 consultation. It is unclear from their different comments / representations whether they would use Manor Farmhouse Green as a replacement playground or for new housing. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 5.
No amendment required.

Submission Plan and Appendix 5, page 48, Local Green Spaces Policy ENV 1, BG1.1

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

In principle the Trust is in agreement with the designation of Goose Field, Burrough on the Hill (SG1.3) being designated as Local Green Space, provided more details regarding its use are forthcoming from the Parish Council.

Please provide your suggestions below:

(None)

SPC response:

We believe the details provided in Appendix 5 (Local Green Spaces) to be sufficient evidence of its continuing value and use, being historical, practical, educational, visual and distinctively rural. All of this is based on the keeping of poultry and fowl and no more is sought than for that to continue, enabling the described benefits to the village which cause it to be called 'the Goose Field'.

Submission Plan and Appendix 5, pages 48 and 50-51, Local Green Spaces Policy ENV 1 (re: BG1.3) and POLICY ENV 2 (re: BH-01)

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

The Trust is not in agreement with the designation of Kings Lane Paddock, Burrough on the Hill (BG1.3) being designated as Local Green Space and the Bank off Kings Lane (BH-01) in the same location, as a Locally significant site.

Please provide your suggestions below:

This paddock does not form part of Cheseldyne House or The Limes. The paddock represents an opportunity for future development within the village as and when appropriate.

SPC response:

At the Reg. 14 stage the Trust objected to designation of King's Lane Paddock as a Local Green Space. Comments and response can be seen at Appendix 2m (Regulation 14 Comments and Responses) Comment 4.

No amendment required.

Submission Plan, page 55, Policy ENV 3: Important Open Spaces (re: CYP-1 and PP-1)

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

These areas designated CYP-1 and PP-1 are within the Melton Local Plan's allocation SOM2 for residential development.

Please provide your suggestions below:

The Trust which owns both these pieces of land has already confirmed that as part of the development of SOM2 it would replace the playground on CYP-1 to the more suitable location of the Manor Lane Paddock (which is in its ownership).

SPC response:

Protection of the playground and sports pitch has regard for the NPPF, is in conformity with the Local Plan and contributes to sustainable development.
 At the Reg. 14 stage the Trust objected to designation of CYP-1 (playground) and PP-1 (football pitch) as Important Open Spaces. Comments and response can be seen at Appendix 2m (Regulation 14 Comments and Responses) Comments 6 and 7.
 No amendment required.

Submission Plan and Appendix 10, pages 62-66, Policy ENV4 map reference 31 Figure 10.3

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

This field forms part of SOM2 which is allocated for residential development in the Melton Local Plan.

Please provide your suggestions below:

The Trust undertook the site evaluation referred to in appendix 10 and is fully aware of its findings. All appropriate measures can and will be taken in accordance with those finding in the masterplanning of the residential development allocated for this site in the Local Plan.

SPC response:

Policy ENV4 identifies the Croft Field Medieval Earthworks as a Local Non-designated Heritage Asset. The policy requires only that their 'features and settings should be protected wherever possible' and 'balanced against the local value of a development proposal'. It seeks to guide development not prevent it if appropriate. The Trust indicates that 'appropriate measures can and will be taken' and if this were so a proposal could satisfy Policy ENV4.

As we have not been given access to the April 2017 site evaluation, we cannot comment in more detail. No amendment required.

Historic England

General comments

Thank you for consulting Historic England about your Neighbourhood Plan.

The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.

If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.

Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:- <https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

You may also find the advice in "Planning for the Environment at the Neighbourhood Level" useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:-

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environmentagency.gov.uk/LIT_6524_7da381.pdf

If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, "Housing Allocations in Local Plans" as this relates equally to neighbourhood planning. This can be found at <https://content.historicengland.org.uk/imagesbooks/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-siteallocation-local-plans.pdf/>

If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.

SPC response:

Noted.

No amendment required.

Leicestershire County Council

HIGHWAYS SPECIFIC COMMENTS

2.2.6: Transport and Infrastructure – para 024

Bullet point 1 mentions speeding problems, LCC are not aware of any evidence to support this. Community Speed Watch is an initiative to help people reduce speeding traffic through their community see <https://www.communityspeedwatch.org.uk/> for details.

SPC response:

Para 024 reports only that speeding is complained of by residents, which it is (Household Questionnaire, question 8). The Parish participates in Community Speedwatch most recently in 2019.

No amendment required.

2.3: Challenges for the Parish – para 026

Bullet points 5 & 6 mention shortage of parking and possible reasons for this, LCC are not aware of any evidence to support this.

SPC response:

Para 026 reports only that shortage of parking is complained of by residents, which it is (Household Questionnaire, question 8).

No amendment required.

3.2.5 Transport and Infrastructure – Objective 25

Size could be managed by way of weight restrictions, however numbers of vehicles accessing roads cannot be restricted.

SPC response:

Noted.

9.0 Transport and Infrastructure

Large section on transport issues pages 97-100.

163 - Traffic surveys should be undertaken to establish whether there are genuine speeding/ congestion issues. Community Speed Watch is an initiative to help people reduce speeding traffic through their community see <https://www.communityspeedwatch.org.uk/> for details.

5. Traffic surveys would establish the percentage split between types of vehicles and provide evidence base.

9. LCC's Traffic and Signal Team could check the number and types of complaints received.

SPC response:

It is not financially viable for the Parish Council to commission professional traffic surveys at the multiple possible locations. Accordingly, it does not have an evidence base sufficient to justify changes to the roads network and the Neighbourhood Plan does not propose any (which would in any case be outside its remit).

No amendment required.

9.3 Road Travel, Road Safety and Parking – Policy TI1: Traffic Volume, Road Safety and Parking

Pedestrian safety would be in line with paragraphs 108 and 109 of the National Planning Policy Framework.

Parking - the provision of car parking in Somerby village centre with low visual impact is supported.

e) Visitor parking - Regarding visitor parking, this is not something the Highway Authority would look to secure. Any necessary highway mitigation borne out of new development would need to be fully funded by developer contributions. It should be noted that a new development should only mitigate its own residual impact; it cannot be expected for developers to mitigate existing concerns. The Leicestershire Highways Authority would normally expect development proposals to comply with prevailing relevant national and local policies and guidance, both in terms of justification and of design.

SPC response:

Noted. Identical comment on visitor parking was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 18. Amendments were made.

Community proposal 13: Parking and new housing developments

LCC parking standards are in place to avoid overspill of cars parking within the public highway. Waiting restrictions on existing roads in connection with development can have unintended consequences, such as penalising existing residents.

SPC response:

Noted.

9.5 Travel Pack Policy – Policy TI3: Travel Packs

The 2014 policy does not specify the number of dwellings; the Highway Authority will consider on a site by site basis.

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 20. Amendments were made.

General Comments

The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.

Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be **fully** funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in the position to accept any financial risk relating to/make good any possible shortfall in developer funding.

To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.

Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provided as a commuted sum.

In regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped ie they would be able to operate without being supported from public funding.

The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third-party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third-party funding. Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 21.

FLOOD RISK MANAGEMENT

The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution.

The LLFA is not able to:

- Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.
- Use existing flood risk to adjacent land to prevent development.
- Require development to resolve existing flood risk.

When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:

- Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).
- Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).
- Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.
- How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff. • Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.

All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve bio-diversity and amenity of new developments, including benefits to surrounding areas.

Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.

LCC, in its role as LLFA will not support proposals contrary to LCC policies. For further information it is suggested reference is made to the National Planning Policy Framework (March 2012), Sustainable drainage systems: Written statement - HCWS161 (December 2014) and the Planning Practice Guidance webpage.

Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals.

Risk of flooding from surface water map:

<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

Flood map for planning (rivers and sea):

<https://flood-map-for-planning.service.gov.uk/>

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comments 23 and 24. Amendments were made.

PLANNING

Developer Contributions

If there is no specific policy on Section 106 developer contributions/planning obligations within the draft Neighbourhood Plan, it would be prudent to consider the inclusion of a developer contributions/planning obligations policy, along similar lines to those shown for example in the Adopted North Kilworth NP and the Adopted Great Glen NP albeit adapted to the circumstances of your community. This would in general be consistent with the relevant District Council's local plan or its policy on planning obligations in order to mitigate the impacts of new development and enable appropriate local infrastructure and service provision in accordance with the relevant legislation and regulations, where applicable.

North Kilworth Adopted Plan

Great Glen Adopted Plan.

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 25. Amendments were made.

Mineral & Waste Planning

The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development.

Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.

<p>You should also be aware of Minerals and Waste Safeguarding Areas, contained within the adopted Minerals and Waste Local Plan. These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p>
<p>SPC response: Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 26.</p>
<p>Property Education</p> <p>Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two-mile (primary) and three-mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places.</p> <p>It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school.</p> <p>However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.</p>
<p>SPC response: Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 27. Amendments were made.</p>
<p>Strategic Property Services</p> <p>No comment at this time.</p>
<p>SPC response: Noted.</p>
<p>Adult Social Care</p> <p>It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.</p>
<p>SPC response: Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 28. Amendments were made.</p>
<p>ENVIRONMENT SPECIFIC COMMENTS</p> <ul style="list-style-type: none"> • The plan makes no reference to electric vehicle charging. As the Government plans to end the sale of new conventional petrol and diesel cars and vans by 2040 in the UK (or perhaps even earlier), there will be a reliance on electric vehicles. This should be reflected in infrastructure (for example electric vehicle charging points for new developments and on-street charging points). • P78. The proposal Env 11 – f. that 3 trees are planted for every new dwelling may not be achievable in every case due to small plot size of residential properties. This may result in developers not being able to offer low cost and/or properties to rent. This issue may be overtaken by the 10% biodiversity net gain requirement in National Planning framework.
<p>SPC response: Identical comment in relation to electric vehicle charging was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 32. The Plan does makes clear reference to electric vehicle charging points. Amendments were made.</p>

Comment in relation to Policy ENV11 noted. Whilst any and all costs can bear on economic viability, there is no specific connection between tree planting and ability to provide low cost properties or properties to rent.
No amendment required.

GENERAL COMMENTS

With regard to the environment and in line with Government advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of the natural environment including climate change, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 33. Amendments were made.

Climate Change

The County Council through its Environment Strategy is committed to reducing greenhouse gas emissions in Leicestershire and increasing Leicestershire's resilience to the existing and predicted changes in climate. Furthermore, LCC has declared a climate emergency along with most other UK councils. The County Council has committed to becoming carbon neutral as a council by 2030 and to working with others to keep global temperature rise to less than 1.5 degrees Celsius, which will mean in effect needing to achieve carbon neutrality for Leicestershire by 2050 or before. Planning is one of the key levers for enabling these commitments to be met and to meeting the legally binding target set by the government for the UK to be carbon neutral by 2050. Neighbourhood Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and to increasing the county's resilience to climate change.

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 34.

Landscape

The County Council would like to see the inclusion of a local landscape assessment taking into account Natural England's Landscape character areas; Leicester, Leicestershire and Rutland Landscape and Woodland Strategy; the Local District/Borough Council landscape character assessments and the Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire (2017) which examines the sensitivity of the landscape, exploring the extent to which different areas can accommodate development without impacting on their key landscape qualities. We would recommend that Neighbourhood Plans should also consider the street scene and public realm within their communities, further advice can be found in the latest 'Streets for All East Midlands' Advisory Document (2006) published by English Heritage.

LCC would encourage the development of local listings as per the National Planning Policy Framework (NPPF) and LCC have some data on the social, cultural, archaeological and historic value of local features and buildings (<https://www.leicestershire.gov.uk/leisure-andcommunity/history-and-heritage/historic-environment-record>)

SPC response:

First paragraph: Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 35. Amendments were made.
Second paragraph: Local listings as encouraged by LCC are prominent in the Submission Draft (as they were in the pre-submission draft) notably in policies ENV1 to ENV10.

We note the sources LCC would like taking into account. In particular they encourage Neighbourhood Plans to use the Leicestershire and Rutland Historic Environment Records (L&R HER) as a source in the preparation of local listings. We have followed this advice in Policy ENV2 (Sites and Features of Environmental Significance) and Policy ENV4 (Buildings and Structures of Local Historical Significance).

Biodiversity

The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment, providing net gain for biodiversity, and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development or management of open spaces on enhancing biodiversity and habitat connectivity, such as hedgerows and greenways. Also, habitat permeability for habitats and species which addresses encouragement of movement from one location to another such as the design of street lighting, roads, noise, obstructions in water, exposure of species to predation and arrangement of land-uses.

The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species.

These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme.

Contact: planningecology@leics.gov.uk, or phone 0116 305 4108.

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 36.

Green Infrastructure

Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls.

The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promote good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.

Neighbourhood Plan groups have opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 37. Amendments were made.

Brownfield, Soils and Agricultural Land

The NPPF encourages the effective use of brownfield land for development, provided that it is not of high environmental/ecological value. Neighbourhood planning groups should check with Defra if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological value of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological value of a brownfield site before development decisions are taken.

Soils are an essential finite resource on which important ecosystem services such as food production, are dependent on. They should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the governments "Safeguarding our Soils" strategy, Defra have produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies.

High quality agricultural soils should, where possible be protected from development and where a large area of agricultural land is identified for development then planning should consider using the poorer quality areas in preference to the higher quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide further information and Agricultural Land classification.

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 37. Amendments were made.

Strategic Environmental Assessments (SEAs)

Information for Neighbourhood Planning groups regarding Strategic Environmental Assessments (SEAs) can be found on the Neighbourhood Planning website (www.neighbourhoodplanning.org) and should be referred to. As taken from the website, a Neighbourhood Plan must meet certain basic conditions in order to be 'made'. It must not breach and be otherwise compatible with EU obligations. One of these obligations is Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment' (Environmental Assessment of Plans and Programmes Regulations, 2004, available online). This is often referred to as the SEA Directive. Not every Neighbourhood Plan needs a SEA, however, it is compulsory to provide when submitting a plan proposal to the local planning authority either:

- A statement of reasons as to why SEA was not required
- An environmental report (a key output of the SEA process)

As the UK prepares to leave the EU in 2020, Neighbourhood Planning groups should remain mindful of any future changes which may occur to the above guidance.

SPC response:

SEA and HRA screening opinions were prepared by Melton Borough Council in July 2019. It concluded that neither an SEA nor a full HRA were required. A copy of the report accompanies the submission draft on the Melton Borough Council website.

No amendment required.

Impact of Development on Household Waste Recycling Centres (HWRC)

Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district area and Leicestershire County Council. The County's Waste Management team considers proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local HWRC infrastructure then appropriate projects to increase the capacity to off-set the impact have to be initiated. Contributions to fund these projects are requested in accordance with Leicestershire's Planning Obligations Policy and the relevant Legislation Regulations.

SPC response:

Noted.

Communities

Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;

1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community.
2. Set out policies that seek to;
 - protect and retain these existing facilities,
 - support the independent development of new facilities, and,
 - identify and protect Assets of Community Value and provide support for any existing or future designations.
3. Identify and support potential community projects that could be progressed.

You are encouraged to consider and respond to all aspects of community resources as part of the Neighbourhood Planning process. Further information, guidance and examples of policies and supporting information is available at www.leicestershirecommunities.org.uk/np/useful-information

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 38.

Economic Development

We would recommend including economic development aspirations with your Plan, outlining what the community currently values and whether they are open to new development of small businesses etc.

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 39.

Superfast Broadband

High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a superfast broadband connection is no longer merely desirable but is an essential requirement in ordinary daily life.

All new developments (including community facilities) should have access to ultrafast broadband (of at least 100Mbps). Developers should take active steps to incorporate adequate broadband provision at the pre-planning phase and should engage with telecoms providers to ensure ultrafast broadband is available as soon as build on the development is complete. Where practical, developers should consider engaging several telecoms providers to encourage competition and consumer choice.

SPC response:

Almost identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 40. Amendments were made. Noted that LCC have since changed their recommendation from minimum 30Mbps to minimum 100Mbps. As the NP deals with planning and design rather than the capability of internet providers, which varies over time not necessarily with changes to physical infrastructure, the NP continues to refer to 'full fibre-optic broadband' without specifying Mbps. No amendment required.

Equalities

While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council's Equality Strategy 2016-2020 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work. A copy of the strategy can be view at: www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality-strategy2016-2020.pdf

SPC response:

Identical comment was made by LCC at Reg.14 consultation. Comment and response at Appendix 2m (Reg.14 comments and responses) comment 41. Amendments were made.

Melton Borough Council

General re. Reg 16 Consultation

Thank you for submitting the Somerby Neighbourhood Plan (regulation 16 version) to Melton Borough Council.

Melton Borough Council fully supports the community's initiative to produce a Neighbourhood Plan and recognises that this is a community-led process. The advice contained within this letter is intended to assist the Neighbourhood Plan Group / Parish Council in ensuring a submission version Neighbourhood Plan is developed that will withstand examination and any possible legal challenge.

Melton Borough Council's response is based on the Regulation 16 consultation documents provided via email to Jorge Fiz Alonso on 16th March, 2020. This response is structured with regard to the basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied to Neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004):

- A. Whether the Plan has regard to National Planning Policy and advice;
- B. Whether the Plan contributes to Sustainable Development.
- C. Whether the Plan is in general conformity with the Council's own development plan; and
- D. Whether the Plan complies with various European Obligations;

The Melton Local Plan 2011-2036 was adopted by Full Council on October 10, 2018. It sets out the Council policies for the use and development of land across the whole of the Borough. The Local Plan is the main part of the development plan for the Borough and will be given full weight by the Council in making decisions on planning applications. This also means that, as stated above, Neighbourhood Plans must be in general conformity with the strategic policies within the adopted Local Plan. Also, as specified in para 1.8.5 of the Local Plan:

'For the purpose of testing conformity of Neighbourhood Plans with the Local Plan, all policies included in the Local Plan up to and including Chapter 8 are regarded as strategic policies. Whilst the remaining policies will be relevant for determining planning applications, they are not viewed as strategic policies for the purpose of testing Local Plan conformity.'

These issues were subject of scrutiny and debate during the independent Examination of the Local Plan and the wording cited here follows the process of assessment and adjudication by the Inspector.

Additionally, we recommend to the Neighbourhood Plan Group access to the Examiner's report for the Ab Kettleby Neighbourhood Plan at: <https://www.meltonplan.co.uk/abkettleby> , or more recently the Examiner's report for the Scalford Neighbourhood Plan at: <https://www.meltonplan.co.uk/scalford> . To help your understanding of our response, we have structured our comments into themes:

SPC response:
Noted.

HOUSING

Page 10 Para 010 (Minor)

Although it is clarified later on, perhaps some rewording is needed for clarity: Where it says 'with only one different allocation, this being a reserve...', we suggest it to read 'with the addition of a reserve...'. Otherwise it seems to suggest that the SOM3 reserve site is being replaced by RSOM1.

SPC response:
We do not mean to suggest that SOM3 would be replaced by RSOM1. The intended relationship is as described in Policy HR1.
To state this at an early point in the Plan, we agree Page 10 Para 010 should be amended to read:

*010 This Neighbourhood Plan seeks to meet Melton Borough's housing requirement by applying a locally sensitive spatial strategy with only one different allocation, this being **the addition of a reserve housing***

site in Pickwell (Policy HR1, site RSOM1). This approach finds support from the NPPF 2019 Paras 13, 15, 21, 28, 29 and 78, and the NPPG (our Para 1.3.1 above and Supporting Document 1).

Page 14 Para 020 (Moderate)

The number of new homes built and sites under construction is different to the ones identified in the Council's monitoring year. We think that there are two elements that need to be addressed just to clarify this; first the starting year in this document is 2010/2011 (usually identified as 2010) and not 2011/12. This would need to be clarified or numbers would need to be amended accordingly. Also, I think the group did a monitoring exercise in the middle/end of 2018, which is worth mentioning as it differs from the 2018/19 monitoring data from the Council.

Although these numbers do not have an implication in other chapters of the Plan, these discrepancies with the Local Plan are relevant because they are using the same baseline (2011).

SPC response:

We have high confidence in our Appendix 3 (Housing completions and approvals 1991-2019) which was compiled using data from MBC, searches of decided planning applications, and what we know to have been built because we can see it. If the numbers differ slightly from MBC's possible explanations are:

- We know when houses were built but not when they were fully finished and 'signed off'.
- Appendix 3 is based on calendar years, MBC use financial years.
- MLP Table 6 (Residual Housing Requirements) includes completions/approvals for Somerby Village whereas our totals are for Somerby Parish, as the NP is for the whole Parish. We do not subtract completion/approvals in Burrough and Pickwell from MBC's requirement, which is for Somerby Village only.
- There have been completions since 31st March 2017, the 'cut off' for Table 6. Time has passed.
- It is to consider whether 'Firdale Farm, 9 High Street, Somerby, 7 new dwellings' are substantially 'under construction'. We believe only footings were dug to prevent the permission lapsing, but if that was effective they are properly considered under construction.
- Every year the number of completions, under constructions and approvals changes, so the figure depends on the end date as well as the start date. Para 20 is not relied on by any policies of the NP but is intended as a portrait of 'Somerby Parish in 2019'. As a portrait it is accurate.

We do not wish to burden the Examiner with detailed accounting of housing developments over the last 29 years so have conferred again with Jorge Fiz Alonso at MBC. In order to acknowledge primacy of MBC's figures in calculating residual requirement, but also to preserve Appendix 3 as an accurate portrait of long-term historic growth, we have agreed to amend Para 020 and Appendix 3 as follows:

020 According to Census 2011 the number of occupied households was 387, a 10.6% increase on 2001. The Parish has supported significant housebuilding in the past and in 2019 housing development is ongoing independent of Local or Neighbourhood plan allocations. For example, from 2011 to 2019, **approximately 38** new homes were built in Somerby Parish. As at December 2019 a further 8 were under construction and planning permission has been approved for a further 26, all of them outside the **site** allocations in the Melton Local Plan ie. Additional to them. This increase in housing provision has been achieved organically by infill and high density conversion of existing commercial or agricultural buildings. There has been minimal harm to the character of the Conservation villages, historic landscapes or community cohesion. A list of the 153 houses built since 1991 or under approval by late 2019 appears at Appendix 3.

Appendix 3, first column: amend from 'Year built' to '**Calendar** year built'.

These changes would make it clear that SPC are not using the same counting periods as MBC, and MBC's would be definitive for MLP Table 6 because it is based on calendar years.

Page 27 Policy HR1 (Moderate)

We would like to use this opportunity to support the inclusion of RSOM1 in the Plan. There are several elements that have been considered when assessing this policy. First and most importantly is the strong link between the settlements of Somerby and Pickwell, well supported by the evidence provided in Appendix 6. The proximity, the connectivity and the use of services and facilities in Somerby by residents from Pickwell contribute to the justification of the policy. Moreover, the reserve site is located at the

southwestern edge of Pickwell, which is the part of the village that is in closer proximity to Somerby. Additionally, the good relation of the site with the existing built-up area and the relatively small capacity of the potential development site, seem to indicate that when needed, this site will contribute to the sustainable development of the area.

Finally, not less important, the support from the community to the inclusion of the site as a reserve site cannot be ignored, in fact, it needs to be reinforced in a Neighbourhood Planning context.

Our only suggestion relates to some rewording in the final paragraph of the policy. Where it reads 'housing requirement' we recommend the addition of "parish-level" to read as 'housing parish-level requirement' (or similar) as the supporting text mentions two different types of requirement. Also, the selection of the reserve site when a shortfall is identified could be slightly clearer for development management purposes by including the objective of meeting the shortfall as a minimum (first objective) then whichever site is most closely aligned to the shortfall. For example, if the shortfall is 12 units, SOM3 will be "activated" unless a different capacity (≥ 12 units) has been proven for RSOM1.

SPC Response:

First suggestion by MBC:

This response has changed. In their 02/02/2020 response to the Examiner, MBC now suggest that if RSOM1 were built it *would* count towards the Somerby housing requirement. We think this is rational due to the proven close connections between Somerby and Pickwell (NP Appendix 6).

Second suggestion by MBC:

Suggestion seeks to make clear that if a shortfall is identified which RSOM1 cannot fully meet ie. Meet the housing requirement (as a minimum) then Policy C1(B) of the MLP will apply ie. SOM3 will come forward.

For consideration by the Examiner, both suggestions might be accommodated by words similar to:

POLICY HR1: RESERVE SITE ... If development of a reserve site becomes necessary to achieve the parish-level housing requirement, RSOM1 will be preferred if it is able to meet the shortfall. If RSOM1 is not able to meet the shortfall, SOM3 will be preferred. If neither is able to meet the requirement by itself then both will be considered equally.

However, we recognise that better wording may be possible.

Page 25 Section 5.1 (paras 039-042) (Important)

Adding a map showing the allocations and reserve sites could be beneficial for the final user.

NP response:

The point is understood. However, we would prefer not to add a map at paras 039-042 as the site allocations are not actually mentioned there. They are named in a more prominent place at Chapter 4.0 – Spatial Strategy and Settlement Roles. To avoid an additional map, we suggest the following solution:

- Chapter 4.0 – Spatial Strategy and Settlement Roles – para 032, second bullet amend to read:

'Housing requirement: The residual requirement of 44 houses is met or exceeded by the Local Plan housing allocations under Policy C1(A). These are sites SOM1 and SOM2 totalling 69 houses, and there is also a reserve site SOM3 for 33 houses. **These sites are illustrated on Figure 3.4 Somerby – Limits to Development.**'
- Figure 3.4 to be amended to expressly show the location and boundaries of SOM1, SOM2 and SOM3. This solution has the advantage of also having been requested by the Examiner, and we have suggested a design for the map change to him.

Page 29 Policy HR2 (Important)

Policies SS2 and SS3 of the Local Plan allow development within or adjacent to the settlements. Could we suggest the inclusion of the 'edge of built-up areas' in the definition?

We welcome the linkage made between Policy H2 and "other policies of the Development Plan" which will prevent a conflict and tension in the villages (other than Somerby where it does not arise) and wonder of citation of the Development Plan Policies referenced in H2 (i.e. SS2 in Somerby; SS3 in Burrough, Pickwell, Leesthorpe) may assist with clarity and understanding for the end user.

SPC response:

We wish to retain Policy HR2 and Limits to Development in their present forms and update them in a subsequent review if housing requirements or community priorities have changed at that time. This is the rational approach given that Somerby Village and Somerby Parish requirements are already comfortably exceeded.

- It is suggested that policy HR2 is amended to include the potential for development adjacent to the settlements and not just within the limits to development. We do not agree with this. The Parish has exceeded its development target and has made provision for additional development by the identification of an additional reserve site and setting Limits to Development. Additionally, there is a windfall policy which sets the conditions for future development proposals to be supported. It is not necessary in these circumstances to extend the Limits to Development policy as suggested. We wish to retain the policy and update it in a subsequent review if community priorities have changed at that time.
- MLP Policy SS3 refers to 'edges of existing settlements' without defining or mapping them, which is ambiguous and possibly contradictory. It is written in the context of settlements having no defined boundaries, which the NP now re-introduces in the form of Limits to Development. There are no settlement boundaries in the MLP therefore it isn't possible to say Policy HR2 is out on conformity with anything specific. There is really nothing for them to be out of conformity with.
- The NP Limits to Development are wider than the historic settlement boundaries in the 1999 Local Plan ie. They include more land. They are drawn to a consistent methodology, enclosing all expansions since 1999, site allocations in the Local Plan, full or outline permissions, and areas which have become partially developed of 'brownfield' or severed from the open countryside. They provide sufficient room for potential proposals under SS3 commensurate with settlement roles (up to about 10 in Somerby and about 3 in Pickwell and Burrough).
- In community consultation (Engagement day 17th Nov 2018) responses to the draft Limits to Development were Agree 73.4% and Disagree 4.2%.

YourLocale who have wider knowledge than us of other NPs in the Borough advise us:

This is not a strategic issue it is a matter of detail which is in the gift of the NP. Most Examiners of NPs in Melton Borough have reached this conclusion and it is unhelpful to pick a single examination to apply more generally. The following extract is from the Broughton and Old Dalby NP Examination:

'One representation has pointed out that the emerging Local Plan policy allows development on the edge of settlements however the policy goes on to say that a scheme for housing should meet a housing need assessed by a neighbourhood plan and I do not consider that this plan identifies a need that needs to be met from outside the settlement boundaries'. This same sentiment applies to Stathern which has accommodated significantly in excess of its minimum housing requirement through Local Plan allocations alone.

Furthermore, the Scalford NP was examined in May of this year and the Examiner rejected the objections expressed by MBC to extend development to 'within and on the edge of' the settlement with a Limits to Development.

Stathern has made provision for an extensive level of development and extending this still further is unnecessary.

Page 33 Policy HR5 (Moderate)

This policy is perhaps too specific. This increases the risk of (involuntarily) leaving out other elements that are important in your vision/strategy. For example, where it is mentioned that priority to develop is given to sites within the village envelopes but not if they are open spaces, what about other elements

such as local green spaces? Is not a reiteration of the Open Spaces policy? The policy gives a good a good idea of the priorities of the community at the present time, but as the policy is long-term, it seems sensible to think that this should be tackled during consequential reviews of the Neighbourhood Plan. Most importantly, is not the Neighbourhood Plan (alongside Local Plan and NPPF) giving these priorities already through the vision/objectives and policies?
For the reasons mentioned above we recommend the deletion of the policy.

SPC response:

This policy is intended to reflect parishioner preferences (Household Questionnaire questions 11 and 21) for the kinds of sites that might accommodate housing in the long-term, meaning further site allocations during the life of the Plan. This it faithfully does. However, we do understand MBC's criticisms. We see a risk that the policy could become confused with policies on Limits to Development and/or Windfall, or even conflict with them, and have unintended consequences.

We respectfully seek the opinion of the Examiner on whether this policy should be retained.

AFFORDABLE HOUSING AND HOUSING MIX

Page 34 Para 065 (Important)

The wording of this paragraph cites an old definition of affordable housing. To align with the current 2019 NPPF, the wording will need to be updated to the current definition set out in Annexe 2: Glossary.

SPC response:

Noted and agreed. The definition of affordable housing has changed during Plan preparation. We agree the wording needs to be changed and suggest for consideration by the Examiner:

'065 Nationally, affordable housing is defined as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers) and complies with one or more of the definitions in the National Planning Policy Framework 2019, Annex 2: Glossary. Those definitions are not duplicated here but are of a) Affordable housing for rent, b) Starter homes, c) Discounted market sales housing, and d) Other affordable routes to home ownership'.

Page 35 Para 66 and Policy HR6 (Moderate)

To align with the affordable housing definitions in Annexe 2 of the NPPF, it is recommended that both in para. 66 and in policy HR6, 'Starter Homes' and shared ownership are not the only affordable home ownership options cited but also includes 'Discounted Market Sale' and 'Other Routes to Affordable Home Ownership'. Reasons for this include how Starter Homes are limited to people under the age of 40 years and shared ownership is part buy and part rent: some 40+ year households may prefer to purchase the whole property but at a discount (held in perpetuity) eg. a Discounted Market Sale home. As currently written, these affordable housing tenures may be overlooked.

SPC response:

Noted and we agree. As written Para 066 and Policy HR6 are too narrow concerning types of affordable ownership. This was an accident and we would like to correct it. As well as supporting provision of quality affordable homes generally, the NP intends to particularly support provision of *all* affordable home ownership options (not only Starter Homes and/or Shared Ownership).

For consideration by the Examiner we suggest:

In para 060 delete both mentions of 'Starter Homes' and replace with 'affordable home ownership options'.

Policy HR6 should read (after the requirement to supply high quality affordable housing) 'The provision of affordable home ownership options will be particularly supported...' then continue as presently drafted.

We hope this would align the policy and text with the intention of the NP.

35 Policy HR6 (Minor)

The last sentence of the policy states “where possible, affordable rental housing within the Neighbourhood Plan area shall be allocated to eligible households with a connection to the Parish”. This could be extended to affordable home ownership as well, if they wish.

SPC response:

Noted and agreed. There is no reason why people with a connection to the Parish should not benefit from affordable home ownership as well as affordable rental. We suggest deleting one word from the last sentence of Policy HR6:

‘POLICY HR6: AFFORDABLE HOUSING PROVISION ... Where possible, affordable ~~rental~~ housing within the Neighbourhood Plan area shall be allocated to eligible households with a connection to the Parish.’

ECONOMY AND EMPLOYMENT**92 Para 151 (Minor)**

We want to make the parish aware that the evidence bases used are rather dated however at the time when the NP has begun production this was the most recent. They may want to quickly look at the Rural Evidence Base 2018 in case there is any key figures that they may want to change.

SPC response:

The Economy Them Group did review the Rural Evidence Base 2018 when it was published. Although more recent than the Leicestershire Rural Economy Evidence Base 2014 we found it less useful because:

- 2014 report concentrates more on ‘rural village and dispersed / more rural’ rather than also ‘Urban city and town’ (including Melton). It therefore fit Somerby Parish better.
- 2014 report extends to recommendations which the 2018 report does not.
- Census-derived data is the same in the 2014 as 2018 report.
- The ‘signature rural sectors’ are almost identical between the 2014 and 2018 reports.
- Survey data in the 2018 report is less location-specific than the data from the Somerby Parish Household Questionnaire 2017, which achieved a 60% return rate and so is preferred.
- 2014 report more consistently separates the different Leicestershire boroughs, including Melton, making it more easily applied to a Local or Neighbourhood Plan.
- Demographic and housing needs data in the 2018 report is dealt with more thoroughly in HEDNA 2017 (which it draws from). However, Melton Borough Council in drafting the Local Plan positively decided to rely not on HEDNA 2017 but on the Strategic Housing Market Assessment (2014) and Towards a Housing Requirement for Melton (2017). The 2018 report is correspondingly less relevant.
- The ‘barriers to housing and services’ deprivation index in the 2018 report is revealing but felt to have been fully accounted for in the affordable housing policies of the Local Plan. These effectively cascade down to Somerby Parish with a 40% affordable housing requirement.

Although we nowhere quote the 2018 report, we did use it, and it should be added to the list of sources of information bullet-pointed at the end of para 151. This will counter any impression that we ignored the most recent material.

TRANSPORT AND INFRASTRUCTURE**100 Para 167 (Minor)**

Looking at this paragraph I am unsure what evidence you are using as you may not be using the LCC supported data set, therefore I would recommend making some minor changes to match the Leicestershire Highways Design Guide 2018, part 3 page 56, simple changes such as For residential developments of 5 or more houses and making corrections to the correct paragraph numbers. Specifically looking at 3.174 and 3.175.

SPC response:

The only evidence we use in paragraph 167 is from the Household Questionnaire, which is parish-specific and reliable due to its high 60% response rate. We should have mentioned para 3.173 in relation to ‘car ownership is likely to be higher...’ and given the date of the Design Guidance.

We suggest minor changes to para 167 to read as follows:

'167 Policy T11 was drafted having regard to the Leicestershire Highways Design Guidance (2018), Part 3. Following DG14 (Vehicle parking) para 3.173, for developments of 1 to 5 houses this Parish is an area 'where car ownership is likely to be higher than locations better served by public transport'. Our Household Questionnaire disclosed reliance on private cars as high as 98.5% for essential journeys. For residential developments of more than 5 houses DG14, paras 3.174-3.175 advises use of the DCLG Paper Method (Residential Car Parking Research) which also quantifies the need for appropriate visitor parking. Policy T11 is supported by Community Proposals 11, 12 and 13.'

ENVIRONMENT

Pages 50, 55, 64 & 74; Policies ENV 2, ENV 3, ENV 4 and ENV 9 (Minor)

These Policies are quite long due to the fact that each individual site has been listed. It may be worth removing these and referencing the appropriate appendix within the Policies.

SPC response:

Noted but the appendices are also long and we feel policies ENV2, ENV3, ENV4 and ENV 9 are easier to read and understand with policy, maps and listings presented together in the same document.

No change required.

Strategic Environmental Assessment (SEA)

The SEA Screening report was issued the 17th July 2019, in relation to the Neighbourhood Plan in its regulation 14 consultation stage. The nature of the changes from regulation 14 to regulation 16 makes this document still valid for this consultation. The document is available at

<https://www.meltonplan.co.uk/somerby>

SPC response:

Noted we were aware of the SEA Screening Report and signposted it for LCC when they asked.

Natural England

General comments

Thank you for your consultation on the above dated 28 May 2019 Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this neighbourhood plan.

For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.

SPC response:

Noted.

Severn Trent Water

General comment

Thank you for the opportunity to comment on your Somerby Neighbourhood Plan consultation. Severn Trent are generally supportive of the Somerby Neighbourhood Plan, however there are a few areas of the plan that we feel would benefit from alteration or additions to deliver against the Neighbourhood plan objectives and wider environmental goals. These comments have been detailed below as responses to the relevant section of the Neighbourhood Plan to aid with interpretation.

SPC response:
Noted.

Section 3.2.2 Character and Design Objectives

Severn Trent note that OBJ 10 relates to the use of technology and design to reduce energy consumption. We are supportive of this approach but would advise that an equivalent objective is set up from a water efficiency or surface water management perspective, potentially objectives with words to the effect of:

OBJ xx: To ensure that development make use of new technologies and are designed so that they are water efficient, and where possible incorporate innovative water efficiency and water re-use measures.

OBJ xx: To ensure that and development follows the good surface water management principles, incorporating Sustainable Drainage Systems (SuDS) and the Drainage Hierarchy principles alongside rainwater harvesting technology where appropriate.

SPC response:

We are content to incorporate the additional objectives relating to water efficiency. However, they would only be meaningful to the extent that the corresponding suggested policy amendments (below) are also accepted by the Examiner.

Policy HR4: Windfall Sites

Severn Trent would highlight that it is important for all development including Windfall sites to consider how surface water in managed this is particularly applicable within rural areas where there are more opportunities to manage surface water sustainably. We would therefore recommend that Policy HR4 includes a bullet point to highlight the need for the sustainable management of surface water and consideration of the Drainage Hierarchy (Planning Practice Guidance Paragraph 80) and implementation of SuDS where appropriate. Further guidance on wording in relation to the drainage hierarchy and SuDS are provided in our comments to policy CD1.

SPC response:

We do not support the suggested additional bullet point to Policy HR4 as these are better located in the design policy CD1 rather than within a specific windfall policy which anyway requires that proposals meet other NP and LP policies.

Policy CD1: Building Design Principles

Severn Trent are generally supportive of the approach to include a policy to direct design principles to be included such that good design guidance is followed and development is in keeping with the surrounding settlement.

Bullet point b highlights the need to ensure that boundary features are retained, however it does not mention ditches or watercourses. Severn Trent would advise that this bullet point is amended to incorporate a reference to watercourses and ditches, as they both form part of the local setting and provide essential surface water management functions, that prevent increase in flood risk and the sustainable discharge of surface water.

The retention of natural watercourses is a vital part of the water cycle and supports Severn Trent to deliver our sewerage and water provision duties There is a need to maintain health river flows, by allowing land to naturally drain into watercourses, this allows water to be abstracted at permitted locations where environmental harm will not be caused. In addition, the ability to discharge surface water to a watercourse reduces the impact that new development has on the sewerage system and will reduce additional impacts from climate change in the future. An example bullet point could contain wording to the effect of:

x) watercourses (including ditches) will be retained as open features and where possible, not contained within private land, to ensure that development does not result in an increase in flood risk or prevent the long-term maintenance of these hydrological features

Bullet point h references consideration of energy provision and sustainable drainage system but does not mention water efficiency. As a result of climate change and increasing demand for clean water, it is essential that we manage water in a sustainable way. As such we would recommend that either bullet point h references water efficient design, or an additional bullet point for water efficiency is incorporated. This approach is supported by Building Regulation part G through the implementation of the optional water efficiency target. The wording of an additional bullet point could contain wording to the effect of:

“All development should be design in accordance with the optional water efficiency target of 110 l/p/d, as per Building Regulations Part G”.

Reasons for supporting the inclusion of this wording within policies include: National Planning Policy Framework (July 2018) Paragraph 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

The optional efficiency target can only be required of a development where a planning condition is implemented. However, outlining this expectation within the Neighbourhood Plan will help to ensure that developers account for this design requirement from the outset, and support the implementation of a condition to ensure appropriate water efficiency is achieved. Alongside water efficiency we would also recommend that a statement is included to ensure that developers consider opportunities to incorporate water re-use within developments.

Whilst we support the use of SuDS and the management of surface water, it is also critical that surface water is returned the natural water cycle in the most sustainable way. As such the implementation of the Drainage Hierarchy (Practice Planning Guidance Paragraph 80) is equally 3 important. We would therefore recommend that the drainage hierarchy is mentioned within bullet point h, some example wording is provided below for reference.

“All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.”

Reasons for including this wording within your policies include:
Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states:

“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable: 1. into the ground (infiltration); 2. to a surface water body; 3. to a surface water sewer, highway drain, or another drainage system; 4. to a combined sewer.”

Further example wording to support good Quality SuDS design, may include statement such as:

“All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate.”

“All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape.”

“The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.”

“Where possible, all non-major development should look to incorporate these same SuDS principles into their designs.”

The supporting text for the policy should also include:

“Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.”

Further guidance on SuDS should be sort from the LLFA.

SPC response:

We are content to add ‘watercourses and ditches’ to criterion b of policy CD1 and also the suggested reference to water efficiency in criterion (h).

**Policy ENV1: Protection of Local Green Spaces,
Policy ENV2: Protection of sites and features of Environmental Significance,
Policy ENV3: Important Open Spaces and
Policy ENV4: Local Non-Designated Heritage Assets**

Severn Trent recognise the importance of sites that fall into the classifications covered by policies ENV1, ENV2, ENV3 and ENV4. However, we would note that in some cases these areas represent the only viable locations to enable specific projects such as flood alleviation schemes. It is therefore important that these policies are written such to protect these assets, and permit schemes that could provide wider benefits such as flood alleviation schemes. To facilitate this, we would recommend that the policies include wording to the effect of:

“Development of flood resilience schemes within [local green spaces/Site of environmental Significance/Important open space/local Non-Designate Heritage asset] will be supported provided the schemes do not adversely impact the primary function of the [local green spaces/Site of environmental Significance/Important open space/local Non-Designate Heritage asset].”

SPC response:

We do not support addition of the suggested wording to Policies ENV1, ENV2, ENV3 or ENV4. Each of those policies is worded for the type of land or asset it seeks to protect and a proposal for, for example, flood alleviation features would be assessed against the policy like any other proposal. There is no indication that any one or more of the sites is likely to be needed for flood alleviation, therefore a blanket change to all the policies as a mere contingency is not supported.

Policy ENV 10: Biodiversity and Wildlife Corridors

Severn Trent are generally supportive of this policy and would like to highlight the need to consider blue green corridors through development as these design considerations can result in multifunctional spaces that provides wider benefits to both biodiversity, SuDS and wildlife. To assist in the consideration of this type of thinking it is recommended that Policy ENV 10 incorporates wording to the effect of:

“Development should where possible, create and enhance blue green corridors to protect watercourses, and their associated habitats from harm.”

The supporting text for this policy should also highlight that:

“The incorporation of Sustainable Drainage Systems (SuDS) into these blue green corridors can help to improve biodiversity and amenity, assisting with the delivery of the wider benefits of utilising SuDS.”

SPC response:

We do not object to amending policy ENV 10 and supporting text on biodiversity to include the suggested reference to blue green corridors. The Examiner might review Reg. 14 Consultation and Responses, comment 24 by Leicestershire County Council, in considering whether this is necessary.

Policy ENV 11: Trees, Hedgerows and Green Verges

Severn Trent are supportive of Policy ENV 11, however we would highlight the need for watercourses and ditches to be protected from development such that the water is allowed to be conveyed safely through the existing settlements and new development sites without increasing flood risk. We would therefore advise that watercourses are retained as open features, within public open spaces such that they can be accessed for maintenance when required. It is recommended that an additional bullet point is included with wording to the effect of:

“x) watercourses (including ditches) will be retained as open features and not contained within private land where possible, to ensure that development does not result in an increase in flood risk or prevent the longterm maintenance of these hydrological features.”

SPC response:

We are happy to incorporate the suggested reference to watercourses and ditches in policy ENV 11. We were initially uncertain whether this amendment was appropriate under ‘Trees, Hedgerows and Green Verges’ but now believe it is, due to drainage ditches in the Parish often being alongside hedgerows and/or verges).

Policy ENV 16: Flood Risk

Severn Trent is generally supportive of policy ENV 16 however as detailed within our responses to some of the other policies within the Somerby Neighbourhood Plan. It important that the drainage hierarchy is considered to ensure that surface water is direct towards the most appropriate outfall and unnecessary strain is not placed on the sewerage system. Example wording in relation to a bullet point regarding the Drainage Hierarchy is provided under our response to policy CD 1.

SPC response:

We are happy to incorporate the suggested reference to the drainage hierarchy in policy ENV 16.

Community proposal 7: Flood Risk

Whilst Severn Trent do not have any objection to the principles outlined within this proposal it is important to understand that SuDS are not necessarily a method for disposing of Surface water, with the exception of infiltration SuDS, an outfall is still required to facilitate the disposal of surface water. Therefore, the Drainage Hierarchy is vitally important in the sustainable management of surface water.

SPC response:

The suggestion is not suitable for a Community Proposal (essentially voluntary initiatives by residents) but we are happy to incorporate the suggested reference to the drainage hierarchy in policy ENV 16 (previous comment).

General

Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you:

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site-specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue, we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a

development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer. We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers. To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website <https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency

Water Supply

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations. We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens. To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website <https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-andguidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

SPC response:
Noted.

Somerby Parish Council

General comment - Submission plan

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

Somerby Parish Council have had oversight and been involved in preparation of the Somerby Parish Neighbourhood Plan since the initial request to designate a Neighbourhood Area was made in 2015. We have been consulted and updated at appropriate stages therefore Councillors are familiar with the contents of the Submission Draft. Most recently our short comments at Regulation 14 received a satisfactory response.

Please provide your suggestions below:

Somerby Parish Council do not request any changes at this time. We consider the Submission Draft of the Neighbourhood Plan to be a fair and balanced reflection of the views of the electors we represent. We commend it to the Inspector and would be pleased to see the Neighbourhood Plan progress in its present form.

SPC response:
Noted.

Residents

J. Cadman

Submission Plan, page 23, Chapter 4.0 (Spatial Strategy and Settlement Roles)

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this
policy/part of the
plan

Support this
policy/part of the
plan subject to
modifications

Object to this
policy/part of the
plan

Neither support or
object to this
policy/part of the
plan

Please provide your comments here:

The strategy recognises that housing allocations in the Melton Local Plan are more than sufficient to meet the housing requirements of Somerby Parish for the plan period. It also recognises that the requirement might increase and makes contingencies for that by a reserve site in Pickwell and allowing for unallocated developments where of appropriate scale, location and type.

Please provide your suggestions below:
No change to Chapter 4.0.

SPC response:
Noted.

Submission Plan, pages 28-29, Chapter 5.3 (Limits to Development Principles) and Policy HR2 (Limits to Development)

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this
policy/part of the
plan

Support this
policy/part of the
plan subject to
modifications

Object to this
policy/part of the
plan

Neither support or
object to this
policy/part of the
plan

Please provide your comments here:

The principle of Limits to Development is sound, allowing development in the future but seeking to direct it where it will minimise harm to the built and natural environment, settlement character and amenity of existing residents. The exact placement of the Limits to Development is also balanced and sensible; taking the former 'village envelopes' but enlarging them to recognise building which has taken place since, and including areas in Somerby village which are to some extent predeveloped or 'brownfield' and could potentially accommodate small-scale development. Subject to appropriate housing mix and design this is the kind of development which residents would be likely to support, so the Neighbourhood Plan is both realistic and representative of local preferences.

Please provide your suggestions below:

No change to Policy HR2 or the accompanying Limits to Development maps.

SPC response:

Noted.

Appendix 2m (Consultation Statement, Regulation 14 comments and responses) Pages 2, 5, 78 and 80.

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan <input checked="" type="checkbox"/>	Support this policy/part of the plan subject to modifications <input type="checkbox"/>	Object to this policy/part of the plan <input type="checkbox"/>	Neither support or object to this policy/part of the plan <input type="checkbox"/>
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Please provide your comments here:

I am referring to the requests by Burrough Court Estate and Ernest Cook Trust for the Neighbourhood Plan to allocate additional sites for housing development on their land. Given that the Local Plan exceeds the housing requirements of the Parish and the rationale of Neighbourhood Plan chapters 4.0 and 5.0 there is no need for any such further allocations. Any proposals at those locations would be 'windfall' and determined according to policies HR2 and HR4 which exist to address such proposals.

Please provide your suggestions below:

The Neighbourhood Plan is correct to decline the additional site allocations requested by Burrough Court Estate and Ernest Cook Trust.

SPC response:

Noted.

Submission Plan, page number 23, Chapter 4.0 - Spatial Strategy and Settlement Roles

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

There is already adequate provision for future housing requirements in the Melton Local Plan, including providing for possible future increases.

Please provide your suggestions below:

Chapter 4.0 to remain unchanged.

SPC response:
Noted.

Submission Plan, pages 28,29, Chapter 5.3 (Limits to Development Principles) Policy HR2 (Limits to Development)

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

Re Ernest Cook Trust: Potential Development Site 2 – North of Somerby. Building on this proposed site, which is in a green field, would lead to a loss of agricultural land and would impinge into the local countryside (paragraph 049). There is already adequate provision elsewhere for any future housing requirements.

Please provide your suggestions below:

Policy HR2 and the Limits to Development maps to remain unchanged.

SPC response:
Noted.

T. Joyce

**Appendix 2m - Regulation 14 Comments and Responses Page number (if applicable) 11
Paragraph/policy (if applicable) 14**

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	X
Has regard to national Planning policies	<input type="checkbox"/>	X	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	X	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	X	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

The ECT comments regarding "rewarding archaeological dig" again highlight along with play area and soccer pitch, nearby riding school and walks, how active this greenfield site SOM2 is, thus reinforcing the importance this site is to the community.

Please provide your suggestions below:

SOM2 (which is within Primary Green Infrastructure Corridor NO6) should be maintained as a community asset and taken out of plan. This site comes under NPPF Green Infrastructure definition set out below "A network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities "

SPC response:
Noted.

ECT have not given us access to the findings of the archaeological dig.
The National Planning Policy Framework does not allow the Neighbourhood Plan to take SOM2 out of the Local Development Plan, as it is a strategic policy in the Melton Local Plan.

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	X
Has regard to national Planning policies	<input type="checkbox"/>	X	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	X	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	X	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

Looking at my comments (resident 8) and neighbourhood plan comments. I think the confusion comes about because of the difference between the Primary Green Infrastructure corridor Map produced by TEP and MBC :- ref G2711.045 October 2016. and the 'Definitive Map of Public Rights of Way' map from Leicestershire County Council For example on the Primary Green Infrastructure Map , NO 1 is labelled, "Burrough hill country park" and NO 6 (which goes through Somerby and SOM2) is labelled "Jubilee Way". Whereas the Somerby Neighbourhood Plan claims Jubilee way starts at Burrough Hill country park, this information I assume being derived from the 'Definitive Map of Public Rights of Way' map from Leicestershire County Council etc. The reason for this in my opinion is because the primary green infrastructure corridors names are labels given to them because of their close proximity and /or relationship to certain landmarks and walks etc. Please make sure any additional pages are clearly labelled/addressed or attached Typical example is the "Viking Way" thus called because part of it cuts across an area once occupied by Norse men. Therefore I conclude that the comments set out below still hold true. I refer to :- Report to Melton Borough Council by Mary Travers BA(Hons) Dip TP MRTPI an Inspector appointed by the Secretary of State Date 14 September 2018 Planning and Compulsory Purchase Act 2004 (as amended) Section 20 Extract Section 130 :- "An additional criterion is required in the policy for SOM2 to ensure that development of the site enhances the biodiversity and recreational value of Jubilee Way and is consistent with Policy EN3 of the Plan." I also refer to :- Extract from Melton borough plan 2011- 2036 APPENDICES Melton Borough Local Plan, October 2018 Appendix 1 Site allocations and policies. See below "However, ridge and furrow field systems are again evident and limit the potential for residential development.' The popular Leicestershire Round footpath and Jubilee Way Primary Green Infrastructure Corridor (GIC) (which is identified in Policy EN3 of the Plan) pass through the village and link to the wider county public rights of way network. Policy EN3 requires the enhancement of the Jubilee Way GIC, and this has particular relevance to site SOM2."

Please provide your suggestions below:

MBC should clarify the above as it has become very confusing for everyone. If the comments made by Somerby Neighbourhood planning ref page 89 paragraph 127 are true then this clearly throws the "Soundness" of the whole Melton Plan into doubt. It is reasonable to assume that the Inspectors findings and comments would have been influenced by the data at hand at the time, therefore if wrong as suggested above, again throws the "Soundness" of the whole Melton Plan into doubt.

SPC response:

Noted. The Primary Green Infrastructure Corridor is part of the Local Plan not the Neighbourhood Plan. As we explained at Reg.14 consultation, we believe there is a mistake in the Local Plan as to the location of Jubilee Way. We cannot change this ourselves and have made MBC aware.

Page numbers 33 to 34, Paragraph/policy (if applicable) 37

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	X	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	X	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	X	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

Comments made by Somerby Neighbourhood planning again add confusion regarding Primary Green Infrastructure corridors running through Melton Mowbray Borough and their accuracy?

Please provide your suggestions below:

I refer to suggestions above representation FORM 2, especially the question of Soundess regarding whole MBC Plan.

SPC response:

Noted.

The Primary Green Infrastructure Corridors are part of the Local Plan not the Neighbourhood Plan, and we believe public rights of way are correctly mapped in the Neighbourhood Plan.

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	X
Has regard to national Planning policies	X	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input type="checkbox"/>	X
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	X

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

Looking at Somerby Neighbourhood Planning response to Resident 9 comments within "Wellbeing". They confirm that play area and soccer pitch come under ENV3 and should be protected.

Please provide your suggestions below:

The above is within SOM2 and yet again provides strong evidence that SOM2 should be taken out of MBC Plan.

SPC response:

Noted. Policy ENV3 intends that the play area and soccer pitch should not be lost or degraded unless they are replaced. The NPPF does not allow the Neighbourhood Plan to take SOM2 out of the plan, as it is a strategic policy in the Melton Local Plan.

G. Franklin

Submission Plan, page number 23, Chapter 4.0 (spatial Strategy and Settlement Roles)

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	X	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	X	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	X	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	X	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

The strategy recognises that housing allocations in the Melton Local Plan are more than sufficient to meet the housing requirements of Somerby Parish for the plan period. It also recognises that the requirement might increase and makes contingencies for that by a reserve site in Pickwell and allowing for unallocated developments where of appropriate scale, location and type.

Please provide your suggestions below:

No change to Chapter 4.0.

SPC response:
Noted.

Submission Plan, pages 28 and 29, Chapter 5.3 (Limits to Development Principles) Policy HR2 (Limits to Development)

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	X	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	X	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	X	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	X	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

The principle of Limits to Development is sound, allowing development in the future but seeking to direct it where it will minimise harm to the built and natural environment, settlement character and amenity of existing residents. The exact placement of the limits to development is also balanced and sensible taking the former village envelopes but enlarging them to recognise building which has taken place since, and including areas in Somerby village which are to some extent pre-developed or 'Brownfield' and could potentially accommodate small-scale development. Subject to appropriate housing mix and design this is the kind of development which residents would be likely to support so the neighbourhood Plan is both realistic and representative of local preferences.

Please provide your suggestions below:

No Change to Policy HR2 or the accompanying Limits to Development maps.

SPC response:
Noted.

Appendix 2m (Consultation Statement, Regulation 14 comments and responses) Pages 2, 5, 78 and 80

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	X	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	X	<input type="checkbox"/>	<input type="checkbox"/>
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Contributes to the achievement of sustainable development	X	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
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Please provide your comments here:

I am referring to the requests by Burrough Court Estate and Ernest Cook Trust for the Neighbourhood Plan to allocate additional sites for housing development on their land. Given that the Local Plan exceeds the housing requirements of the Parish and the rationale of Neighbourhood Plan chapter 4.0 and 5.0 there is no need for any such further allocations. Any proposals at those locations would be 'windfall' and determined according to policies HR2 and HR4 which exist to address such proposals.

Please provide your suggestions below:

The Neighbourhood plan is correct to decline the additional site allocations requested by Burrough Court Estate and Ernest Cook Trust.

SPC response:
Noted.

A.Wheatcroft

Submission Plan, Page 23, Chapter 4.0 (Spatial Strategy and Settlement Roles)

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	X	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	X	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	X	<input type="checkbox"/>	<input type="checkbox"/>
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Please provide your comments here:

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Please provide your suggestions below:

No change to Chapter 4.0.

SPC response:
Noted.

Submission Plan, Page numbers 28 and 29, Chapter 5.3 (Limits to Development Principles) Policy HR2 (Limits to Development)

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	X	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	X	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	X	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	X	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan
 Support this policy/part of the plan subject to modifications
 Object to this policy/part of the plan
 Neither support or object to this policy/part of the plan

Please provide your comments here:

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Please provide your suggestions below:

No change to Policy HR2 or the accompanying Limits to Development maps.

SPC response:
Noted.

Appendix 2m (Consultation Statement, Regulation 14 comments and responses) Pages 2, 5, 78 and 80.

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	X	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	X	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	X	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	X	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

Support this policy/part of the plan Support this policy/part of the plan subject to modifications Object to this policy/part of the plan Neither support or object to this policy/part of the plan

Please provide your comments here:

I am referring to the requests by Burrough Court Estate and Ernest Cook Trust for the Neighbourhood Plan to allocate additional sites for housing development on their land. Given that the Local Plan exceeds the housing requirements of the Parish and the rationale of Neighbourhood Plan chapters 4.0 and 5.0 there is no need for any such further allocations. Any proposals at those locations would be 'windfall' and determined according to policies HR2 and HR4 which exist to address such proposals.

Please provide your suggestions below:

The Neighbourhood Plan is correct to decline the additional site allocations requested by Burrough Court Estate and Ernest Cook Trust.

SPC response:
Noted.