

I list below my initial responses. In addition, I consider that MBC were flawed in only registering sites for more than 10 houses in each of the villages. This meant that small infill sites were rejected straight away which is contrary to "Good Practice" and has caused an unnecessary amount of spurious housing planning applications and registering of sites on a purely speculative basis.

**Page Clause Comment**

**12 2.3.5 Under jobs and prosperity heading, which villages perform the same role as the 5 service centres mentioned? This is very vague. Without a full definition some of the smaller villages provide little job opportunity I`m afraid. Please supply any data in support.**

**13 2.7.3 Many of the Conservations areas were designated in the 1970s and need reviewing.**

**13 2.7.5 Flood risks are increasing due to ill considered developments and infra structure building in wrong locations. The evidence is increasing in County Council Flood Figures (FRA) which should be in the "key evidence" at the end.**

**19 3.2.1 "safeguarding valued heritage and local landscapes" should include "Conservation Areas" and "Archaeology"**

**20 3.3.2 "Enable and support the provision of affordable housing" needs clarifying re location as there is no point in locating to remote sites with no facilities and high transport cost**

**21 17 Needs to include "protection of existing archaeology, historic landscapes and settings" including "small villages"**

**26 4.2.7 2.3.5 states there are 5 service centres not the 12 referred to. I would argue that certain smaller villages such as Somerby are Rural Hubs as there are other villages in the Parish of Somerby such as Burrough on the Hill, Pickwell, Leesthorpe and part of John O Gaunt. A more certain measure is required such as population.**

**28 4.2.12 Windfall sites is not compared with the actual "Housing Needs" survey recently undertaken. There is no rationale behind the 5% or 15% percentage without discussing land costs, geology, transport and access. It does need a statement that windfall means integration within the villages and not the periphery sites which are not viable. The criteria of the site selection is more complex than a mathematical formula. It should take into account for example, infill sites or existing buildings that will be demolished because they are not sustainable.**

**101 7.3.5 Since when has the Jubilee Way been the most notable public rights of way? The "Leicestershire Round " is the most prominent and well used!!!!!!!!!!!!!!**

**103 Policy EN3/15 and 17 MBC have not undertaken any thorough research yet on potential archaeological sites and historic parkland. By designating both housing allocation sites and reserve sites in various small villages and hamlets without proper evaluation, MBC are purely speculating on extremely sensitive areas creating unnecessary aspirations when the Housing Need for the next**

20 years has already been satisfied elsewhere. This is a clear departure from delivery, protection and enhancement of Green Infrastructure that exists within the existing villages, many of which are important Conservation Areas. I cannot think of a better example where MBC are at odds with their own policies. I would therefore strongly object to the following sites being included in the local plan for SOM 1,2 & 3 (Reserve site) for this reason.

104 7.4.1 I would argue that other areas of separation shall be between a. Somerby and Pickwell b. Somerby and Cold Newton c. Somerby and Burrough on the Hill

109 7.14.3 The indoor swimming facilities are not correctly recorded. The aged facilities are not going to last and vulnerable to closure at short notice. I attach a copy of "Melton BC Indoor Sports Assessment, April 2011" which indicates of 10% shortfall in swimming pool demand according to Sport England recommendations. Waterfields is also in a flood plain. The car parking is also shared and on a steep slope making it difficult to access for disabled. There is no reference to the other pools and ideal location and ideally there needs to be a spread of facilities on other sites, geographically. The report is now 5 years out of date and with increasing population and firmed/ health trends the need for new 25 and 50m pools is essential.

125 Policy EN11 Many of the sites identified in the Proposed Submission Policies map showing housing and reserve sites already fail the sequential test of flooding! The maps showing the flood zones have not caught up with recent events or acknowledge local conditions such as ground or topography. Similarly it does not acknowledge the SUDS is very expensive to provide and not reliable in the long term due to poor maintenance. To make matters worse the County Council are only emptying road gullies once a year and with the growth of tarmac/ impervious surfaces the water run off is increasing worse as ditches are also not being maintained.

The conclusion is that many of the MBC suggested sites clearly are not "sustainable" due to high site costs combined with higher standards of design required.

128 7.23 Although the Conservation Area Appraisals are completed, there is no evidence as many have not been reviewed since the early 1970`s. There is no reference to the important risk of archaeological finds during excavation, need for Geophysical surveys, trial holes, desk studies on likely sites. Section 69(2) and 70(1) place a continuing duty on LPAs to review and extend existing Conservation Areas. MBA have failed to do this in the case pf Somerby and many other areas.

129 Policy EN13 /A MBC need to add the word "adjacent" to historic sites

129 Policy EN13/B MBC are promoting sites for development which are clearly in breach of this policy. Positive contribution in villages is not encircling it with new housing and increasing traffic levels on already unsafe narrow winding roads.

129 Policy EN13/C MBC needs to add the word "adjacent" to Conservation Areas and after the words new conservation areas add " review boundaries of existing Conservation Areas"

In the case of Somerby, I would add the following comment :

**Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study, Sept 2015 ( INF NO318) : There are missing a number of sites. I attach a marked up plan indicating important areas of fringe which your consultants appear to have missed.**

**Regarding the Proposed Submission Policies Map of Somerby and others, this is becoming a huge farce, as outline applications have already been submitted on 2 sites raising probably the largest number of objections the MBC has ever had with no support whatsoever, except for the planning department itself. The Parish Council and local residents have made the case several times that the demand for houses in this village can easily be met within the village but MBC seem to take no notice.**

**In addition, various residents have suggested reviewing the existing Conservation Area after 40 years as the current CA is now inadequate. This is urgently overdue.**

**I would comment as follows on each site :**

**SOM1 Outline application for 32 houses has been submitted for 10 months now with 90 valid objections and only one in support. This site on the edge of the village and is being used for grazing and is high quality agricultural land. The main objections are flooding, traffic, loss of trees, loss of night light, loss of amenity and inappropriate use.**

**I therefore would add my strong objections to this application on this basis.**

**SOM2 Ref MBC/023/16 This site was registered very recently by a Registered Charity who have sold off land for housing in the MBC over the last few years. They also own the children`s play area and small football field adjacent. None of the site has been assessed yet but potentially has a high risk of archaeological work underneath and is a very important part of an overall historical landscape previously owned by Brasenose College, Oxford.**

**I attach a recent appeal decision on an adjacent site which gives an excellent range of reasons to reject the inclusion the Melton Local Plan.**

**The principal reasons to reject this site being included on this sensitive site can be précised as follows :**

- **Close to (or on ) a former Medieval settlement or possible Roman previously requiring both geophysical surveys and trial trenching to establish the archaeological importance**
- **Far too large a scheme which would have a significant negative impact on the present small village and its sensitive rural environs**
- **Too close to the Conservation Area, major listed buildings and a 16C Cruck Building (Former School and Infirmary)**
- **Detrimental influence on other houses, public rights of way (Leicestershire Round) and horse trails**
- **Substantial harm to Heritage assets and using up valuable “green open space”**
- **Increase travel distance of village playground from local school and not easily supervised for children`s safety**
- **Increased urbanisation of a very small village and equestrian community**

- Inadequate drainage provision (the current area floods the adjacent roads already due to poor porosity and inadequate road drainage)
- Highway access is extremely dangerous due to speeding vehicles and inadequate visibility splays
- Increased traffic to a village with already too narrow roads
- Removal of important trees and landscape in the Conservation Area
- Lack of infrastructure generally

**SOM3 Ref 16/00615/OUT Outline application for 31 Houses**

This was submitted in September 2016 but has been rejected on several occasions in past planning applications. However, the number of present objections is already growing (71 so far) after no consultation with the community whatsoever. The land is currently used for grazing and has been used previously as allotments which Somerby is now short of other green spaces.

I would list the following objections :

- Lack of visibility splays for safe egress
- Adjacent traffic travelling too fast (5 to 15mph recorded as part of survey) increasing risk of accidents as it is on a bend in the road and opposite another entrance
- Adjacent to Grade 11 listed greenhouse with negative impact upon the setting, landscape, Grove House and the Conservation Area adjacent
- Negative impact on the rest of the village, particularly at the entrance to the village
- Possible archaeology on the site
- Loss of amenity particularly to public footpath adjacent
- Risk of flooding and lack of services adjacent (no capacity for foul or surface water left)

**APPENDIX**

1. Melton BC Indoor Sports Assessment, April 2011
2. Marked up plan of missing Separation, Settlement Fringe Sensitivity and Local Green Space Study
3. Copy of Planning Inspectorate Appeal Decision 9 December 2014

The above comments have been made by

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