

Dear Madam,

**Melton Local Plan Examination – Somerby & SOM 2 MBC/023/16**

In write in connection with the Melton Local Plan Examination.

I have attempted to categorise my representation under the various Matters.

**Matters 5, 8 and 9**

In the document Emerging Options (Draft Plan) Jan 2016 MBC stipulated in Policy SS3 for development to enhance the sustainability of communities the development will respect ecological historic and biodiversity features. Since SOM 2 MBC/023/16 (The Croft Field) HER reference MLE22781 contains medieval assets and is the primary field to exhibit such features within Somerby, MBC has steadfastly ignored the evidence. Please refer to my past submissions to MBC (For ease of reference I attach at Appendix 1 an email sent to MBC on 22/02/2017 at 16:03).

SOM 2 MBC/023/16 ("SOM 2') fails the Policy EN3. It is impossible to protect and enhance this historical landscape by building over it! The site allocation SOM2 is inconsistent with the policies contained in the local plan.

As the Croft Field contains visible evidence in Somerby of our medieval past, the loss of such an asset to our village locally would be significant. The Croft Field forms an important reminder to each successive generation of our historic past beneath our feet.

The Croft Field is partly within the Conservation area of Somerby and therefore the proposed development of SOM2 would cause harm to the historic buildings within the conservation area including their setting. It fails Policy EN13- Heritage Assets. SOM2 is also adjacent to the historic walled paddock enclosure. Refer Site Reference 11 p105 MBC Areas of Separation Settlement Fringe Sensitivity and Local Green Space Study 2015. This report notes the historic enclosure has a "strong relationship to settlement /focus for settlement and quality" with a recommendation to "reinforce". The proposed site SOM2, which is directly adjacent to the enclosure and other listed properties, is therefore incompatible and inconsistent with this objective and Policy EN4.

MBC is not taking a positive approach in accordance with Policy EN13 in seeking to ensure the protection and enhancement of this heritage asset and the medieval remains and features contained in this field.

In designating site SOM2 within the local plan MBC have failed NPPF clause 126 to adopt a positive strategy for the conservation and enjoyment of the historic environment. SOM 2 ought to be omitted from the local plan and alternative sites sought which causes less harm should be considered.

## Matter 4 & 5

MBC have consistently ignored previous comments regarding the inability of Somerby's existing infrastructure to accommodate the proposed housing allocation through large sites. MBC seem to make their decisions on site allocation in a vacuum without considering the context of the wider surroundings. For example in summary:-

- High Street through Somerby (the only road through the village and the primary route to both Melton Mowbray and Oakham) is restricted to a single lane of traffic (two way traffic is not possible), has two extremely dangerous blind ninety-degree bends, with narrow or non-existent footpaths in places. High Street is incapable of supporting existing traffic let alone the additional traffic from site SOM 2. It is not possible to widen the road due to the close proximity of the houses on either side of the road. This most important issue is incapable of being resolved. A site visit in the evening or weekends will demonstrate at first hand the issues involved.
- High Street is a narrow road and does not conform to minimum widths required for a road serving a school (6.75m).
- Parking on Somerby High Street causes vehicles heading eastwards to cross on the wrong side of the road for an extended distance and is restricted to single file traffic in a contraflow system.
- High Street contains three T junctions (Chapel Lane, Manor Lane and Church Lane) all with severe limited visibility. Any increase in the traffic flow caused by any of the sites but particularly SOM 2 and SOM 3 would increase the risk of accidents further.
- The school has no car park or layby for drop off parking, no proper playing fields, (the children have to use the village playing field, which is earmarked for development under SOM 2). The school does not have the space for physical expansion and this will be a necessity if the proposed development proceeds. Refer to the MBC SOM 2 site appraisal which stated "an increase of the capacity of the Primary School" was required. Any expansion to the school is simply not physically feasible and any capital expenditure on a school with such existing limiting factors is not viable and would be a folly.
- The existing village shop has just two car parking spaces is situated on a narrow blind ninety degree bend. There is no capacity for this to be increased if Somerby is intended to be a service hub. The pavement outside the shop is less than one metre wide at one point!
- Access to the site SOM 2 is on a dangerous 90 degree bend a site of previous accidents.
- The existing sewerage and drainage system within the village is already inadequate with no capacity for expansion. This is a well-reported issue and flooding has already taken place. SOM 2 & SOM 3 will fail policy EN11 to minimising the risk of flooding.
- There is no gas supply to Somerby limiting options for heating etc.
- Inadequate public transportation. A poor infrequent bus service.
- The existing community facility on High Street such as the Methodist church hall has no car parking and the Village hall has very limited parking. All

community facilities are accessed on High Street which already suffers from congestion and difficult visibility. Increased traffic consequent from proposed sites SOM 2 and SOM 3 will exacerbate the problem.

- Existing pavements in Somerby narrow to significantly less than the recommended 2m (refer Leicestershire County Council 6 C's Design Guide. In addition the pathway outside the school is less than 1.5m when the recommendation is it should be at least 3m. These inadequacies are incapable of rectification due to physical constraints. Any expansion of Somerby in the local plan does not take into account the constraints of local infrastructure to allow proper safe movement particularly those people with impaired mobility (footpaths too narrow for mobility scooters) or school children.

Contrary to the NPPF clause 7 MBC has completely failed to take into account the infrastructure provision requirements or set out any coherent strategy to solve the significant problems which will arise from potential large scale housing development in Somerby. NPPF stipulates "local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development". MBC has failed to provide any evidence or confidence that that the infrastructure will be provided to support the housing allocation and strategy for Somerby and therefore failed policy IN2 in the local plan. MBC has failed to explain how they would mitigate the impact on local infrastructure by the proposed growth of the village. MBC has failed policy IN1 to identify "The necessary infrastructure required to support development in accordance with Policy IN1 "

#### Matter 4 and 5

MBC have failed to properly explore potential "brownfield" sites and provide adequate importance weighting to sites such as Great Dalby Airfield. To simply mention this site under Policy SS6 is inadequate and MBC ought to be more specific regarding both the impediments for considering this site and what would trigger further review. Brownfield sites such as Great Dalby Airfield should be prioritized. NPPF 111 states, "Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value. Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land." There is no evidence that MBC have properly explored the Great Dalby Airfield site. They advise this has not been brought forward by the owner and is on the reserve list. One may speculate on the reasons this site has not been brought forward and it may be connected to the demands for Section 106 contributions. MBC ought to be transparent on the discussions which have taken place with the owner.

The brownfield site Great Dalby Airfield has many advantages for example:-

- Such a development would reduce the pressure to build large sites in rural communities, which have inadequate infrastructure to support increasing housing development as contemplated by the existing draft local plan.
- Will be closer to the Southern or Eastern distributor road than those proposed sites in rural communities.
- Is a brownfield site which would benefit from remediation.
- Is closer to Melton for employment, services, schools, shopping. Has better public bus service and road servicing the site. Will create lower carbon emissions.
- Is of sufficient size to have proper purpose built infrastructure rather than bolting on developments to existing drainage infrastructure, and electricity supplies etc. of small rural communities which are already unable to cope with existing demands.
- Is a rather unattractive desolate site which would greatly benefit from redevelopment. Planners and consultants would have a “blank canvas” to design a sustainable development and thriving community.
- Is of a size which would deliver a mix of housing catering for a variety of needs and have its own community
- Is a large site which should ensure its viability to cover such costs as remediation, infrastructure requirements.
- The site is of sufficient scale that it would be possible to build at an appropriate density far better than those proposed rural sites.

MBC should be playing a critical role in bringing forward brownfield land and yet this prime opportunity to develop is being missed with the consequent pressure to develop ill-conceived sites in rural communities such as Somerby. MBC is failing to realise the potential of brownfield sites.

Appendix:

**From:** Watts, Jason

**Sent:** 22 February 2017 16:03

**To:** [planningpolicy@melton.gov.uk](mailto:planningpolicy@melton.gov.uk); [jbeverley@melton.gov.uk](mailto:jbeverley@melton.gov.uk)

**Subject:** Melton Mowbray Borough Council Draft Local Plan (Pre-submission)- Site SOM 2 MBC/023/16 -Earthworks in the field known as The Croft - Grid reference SK 7771 10396 - Somerby west of Chapel Lane -

Dear Sir or Madam,

I write in conjunction with the draft Melton Mowbray Borough Council Draft Local Plan (Pre-submission) and in particular the proposed housing development site in Somerby site reference SOM 2 MBC/023/16.

I wish to draw your attention to the likely presence of former medieval archaeology in this field known as "The Croft" (the proposed potential development site SOM2 MBC/023/16). Melton Borough Council do not appear to have investigated the field which is far more complex than the ridge and furrow described in the reports which accompany the draft local plan. In my letter dated 10<sup>th</sup> December 2016 addressed to the Council I advised the topography of field indicates evidence of previous earthworks and medieval activity.

I have been researching some of the heritage assets adjacent to Chapel Lane and have been in e-mail correspondence with Mr R F Hartley regarding this field in the south west corner of Somerby village. I am sure you will be aware Mr Hartley is a widely respected expert on the Medieval Earthworks of Leicestershire. In light of Mr Hartley's response I thought it appropriate to send to you a copy of our e-mail exchange and raise the matter with you. Please refer to the two e-mails attached.

Mr Hartley believes that the field known as The Croft (identified on the plans contained within the e-mails) contains (possibly medieval ) remains of the south west corner of our village. This field is directly adjacent to our conservation area and also to other heritage assets.

I am sure the comments within the e-mails are self explanatory.

Attached to my original e-mail are also some photographs which hopefully convey the sense of the mounds within the field. In addition I also attach a couple of "drone" photographs which also illustrate the remains. The RAF Vertical photograph (Reference CPE UK 1932 1022) referred to in the book Medieval Earthworks of North East Leicestershire is available at the Leicestershire Record Office.

The Croft field earthworks has, I believe, been allocated a HER reference number MLE22781. Within our village this is one of the last visible remains of Somerby's medieval past. Hopefully the plans and Mr Hartley's annotated plan provide you with the exact location.

In addition The Croft field is adjacent to other heritage assets including 7 Chapel Lane HER MLE22700 and the earthwork remains of the medieval and post medieval village contained within the field forms an important part of its setting.

I do not believe this field, which is visible from two public footpaths (one of which is the important Leicestershire Round), should be adopted as a preferred development site within Melton Borough Council Draft Local Plan.

I would refer you to the points noted on page 4 of my letter dated 10<sup>th</sup> December 2016 which outlines my objections to the proposed inclusion of SOM 2 MBC/023/16 as a preferred development site on the basis of impact on historic landscape legacy. I will not repeat those arguments here but am happy to send a further copy of my letter if required.

I understand Mr Richard Clark, Principal Archaeologist, Leicestershire County Council has already advised Melton BC of the following in respect of site SOM 2 MBC/023/16:-

*“SOM2: Land off High Street, Somerby: The centre and east of the development area lies within the historic settlement core of Somerby (MLE8617) and contains substantial and well preserved earthworks remains of the former medieval and post-medieval village (MLE22781). The western third of the development area includes a section of surviving former ridge and furrow earthworks providing clear evidence of the extent of the former village and the associate agricultural land use. The survival of earthwork remains indicates a high probability of significant associated buried archaeological remains. Loss of the earthworks will impact upon the setting and significance of the conservation area, which abuts the site along its northern and eastern boundaries.”*

The Croft field has significant and outstanding heritage implications. The proposed development of SOM 2 MBC/023/16 will be considered to be contrary to NPPF in relation to safeguarding heritage. It will not be in accordance with policy EN3 DLP (page 103) which states the objective to retain areas of archaeological interest.

It is clear that the development of site SOM 2 MBC/023/16 would not be in accordance with either the independent consultants report or the NPPF.

Thank you for considering my e-mail together with the attached information. Please let me know if you require anything further.

I should be most grateful if you would acknowledge receipt of my e-mail.

Yours sincerely,

Jason Watts

