



**Somerby Parish Council's submission to the
MELTON LOCAL PLAN EXAMINATION.
MATTERS AND QUESTIONS.**

To be read in conjunction with the submissions from Carl Powell &
Mary Ann Donovans. (NP leads for Somerby Parish).



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MELTON LOCAL PLAN EXAMINATION MATTERS AND QUESTIONS

Note 1: It is implicit that in answering the following questions, if respondents identify a soundness deficiency in the Plan (as amended by the Focused Changes) they should make clear how the Plan should be changed.

Note 2: Policy references are to the principal policies at issue but other parts of the Plan may also be relevant.

Matter 2: Overall Spatial Strategy

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

No - The MLP does not provide a sound framework for the roles to be played by various parts of the Borough. Asti has been based upon old, poor or even non-existent data.

i) are the development strategy, settlement hierarchy and broad apportionment of growth (Policies SS2 and SS3) consistent with the Plan's vision and strategic objectives?

The criteria for settlement role was altered after concerns were raised by a large number of Parish Councils. The initial number of criteria was reduced to 4 interestingly this resulted in exactly the same settlement hierarchy as originally proposed. An instance of making the test fit the data which is unsound as not being evidence-based.

No the criteria for settlement roles being too simplistic and placing too much weight on fast broadband, community building and a school. The fourth criteria being "employment opportunity" on which MBC have little or no data for. There should be some account taken of "good" public transport as opposed to transport whose timetable does not facilitate, for example, travel to work

Suggested Changes

The criteria for selecting and assigning settlement roles need revising, as the criteria of Fsat Broadband and community building applies to a large number of villages. The LP should be amended to exclude as 'service centres' settlements with poor employment opportunity and inadequate or no public transport links. MBC will need to gather data on employment opportunity across the borough as this information is woefully lacking, but parishes with NP's or emerging NP's have this data.

ii) are they founded on robust evidence, consistent with national planning policy and deliverable?

[Note: the soundness of the specific site allocations including the Melton Mowbray Sustainable Neighbourhoods will be considered under Matters 4 and 5]?

No - The settlement hierarchy and apportionment of growth are not founded on robust evidence: It became abundantly clear at two meetings, for parish councillors, in early and mid-2016 that MBC were using outdated information (2001 census) or little or no information (when asked directly by myself) where were the good employment opportunities in my parish the officer concerned tried to come up with an answer and failed siting businesses which in the main were small family concerns.

Suggested Changes

Source and apply the evidence using up to date data i.e. Data that is not more than 8 years old.

iii) is the role of Table 4 in informing the detailed housing allocations policies sufficiently clear? Is its evidential base sufficient for its purpose?

No - The role of Table 4 is quite clear but the evidence base is insufficient for its purpose. This is primarily because the overall housing target is arbitrary and un-evidenced (Matter 3) because of inaccurate and

arbitrary settlement roles (using assumptions about 'employment opportunity' based on no evidence as highlighted in ii) above).

*Interestingly Service Centres and Rural Hubs are treated exactly the same, even though Rural Hubs have already failed to meet at least one of the four sustainability criteria for rural settlements? (**Matter 2**).*

*The requirement based on % population is rather blunt. The village with the larger population is not necessarily more sustainable for development E.g. Does it have employment opportunity, or good public transport? (**Matter 2**).*

Is population the best way of assessing the housing number requirement or would number of dwelling be more informative for this exercise?

Suggested Changes

*Source and apply the evidence using up to date data i.e. Data that is not more than 8 years old
Remove Service Centres and Rural Hubs and replace with allocations based on parish populations or even numbers of dwellings.*

2.2 Does Policy SS3 provide effective guidance for development proposals on unallocated sites in/on the edge of existing rural settlements? How will the risk of inconsistency with the development strategy from repeated application of the policy be assessed?

No – This guidance is not quite effective. The weakness in SS3 is it allows a developer to make a series of applications for 'small' developments year after year which may result in a 'large' development by stealth. The policy does require that the proposal 'will not result in a level or distribution of development that is inconsistent with the development strategy' but this is not sufficient because the development strategy contains no upper limit..

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