



---

**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).



JANUARY 8, 2018

PREPARED BY LYNNE CAMPLEJOHN, CHAIRMAN  
& HOWARD BLAKEBOROUGH, COUNCILLOR.



# 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 5: Other Housing Allocations (Policy C1(A) and Appendix 1) and Reserve Sites (Policy C1(B) and Appendix 1)**

### **5.1 Overall, has the allocation of the sites in Policy C1(A) been based on a clear, robust process of site assessment and informed by sustainability appraisal? In particular:**

*No - The LP site allocations are not based on a clear, robust process of site assessment nor were they informed by the sustainability appraisal, as outlined in Matter1 point 1.2.*

#### **i) has an appropriate selection of potential sites been assessed? Melton Local Plan 2011-2036: Matters and Questions for the Examination 5 All sites**

*No - The potential sites were identified through a paper exercise however the assessment of the sites have not been meaningfully applied (if at all) during the subsequent selection process.*

#### **ii) has an appropriate methodology been used and has it been applied consistently?**

*No - Appropriate methodology has not been applied consistently. This is evident in the differences between the 'scoring' of sites in the Sustainability Appraisal (SA) and in the Evidence Base (EB) which was used to inform the Spatial Strategy. Methodology appears to me to have been adjusted, (taking little account of landscape, historic landscape or heritage) in order, to remove obstacles to development on sites selected by MBC. The following is an example from Somerby, but similar inconsistencies can be seen for other sites.*

Criteria.	SA Score	EB Score
<b>Employment</b>	- All sites	All sites 0
<b>Biodiversity</b>	--? All sites	All sites ++ except 1 site -
<b>Historic/Heritage</b>	0 All sites	++ and +
<b>Flooding/Flood Risk</b>	- All sites	All sites ++

*(Please refer to Carl Powell's submission for a detailed explanation of the unsoundness of the methodology applied here). In this instance evidence has been ignored so that policy can be made.*

#### **Suggested Changes**

*Carry out SEA, Assign numbers instead of using +or – for impact ratings and each option total will provide a numerical score clearly indicating the "best" option. Use the data to inform Policy C1(A).*

#### **iii) are the reasons for selecting the preferred sites and rejecting the others clear and sufficient? Would any inaccuracies in the assessments significantly undermine the overall conclusions?**

*No - The reasons for selecting the preferred sites are not clear and sufficient. There are concerns regarding the appropriateness of using a SA rather than a more rigorous SEA. Once the SA was produced this less reliable assessment was then poorly applied, the Evidence base does not match the SA resulting in inaccuracies which significantly undermine the overall conclusions, particularly under the headings of*

biodiversity, landscape, heritage, employment and flood risk. Thus insufficient weight given to corresponding parts of the NPPF.

### **Suggested Changes**

Carry out SEA, Assign numbers instead of using +or – for impact ratings and each option total will provide a numerical score clearly indicating the “best” option. Use the data to inform Policy C1(A).

**iv) has a reasonable balance been struck between the residual requirement figure for each of the settlements in Table 4 and the allocation of sites to meet the residual requirement as closely as possible?**

No - A reasonable balance has not been struck between the residual requirement and the allocation of sites. This is due to MBC’s political decision to build 6,126 dwellings (2011-2035) rather than the better-evidenced HEDNA number of 4,250, the requirement / allocation proportions are correct when using 245 dpa, however this is unsound and the resulting the resulting residual requirement itself becomes too high.

### **Suggested change**

Adopt and plan for the HEDNA FOAN of 4,250 houses. Follow the evidence.

**5.2 Overall, will the allocations provide sufficient flexibility to help deliver the spatial strategy?**

Yes - The allocations in the LP as it stands NOW will easily deliver the spatial strategy (they are more than is necessary, because the spatial strategy seeks to deliver an unsoundly high number of houses (6,125 as opposed to 4,250 - Matter 3).

The site allocations to Service Centres and Rural Hubs significantly exceed the residual requirement even based on a target of 6125; the residual requirement totals 855 houses, whilst actual allocations total 1049 houses in preferred sites with a further 403 in reserve sites.

### **Suggested change**

Adopt and plan for the HEDNA FOAN of 4,250 houses. Adjust allocations in Service Centres and Rural for the lower requirement.

**5.3 Are the specific policy requirements for the site allocations in Appendix 1 justified and effective? Together with the Plan policies as a whole, is there reasonable assurance that the development of the allocations will be sustainable and in accordance with national planning policy?**

No - There is not reasonable assurance the allocations will be sustainable or in accordance with national policy, because the methodology used to obtain the evidence is insufficient. There are discrepancies between SA and EB data and finally the data has not been used in site selection. This leads to insufficient weight being given to corresponding parts of national planning policy (E.g. NPPF paras 30, 34, 35, 37, 99, 100, 101, 110, 126, 129, 165, 169, 170).

### **Suggested Changes**

Carry out SEA, Assign numbers instead of using +or – for impact ratings and each option total will provide a numerical score clearly indicating the “best” option. Use the data to inform Policy C1(A).

**5.4 Is the identification of ‘reserve sites’ in Policy C1 (B) appropriate in principle?**

Policy C1(B) is linked to failure to deliver housing in the relevant settlement. Therefore the identification of reserve sites is appropriate in principle.

**5.5 Has the basis for their identification been robust? Is there clear justification for the identification of the individual sites as reserve sites?**

No -The reasons for this are outlined in 5.1 above.

***Suggested Changes***

Amend policy as *outlined in 5.1 above*

**5.6 Are the policy criteria of Policy C1(B) justified and effective? How will criteria iii) and iv) be assessed?**

*No -In principle the policy is appropriate however, the allocations overall are unsound. See 5.1 and 5.5 above.*

***Suggested Changes***

Amend policy as *outlined in 5.1 and 5.5 above.*