

Subject: Representation -- Focussed Changes -- Melton Local Plan -- 23 August 2017

From: M.A. Donovan, resident, [REDACTED]
[REDACTED]

1. FC1.2 Policy SS2, point 4.2.16 (Development on unallocated sites in rural areas) and Policy SS3 Sustainable Communities (Unallocated sites):

1.1 These Policies, as written, do not support sustainable rural development. Specifically they are not linked to the sustainability of the natural and historic rural environmental or meet the goal of NPPF para 126 which requires the Melton Local Plan to set out a positive strategy for conservation and enjoyment of the historic environment. I consider this a major weakness in the Pre-submission MLP and Focussed Changes documents.

1.2 NPPF para 55 states housing should be located where it enhances the vitality of rural communities. This is a fundamental consideration in places where the vitality of a community is underpinned by shared environmental features and their social and economic benefits, which is the case in 3 villages in Somerby Parish -- Somerby, Pickwell and Burrough-on-the Hill.

Evidence to support a community approach to the MLP has been submitted to Melton Planning in the document '180617 Planning the Future of Somerby', attached. This examines subjects including housing need, economic and environmental sustainability and resident input on their usage of the surrounding environment, facilities and their essential but 'unsustainable' travel. Evidence from this document should be incorporated into the final draft of the MLP and trigger a re-examination of the spatial allocation strategy in the MLP for Somerby Parish.

1.3 It is recommended that the above policies be amended to include an additional category of 'Cluster Villages' where small scale development (5-10 houses) and infill will count towards a common growth target, rather than be labelled as 'windfall'.

This is a different road to the same mountain top. Rather than three large Somerby sites, all of which have considerable environmental constraints and resident opposition, a more organic approach is recommended, consistent with the historic growth patterns in rural settlements (of which Somerby village should be seen as a high standard of sustainable development without meaningful change to its historic character).

1.4 This approach will deliver a more environmentally positive and sustainable plan across the rural communities of Somerby Parish with regard to built heritage and historic landscapes, sustainable travel and infrastructure. It has the potential to increase growth above plan allocations while maintaining the environment, character, appearance and land usage of the area. It is supported by more up-to-date, relevant and local evidence than the Plan's updated (but still incorrect - see following) sustainability study provides, in accordance with NPPF para 158.

1.5 Somerby, Pickwell and Burrough-on- the-Hill are each small villages which share services. They have long associations, share important historic landscapes including Burrough Hill Fort (SAM) and surroundings, are linked by farming, tourism and equestrian economies, by public transport, cycling and walking through connected major footpaths such as the Leicestershire Round and Jubilee way and many permitted footpaths and cycle routes.

1.6 Importantly, Somerby Parish is part of Natural England's National Character Area: 93, High Leicestershire, whose Strategic Environment Opportunities urge planning authorities to protect and

maintain the High Leicestershire settlement pattern, its open views of historic villages, country house parkland settings, veteran trees and the tranquil and dark skies at night rural sense of place.

Currently, the large scale site allocations in the Plan for Somerby village itself do not meet Natural England's conservation principles and can be considered in the FC document as unjustified by relevant and accurate evidence, despite numerous evidenced based representations made to the MLP.

To produce a sound and justified plan which is consistent with the NPPF the MLP should implement a Cluster Village strategy, particularly in areas of the Borough which have high heritage and landscape values which give major support to the vitality of rural communities socially and economically.

2.0 FC4 Housing Sites Allocation and Appendix 1 - FC4 and FC4 Part 2 Service Centres Site Update May 2017 - SOM 2 and 3

2.1 These two sections will be addressed together. It is clear that evidence submitted to the MLP beginning in August 2015 in large part has not been reflected in FC4. Sites SOM2 and 3 have heritage constraints and increasing evidence that they are inappropriate for development, and should be removed from the SHLA.

Although not part of the Focussed Change consultation, the Pre-submission Sustainability Appraisal and the Areas of Separation, Fringe Sensitivity and Local Green Space Studies for Somerby village, which inform the MLP allocations, have not been amended with recent evidence either, resulting in questionable status as justification for the MLP allocations.

It should be noted that Historic England, on page 124-6 of the Pre-submission Sustainability Study encourages the Plan to be sharpened with relevant, local evidence, particularly with regard to local heritage, un-designated heritage, historic landscapes and long term, effective approaches to mitigation versus vegetative screening often referred to. This should included in the submitted MLP.

2.2 Service Centre Site Update Part 2: SOM2

2.3.1 The section on Planning History should note Appeal Decision Ref: APP/Y2430/A/14/2221470 with reference to the inspector's comments in paragraph 10 and in paragraph 33, points one and three. SOM2 is in the south west landscape area of Somerby village described in the Appeal refusal as having high value and sensitivity to change; part of the built heritage included in the decision (para 33) is inter-visible with the site.

2.3.2 The section 'What are the key constraints that need to be dealt with/designed in/overcome' should include the LCC Archaeology requirement for further evidence to be provided (geophysical/trenching) on the significant find of medieval and post medieval earthworks extensively across the site.

2.3.3 The nearest listed building from the village streets is Burley House, not the Stilton Cheese pub. However other listed and undesignated buildings near the site are not in the appraisal and should include Grade II Manor Farmhouse, Somerby School and two undesignated cruck houses. There is no score given to heritage score it seems.

2.3.4 The TPO/Woodland adjacent at the west of the site is not just woodland, but park land with designed plantings and veteran trees and does not produce dense vegetative screening for the scale proposed. Points given for the absence of an Historic Park (++) and should be amended.

2.3.5. The Landscape rating should reflect the LCC comments regarding extensive presence of early earthworks across the site, not ridge and furrow as the Fringe Sensitivity Study reported. The score given landscape (0) should be amended to a negative score to reflect the historic landscape of the site.

2.3.5 Visual impact on the Conservation Area is rated (++) due to screening from 'woodland' which is accurately park land plantings, not dense, and composed of veteran trees with no long term positive effect. Visual impact from the south and countryside views of the site have not been addressed but is covered in the comments of the Appeal Decision.

2.3.6. The pictures of the site present only its perimeters and access. They are not an accurate representation of the sites topography, earthworks, relationship to the village and should be changed.

2.4 Service Centres Update Part 2: SOM3

2.4.1 Planning History should include:

- Appeal Decision Ref: APP/Y2430/A/14/22221470 Land at Southfields Farm. The Somerby Conservation Area and its landscape setting at The Grove were included in the decision to refuse as described under point 2.3.1.

- Planning Application 77/0581/6, October 1977. A development of similar scale was refused for reasons of harm to the character of the village, unresolved drainage strategy and not in the interest of highway safety.

2.4.2 'What are the key constraints to be dealt with/designed in/overcome does not include the LCC Archaeology comments requiring further evidence (Trenching) on possible medieval or pre-historic archaeology on the site or LCC and Gardens Trust comments on the sustainability of the Grade II Vinery.

2.4.3 Relationship to the village: the site is not 'enclosed' and has historic relationship to open country side at the west and north, and park land on the south. The rating of (0) should be amended.

2.4.4 For heritage, the nearest listed building is the adjacent Grade II Vinery, not the Stilton Cheese. This demonstrates no consultation with heritage records or representations by the appraiser. Other heritage structures immediately adjacent to the site and registered in the HER include service buildings, Grove House, Water Tower and Stables.

2.4.5 No adequate biodiversity study exists for the site or the property immediately adjacent which the site was once part. It is rated of 'low ecological value'. However, the varied landscape of the Grove Park land and tree plantations, including well over 200 trees in 12 acres, should be adequately assessed for its diverse population of mammals and birds which include observed 3 species of roosting bats and breeding pairs of birds of prey. The (++) rating for low ecological value is unjustified.

2.4.6 The site appraisal rates the absence of an Historic Park as (++) and Landscape is rated (0). NPPF para 141 states information gathered as part of plan-making should be publicly accessible and considered. Although the park and gardens in the Somerby Conservation Area are not yet registered, they are mentioned in the HER, the HE listing and in the Gardens Trust consultation and the 4 April 2016 plan consultation. The Historic Park and Landscape rating should be amended to reflect the input of heritage bodies, the attached amendment to the Fringe Study and the LCC Archaeology geophysical and stratascan report. The Melton Fringe Sensitivity Study and Local Green Space

Study should be amended to be considered justified.

2.4.6 Visual impact of the development has not been rated for its affect on the conservation area, its setting, surrounding un-designated heritage assets at the entrance to the village, or the wider rural views of development together built and landscape heritage assets.

Please see the attached documents which provide evidence for these observations.

3.0 FC4 Housing Sites Allocations and Appendix 1 - FC4

3.1 This section contains the original and longer written summaries of the SOM 2 and 3 site appraisals. They omit many of the points listed above, do not address the extensive nature of the Somerby Conservation Area and that both SOM2 and 3 are part of the setting of listed buildings within the Conservation Area. In particular, the Fringe Sensitivity Study, which the FC/Consultations summary characterises as 'fit for purpose' has missed medieval earthworks in SOM2-3 and an historic country house parkland adjacent to site SOM3. This has had consequences for the proper heritage assessment in Planning Application 16/00615/OUT, which has not to date submitted a tree or ecological survey.