



Hearing Statement of Jelson Ltd

Melton Borough Local Plan Examination

**Matter 4: Melton Mowbray Sustainable
Neighbourhoods**

January 2018

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4.1 **Are the sustainable neighbourhood allocations as a whole consistent with the strategic objectives for Melton Borough?**

The allocations should, in theory, make a significant contribution to satisfying a number of the Borough's Strategic Objectives. However, they will massively underperform in respect of affordable housing (Strategic Objective 1). This is a particularly serious concern as having the 'critical mass' to fund affordable housing was one of the stated advantages of the Local Plan focussing on the delivery of two large-scale developments adjacent to Melton Mowbray. The inability of the allocations to deliver an appropriate level of affordable housing begs the question whether the Neighbourhoods will be sustainable at all. They will certainly not contain a sustainable mix of housing that helps build rounded communities.

Moreover, because the Plan strategy is so heavily reliant on the MMSNs, if they fail to deliver housing, employment and infrastructure in the manner required, the Plan strategy will fail and priority, as well as non-priority Strategic Objectives will not be satisfied. A catastrophic failure (within either allocation) is not capable of being 'managed' by the development strategy as currently drafted.

4.2 **Based on all the evidence, have they been positively prepared and has their identification been adequately justified? Is the overall size of the allocations and the quantity of development proposed appropriate?**

So far as Jelson can tell, the allocations have been positively prepared and their identification adequately justified. However, Jelson has submitted to the Council representations which suggest that the MMNSN should be extended to the east, enabling (i) additional housing to be delivered in a sustainable location (see our submissions in respect of Matter 3 on housing need) and (ii) an additional section of the Distributor Road to be constructed between Melton Spinney Road and the A607 to the north east of Thorpe Arnold. The latter would, we believe, deliver a material benefit in transportation terms, enabling traffic heading north east (to Grantham) or south west (from Grantham to Leicester) to avoid having to drive down to the junction of Thorpe Road (A607) and Melton Spinney Road and then back out to the northern section of the Distributor as currently conceived. Instead, traffic would be able to cross directly from the A607 to the northern Distributor to the north of Thorpe Arnold. By allocating additional land for development between Melton Spinney Road and the A607, the Councils will be better able to rely on developer contributions to fund this section of Road, rather than seeking out public funds as planned.

4.3 **Is the housing trajectory for completions over the Plan period and particularly within the first five years realistic and underpinned by robust evidence from all partners to the MMSNs delivery? Does progress on masterplanning and timescales for full planning permission support the trajectory figures? What is the market evidence to support the level of completions expected by 2022/2023? Is there in-built flexibility to resolve any barriers to delivery?**

Jelson has no doubt that the promoters of the SNs and the Council will have collaborated on the matters of programme and delivery rates. However, there is no clear explanation or documentation of this in the Council's evidence base and, for example, no Statements of Common Ground between the relevant parties.

In addition, in the space of just over 12 months, we have seen the parties revise, to a material extent, their trajectories for the SNs. In its Sustainable Neighbourhoods Topic Paper of September 2016, the Council indicated that both sites would begin to deliver housing in 2018/2019 and, by 2021, would be achieving 100 dwelling completions each per annum. In its latest note on Five Year Land Supply (MBC/HS1a), the Council it is indicating that the allocations will not now yield housing until 2020/2021. Furthermore, the Council has revised the rate at which dwellings are expected to be delivered. In 2016, the trajectory indicated that each site would deliver 25 dwellings in the first year, 50 in the second, 75 in the third and then 100 per annum from that point on (with a slight increase towards the end of the Plan period). The latest information, however, provides a combined figure for the two allocations (so it is not possible to tell how each is expected to proceed) and the annual rates increase from 61 dwellings in the first year, to 147 in year two, 210 in years three and four and then 215 in all but the last two years of the Plan period. We would not be at all surprised if the trajectories are altered further in due course.

The latest trajectory assumes that the developers of the SUEs will do the following in the next 2 to 2.5 years:

- a) produce comprehensive masterplans for the entirety of each of the SNs (incorporating phasing and delivery plans and design codes), in accordance with Policies SS4 and SS5 and in consultation with key stakeholders, and have these approved by the Borough Council before preparing applications for planning permission for any part of the SNs (it is not clear what will be done with the applications that have been submitted already and how the provisions of Policy SS5 will impact on the preparation of the application for MMNSN which has plainly been delayed having originally been expected in January 2017 according to the Topic Paper referred to above);
 - b) prepare, submit and have assessed by the Borough Council applications for planning permission that accord with the provisions of the masterplan and associated design codes;
 - c) negotiate appropriate S106 and S278 Agreements as well as any agreements required by the utilities providers;
 - d) resolve any outstanding land ownership issues, including any collaboration or equalisation agreements that will be needed to control / manage the costs associated with on and off site infrastructure;
 - e) prepare, submit and have determined by the Borough Council any reserved matters applications;
 - f) discharge all pre-commencement conditions and satisfy any pre-commencement planning obligations;
 - g) prepare the land for development; and
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h) deliver any up front infrastructure required as a consequence of conditions or obligations.

It is impossible to foresee how the masterplanning and planning application processes will unfold, how long it will take to work through the above stages, what the planning permissions for the allocations will look like (and what the developers will be required to deliver in the way of infrastructure before any housing is commenced / occupied, or during the early stages of the schemes – either of which will impact on the timing and rate of delivery of housing). Moreover, and with all due respect to the parties concerned, development on this scale remains unprecedented in Leicestershire (certainly in recent times) and delivery rates are accordingly entirely unpredictable. No development of this scale has yet delivered significant housing in the County, despite SUEs being a key feature of the regional strategy for over a decade. The only SUE to deliver any housing to date (Lubbesthorpe in Blaby District) has been blighted by significant delay and even now has not delivered sufficient new homes to provide any Barometer of delivery rates. Several other major SUEs have made it to planning application and / or outline planning permission stage but, on average, it is taking the promoters at least 3 years to secure outline planning permission (from submission of an application to the completion of the S106 Agreement). Reserved Matters are then taking up to and beyond 12 months to determine, conditions are taking up to and beyond 6 months to discharge and site preparation can take anything from 6 to 12 months. Accordingly, (i) any predicted delivery rates from the SUEs can be no more than a finger in the air at the current time and common sense suggests erring on the side of caution; and (ii) the trajectory in the Council's latest evidence seems to us wholly unrealistic.

The trajectory should be adjusted to assume delivery from the MMSNs commencing in 2022/2023.

So far as we can tell, there is no flexibility built-into Policies SS4 and SS5 to deal with minor or major delivery issues.

Making appropriate adjustments to the trajectories for the SNs will necessarily impact (significantly) on the Council's first five year supply calculations and also its overall estimates for housing delivery through the Plan period.
