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Our ref: Melton Local Plan Focussed Changes Your ref: Planning Policy/James Beverley

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### **Planning Policy**

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Dear James

# Melton Local Plan Addendum of Focussed Changes and CIL Preliminary Charging Schedule - Consultation

Thank you for consulting Leicester City Council on the addendum of focussed changes to the pre submission Melton Local Plan, and preliminary CIL charging schedule. The City Council submitted its comments to the pre submission Plan in the letter dated 20<sup>th</sup> December 2016.

The following are Leicester City Council's comments on the 'Focussed Changes'.

## 'FC1 'Spatial Strategy', and FC3 'Growth Strategy'

Since the consultation on the pre submission local plan in November 2016, the Leicester and Leicestershire Housing Market Area Housing and Economic Development Needs Assessment (HEDNA) has been published. This has established new evidence on objectively assessed housing need (OAN) across the HMA. It is clear that the scale of the OAN for Leicester means that not all of this need can be accommodated in the administrative boundaries of the city. Therefore Leicester City Council formally declared an unmet housing need arising in the city shortly after the publication of the HEDNA (see letter to all HMA authorities in February 2017).

The Melton Local Plan should specifically refer to unmet need in Leicester and set out how it will help to address this need now, including setting aside a specific amount of housing land to help meet this need, in advance of full agreement on HMA wide housing distribution.

It is unclear if the housing requirement in the plan (245 dwellings per year) being higher than the OAN set out in the HEDNA (154 dwellings per year) means that the difference (an additional 91 dwellings) will specifically count against unmet need arising elsewhere in the HMA. The Addendum to 'Towards a Housing Requirement for Melton Borough Report' (June 2017) para 3.3 last bullet appears to indicate this. However this should be clarified in the plan and make specific reference to the unmet needs of Leicester.

#### **FC4 Housing Site Allocations**

Policy C1 (B) lists a number of reserve sites capable of accommodating around 560 dwellings. The policy currently states that these 'will be approved where the proposal helps to meet the identified housing target for the settlement, and it is demonstrated that allocated sites and existing permissions are unable to do so.'. The wording of policy C1 (B) could be amended to refer to the wider housing needs of the Housing Market Area as well as the settlement/Borough to further help address HMA wide unmet need.

#### FC11 – Melton Transport Strategy

The City Council acknowledges that there has been considerable amount of information that has been prepared to update Melton's Local Plan Transport Strategy chapter (FC11). In particular the City Council notes the additional information on a new strategic link road proposed to help deal with existing transport issues within Melton Mowbray and those forecast to arise over the Local Plan period as a result of sustainable development focussed around the market town. However, the chapter appears not to have addressed the issues raised in the Council's response to the Pre-Submission Local Plan consultation (December 2016) with regards to acknowledging any potential strategic transport impacts outside Melton Borough.

In providing new infrastructure around Melton Mowbray, traffic movements from the new housing stock could gravitate towards Leicester (subject to robust transport modelling) as this may facilitate easier access to Leicester's employment and other opportunities. Whilst the new link road could reduce traffic impacts within Melton, there is the potential to create adverse impacts on the existing transport network for routes coming into the city. These areas may include the A47, A607 and A46.

Mitigation measures for Leicester's highway network therefore may be required to support this new growth, based on any strategic transport modelling findings and identified through transport assessment for developments producing a significant level of trips to the city. Additionally, the draft Local Plan does not acknowledge any existing strategic infrastructure, such as Birstall Park and Ride, that could be utilised to help to address any increase in people travelling into the city by car.

There are no comments on the other changes, or the CIL charging schedule.

Yours sincerely

Grant Butterworth
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Leicester City Council.