



Melton Local Plan Partial Update, Issues and Options Consultation, November 2023

Representation made on behalf of **Greenlight Developments (Melton Mowbray) Limited**

Project Ref: 33313491300/A3 | Rev: 01 | Date: January 2024

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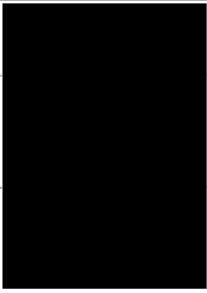
Project Name: Land South of Melton Mowbray

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Report Title: Melton Local Plan Partial Update, Issues and Options Consultation

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For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved
01	04/01/2023	Client draft	BDC	MXS	MXS
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1 Introduction

- 1.1.1 Stantec is instructed by Greenlight Developments (Melton Mowbray) Limited (hereafter referred to as ‘Greenlight’) to prepare and submit a representation to the *Melton Local Plan Partial Update Issues and Options Consultation* (November 2023) (hereafter referred to as ‘the Consultation Document’). This consultation is being held by Melton Mowbray Borough Council (‘MMBC’) which commenced a Review of the *Melton Mowbray Local Plan* (‘MMLP’) in line with Paragraph 33 of the *National Planning Policy Framework* (December 2023) (‘the NPPF’) which requires Policies in local plans and spatial development strategies to be reviewed to assess whether they need updating at least once every five years.
- 1.1.2 Paragraph 1.1.3 of the Consultation Document sets out that, following review, MMBC has concluded that the spatial strategy, housing targets and housing allocations do not require reviewing. However, employment allocations and development management policies would need revision. MMBC has therefore taken the decision to undertake a partial¹ review of the Local Plan.
- 1.1.3 This representation has been prepared in the context of Greenlight’s interest at Land South of Melton Mowbray (hereafter referred to as ‘the Site’). A Site Plan is attached at **Appendix 1**.
- 1.1.4 The Site forms part of the Melton South Sustainable Neighbourhood (‘MSSN’) allocation (Policy SS4 of the adopted Local Plan).
- 1.1.5 Greenlight has been working with Davidsons Developments Ltd, who also have an interest in land in the Masterplan area. Together they have been actively engaged in the preparation of the adopted Local Plan and Masterplan for the Melton South Sustainable Neighbourhood and welcome the opportunity to input into the Local Plan review.

¹ Commentary is made within this representation regarding the appropriateness of undertaking a partial review.

2 Partial Review

2.1.1 The Issues and Options report outlines that the Council has decided to undertake a partial review of the Local Plan. Greenlight supports this decision but wishes to raise several relevant points on this matter as set out below.

2.1 Current Scope

2.1.1 Paragraph 1.1.3 of the Consultation Document sets out that, following review, MMBC has concluded that the spatial strategy, housing targets and housing allocations do not require reviewing. However, employment allocations and development management policies would need revision. MMBC has therefore taken the decision to undertake a partial review of the Local Plan.

2.1.2 This, however, omits the fact that the Consultation Document then goes on to recommend updates to Policy SS4 (Melton Mowbray South Sustainable Neighbourhood) as well as Policy SS5 (Melton Mowbray North Sustainable Neighbourhood). These policies pertain to the two largest strategic allocations within the adopted Local Plan.

2.1.3 On the basis that the scope of the Local Plan update includes ‘*most policies*’, including employment allocations, many of the development management policies and the two strategic housing allocations, it is considered that MMBC should provide further justification as to why a partial review has been undertaken, in order to ensure that this approach is justified and robust.

2.2 Plan Period

2.2.1 The current Local Plan covers the period 2011 – 2036, which accords with the NPPF requirement for strategic policies to cover a minimum 15-year period from adoption (Paragraph 22). However, following the completion of a partial review (which, as above, includes updating two strategic housing allocations) the remaining plan period would cover a period of around ten years. MMBC should accordingly consider extending the plan period to 2041 to remain compliant with the requirements of the NPPF.

2.2.2 The argument made by the Council for not extending the plan period, by the additional five years is that the *Leicester and Leicestershire Statement of Common Ground* (June 2022) (hereafter referred to as ‘the SoCG’) only covers the period to 2036.

2.2.3 Whilst we agree that the Plan needs to take account of Leicester’s unmet need, this is not preventing other authorities within Leicestershire from moving forward with their full Local Plan updates that take their plans beyond 2036, for example North West Leicestershire and Harborough District Councils. MMBC will need a robust argument for not choosing this course of action. The Council should also be prepared to take into account the fact that the need to update the Statement may be picked up through the Examination in Public of the Leicester City Local Plan which currently only looks forward over 12 years not the required 15 years.

2.3 Housing Requirement

2.3.1 The Consultation Documents sets out that MMBC has concluded that there was no need to reconsider the, housing targets within the adopted Local Plan. Greenlight disagrees with this conclusion, as the current housing requirement in the adopted Local Plan is out of date.

- 2.3.2 Policy SS2: Development Strategy sets out a housing requirement of 6,125 dwellings between 2011 – 2036 with a stepped housing trajectory averaging 245 dwellings per year. This was based on a minimum Objectively Assessed Need ('OAN') of 170 homes a year at the time the plan was formulated.
- 2.3.3 The current Local Housing Need figure for Melton derived from the Standard Method is 185 homes per year. This represents the minimum number of homes that must be planned for an is 15 homes per year (9% higher) than the OAN when the Local Plan was adopted.
- 2.3.4 Furthermore, MMBC has also signed up to the Leicester and Leicestershire SoCG which apportions an element of Leicester's unmet needs to Melton Borough, amounting to a further 69 dwellings per year (on average) and a total need for MMBC to plan for 300 homes a year. This is 55 homes a year higher than the current Local Plan average requirement (22%), and the equivalent of 990 homes over a plan period to 2041.
- 2.3.5 This is a significant change to the housing requirement for the Borough and needs to be addressed through the partial review of the Plan.

3 Policy SS4: South Melton Mowbray Sustainable Neighbourhood

3.1 Issues with the Policy

3.1.1 The Consultation Document identifies that an update is required to Policy SS4 due to the following issues:

- Revised education needs evidence, demonstrated by recent Local Education Authority consultation responses relating to housing growth across the Borough indicates that additional education facilities are required over and above the current policy, including a new secondary school and a further primary school within this site.
- Funding for significant sections of the Melton Mowbray Distributor Road has been obtained from various government funding streams. Part of the bid involved agreement to change various aspects of the allocation including a deliverable route for the road and additional land for housing and employment delivery.
- The site masterplan was revised by the Council and approved in 2021 to incorporate these new requirements, see the Approved Melton South Sustainable Neighbourhood Masterplan 2021 which render the policy requirements of SS4 out of date.

3.1.2 The Consultation Document then poses two options for updating the Policy; Delete the Policy, or Amend to reflect the 2021 Masterplan, the latter of which is identified as being the Council's preferred option.

Question 10: Looking at the options, which option do you support?

3.1.3 Greenlight broadly supports Option 2; retaining and amending the policy. However, Option 2 suggests the Policy be updated to reflect the 2021 Masterplan.

3.1.4 The 2021 masterplan is now somewhat dated, and it therefore makes sense for the relevant stakeholders² to revisit the Masterplan to ensure that it is up to date and fit for purpose before including it in an updated Policy. The Policy should not, therefore, be updated to simply reflect the 2021 Masterplan.

Question 11: Please explain your response or provide any additional information you would like us to consider in our review of this policy.

3.1.5 As set out above, we believe the 2021 Masterplan should be revisited before Policy SS4 is updated.

3.1.6 Whilst we agree that SS4 requires updating in order that its contents are up to date and relevant, including additional education provision and additional land take, to update the policy on the basis of the 2021 Masterplan would not be accurate. Parts of the vision and principles established within the Masterplan document are also outdated. Most critically, the Masterplan

² MMBC, Leicestershire County Council, Davidsons Developments Ltd and Greenlight Developments Ltd

does not pick up on recent developments relating to funding delivery mechanisms for the MMDR South.

- 3.1.7 In October 2023 it was announced that the cost of the MMDR South had increased by £27million to circa £70million. As a result, Government funding previously secured through Homes England to 'forward fund' the road has been withdrawn. In the 2021 Masterplan the proposed phasing shows the MMDR South as commencing delivery in 2024. Clearly, this timeline is not achievable. We consider that the Masterplan and subsequently Policy SS4 need to be updated to reflect a new funding model which would need to be agreed between the relevant stakeholders.
- 3.1.8 Notwithstanding the above, it is important to stress that the developers and landowners remain committed to delivering the Melton South Sustainable Neighbourhood (hereafter referred to as the 'MSSN') within the overall context of the allocation.
- 3.1.9 Retaining the allocation remains critical given the importance of the MSSN which is identified by the Council as a *'key element of the Borough Council's strategy to deliver new homes and employment opportunities over the plan period to 2036'*. The current MSSN Allocation (through the adopted version of Policy SS4) seeks the delivery of 2,000 homes. The MSSN will therefore contribute more than 50% of the total homes expected to be delivered in Melton Mowbray to 2036. It is vital that amendments to Policy SS4 maximise the potential of this allocation and promote its delivery. Continuing to incorporate the Site to which this representation relates as part of the allocation is necessary for the Borough's identified housing need to be achieved.
- 3.1.10 As such, Greenlight supports the Council's preference to maintain the allocation.

Appendix A Site Location Plan

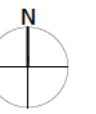


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Revision	Date	Dm	Ckd
A Site boundary updated	05.01.23	SM	RJP

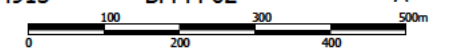
— Site boundary

Project
Melton Mowbray South



Drawing Title
Site Boundary Plan

Date 20.02.23	Scale 1:10,000@A3	Drawn by SM	Check by LH
Project No 34913	Drawing No BM-M-02	Revision A	



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