



Melton Borough Council,
Parkside, Station Approach,
Burton Street,
Melton Mowbray,
Leics, LE13

31 August 2017

Dear Sirs,

Regulation 16 consultation on the Submission Version of WOTWATA Neighbourhood Plan

Thank you very much for contacting the Belvoir Estate as part of your consultation process on the WOTWATA Neighbourhood Plan. The comments below represent the Estate's response to the Submission consultation.

Vision

The Belvoir Estate broadly supports the Neighbourhood Plan Vision. However, whilst we note that it makes a declaration to meet social needs, the Aims of the plan fail to reflect the requirement to promote the right development, including the amount needed, for the area (paragraph 184 NPPF).

Policy H1: Housing Provision

As you will be aware, a Neighbourhood Plan must meet a set of basic conditions if it is to be put to a referendum. These conditions will include testing the Neighbourhood Plan for general conformity with the local development plan; in this case, the Melton Local Plan 1999. There is an inherent difficulty with this in that the housing requirements of that plan are out of date and although work has commenced on the replacement local plan it is not sufficiently advanced and not without significant objection for it to be considered to have

weight (paragraph 216 NPPF) and capable of being relied upon for decision taking or providing strategic policies to the Neighbourhood Plan (paragraph 184). As a result there is no up-to-date housing requirement, which meets the objectively assessed need for homes in accordance with the Framework, for Melton or for Waltham on the Wolds.

This causes a dilemma in that the Neighbourhood Plan should respond to the need for homes by making provision. It is notable that H1 does not set out a numerical requirement. This may be because of the uncertain requirement for homes but this simply highlights the risk being taken by proceeding ahead of the local plan. To address this, a requirement figure is needed and flexibility in supply should be provided.

In addition to the above, it is clear that the plan intends to rely on a small number of sites to meet the requirement. However, the reasonable prospects for those sites to deliver are unclear given the position of the local plan and the limited testing of their deliverability. There may be some doubt that the needs of the village can be met without greater flexibility in supply. The policy should be amended to include reserve sites or set out criteria for assessing future proposals to provide the flexibility required by the Framework. The Estates land to the north of Mere Road, application reference 17/00080/OUT, represents a logical extension to the village in an area which is least sensitive in terms of impacts on the historic heart of the village, landscape and ensuring traffic is minimised through the High Street area of the village. It also has the added bonus of providing an opportunity to improve the edge of the village consequently enhancing the setting of the historic core and the placing of the village in the landscape.

Finally, Policy H1 seeks to restrict any further development until the housing need increases or the commitments fail to deliver. This restrictive approach is not consistent with the aims of the NPPF with regard to positively boosting the supply of housing and promoting sustainable development.

Policy H3: Affordable Housing

The Estate supports the plans intention to secure Affordable Housing. However, the very precise figure of 32.4% affordable housing will prove awkward for calculating the proportion of affordable homes in the village. There are also concerns about the viability evidence that underpins it. The Neighbourhood Plan appears to rely on the Local Plan and Community Infrastructure Levy Viability Study October 2016. That study assumed that sites will provide 20% of houses as starter homes (which would leave 12.4% of houses as affordable units – either shared ownership or affordable/social rent). Not only do starter

homes (at 80% market value) not meet the definition for affordable homes as prescribed by the NPPF (Annex 2). There can be no assumption that the figure prescribed by Policy H3 is viable. Not only is it inherently risky to copy a figure from a Local Plan which cannot be assumed to have weight, the NPPF also cautions against duplication (paragraph 185).

Monitoring and Review

The plan suggests it is meeting need but is not explicit about the requirement it is meeting (H1) and is restrictive in what it considers to be appropriate beyond that requirement (H1 and H8). The plan includes references that suggest this is accepted, noting that circumstances change and proposing a five yearly review cycle in the Monitoring and Review section.

However, the restrictive approach and the lack of built in flexibility both cause concern. It is our view that these should not be adopted in their current form and are highly likely to require review if they were. A robust and specific review mechanism is required which is specific about the circumstances that will trigger the review, the action that will be taken and when and the consequences for the plan if action is not taken.

I trust these comments are clear. Should you require any further assistance please contact me at this office.

Yours sincerely

Claire Pendle