

Planning Policy
Parkside, Station Approach
Burton Street
Melton Mowbray
Leicestershire
LE13 1GH

Gladman House
Alexandria Way
Congleton
CW12 1LB

5th January 2024

Dear Sir/Madam,

RE: Melton Local Plan Update Issues and Options

This representation is submitted by Gladman Developments Ltd (Gladman) in response to the Melton Local Plan Update Issues and Options consultation. Gladman welcome the opportunity to comment on the Issues and Options document and are supportive of Melton Borough Council's (MBC or 'the Council') recognition of their need to review the Melton Local Plan 2011-2036 in line with section 17 of the Planning and Compulsory Purchase Act 2004 and paragraph 33 of the NPPF which requires local authorities to consider changing circumstances affecting the area as well as any relevant changes in national policy.

As part of the review exercise, an initial assessment was carried out by the Council and published in September 2023 which provided a high-level commentary as to whether an update was needed or not for each of the adopted policies. The assessment concluded that whilst there was no need to reconsider the spatial strategy, housing targets or housing allocations, additional employment allocation(s) may be required to meet the full employment need through to 2036 and many of the development management policies required updating. The Council therefore took the decision to prepare a partial update of the Melton Local Plan.

The current timetable, as set out in the September 2023 Local Development Scheme, proposes Regulation 19 consultation during 2024 before submission to the Secretary of State in March – May 2025, followed by examination and adoption in December 2025. The ambitious timetable aligns with the transitional arrangements set out in the Levelling Up and



Regeneration Act which allow plans submitted for examination prior to 30th June 2025 to be prepared under the existing legal requirement and duties. Any Local Plan submitted for examination after this date would need to be prepared in accordance with the new system, with the regulations, policy and guidance for the new system expected to be in place by autumn 2024.

The Local Development Scheme establishes that as soon as possible following the adoption of the partial Local Plan Update, the Council will undertake a further Local Plan Update, which is likely to be a full update that would extend the time period the Local Plan covers, and involve a review of the spatial strategy, housing targets and housing allocations. The broad timetable proposes Regulation 18 preparation and consultation Q4 2026 to Q2 2027 followed by Regulation 19 preparation and consultation Q4 2027 – Q4 2028.

The partial update to the Local Plan consists of an update to the Local Plan's vision and objectives, updates to all the Local Plan policies except for SS2, C1(A), C1(B), C5, C6, EN1, EN4, EN6, EN13, IN2, D2 and D3 and potential incorporation of new development management policies. For each policy, the Issues and Options document puts forward proposed amendments to ensure that the policies are up to date.

It is Gladman's view that a significant proportion of the proposed amendments are unnecessary. Through the Levelling Up and Regeneration Act, the Government are proposing to introduce National Development Management Policies (NDMPs) with the purpose to save plan-makers having to repeat nationally important policies in their own plans, thus helping to speed up the plan-making process. The NDMPs will be set out separately from the NPPF and whilst there is no timetable as to when they will be published, it is likely that it will be prior to the adoption of this partial update and once introduced, would supersede any relevant policy in the partial Local Plan Update.

In addition, there are some proposed amendments to adopted policies that are unnecessary because they are already covered by Building Regulations. For example, Policy IN2: Transport, Accessibility and Parking (where it is proposed to amend the policy wording to encourage the implementation of EV charging) is not necessary as the 2022 update to Part S of Schedule 1 of the Building Regulations requires that a new residential building with associated parking

must have access to electric vehicle charge points. As such, there is no need for further duplication of the Building Regulations within the updated policies.

Gladman accept that the current vision for Melton Borough falls short on climate objectives including the Borough's aim to be carbon neutral by 2050. Many of the proposed amendments to the adopted policies which are aimed at reducing emissions and helping to tackle the climate are already being brought forward on a national scale through the aforementioned NDMPs and existing Building Regulations. Further to these, the Future Homes Standard and Future Buildings Standard are due to be implemented in 2025, prior to the adoption of the partial Local Plan Update.

Given the associated cost, time and resources required to progress this Local Plan Update through to adoption, Gladman suggest that there is merit in the Council taking stock and considering whether it would be more appropriate to commence early preparation work on the future full Local Plan Update that will seek to extend the plan period post 2036. Extending the plan period to 2050 would be most logical as this would tie in with the wider Leicester and Leicestershire Strategic Growth Plan through to 2050.

Gladman acknowledge that 2022 HENA demonstrated that Policy EC1: Employment Growth in Melton Mowbray is not performing well and highlighted that there would be a shortfall in the development of employment land by 2036. In order to rectify this the Council held a Call for Sites in June 2023 to consider potential additional allocations. No specific additional employment sites are proposed in the Issues and Options document however given the scale of the additional employment land required (circa 10 hectares), this could be dealt with through a Supplementary Planning Document, or Single Issue Review, which would be more efficient in terms of time and resources.

Another reason to commence a full review of the Local Plan as opposed to the partial update relates to the uncertainty surrounding the deliverability of the South Melton Mowbray Sustainable Neighbourhood. Whilst the Borough has received funding from Homes England through a HIF grant, the offer was dependent upon Leicestershire County Council providing the remaining shortfall. The cost of providing the road has increased significantly as a result of rising construction costs and inflation, and now is thought to be in the region of £70million. Leicestershire County Council have confirmed that they are not able to provide the remaining

funding for the road and therefore the future delivery of the road is uncertain. Further, the education authority have now stated that a new secondary school and a further primary school are required on the South Melton Mowbray Sustainable Neighbourhood, casting potential further doubt over the viability of the site.

This uncertainty provides another reason for pausing the partial Local Plan Update in favour of progressing a full Local Plan Review as it would allow the Council more opportunity to work with the developers at South Melton Mowbray Sustainable Neighbourhood to produce evidence in support of the site and demonstrate that it is viable. The consultation document states that the site is a centrepiece of the local plan strategy and will continue to be so, however without this clear evidence, we are concerned there is a risk to the Council that the site's inclusion could be challenged through the examination.

In summary, Gladman recognise the Council's reasoning behind reviewing their Local Plan at this stage, however for the reasons set out above, we consider that instead of progressing the partial update in its current form, it would be more logical and a better use of time and resources if the Council commenced work now on the full review of the Local Plan through to 2050 instead of waiting until 2026.

The Council will be aware that Gladman are currently promoting land at Six Hills for the development of a new mixed use Garden Village and land at Saxilby Road, Asfordby. We trust that our comments are of assistance and would welcome the opportunity to discuss them and our land interests within Melton Borough further.

Yours sincerely,



Richard Naylor



Senior Planner | Gladman Developments Ltd