



Planning Policy
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05/01/2024

Dear Planning Policy Team,

RE: REPRESENTATIONS IN RESPECT OF MELTON BOROUGH LOCAL PLAN UPDATE ISSUES AND OPTIONS (REGULATION 18) CONSULTATION

This representation has been prepared and submitted by Chevin Homes ('Chevin') in response to the Local Plan Issues and Options (Regulation 18) Consultation which is currently being undertaken by Melton Borough Council ('MBC'). Chevin are a multi award-winning local housebuilder who have current development interests in Stathern, as illustrated on the enclosed red line plan. It is anticipated that the site could accommodate in the region of 20-25 dwellings which is considered entirely appropriate for, and of a scale to be in keeping with, the existing settlement.

In broad terms, and as a member of the Home Builders Federation (HBF), Chevin are entirely supportive of the representations that the HBF have submitted on behalf of their members and therefore we do not propose to repeat what is covered within their representations here but, moreover would like to take this opportunity to reinforce a few points. A broad point of note, which covers multiple consultation questions, is that it is important that MBC consider how the recent changes to the National Planning Policy Framework (NPPF), as well as changes to PPGs in relation to Biodiversity Net Gain (BNG), impacts on their emerging Local Plan and this consultation. If necessary, it would be helpful to have a further interim consultation to incorporate these changes where applicable.

In response to Questions 1-3, it is Chevin's view that it is imperative that the refocused and simplified version of MBC's Vision and Objectives should maintain a reference to ensuring that local housing meets the local communities' current and future needs, including the need for both market and affordable housing. There should be a clear reflection of how housing delivery can support a diverse, competitive and rural economy, and, in fact, should direct a proportionate amount of housing towards local and rural communities. This, in turn, can help with MBC's vision of promoting high quality and well-designed development to help create healthy, sustainable and safe communities.

Stathern is currently classed as a Service Centre and therefore it is our view that it is of the utmost importance that a Local Plan should include allocated sites in areas outside of the Main Urban Area of Melton Mowbray. This is important to ensure that there is more certainty when looking at how best to apportion and meet housing numbers, and delivery of new houses in such areas ensures that there is a level of choice in the market. More likely, the allocations within these areas will be of a scale that can come forward in relatively quick fashion and thus make a contribution to MBC meeting their housing numbers earlier in the plan period. A reliance on Melton Mowbray meeting the bulk of housing numbers through large sustainable urban extensions would be concerning as, naturally, large strategic sites are often complex and time consuming to deliver.

It will be important for MBC to ensure that the Local Plan is clear on how and when delivery of housing will be monitored and, if monitoring shows an under delivery of housing, what action MBC will take to address this shortfall. This action could be to include allocation of reserve sites or criteria to support development of non-allocated sites. It should be remembered that housing targets for the Plan period are a minimum and these numbers will need to account for a proportion of the unmet need from neighbouring areas, where it is practical to do so. Accounting for the unmet needs of Leicester City is not a new concept to MBC and, it is Chevin's opinion that, the authorities within the Housing Market Area need to agree an appropriate strategy to deal with this unmet need now or else the Plan runs the risk of not being positively prepared and therefore being found unsound when judged against Paragraph 35a of the NPPF.

Chevin are supportive of the requirement to deliver a mix of house types and sizes to accommodate local needs. However, these should be based on a local needs assessment at the point in time of the proposals being brought forward, rather than being dictated by a set mix within the Plan. Many factors, such as demographics, location and affordability will affect an 'optimum' mix and there should be sufficient flexibility within the Plan to deal with this. In terms of the fabric of any new dwellings, it is Chevin's view that these should be led by the Government standards at the time (such as latest Building Regulations) as opposed to MBC implementing their own specific policies to deal with accessibility standards, energy efficiency and Nationally Described Space Standards (NDSS). With regards to NDSS, these standards should be backed up and justified by evidence as envisaged in the NPPF (footnote 52) and PPG (ID:56-020-20150327) – they are optional standards and not mandatory and should not be enforced on every development site coming forward in the Borough.

Chevin is supportive of the provision of affordable housing on development sites as long as thresholds/requirements of such are set in accordance with current government policy, backed up by current evidence, and does not render a development unviable. Chevin do have some concerns, however, about the proposed requirements for self-build plots to be included within larger development sites, particularly if the threshold is reduced to 20 dwellings. There are better ways to address the perceived self-build demand in our opinion.

Chevin recognises the importance of climate change, biodiversity and developing healthy communities and suggests that policies related to these are not contradictory to government standards and are not detrimental to the delivery of development sites. It must be noted that provision of on-site BNG is not always possible and therefore it would be helpful if MBC had a clear mitigation hierarchy and the cost of any off-site mitigation be factored into any viability assessment.

I trust that MBC will find the above comments helpful.

Yours faithfully,

Chevin Homes

January 2024

Enc. Red Line Location Plan