

nineteen47

CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

Melton Borough Council Local Plan Review
Issues and Opportunities Consultation
(Regulation 18)

*Land off Blacksmith End,
Stathern*

On Behalf of
Bowbridge Land Ltd

Client:

Bowbridge Land Ltd

Project:

Land off Blacksmith End, Stathern

Report Title:

Melton Local Plan Review Representation

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SECTION 1: INTRODUCTION

- 1.1 This Representation has been prepared by nineteen47 on behalf of Bowbridge Land Ltd in response to the Melton Borough Council Local Plan Review Issues and Opportunities Consultation. It relates to the parcel of land located on land off Blacksmith End, Stathern, [“the Site”] as shown in Figure 1 below.
- 1.2 The Site is designated as a Reserve Site for 45 dwellings in the adopted Melton Borough Council Local Plan (October 2018). The Site has previously been submitted for inclusion with the Council’s Strategic Housing and Economic Land Availability Assessment (SHELAA) published in 2020.
- 1.3 The Site formed part of a wider site ref. MBC/006/17 in the SHELAA, which was viewed favourably and was concluded to be deliverable by the Council in their assessment of the Site.



Figure 1: Site Location

- 1.4 Melton Borough Council [the “Council”] have stated an intention to engage with stakeholders who have an interest in the Borough, to inform the Melton Local Plan Update preparation. The consultation document will be designed to gain general direction from the public and stakeholders.
- 1.5 There are several issues identified in relation to housing need and delivery which are discussed in Section 3. Section 4 then provides a response to the consultation questions based on the evidence base available at this time. The responses make recommendations.

SECTION 2: SITE CONTEXT AND ASSESSMENT

Site Context

- 2.1 The Site lies to the North West of the village centre of Stathern, which is identified as one of the Service Centres at the second tier of the spatial strategy in the adopted Melton Local Plan.
- 2.2 The location of the Site in the context of the village is provided in Figure 2 below:



Figure 2: Site Context

- 2.3 The Eastern boundary adjoins Blacksmith End, an existing hedgerow with the occasional mature tree, a drainage ditch and a 3.5m wide grass verge on either side of the road.
- 2.4 To the south of the Site is a modern development of approximately 6 large houses served off an un adopted private drive, another hedgerow separates this from the Site.
- 2.5 The Western boundary again is marked with a hedgerow separating further parcels of agricultural land further West. The existing PROW - G24 runs along this boundary before turning North West at the corner of the plot boundary.
- 2.6 Access to the Site is achieved from Blacksmith End - an existing road with residential development and footways. The existing road does narrow as it exits the village northwards, however it already serves an existing commercial site located immediately to the East and several agricultural and other commercial enterprises along with residential properties along Moor Lane. A separate pedestrian route connects with the Site from Penn Lane, adjacent to the allotment site in the village.

- 2.7 Two PROW's cross the Site, G19 from the corner of the Site at Blacksmith End in a general North-South direction, and G24 from within the site in a general East-West location towards the junction of Blacksmith End and Moor Lane.
- 2.8 The Site falls within Flood Zone 1 as shown on the Government's Flood Map for Planning which means that the Site has a less than 1 in 1,000 annual probability of flooding from a river or sea.
- 2.9 There are no designated heritage assets located within or immediately adjacent to the Site, although the Stathern Conservation Area is located approximately 150m to the south.
- 2.10 The Site is located within 200m walking distance from the junction of Blacksmith End and Main Street, where a cluster of village facilities are located. These services and facilities which make Stathern a sustainable settlement, including a convenience store, a primary school with equipped play park, a public house with post office, a coffee shop, a car garage and a regular bus service.
- 2.11 In the wider context, Stathern is located approximately 9 miles to the west of Grantham and 7.5 miles to the north of Melton Mowbray. Both of these settlements are accessible by bus. Within the broader region, Nottingham and Newark-on-Trent are located within 13 miles and 13.5 miles respectively and are accessible via the local road network. The A1 is located approximately 8 miles from the Site making it well placed in terms of transport connections.

Planning History

- 2.12 Table 1 below summarises the relevant planning history associated with the Site.

Table 1: Site Planning History

Planning Reference	Description	Decision	Date
19/01193/OUT	Outline application for 9 dwellings	Refused	24.01.20
APP/Y2430/W /20/3256174	Appeal against application ref. 19/01193/OUT	Allowed (subsequently quashed by High Court)	11.02.21
18/01533/OUT	Outline application for 45 dwellings	Withdrawn	04.11.19
14/00412/FUL	Regularisation of works including the creation of a pond, footbridge, drainage ditch, earth bank, access track, footways.	Permitted	23.10.14

Local Plan Designation

- 2.13 As identified by the Melton Borough Council Local Plan (October 2018), the Site is designated as a Reserve Site for 45 dwellings. The Site does however fall outside of

the 'Limits to Development' within the Stathern Neighbourhood Plan and is therefore classed as Open Countryside within the Neighbourhood Plan.

2.14 Figure 3 provides an extract from the Council's Policy Map for Stathern:

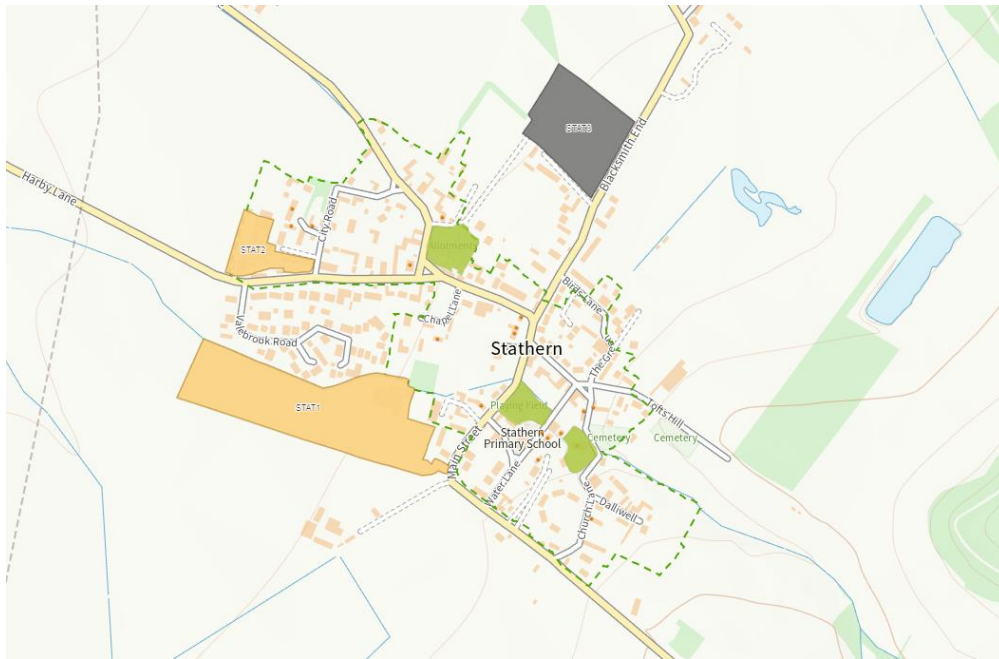


Figure 3: Melton Local Plan Policies Map

- 2.15 There are no designated heritage assets located within or immediately adjacent to the Site, although the Stathern Conservation Area is located approximately 150m to the south.
- 2.16 The Site is located within 200m walking distance from the junction of Blacksmith End and Main Street, where a cluster of village facilities are located. These services and facilities which make Stathern a sustainable settlement, including a convenience store, a primary school with equipped play park, a public house with post office, a coffee shop, a car garage and a regular bus service.
- 2.17 In the wider context, Stathern is located approximately 9 miles to the west of Grantham and 7.5 miles to the north of Melton Mowbray. Both of these settlements are accessible by bus. Within the broader region, Nottingham and Newark-on-Trent are located within 13 miles and 13.5 miles respectively and are accessible via the local road network. The A1 is located approximately 8 miles from the Site making it well placed in terms of transport connections.

Site Assessment

- 2.18 In order to ensure that there is a sufficient and suitable supply of land to deliver their housing and previously developed land objectives, Local Planning Authorities are required at the local level to identify broad locations and specific sites, which will enable a continuous delivery of housing for at least 15 years. Specifically, Local Planning Authorities should identify sufficient deliverable sites for the first five years, to be considered deliverable sites, at the point of adoption of the Local Plan.

- 2.19 In accordance with the Framework glossary, for sites to be deliverable they need to be: **available** (the site is available now), **suitable** (development of the site would contribute to the creation of sustainable communities) and **achievable** (there is a reasonable prospect that housing on the site will be deliverable on the site within 5 years).
- 2.20 The remainder of this section will demonstrate how these criteria are supported by the Site.

Available

- 2.21 The Site is controlled by Bowbridge Land who is a well-established land promoters that have an extensive track record for successfully acquiring, promoting and developing in land. Bowbridge Land is a subsidiary of Bowbridge Homes an established local developer known for community engagement within the borough of Melton and delivering high quality homes.
- 2.22 The Site has previously been promoted and is considered appropriate for housing as a Reserved Site which can come forward if needed to help meet the identified housing requirement and development needs of the settlement.
- 2.23 The Site is presently agricultural land and is available in the short term for development.
- 2.24 These representations confirm Bowbridge Land's continued commitment to bring the Site forward at the earliest opportunity. The Site represents a sustainable and logical extension to Stathern and is available within the plan period.

Achievable

- 2.25 It is considered that the Site can be comprehensively designed for the provision of residential development together with supporting infrastructure, including access, drainage and landscaping. This is evidenced in the recent planning applications including 18/01533/OUT.
- 2.26 The Site has previously been submitted for inclusion with the Council's Strategic Housing and Economic Land Availability Assessment (SHELAA) published in 2020. The Site formed part of a wider site ref. MBC/006/17, which was viewed favourably and was concluded to be deliverable by the Council in their assessment of the Site.
- 2.27 Based on the size of the Site and its anticipated developable area, the total yield anticipated is circa 45 no. dwellings. Affordable housing can also be integrated within the scheme to meet housing need requirements to be set out in the plan.
- 2.28 The developable area of the Site provides the opportunity to deliver both market and affordable housing and new community facilities including public open space and biodiversity enhancements.
- 2.29 There is a commitment to develop the Site as soon as possible given its unconstrained nature. It is therefore considered that the Site is achievable in the plan period.

Suitability

- 2.30 It is considered that the Site can be comprehensively developed to create a sustainable extension to Stathern and represents a logical rounding off to the existing settlement. Stathern is designated as a Service Village in the Local Plan and is therefore a sustainable settlement which is suitable for additional housing growth.
- 2.31 The Site is not subject to any site specific designations or restrictions and is located in flood zone 1 (lowest risk of flooding) and offers the potential for SuDS to be introduced to address drainage requirements for the development.
- 2.32 The Site offers the opportunity for sustainable housing provision throughout the plan period and represents a suitable location for development, unencumbered by insurmountable site constraints.

Conclusion

- 2.33 For the reasons set out above, the Site is confirmed to be available, suitable, and deliverable for housing. The Site forms a logical and sustainable extension to the existing community within Stathern and offers the opportunity to secure a number of socio-economic and environmental benefits in accordance with the NPPF.

SECTION 3: HOUSING NEED AND DELIVERY

Background

- 3.1 This section of the representation provides an assessment of the Council's housing needs and its delivery, and whether this requires an update as part of the Local Plan Review.
- 3.2 In September 2023, the Council published its 'Outcomes of the Melton Local Plan five-year review' document ["the Review Document"]. This was a review of the adopted Local Plan and its policies, required in accordance with the requirements of Paragraph 33 of the NPPF due to the Local Plan being over 5 years old.
- 3.2 The Review Document determined that the adopted Local Plan targets continue to be broadly appropriate to the housing need of the Borough and therefore an update to the Developed Strategy in terms of the overall housing requirement for the Borough, was not required.
- 3.3 The Review Document did however confirm that updates to a number of evidence base documents is required, including the production of a Local Housing Needs Assessment. The Review Document notes that this is currently a 'Work in Progress' although no timescales are given for its completion.
- 3.4 Paragraph 31 of the NPPF however states that "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence." To date, the Council's position that an update to the housing need of the Borough, and the need to review the housing allocations has not been supported with evidence therefore it is deemed appropriate to make comments on such matters in this representation.
- 3.5 As set out in the National Planning Policy Guidance ["the PPG"], the local housing need is calculated at the start of the plan-making process, but this number should be kept under review and, when appropriate, be revised until the Local Plan is submitted for Examination (ID: 2a-008-20190220).
- 3.6 As set out in the PPG, the Government is committed to ensuring that more homes are built and supports ambitious Councils wanting to plan for growth (ID: 2a-010-20201216). The PPG states that a higher figure "can be considered sound" providing it "adequately reflects current and future demographic trends and market signals". However, the PPG does not set any limitations on a higher figure, which is a matter of judgement.
- 3.7 The Government's objective of significantly boosting the supply of homes set out in the National Planning Policy Framework (para 60) is relevant and we consider that the Council's current strategy to not review the housing need of the Borough is insufficiently ambitious and will fail to support sustainable economic growth in the Borough over the remainder Plan period.
- 3.8 As such, before the Local Plan is progress to the Regulation 19 Stage, the Council should consider a higher housing requirement with Policy SS2 continuing to recognise that the Council's housing requirement as a minimum figure.

The Duty to Co-operate

- 3.9 With regards to Housing Need, it is relevant to note the most recent Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (June 2022). This document which defines the Leicester and Leicestershire Housing Market Area (HMA) covers the administrative areas of eight local planning authorities, including Melton Borough Council.
- 3.10 The Statement of Common Ground confirms that the authorities within the HMA agree that Leicester City Council has an unmet need between 2020 – 2036 of 18,700 homes. Therefore, an apportionment of Leicester City's Unmet Local Housing Need is required to be distributed across the remaining authorities in the HMA to address this shortfall.
- 3.11 Melton Borough Council will therefore be required to accommodate additional housing need and growth as part of the Duty to Co-operate. As such, when the overall strategy for Leicester and Leicestershire has been finalised, this will represent a material change in the circumstances to the Local Plan and will include the likely additional housing growth across the Borough, including new housing allocations.
- 3.12 It is therefore our recommendation that the Council give consideration to how this matter will be addressed as part of the Local Plan Review, to ensure the Local Plan has sufficient flexibility within its Policies to address this need should the position of the HMA change during the Plan Period.
- 3.13 Mindful of Council's Duty to Co-operate with other authorities within the Leicester & Leicestershire Housing Market Area to address the City of Leicester's unmet housing need, the lack of additional supply in the Local Plan Review to meet such needs is considered contrary to the Framework, which expects effective joint working on cross-boundary strategic matters.
- 3.14 As such, the Council should demonstrate that this matter has been taken into account as part of the Local Plan Review process through the adoption and maintenance of a Statement(s) of Common Ground identifying the cross-boundary matters to be addressed and the progress of co-operation in addressing these matters. Fundamentally, to address these additional housing needs, the Council will require additional sites which can be utilised if required. The Reserved Sites clearly represent the most appropriate method to meet these requirements in the short term and we would strongly recommend that the Council give consideration to how they could be supported in planning policy terms if so required.

Housing Delivery

- 3.15 With regards to housing delivery in the adopted Local Plan, Policy SS2 (Development Strategy) of the Core Strategy defines numerous housing allocations pursuant to meeting the proposed housing requirement as set out in Policy SS1.
- 3.16 The policy confirms that the Melton Mowbray Main Urban Area will accommodate approximately 65% of the Borough's housing need with the majority of these provided in Melton South Sustainable Neighbourhood (2,000 homes) and Melton North Sustainable Neighbourhood (1,7000 homes). The Council are therefore heavily dependent on the Melton SUE's to deliver their housing needs over the Local Plan period.

- 3.17 Where housing land supply is particularly dependent upon one or relatively few large strategic site, greater numerical flexibility should be applied than if the housing land supply was more diversified. In the case of Melton Borough Council, the 3,700 dwellings to be delivered on SUEs around Melton represents 60% of the overall housing land supply.
- 3.18 In the context of the Local Plan Review, it is relevant to note that the Melton South Sustainable Neighbourhood, which provides 32% of the housing supply, has not yet commenced despite the Local Plan having been adopted over 5 years ago. Key to the delivery of the SUE, is the provision of the Melton South Distributor Road [“MSDR”] to be funded by Leicestershire County Council.
- 3.19 However, in the latter part of 2023, Leicestershire County Council announced that they are no longer able to fund the MSDR which places significant doubts on whether or not the MSDR will be delivered. This places questions on whether or not the SUE itself, and the 2000 homes will be delivered which would leave a significant shortfall in the Council’s housing supply. Even in the event that the MSDR is delivered, the delays that have occurred thus far, and will occur from this point onwards, will result in significant lead-in times before this SUE can start providing housing for the Borough.
- 3.20 Therefore, our recommendation is that additional housing delivery should be provided in the Local Plan Review to prioritise a short the medium term to boost housing supply to bridge the gap whilst the SUE is delivered or whilst a new Local Plan is prepared and adopted. In so doing, this will ensure that the Local Plan will be a robust as possible and treating the housing requirement as a minimum rather than a maximum. Our recommendations are that this can be achieved by providing greater flexibility and support of the Reserve Sites.

Policy C1 (B) Reserve Sites

- 3.21 In terms of the Reserve Sites, these are recognised in the adopted Local Plan as being suitable, available, and deliverable, and are therefore a source of sites which the Council can incorporate into the housing land supply to provide additional flexibility and resilience in light of the issues mentioned above.
- 3.22 Policy C1 (B) of the Local Plan states that:

Proposals for new housing development on the reserve sites listed in this policy and identified on the Policies Map will be permitted where:

- a) It helps to meet the identified housing requirement and development needs of the settlement; and
- b) It will secure the sustainability of the settlement; and
- c) It is demonstrated that a) and b) above cannot be achieved through allocation under Policy C1(A) and other permissions granted.

Where proposals on reserve sites are submitted, assessment will be carried out taking into account the following:

- i. the degree to which the allocated requirement is unmet within a settlement;
- ii. the likelihood that the allocated sites and outstanding permissions in the relevant settlement category (Melton Mowbray or Service Centre) will be delivered; and
- iii. evidence of the extent of community support through allocation of reserve sites in Neighbourhood Plans and/or bespoke approaches to measuring support.

3.23 It is our opinion that a review of this policy is necessary as part of the Local Plan Review. The policy itself does not recognise that the housing requirement set out in the Local Plan is a minimum figure and as such it is overly restrictive. The policy is not supportive of the overarching aims of the NPPF to promote sustainable development and the need to significantly boost housing supply.

3.24 Our recommendation is that this can be best achieved through a re-wording of the existing policy which removes criteria c) and criteria i. ii, and iii. This will ensure that the assessment of a development proposal on a Reserved Sites is based on the current and future housing needs of the settlement rather than a restrictive housing figure. This approach will ensure that the policy accords with the fact that the Local Plan provides a minimum housing figure rather than a maximum figure and the aim to deliver deliverable sites in sustainable locations.

3.25 Given that the Reserve Sites clearly represent sustainable development, we believe that there should be recognition within Policy C1 (B) that the Reserve Sites can also be delivered as windfall development and that smaller scale residential development on the Reserve Sites is appropriate in that context.

Bio-Diversity Net Gain

3.26 Finally, on the matter of housing need and delivery, we recommend also acknowledging the need to deliver Biodiversity Net Gain (BNG) across the allocations in the Local Plan. The 10% requirement for BNG in the Environment Act, introduces a materially consideration which is likely to influence the quantum of new houses that will be delivered on each site going forward. The Council should therefore consider how BNG will be delivered on the allocations and how this will impact on the number of houses they can deliver.

3.27 In respect of the demand for new housing, the Council should acknowledge that BNG will impact on the overall number of units each allocation will provide and that additional housing sites will be required to make up the shortfall created as a result.

SECTION 4: RESPONSES TO QUESTIONS

- 4.1 This Section considers and responds to the questions posed by Melton Borough Council in their Local Plan Review Issues and Opportunities Consultation document. The Council are seeking to respond to local and national changes, to meet development requirements by updating the Melton Borough Local Plan. This is required by national planning policy and deems the Council to positively prepare an aspirational and realistic Local Plan.
- 4.2 The Council are therefore seeking to engage with stakeholders who have an interest in the Borough, helping shape a new Local Plan to ensure the best outcomes are achieved over a new Plan period. In accordance with paragraph 35 of the Framework, plans should be:
1. ***Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
 2. ***Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
 3. ***Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
 4. ***Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.*
- 4.3 The comments in this Section focus on the issues surrounding housing need and delivery of the Borough and whether the consultation is sufficiently addressing the need for Melton Borough Council in the future. As such, this representation will focus on the following matters:
- **Vision and Objectives.**
 - **Policy SS1. Presumption in Favour of Sustainable Development.**
 - **Policy SS3. Sustainable Communities (unallocated sites).**
 - **Policy SS4. South Melton Mowbray Sustainable Neighbourhoods.**
 - **Policy SS6. Alternative Development Strategies and Local Plan Review.**
- 4.4 The questions relevant to each of the above matters are considered in turn and in the context of the National Planning Policy Framework to ensure conformity with planning policy at a national level.

Vision and Objectives

- 4.5 With respect to **Question 1**, we strongly agree with **Option 2** which states that the Visions and Objectives of the Local Plan are in need of a refocus to ensure that they align with current plans and policies at both a national and local level.
- 4.6 In response to **Question 2**, for the purpose of this representation, our recommendations on the Vision and Objectives relate to the Housing Objectives. For ease of reference, the Housing Objectives at current are provided below:

Housing Objectives

1. Help provide a stock of housing accommodation that meets the needs of the community, including the need for affordable housing.
2. Develop a housing stock to provide for the future aspirations for the local economy

- 4.7 Whilst we agree with the general principles of the existing Housing Objectives, we believe that they are not strong enough in their ambitions to deliver the required housing growth for the Borough and its residents. The Housing Objective should be more forthright in terms of a clear statement that will ensure more housing is delivered and on a range of sites to provide choice in the market.
- 4.8 The Housing Objective should also provide greater recognition of the need to provide robust housing stock to deliver the economic growth for the Borough, and to ensure that affordable housing is delivered in a viable way which meets the current identified needs.
- 4.9 Housing is an important element of delivering sustainable development and plays an important role in contributing to growth of the local economy and the growth of the communities that we live in. With regards to **Question 3**, we therefore recommend that the most important objectives to be covered by the Vision are:
- Ensure local housing meets the local communities current and future needs
 - Improving facilities for all of the community and providing the new infrastructure needed to support our growing population
 - Promoting high quality and well-designed development to help create healthy, sustainable and safe communities

Policy SS1. Presumption in Favour of Sustainable Development.

- 4.10 With regards to **Question 4** and whether Policy SS1 should be retained, we strongly disagree with **Option 1** which states that this policy should be deleted. We are strongly of the opinion that this policy should be retained in accordance with **Option 2**.
- 4.11 In addressing **Question 5**, which seeks clarification on why the policy should be retained, the Presumption in favour of sustainable development is a fundamental part of the NPPF and therefore the removal of this policy from the Local Plan would make it inconsistent with the NPPF and out-of-date. The retention of this policy is therefore of fundamental importance.

Policy SS3. Sustainable Communities (unallocated sites).

- 4.12 With respect to **Question 6**, we support Option 3, which is to review this policy to enhance wider sustainability.
- 4.13 As discussed in Section 3 of this Representation, given the overreliance the Council has on the SUEs in the Borough to deliver new housing, we recommend that provisions are made for additional housing supply in the Local Plan Review. This can be achieved in part through the re-wording of Policy SS3, and the need to deliver sustainable development outside of the main urban area of Melton.
- 4.14 Paragraph 83 of the NPPF states that:
- “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”**
- 4.15 Paragraph 83 seeks to ensure that the communities of these villages and settlements can continue to grow and thrive, key to supporting the services and facilities that exist within them. As such, it is considered that the Plan should provide for a wide range of deliverable and developable sites across the Borough in order to provide competition and choice to ensure that housing needs are met in full and that communities can thrive and grow.
- 4.16 Paragraph 70 of the NPPF highlights the importance of small and medium sites to contributing to the housing requirement of an area. The inclusion of additional non-strategic allocations would expand the range of choice in the market, and be of a scale that can come forward and making a contribution to housing numbers earlier in the plan period. The Reserve Sites represent an excellent source of sites which can come forward to meet this need.
- 4.17 Therefore, as part of this review, it is important that the wording of the Policy is revised so that all sustainable sites can potentially be supported by Policy SS3, including the Reserved Sites.
- 4.18 Our recommendation is that when reviewing this policy, consideration is given to those sites which are best placed to meet that need and requirement, including the Reserve Sites.
- 4.19 The Reserve Site have previously been assessed by the Council and deemed to be suitable for housing growth. Therefore, it is recommended that the Policy provides a preference for the Reserve Sites over those which have no formal designation in the Local Plan.

Policy SS4. South Melton Mowbray Sustainable Neighbourhoods.

- 4.20 As mentioned in Section 3 of this Representation, significant doubts exist as to whether or not this SUE will be deliverable. This allocation is however the centrepiece of the Local Plan Strategy and if it cannot be delivered, it is clear that a full Local Plan update will be required.

- 4.21 In response to **Question 10** however, our supported option is Option 2, which seeks to amend to reflect the 2021 Masterplan. This represents the most sensible option to ensure any delivery on the site is done so with the most relevant information.

Policy SS6. Alternative Development Strategies and Local Plan Review.

- 4.22 With respect to **Question 15**, given the various elements that are in place for Melton Borough Council in term of the Leicester and Leicestershire HMA, and whether the South Melton Mowbray Sustainable Neighbourhoods will be delivered, it is clear that an update to this policy is required to reflect the triggers necessary for the review of the Local Plan. This is most appropriately provided by **Option 3**.

- 4.23 It is our opinion that there are two matters which specifically require attention for this update and the trigger for a full update to the Local plan. These are detailed below:

The Duty to Co-operate

- 4.24 As previously noted in this representation, Melton Borough Council are located within the Leicester and Leicestershire HMA. The Review Document recognises the issues relating to Leicester City's unmet housing needs, however it was concluded that it would not be sensible to seek to update this policy at this time, as the joint work on the Strategic Growth Plan for Leicester and Leicestershire is not yet complete. The Review Document does however state that *"a full update of the local plan can be undertaken when the strategic position becomes clear through agreement."*

- 4.25 We therefore recommend that Policy SS6 is updated to reflect the above statement and that a full update of the Local Plan is undertaken once the strategic position of the Leicester and Leicestershire HMA has been finalised.

South Melton Mowbray Sustainable Neighbourhood

- 4.26 The South Melton Mowbray Sustainable Neighbourhood is fundamental to the delivery of the Local Plan, providing 2,000 homes over the plan period. The allocation is however reliant on the delivery of key infrastructure in the form of the Melton South Distributor Road which will facilitate the SUE.

- 4.27 We understand that Leicestershire County Council have withdrawn their funding for the MSDR, which has placed significant doubt as to whether the road has funding and whether it can be delivered. This would have implications for the delivery of the SUE as a whole and whether the Council could meet the requirements for housing and employment across the Local Plan period.

- 4.28 As such, we would recommend that Policy SS6 is updated such that if it becomes clear that the MSDR cannot be delivered, and therefore the South Melton Mowbray Sustainable Neighbourhood, that this would trigger the need for a full update to the Local Plan. We would also recommend that provision is made in the policy for the Reserve Sites to come forward should a full update to the Local Plan be triggered.

SECTION 5: CONCLUSIONS

- 5.1 This report has been prepared by nineteen47 on behalf of Bowbridge Land Ltd in response to the Melton Borough Council Local Plan Review Issues and Opportunities Consultation (December 2023).
- 5.2 Section 2 of this representation confirms that the Land off Blacksmith Lane, Stathern, is available, suitable and achievable to provide up to 45no. dwellings to meet the council's housing need. The detailed information regarding the Site provided within Section 2 confirms that the site can be appropriately delivered for housing and supporting infrastructure.
- 5.3 The Site can be delivered in the short term, is within a sustainable location and can make a viable contribution to the vitality and sustainability of the nearby area, in accordance with the aspirations of the Framework.
- 5.4 Section 3 discusses housing need and delivery and makes comments on a number of matters which are not covered by questions raised in the consultation document. This Section clearly demonstrates that there is a need for the Council to review the housing need of the Borough and the delivery of new housing.
- 5.5 Section 4 responds to the questions raised in the consultation document, which focuses on the key matter of housing and housing delivery. It provides a number of comments and recommendations which will make the Plan more robust to be able to re-act to changing circumstances in the Borough over the plan period.
- 5.6 Overall, the representation demonstrates the need to provide greater flexibility in the Council's housing supply, and to allow greater support to the Reserve Sites to meet the housing requirements, keeping in mind that these are minimum housing targets and not a maximum. This approach will ensure that the Plan is positively prepared, justified, and effective and therefore sound in accordance with the Framework.
- 5.7 We reserve the right to respond to make further comments on other matters as the Local Plan process progresses.