

MELTON LOCAL PLAN

STATEMENT OF COMMON GROUND BETWEEN MELTON BOROUGH COUNCIL AND LEICESTER CITY COUNCIL

Introduction

This statement identifies the areas of common ground between Leicester City Council (LCC) and Melton Borough Council (MBC), in respect of those policies contained in the Pre-Submission Draft Melton Local Plan and in the Addendum of Focused Changes, on which LCC has submitted representations. It also identifies those matters remaining that are still the subject of specific disagreement.

The statement should be read alongside the LCC representations and MBC's responses to those representations.

2. Background

- 2.1 Leicester CC are a specific consultee under the Town and Country Planning (Local Development)(England) Regulations 2012.
- 2.2 Representations were submitted by LCC at Regulation 19 (Pre-submission draft local plan) stage, following responses submitted at previous formal and informal consultation stages. These are attached at Appendix A
- 2.3 Subsequently, in July 2017, the Council published an Addendum of Focused Changes to the Draft Local Plan. Further representations were received from LCC in response to that consultation.

3. Areas of Agreement and Outstanding Areas of Disagreement

- 3.1 The schedule below indicates where an agreed position has been reached and where it has not for each of the matters raised in LCC's representations and MBC's response to them.

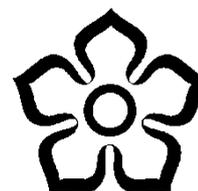
Draft Local Plan Policy	Position
SS2	<p>AGREED The parties agree that HEDNA 2017 is a sound and robust basis on which to base Housing Requirements.</p> <p>The parties agree that there is headroom of 91 dwellings per annum (or 2275 dwellings in total) in the Melton Local Plan which will contribute to meeting unmet needs from elsewhere in the HMA.</p> <p>It is agreed that the HMA Joint Statement of Co-operation (MBC/HN3A (para 2.9) also states that: 'Both Leicester City Council and Oadby & Wigston Borough Council are yet to formally and finally evidence the extent of their unmet need, however it is necessary to include provision to accommodate unmet need arising from these two Council areas, for the relevant periods, within the HMA as a whole; this may include an element of a flexibility allowance in local plans currently in preparation, should the need arise'.</p> <p>It is agreed that the HMA Joint Statement of Co-operation (MBC/HN3a, para 2.10) recognises and states that 'all authorities are at different stages of plan preparation and that this situation must be accommodated'.</p> <p>It is agreed that as currently drafted, the Plan does not explicitly state that the housing requirement will accommodate an element of the housing needs arising from elsewhere in the HMA.</p> <p><u>NOT AGREED</u></p> <p>LCC consider that the Melton Local Plan should specifically refer to unmet need in Leicester and set out how it will help to address this need now, including setting aside a specific amount of housing land to help meet this need, in advance of full agreement on HMA wide housing distribution. The City Council therefore want the Melton Local Plan to set out a specific amount of dwellings (of the 2,275) that it is proposed will go towards meeting the unmet housing needs of Leicester City.</p> <p>MBC consider that the following suggested modifications to the submitted plan are as far it can go to address LCC's concerns, in the absence at this time of both a declared quantum of unmet needs from Leicester City, and the agreement of all the HMA authorities on apportionment of those unmet needs. Oadby & Wigston Borough (within the HMA) also have unquantified declared unmet needs which may need to be partially accommodated in Melton Borough too.</p> <p>1. Amend paragraph 4.2.2 to read:</p> <p>The Melton TAHR indicated that taking account of wider considerations, <u>including meeting some of the unmet needs arising from elsewhere within the housing market area</u>, there was a clear justification for planning for between 5,750 and 7,000 dwellings, equivalent to 230-280 dwellings per annum. The Council has agreed a housing requirement of 245dpa, within that range.</p> <p>2. Add the following sentence to the end of paragraph 4.2.2: <u>The headroom between the demographic OAN (with affordability adjustment) of 154 dpa set out in HEDNA and the 245 dpa housing requirement of the plan, 2775 dwellings, will go towards meeting some of the unmet needs arising elsewhere, principally from Leicester City but also from Oadby & Wigston, both of which have formally declared unmet needs.</u></p>

	<p><u>AGREED</u> The parties agree that the Strategic Growth Plan (Consultation Draft) has now been published and will enter a period of consultation From January to March 2018.</p>
SS6	<p><u>AGREED</u> The parties agree that all the HMA authorities have agreed the principle of the use of trigger policies in local plans.</p> <p>The parties agree that Policy SS6 – Alternative Development Strategies and Local Plan Review identifies potential options that have not been assessed to date, which would be the subject of further assessment should the need for additional or alternative sites arise through a process of review . The Review process will include engagement of partner Authorities in the HMA.</p> <p><u>NOT AGREED</u> LCC consider that it is not certain that Policy SS6 will enable the plan to respond positively to changes in the HEDNA, given that the City Council have formally declared an unmet need arising in the city now, which must be addressed now.</p> <p>MBC consider that Policy SS6 – Alternative Development Strategies and Local Plan Review provides an appropriate “trigger policy” which will enable the Plan to respond positively to any changes which are subsequently required to the Local Plan arising from HEDNA or the Strategic Growth Plan.</p>
FC4 (Policy C1 (B)– Housing allocations)	<p><u>NOT AGREED</u> LCC are seeking a revision to the wording pf Policy C1 (B) to refer to the wider housing needs of the Housing Market Area as well as the settlement/Borough, to further help address HMA wide unmet need.</p> <p>MBC consider that the headroom identified above and the review triggers in Policy SS6 accord with the preferred method for dealing with ‘unmet need’ in the HMA set out in MBC/HN3a. Reference to unmet need in Policy C1(B)would be additional to this process and potentially at odds with that preferred approach. Also, ‘Reserve Sites’ have been identified, where available, to provide additional capacity in the event that allocated sites prove undeliverable over the term of the Plan.</p>
IN1	<p><u>AGREED</u> Provision should be made for any unacceptable impacts on the highway network outside the confines of Melton Borough.</p> <p>It is understood that proposed large scale development within Melton’s Local Plan has been the subject of traffic modelling in partnership with Leicestershire County Council Highway Authority and policies require that it makes a contribution to the wider road network.</p> <p>There is currently no evidence available to suggest the scale of development proposed in Melton’s Local Plan will have an adverse impact on the wider road network outside the Borough, i.e. within the boundaries of the City of Leicester.</p> <p>However it is agreed that any impact arising from growth in Melton Borough’s Local Plan will be one of a number of factors to take into account in considering highway network issues within the boundaries of the City of Leicester and will be relatively minor in the context of overall traffic movements.</p> <p>The parties agree that the best source of evidence of commuting is from the Census 2011, (replicated in HEDNA Table 25, page 71) in which it is identified that 6.8% of employed residents commute from Melton to Leicester, whilst 0.7% of Leicester residents commute into Melton Borough.</p>

Policy C6 – Gypsies and Travellers	<u>AGREED</u> The amended Policy C6 (introduced by Focused Change 7) overcomes previous concerns raised regarding the use of a Draft Evidence Document
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Signed on behalf of Leicester CC Fabian D’Costa	Signed on behalf of Local Planning Authority  Valerie Adams
Date 8 th January 2018	Date 8 th January 2018
Position: Team Leader Planning Policy	Position: Local Plans Manager

APPENDIX A



Leicester
City Council

James Beverley
Planning Policy
Melton Borough Council
Parkside, Station Approach
Burton Street
Melton Mowbray
LE13 1GH

Planning Policy

City Hall
115 Charles Street
Leicester
LE1 1FZ
www.leicester.gov.uk/planning

Dear James

Melton Local Plan Pre Submission Local Plan Consultation

Thank you for consulting Leicester City Council on the pre submission Melton Local Plan. The following are Leicester City Council's comments.

'Growing Melton Borough – The Spatial Strategy'

'Section 4.2 – Policy SS2 'Development Strategy':

This sets out the approach to objectively assessed housing need across the Housing Market Area (HMA), through the Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) 2014. Policy SS2 sets out a housing requirement based on the agreed SHMA and this approach is supported by the City Council.

The City Council also supports the statement at paragraph 4.7.6 which confirms that Melton Borough Council are 'committed to working collaboratively with other Authorities, including those within the Leicester & Leicestershire Housing Market Area, to update objectively the level of long term growth'.

We note that the housing requirement set out in the plan seeks to address issues in respect of economic growth for the borough. If the housing requirement is above the emerging Housing and Economic Development Needs Assessment (HEDNA) objectively assessed need for the borough, this also will be expected to count towards addressing any unmet need which may arise in the HMA.

We welcome the inclusion of a commitment to review the plan should the HEDNA and associated work to establish the scale and distribution of housing and economic land, including the emerging Strategic Growth Plan, lead to additional need to be accommodated within the Borough (paras 4.7.6-4.7.8). This is in line with a HMA wide agreement on local plan trigger mechanisms.

Policy SS6 – Alternative Development Strategies and Local Plan Review

The City Council also supports the flexibility in the plan provided by policy SS6 which sets out several alternative strategies should they be required in the future as a result of monitoring and review of the Plan 'to accommodate any potential

additional need which may arise.’ However any further consideration of sustainable village proposals such as at Six Hills will require close engagement and collaborative work with the City Council.

Transport

Accessibility and Transport : Paragraph 2.4.1. should also note that the A46 also provides access between Melton and Leicester, and north towards Nottingham and Lincoln. It also notes that Melton Mowbray station is on the Birmingham to Stanstead Airport railway line and is described as providing ‘quick and regular access to Leicester’. It should be noted that this is only an hourly service.

Policy SS2 Development Strategy:

This also notes that :

‘Development will be expected to contribute positively to the provision of key infrastructure, including traffic relief within the town, to support its growing population and economy.’

It should be highlighted that development will also be expected to contribute to the provision of key infrastructure where adverse impacts are identified from robust transport modelling on the wider highway network.

Growing Melton Mowbray through Large Scale Development Sites

This notes that development required in Melton Mowbray will be focussed in two new large scale ‘sustainable neighbourhoods’ to the north and south of the town.

Paragraph 4.3.4 states *that ‘these developments will deliver new residential and business communities in the form of attractive and high quality new neighbourhoods and places supported by the infrastructure necessary to mitigate the impacts of growth.’*

However modelling should include identification of impacts on the wider highway network outside the Borough.

The City Council notes that a new strategic link road will be provided to help deliver both the Melton Mowbray Sustainability Neighbourhoods which is expected to improve Melton Mowbray’s east/west connectivity through a link road. By providing this new infrastructure, traffic movements from the new housing stock could gravitate towards Leicester (subject to robust transport modelling) as this may facilitate easier access to Leicester’s employment and other opportunities. Whilst this could reduce the traffic impacts in Melton Mowbray, there is the potential to create adverse impacts on the existing transport network in Leicester. These areas may include the A47, A607 and A46. Any adverse impact in this area may be accelerated from proposed large scale housing growth in Charnwood and Harborough. Mitigation measures for Leicester’s highway network may be required to support this new growth based on any strategic transport modelling findings.

Policy IN1 – Transport & Strategic Transport Infrastructure

The provision of strategic transport infrastructure should also have regard for the identification and mitigation of impacts on the wider highway network outside the Borough.

Policy C6 – Gypsies and Travellers

Paragraph 5.10 of the supporting text states that the 2016 Gypsy and Traveller Accommodation Needs Assessment (GTAA) identified the level of need for additional Gypsy and Traveller pitches. The GTAA is a document that is currently being led by the City Council, and involves all of the authorities in the Housing Market Area (except Hinckley and Bosworth), including Melton and the City Council. However it is still a work in progress, and currently at this point in time a final, completed version is not available.

The City Council therefore requests that this paragraph is amended to make clear that the levels of need identified are draft at present.

Similarly, paragraph 5.10.10 contains a quote which is attributed to the 2016 GTAA, setting out a recommendation that review of the evidence base relating to unauthorised encampments should be undertaken in autumn 2018 once there is a new 3 year evidence base following the changes to the 'Planning Policy for Travellers Sites (PPTS) in August 2015.

Paragraph 5.10.11 contains a commitment to update an evidence base review in 2018. . As already stated, the final GTAA has not yet been completed (at the time the draft Local Plan was published, not even a draft GTAA was complete, so the quote is not from an available draft report).

It is therefore concerning that such a statement should be included in the draft Plan as there is currently no agreement between participating authorities on this issue.

While it is the prerogative of Melton Council to undertake an evidence base review in 2018 should they see fit to do so, it is not the case that there is agreement from all of the participating authorities (including the City Council) that this is required or an additional joint GTAA planned.

Yours sincerely

Grant Butterworth
Head of Planning
Leicester City Council.