

**MATTER 3. OVERALL REQUIREMENTS FOR HOUSING AND EMPLOYMENT LAND AND THE LONG TERM GROWTH STRATEGY (Policies SS2 and SS6) ; AFFORDABLE HOUSING NEED AND POLICY TARGETS (Policies C4, SS4 and SS5)**

**STATEMENT BY CHARNWOOD BOROUGH COUNCIL**

Addendum of Focussed Changes Representor Number 198 and Pre Submission Draft Representor Number 376

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**3.1 Has the housing requirement figure of 6125 dwellings (2011-2036) (equivalent to 245dpa) as set out in Policy SS2 been informed by a robust, credible assessment of the objectively assessed needs and is it positively prepared and consistent with national planning policy?**

1. Charnwood Borough Council considers that a compelling case has not been made for the requirement of the figure of 245 dwellings per annum. It departs significantly from the Objectively Assessed Need for Melton which was established through a robust study supported by all Leicestershire local authorities.
2. While we accept the strong emphasis on boosting significantly the supply of housing, and promoting economic growth we have concerns that Melton's approach will have implications across the HMA which could devalue the effective collaborative approach which local authorities achieved through HEDNA. .

**Is the Housing and Economic Needs Assessment for Leicester and Leicestershire (HEDNA 2017) an appropriate starting point for setting the requirement in terms of its demographic assumptions (including future trends in household formation and migration), the account taken of market signals, forecast growth in employment, commuting patterns and the need for affordable housing?**

3. In the Statement of Common Ground between Charnwood Borough Council and Melton Borough Council (**SCG2**) it was agreed that the HEDNA 2017 provided a sound and robust basis on which to base housing requirements.
4. HEDNA (**MBC/HN2**) provides a consistent, objective assessment of need for housing. At the time of preparation these were the 2014-based Household Projections, published by Government in July 2016, which were based on ONS 2014-based Sub-National Population Projections (SNPP) of May 2016. The thorough demographic analysis (including future trends in household formation and migration) was supplemented by an analysis of market signals, forecast growth in employment, commuting patterns and the need for affordable housing.
5. HEDNA provides a demographic need in Melton based on ten year migration trends (2011 to 2036) of 134 dwellings per annum. Taking into account employment growth it finds an economic led housing need in Melton of 170 dwellings per annum for the

period 2011 to 2036. This forecast assumes that commuting between Districts remains constant, however HEDNA acknowledges that as employment grows in different locations there will inevitably be some cross-boundary commuting between local authorities.

**Is the uplift from the HEDNA OAN figure for Melton (170dpa) to 245dpa soundly based, having regard to the evidence and national planning policy?**

6. Melton Borough Council's justification for adopting a higher housing requirement than the OAN draws on the findings of another report by GL Hearn 'Towards a Housing Requirement for Melton Borough' (TAHR), January 2017 (**MBC/HN4a**) which set out a housing requirement of 230 to 280 dwellings per annum.
7. The precise figure of 245 dwellings per annum for their requirement was agreed by Melton Borough Council in December 2015 to reflect the upper end of the 195-245 homes per year recommended by the 2014 Strategic Housing Market Assessment (SHMA) and pre dating the HEDNA (Full Council report **MBC/HN5**).
8. A significant increase from the HEDNA OAN to 245 dpa should be agreed through the Strategic Growth Plan, under the Duty to Cooperate. In simple terms, Melton is planning for 2,775 homes above the demographic scenario over the period 2011-2036. This is reliant on housing need that arises from elsewhere in the HMA or wider afield and cannot be explained through existing migration patterns appearing to be based upon a highway led strategy. This is likely to have wide-reaching implications across the HMA and should therefore be agreed through a strategic planning process.

**Does it take appropriate account of a) employment growth, b) the identified need for affordable housing, c) infrastructure needs, d) capacity of land, and e) deliverability / achievability?**

**a) Employment Growth**

9. HEDNA provides an aligned assessment of homes and jobs, concluding that Melton has an OAN of 170 homes per year, uplifted from a demographic need of 134 homes a year, and a need for 53-66 ha of employment land to 2036, within the context of the HMA.
10. The Melton local plan promotes 245 homes per year and 50.75 ha of employment land. Whilst the strategy for employment land is close to the lower end of the range of need, the homes are significantly higher.

**b) Affordable Housing**

11. Charnwood Borough Council has no further comments on this issue.

**c) Infrastructure Needs**

12. A main driver for having higher housing requirements has been "to support delivery of strategic infrastructure and services" (TAHR, Para 6.8, (**MBC/HN4a**) in particular an Eastern Distributor Road for Melton Mowbray.

13. The strategic importance of this scheme, and other related infrastructure to the Local Plan, and to the growth and prosperity of Melton Mowbray is recognised. TAHR is quite clear that a “the Local Plan can only be a success if (the Northern and Southern SUEs) are delivered and a housing requirement reflective of the OAN alone (170 dpa) is unlikely to achieve the scale of growth required to fund the Eastern Distributor Road” (Para 6.12). Furthermore Para 6.25 also states that a number of strategic objectives could only be funded through increased housing provision including improving access to services and facilities.

**d) Capacity of Land**

14. Charnwood Borough Council has no further comments on this issue.

**e) Deliverability and Achievability**

15. In terms of deliverability it is worthwhile to reflect on the numbers of dwellings completed in Melton in recent years. In none of the years between 2011/12 and 2016/17 was the OAN of 170 dwellings reached yet alone a significantly higher as is being proposed.

**Dwelling Completions in Melton 2011 to 2016**

<b>Year</b>	<b>Number</b>
2011/12	157
2012/13	64
2013/14	52
2014/15	78
2015/16	151
2016/17	149 (estimated)
Total	651 (502 without estimation)

Source: Melton Borough Council, Five Year Land Supply and Housing Trajectory Position, 2<sup>nd</sup> November 2016

**Is the HEDNA’s estimate that c1750 affordable dwellings are required in the Borough robust?**

16. Charnwood Borough Council has no further comments on this issue.

**Is the Plan’s target of 1300 net affordable dwellings that informs Policy C4 soundly based and deliverable?**

17. Charnwood Borough Council has no further comments on this issue.

**Are the affordable housing targets set out in Policy C4 soundly based and deliverable?**

18. Charnwood Borough Council has no further comments on this issue.

**3.2 Are the relevant parts of section 4.7 and Policy SS6 a sound basis for addressing housing, employment and other needs that may arise in the Borough, the Housing Market Area and elsewhere in the future?**

**Are they fully consistent with the Joint Statement of Co-operation for the Leicester and Leicestershire Authorities, updated in November 2017?**

19. The Statement of Common Ground between Melton and Charnwood Borough Councils restates our respective authorities agreement of the Joint Statement of Co-operation (**MBC/HN3a**). Paragraph 2.10 of the Joint Statement states that “In determining their housing target over the relevant plan period (therefore) each authority will take into account the HEDNA and other relevant evidence”
20. It is intended that the Strategic Growth Plan will be published for consultation in January so at the time of drafting this statement its publication is imminent. As a result however it is not possible to comment at the present time though of course by the time of the Examination the Strategic Growth Plan is likely to be in the public domain.

**Should Policy SS6 be more specific about what would trigger review of the Plan and the timescale for review in order to address such needs?**

21. The updated Joint Statement of Co-operation (**MBCHN3a**) sets out an approach which was agreed in summer 2016 on appropriate trigger mechanisms that would be inserted into all Local Plans coming forward before the Strategic Growth Plan. Paragraph 4.7.8 of the Local Plan uses the same wording as the Joint Statement and commits the authority to undertaking a review within 12 months should it be required. Charnwood is therefore satisfied that this has been interpreted correctly and welcomes the short timescale to address the issue should it be necessary. Where we differ is the way in which the Local Plan makes provision to deal with previously considered sites (see below).

**3.3 Are the references in Policy SS6 to specific locations as potential alternative or long term options justified?**

22. Charnwood Borough Council is of the view that the previously considered large scale site option site at Six Hills is not a reasonable alternative option under the emerging development strategy for the Melton Local Plan 2011-2036 because the Local Plan’s Sustainability Appraisal (**MBC/WP3a**) states explicitly in para 5.73 that the “relatively isolated site options at Six Hills and Normanton Airfield would have the least positive sustainability effects of the 12 sites considered - eight potentially significant negative effects were identified for both site options”. We would therefore propose that the wording of this policy is amended as follows:

**Policy SS6 – Alternative Development Strategies and Local Plan Review**

**Melton Borough Council is committed to meeting its requirements for housing, employment and other development and infrastructure. The Council will regularly monitor delivery of new development in the context of policies and targets within this plan. Where monitoring identifies significant and persistent shortfalls in the delivery of housing and employment, infrastructure or spatial distribution that deviates significantly from the plan strategy, or there are changes within the HMA to the objectively assessed need for development or the spatial distribution of growth across the HMA, the Council will consider an early review of the Local Plan to identify alternative development sites.**

**3.4 Is the target in Policy SS2 for provision of 51ha of employment land in the Plan period justified by the evidence and consistent with the proposed growth in housing?**

23. The Statement of Common Ground (**SCG2**) states that both authorities agree that HEDNA provides the most up to date evidence of an objectively assessed need for employment land needs across the HMA. Charnwood Borough Council considers that while the Melton Local Plan employment land requirement of 50.75ha is broadly similar to the lower end of HEDNA's range of employment land needs of 53 – 66ha for 2011-2036. The evidence in HEDNA indicates that this requirement aligns with an OAN of 170 homes per year. The significant departure from the OAN for homes and jobs established by HEDNA and the mismatch which sees an increase in homes and a reduction in jobs requires explanation within the plan and reconciliation at the Housing Market Area level.