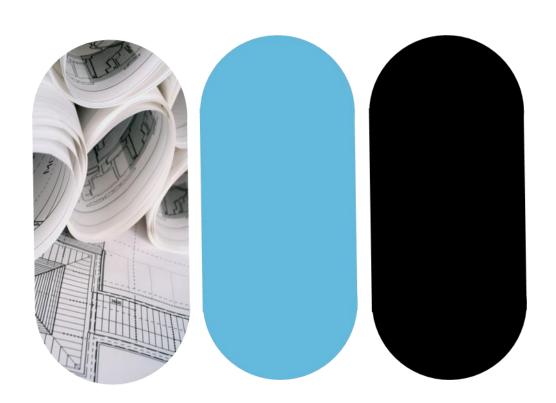


WRITTEN STATEMENT IN RESPECT OF THE MELTON LOCAL PLAN EXAMINATION JANUARY 2018

MATTER 5: OTHER HOUSING ALLOCATIONS (POLICY C1 (A) AND APPENDIX 1) AND RESERVES SITES (POLICY C1 (B) AND APPENDIX 1).

On Behalf of Crofts Developments Ltd



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1. Paragraph 5.1

Question:

Overall, has the allocation of the sites in Policy C1(A) been based on a clear, robust process of site assessment and informed by sustainability appraisal? In particular:

i) has an appropriate selection of potential sites been assessed?

Response:

- 1.1 We wholly agree that the Council have identified an appropriate selection of sites based on sites submitted through the emerging Local Plan process.
- ii) has an appropriate methodology been used and has it been applied consistently?
- iii) are the reasons for selecting the preferred sites and rejecting the others clear and sufficient? Would any inaccuracies in the assessments significantly undermine the overall conclusions?
- 1.2 Crofts Developments Ltd supports the continued identification of land at Colston Lane, Harby (HAR4 in the Focused Changes) as a main allocation for the development of 61 dwellings.
- 1.3 As noted in previous representations made on behalf of Crofts Developments Ltd in respect of land at Colston Lane, Harby (Appendix 1), the site is exceptionally well related to the existing pattern of built form in Harby, as well as being easily accessible on foot to the centre of the village and the services/amenities that the village has to offer. An outline planning application was prepared and submitted to Melton Borough Council for the development of the site for up to 50 houses; this has subsequently received a resolution to grant consent by Planning Committee (July 2017), subject to the signing of a suitable S.106 agreement, which is currently underway. Notwithstanding this, Crofts Developments Ltd is minded to review the layout again once consent is secured, with a view to maximising the efficiency of the site; this could result in proposals coming forward for a marginally higher number of units (i.e. somewhere closer to the 61 dwelling allocation) which it is considered would assist the Council in realising its housing trajectory within the emerging Melton Local Plan (the Plan).
- 1.4 It is considered that there are a number of discrepancies in the site assessment process and associated methodology that need to be addressed in order to ensure that the Plan is found to be justified.
- 1.5 The evidence base (specifically MBC/HA1b Part 2 of 3 Update to Site Assessments, MBC, May 2017) provides an update to the site assessments for the Service Centres, including information on availability of land, suitability of the site, viability and deliverability timescales. The table below shows the scores attributed to three of the preferred allocation sites in Harby.

Suitability				
Consideration	(negative); (stro	++ (strong positive); + (positive); 0 (neutral); - (negative); (strong negative)		
	HAR 2 (Former	HAR 3	HAR 4 (Colston	
	Dairy, Langar	(Millway	Lane)	
	Lane)	Foods)		
Brownfield Lane	++	+		
Noise or other pollutants	++	++	+	
Overall Total	34	23	27	

- 1.6 HAR4 comprises half open agricultural land, with the other half of the site being an intensively developed collection of agricultural buildings/sheds and hardstanding. Whilst it is accepted that the latter half of the site does not conform to the definition of 'previously developed land' set out in the NPPF, it is argued that the environmental impacts of developing this part of the site are likely to be less than a clear greenfield site. HAR5 (not referred to in the above table) is a clear greenfield site and is given a score of - (strong negative) in the Update to Site Assessments, MBC, May 2017; indeed, this trend is mimicked throughout the document. On the basis that HAR4 is partly intensively developed with buildings/structures and hardstanding, it is argued that the scoring should be adjusted to (negative) only.
- 1.7 In respect of the Noise or Other Pollutants category, both of the brownfield sites of HAR2 and HAR3 are given a ++ (strong positive) rating, whereas HAR4 (half open agricultural land, with the other half being an intensively developed collection of agricultural buildings/sheds and hardstanding) is only given a rating of + (positive) on the grounds of likely contamination from the agricultural use. Firstly, it is considered that there is likely to be a greater risk of contamination associated with the former dairy uses (HAR2 and HAR3) as a result of the industrial processes used, and secondly, as part of the Phase 1 Site Investigation Report prepared in support of a recently approved planning application, there are only low/moderate contamination risks identified. As such, it is considered that the ratings for HAR2 and HAR3 should be downgraded to + (positive) and the rating for HAR4 upgraded to ++.
- 1.8 Addressing these discrepancies would alter the site assessment table and overall scoring accordingly:

Su	itability					
Consideration		Potential Impact ++ (strong positive); + (positive); 0 (neutral); - (negative); (strong negative)				
		HAR 2 Dairy, Lane)	(Former Langar	HAR (Millway Foods)	3	HAR 4 (Colston Lane)
Brownfield Lane		++		+		-
Noise or other polluta	ants	+		+	·	++
Overall Total		33		22	·	29

- iv) has a reasonable balance been struck between the residual requirement figure for each of the settlements in Table 4 and the allocation of sites to meet the residual requirement as closely as possible?
- 1.9 In respect of Harby, it is considered that a reasonable balance has been struck between the residual requirement figure for the settlements and the proposed allocations.

2. Paragraph 5.3

Question:

Are there specific policy requirements for the site allocations in Appendix 1 justified and effective? Together with the Plan policies as a whole, is there reasonable assurance that the development of the allocations will be sustainable and in accordance with national planning policy?

Response:

2.1 The specific policy wording relating to HAR4 contained within Appendix 1 of the Plan is considered to be reasonable and is supported by Crofts Developments Ltd. As stated above, Crofts Developments Ltd is minded to review the approved layout for 50 dwellings (resolution to grant achieved Summer 2017) again once consent is secured and the s.106 signed, with a view to maximising the efficiency of the site; this could result in proposals coming forward for a marginally higher number of units (i.e. somewhere closer to the 61 dwelling allocation) which it is considered would assist the Council in realising its housing trajectory within the Plan.