



**EXAMINATION – MATTERS AND QUESTIONS
MELTON LOCAL PLAN EXAMINATION
STATEMENT ON BEHALF OF:
WILSON ENTERPRISES LIMITED IN RELATION TO LAND AT
DALBY AIRFIELD**

**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)**

Pegasus Group
4 The Courtyard
Church Street
Lockington
Derbyshire
DE74 2SL

Telephone: (01509) 670806 Facsimile: (01509) 672247

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MATTER 3: Overall Requirements for housing and employment land

3.1 Has the housing requirement figure of 6,125 dwellings (2011-2036) (equivalent to 245 dpa) 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? In particular:

- i) 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 needs for affordable housing?**
- ii) Is the uplift from the HEDNA OAN figure for Melton (170 dpa) to 245 dpa soundly based, having regard to the evidence and national planning policy? 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?**
- iii) is the HEDNA estimate that c1,750 affordable dwellings are required in the Borough robust? Is the Plan's target of 1,300 net affordable dwellings that informs Policy C4 soundly based and deliverable? Are the affordable housing targets set out in Policy C4 soundly based and deliverable?**

3.1.1 The Pre-Submission Plan sets out a housing requirement of 245 dwellings a year over the plan period to deliver at least 6,125 dwellings. The evidence to support this figure includes the HEDNA prepared by GL Hearn (MBC/HN1a) and the report also by GL Hearn, Towards a Housing Requirement for Melton Mowbray, January 2017 (MBC/HN4a). The latter provides sensitivity testing of findings of the HEDNA report.

3.1.2 The Towards a Housing Requirement for Melton Mowbray report considers a number of factors which are considered to justify the uplift in the housing requirement from 170 dwellings a year to 245 dwellings a year.

- 3.1.3 The report considers the housing growth required to support the forecasted housing growth of 3,420 jobs. Given the particular circumstances relevant to Melton Borough, GL Hearn have considered alternative approaches to assumptions on economic activity rates for the over 60s. Assuming no change in activity rates from the 2011 figures and half the activity rates assumed in HEDNA provides a housing requirement ranging from 230-274 dwellings a year.
- 3.1.4 Whilst these findings are supported, it is considered that this sensitivity testing should have been included as part of the original HEDNA report to ensure that the assessment of objectively assessed need gave proper consideration to economic factors. The guidance on undertaking assessments of objectively assessed need set out in Planning Practice Guidance is clear that the methodology should include a consideration of economic factors (ID 2a-018).
- 3.1.5 The HBF has noted that at the HMA level, HEDNA does not include any economic growth led adjustment to objectively assessed needs. At the North West Leicestershire Local Plan Examination the HBF and other parties criticised HEDNA's approach of no adjustments to support economic growth, expressing concern that the HEDNA does not positively support economic growth in the HMA.
- 3.1.6 A further factor considered in the report to justify the uplift in the housing requirement is the need for significant housing growth to support the plan's strategy of delivering new highway infrastructure at Melton Mowbray to address longstanding issues of traffic congestion in the town.
- 3.1.7 The provision of the proposed new highway infrastructure at Melton Mowbray relies on contributions from the proposed Sustainable Neighbourhoods to secure its delivery as well as public funding to deliver the eastern section of the proposed Melton Mowbray Distributor.
- 3.1.8 The issues set out in the Towards a Housing Requirement for Melton Borough, particularly the need for housing growth to support the delivery of key transport infrastructure, is considered to provide a robust assessment of housing needs for the plan period and justifies the uplift to 245 dwellings per annum proposed in the plan.

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

3.2.1 Policy SS6 of the Submission Draft Plan sets out the proposed approach to deal with potential under-delivery on proposed allocations. The Policy indicates that to ensure any necessary review is carried out quickly, the Council will prioritise exploring potential alternative or long term options including previously considered large scale site options at Normanton airfield, Dalby Airfield, Six Hills and land to the west of Melton Mowbray.

3.2.2 Focused Change 3 updates the plan’s reasoned justification at Section 4.7 to provide an up-dated position in relation to the Housing and Economic Development Needs Assessment (HEDNA) and the Leicester and Leicestershire Strategic Growth plan.

3.2.3 Pegasus Group on behalf of Wilson Enterprises Limited made representations to the Pre-Submission Draft Plan supporting the reference to Dalby Airfield as one of the named potential alternative or long term options that the Council will investigate as a priority.

3.2.4 The Sustainability Appraisal of the Submission Draft Plan (MBC/WP/2e) assesses the land at Dalby Airfield at page 716 and in the summary at page 716. The assessment considers the sustainability of the site in isolation and does not consider it in the context of the proposed allocation of the Melton South Sustainable Neighbourhood, including the provision of a southern link road as part of the proposed Melton Mowbray Distributor Road.

3.2.5 The Dalby Airfield site is located immediately to the south of the proposed Melton South Sustainable Neighbourhood. It is a partly brownfield site and offers the opportunity for longer term growth that would be able to take advantage of the improved connectivity provided by the southern link road. The site could provide for a mix of housing and employment and is therefore an appropriately sustainable option for consideration as a longer term option as part of any plan review in accordance with Policy SS6.

- 3.2.6 The issue of trigger mechanisms required to address any potential issues arising from the Strategic Growth Plan was considered at the recent examination into the North West Leicestershire Local Plan. North West Leicestershire District Council published Proposed Modifications and Further Modifications to provide clarity in the approach to any review and these modifications were accepted by the Inspector in finding that plan sound. The policy in the North West Leicestershire Local Plan (Policy S1) refers to a review commencing by the end of January 2018 or within three months of the plans adoption. These dates related to the agreed date for the completion of an amended Memorandum of Understanding by the HMA authorities. In proposing the Further Modification to this effect, North West Leicestershire commented that this would provide more certainty that a review would take place and when it would commence.
- 3.2.7 For consistency, a similar amendment to Policy SS6 should be considered, with a date for a review commencing within 3 months of adoption.

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

- 3.3.1 It is considered that references to specific locations as potential alternative or long term options is justified. As outlined above, Dalby Airfield represents a suitable and sustainable alternative or longer term option for consideration as part of any plan review.

3.4 Is the target in Policy SS2 for provision of 51 ha of employment land in the Plan period justified by the evidence and consistent with the proposed growth in housing [*Note: the suitability of employment land designations and allocations on Policy EC1 will be considered under Matter 8*].

- 3.4.1 No comment.