



**Somerby Parish Council's submission to the
MELTON LOCAL PLAN EXAMINATION.
MATTERS AND QUESTIONS.**

To be read in conjunction with the submissions from Carl Powell &
Mary Ann Donovans. (NP leads for Somerby Parish).



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PREPARED BY LYNNE CAMPLEJOHN, CHAIRMAN
& HOWARD BLAKEBOROUGH, COUNCILLOR.

MELTON LOCAL PLAN EXAMINATION MATTERS AND QUESTIONS

Note 1: It is implicit that in answering the following questions, if respondents identify a soundness deficiency in the Plan (as amended by the Focused Changes) they should make clear how the Plan should be changed.

Note 2: Policy references are to the principal policies at issue but other parts of the Plan may also be relevant.

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)

[Note: the soundness of the land allocations for housing and employment will be considered under Matters 4, 5 and 8 as appropriate]

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? In particular:

No - The data used is not a robust, credible assessment of the objectively assessed needs for the borough, as it has been skewed to produce the figure of 6,125 dwellings rather than using the data to obtain a credible number.

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

Melton Local Plan 2011-2036: Matters and Questions for the Examination 3 growth in employment, commuting patterns and the need for affordable housing?

Yes - HEDNA 2017 is an appropriate starting point as it contains the most recent evidence available. The unsoundness however is that MBC have deviated drastically from its recommendations.

ii) is the uplift from the HEDNA OAN figure for Melton (170dpa) to 245dpa 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?

No - The uplift from the HEDNA FOAN figure for MBC of 4,250 (170 dpa) to 6125 (245 dpa) is based on an unsound aspiration, it is a political decision and MBC have used unsound methods to try to justify it! (Please refer to Carl Powell's submission for a detailed explanation of the unsoundness of the data used to achieve this figure of 6,125 (2011-2036).

Suggested change

Adopt the HEDNA FOAN of 4,250 / 170 dpa and adjust housing requirements and allocations accordingly.

iii) is the HEDNA's estimate that c1750 affordable dwellings are required in the Borough robust? Is the Plan's target of 1300 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?

Yes – HEDNA's estimate for 1,750 affordable homes is robust. However the LP's lowered target of 1,300 is not soundly based, it is too low.

The reduction was a tough choice between affordable housing and developer contributions to the MDR. Resulting in a lower %age of affordable housing in the Melton sustainable neighbourhood areas (new policy C4). The resulting effect is a reduction of the distribution of affordable housing in Melton Town, especially the new MMSNs where there is the potential to build affordable homes and a minor increase in the %age of

affordable housing in the rural villages where it is considerably more expensive to live and buy property. Therefor this policy is unsound.

Suggested change

The spatial strategy should be changed to align affordable homes with locations where the cost of living is lowest. This is achieved by moving housing allocations from rural to urban areas, or by partly restoring the previously-required affordable home percentages in the Melton urban area and MMSNs.

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 review of the Plan and the timescale for review in order to address such needs?

Possibly - If MBC had based it's requirement on the HEDNA, figure of 4,250, using the unsound number of 6,125 would result in SS6 implementation being an unsound basis for addressing housing, employment and other needs that may arise in the Borough, the Housing Market Area and elsewhere in the future.

Suggested change

The MLP should make explicit that SS6 sites will only be activated if the Borough becomes unlikely to meet it's housing target (of the HEDNA FOAN of 4,250) or possibly if the whole HMA requirement deems it necessary.

Any SS6 site should count towards achievement of FOAN and 5 year housing supply. This would allow removal of allocations in the least sustainable locations.

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

Possibly - If the LP is amended as suggested in 3.2 above.

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

No Comments