

**EXAMINATION – MATTERS AND QUESTIONS
MELTON LOCAL PLAN EXAMINATION
STATEMENT ON BEHALF OF:**

**M Hill, P Hill, Mrs M Hyde & Mrs P Pickup and
DAVIDSONS DEVELOPMENTS LIMITED**

IN RELATION TO LAND EAST OF MELTON MOWBRAY

**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)**

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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.
- 3.1.9 The Consultation Draft Leicester and Leicestershire Strategic Growth Plan outlines a proposed strategy for growth over the period 2031 to 2050 and identifies Melton Mowbray as a Key Centre with the scope of further

strategic development to provide an additional 3,000 homes on strategic sites to support growth and regeneration.

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 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 Representations were previously made by Brown and Co on behalf of The Hill Family in relation to land to the east of Melton Mowbray. Davidsons Developments Limited has secured an interest in this land and this statement is made in relation to these land interests.

3.2.4 Representations made to the Pre-Submission Draft Local Plan by Brown and Co highlighted the potential for the land to the east of Melton to be included as one of the potential alternative or long term options in Policy SS6 to be prioritised by the Council in any necessary early review of the plan.

3.2.5 Whilst Focused Change FC11, providing a replacement Section 8.3 and a New Policy IN1, Melton Mowbray Transport Strategy, updates the position in relation to the Melton Mowbray Distributor Road, the implications of these changes has not been adequately reflected on Policy SS6.

- 3.2.6 Further work on the transport strategy for Melton Mowbrary undertaken by the County Council concluded that an eastern link road should be favoured as part of a wider distributor road proposal as apposed to a western option. The County Council has secured funding from the Department for Transport's Large Local Major Transport Schemes Fund to prepare a business case to underpin a future bid for funding of an eastern route to an accelerated timescale that would see construction commencing in 2020 and completing by 2022 (para 8.3.14 of Focused Change FC11).
- 3.2.7 The County Council consulted on a recommended route for the eastern distributor road in October 2017.
- 3.2.8 Given the progress made by the County Council in progressing proposals for an eastern distributor as part of its preferred transport strategy for Melton, the reference to land to the west of Melton Mowbray in SS6 as a potential alternative or long term option is no longer justified. It is understood that the land has not been promoted through the SHLAA and that the landowners do not intend to release the site for development.
- 3.2.9 The construction of an eastern link road as part of the preferred transport strategy for the town will open up longer term opportunities for provide for additional housing development on the edge of Melton, as a long term spatial option. The accelerated timetable for construction of the route agreed by the Council Council as part of its bid submission to the Department of Transport means that the land east of Melton could contribute to addressing any shortfalls in provision from proposed allocated sites.
- 3.2.10 The Melton Pre-Submission Draft Sustainability Report by LUC, (ref MBC/WP2e), assesses the south-eastern and western strategic growth options for Melton at pages 694 and 672 respectively, with a summary assessment at page 734. These assessments commented on the strategic importance of Melton West in delivering the Melton Distributor and considered that Melton South-East would not contribute to the bypass. The Sustainability Appraisal does not reflect the latest position with the Borough and County Councils supporting an eastern link road as part of a wider Melton Mowbray Distributor.
- 3.2.11 Policy SS6 needs to be amended to refer Melton East as one of the alternative or longer terms options that would be investigated as a priority if a review of the plan was required.

3.2.12 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.

3.2.13 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. However, as indicated above, the policy needs to be amended to reflect the current position in relation to the Borough and County Councils' preferred route for the Melton Mowbray Distributor Road involving an eastern link road.

3.3.2 Policy SS6 should be amended to include reference to land east of Melton Mowbrary as one of the priorities for investigation, with the reference to Melton West removed as this no longer reflects the Council's preferred route for the distributor road and is not be promoted as a growth option by the landowners.

3.3.3 Reference to specific options is justified as it reflects the work undertaken in preparing the local plan in identifying reasonable alternative locations for further growth. With the progress being made on the Melton Mowbray distributor road, the inclusion of Melton East as one of the options is clearly justified. Given the Council's position in relation to an eastern link road as part of the Melton Mowbray Distributor Road, the reference to a

potential alternative or long term option to the west of Melton Mowbray is no longer justified.

3.3.4 The Policy also refers to a previously considered site option at Six Hills as a potential alternative or longer term option. This location does not fit with the spatial strategy for the plan involving a focus of growth on Melton Mowbray to secure the delivery of key transport infrastructure and development directed towards the more sustainable rural settlements. The Leicester and Leicestershire Strategic Growth Plan, soon to be consulted on looks at the longer term growth strategy to 2050 to inform reviews of local plans. The strategy proposes to build more development in major strategic locations and to reduce the amount that takes place in existing towns, villages and rural areas. The strategy identifies Melton Mowbray as a Key Centre for future growth, noting that strategic growth facilitated by the Melton Mowbray Distributor Road is already planned and there is scope for further strategic development in the town to support economic growth and regeneration. Again the Six Hills site does not fit with this emerging strategy. It must be questioned therefore whether the Six Hills site is a suitable potential alternative or long term option to be identified in Policy SS6.

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.