

MELTON BOROUGH LOCAL PLAN INQUIRY – January – February 2018

Representations by Long Clawson, Hose and Harby Parish Council (ref: “Elizabeth Crowther”)
Pre-Submission Representor No: 61 (9 Representations)
Focussed Changes Representor No: 40 (8 Representations)

Tuesday 30th January 2018

Matter 3 Requirements for Housing & Employment Land & long term growth strategy; affordable housing need and policy targets

3.1 Is the Housing requirement of 6,125 dwellings (245dpa) in Policy SS2 informed by a robust, credible assessment of objectively assessed needs and is it positively prepared and consistent with national planning policy?

1. The PC notes the Inspector’s Initial question in this regard (ID1), and the content of the Council’s response paper and supporting evidence update (ID1D and MBCHS1A). It is clear that recent decisions by MBC to grant outline planning permission (subject to conditions and S106 Planning Obligations) for a wide slew of longstanding planning applications across the Borough’s villages, has significantly improved the Borough’s short term housing land supply context since the preparation and publication of the LP’s Pre-Submission Draft. The recent ability to demonstrate a five year housing land supply is welcomed by the Parish Council as it will help to avoid further speculative development pressures which have been experienced by the parish in recent years, in favour of the plan led approach which is the first core planning principle of NPPF paragraph 17.
2. In the light of the updated evidence the PC accepts that a modest part of its Pre-submission Representations has now been overtaken by Focussed Change 1.3 which re-distributes the Rural Service Centres new housing figures following the identification of new SHLAA sites in rural settlements which previously had a shortfall. Accordingly, that part of the Parish Council’s Pre-Submission Representations has effectively been resolved. However, other representations relevant to this Matter remain.
3. The Localism Act 2011 requires that Neighbourhood Plans must be in general conformity with strategic policies in the development plan for the area. Consequently, and notwithstanding local concerns at the quantum level of new homes being proposed for the three villages, the Parish Council was not able to challenge the Pre-Submission assessment of Housing Need at the 6,125 new dwellings level for the plan period 2011 – 2036.
4. However, NPPF paragraph 47 makes clear that, in boosting the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, and objectively assessed needs (OAN) for market and affordable housing in the housing market area. Established best practice as set out on PPG, is that such OANs should be based on the most up-to-date evidence addressing identified Housing Market Areas. The Leicester and Leicestershire Housing and Economic Needs Assessment (HEDNA) was published in January 2017. In line with national guidance the assessment identifies a Housing Market Area that extends across a wide area so that plans can be prepared in a complementary and consistent manner.
5. HEDNA Table 88 at page 194 shows the OAN for all of the constituent Local Planning Authorities across the Housing Market Area (HMA) for the 2011-36 period including three elements – Demographic Need, Affordability Adjustment, and Supporting Economic Growth. The aggregate figure identified for Melton as the OAN is 170 new dwellings per annum; this translates to 4,250 new dwellings by contrast with the 245pa and 6,125 total figure which MBC has continued to promote by reference to its own, separately and subsequently, commissioned, “Towards a Housing Requirement report” Jan/Feb 2017 (TAHR).
6. The Parish Council has struggled to comprehend the Borough Council’s evidence on OAN in its TAHR document commissioned after receipt of the HEDNA joint study. It appears that the upgraded level of housing “need” includes a significant aspirational “need” to cater for:

- a boosted and aspirational level of additional economic development;
- making good a potential undersupply of Affordable Housing; and
- providing sufficient added development value to fund necessary infrastructural works including the Melton Distributor Road.

7. Our understanding of the HEDNA evidence is that all the appropriate socio-economic variables were applied across the entire HMA and FEMA and that this included carefully considered contingent uplifts to 20 pa as an “Affordability Adjustment” and 16 pa “to support Economic Growth” to reach the 170pa/4,250 figure for MBC. We note that the generality of the HEDNA analysis was tested and found reasonable and sound by Mr B J Sims, the examining Inspector for the North West Leicestershire Local Plan Inquiry, in his Final Report of 12 October 2017. The MBC’s subsequent and supplementary evidence of “Objective Need” is less than robust in our view and shows an aspiration rather than a true need.

8. Turning to the Supply side, evidence in Table 22 at p.5 of the Housing Land Supply Update 20/12/17 (MBCHS1A) shows that during the last six years, 2011/12 – 2016/17, the average number of housing completions has been 106.5 per annum. Against that historically low level of supply, the anecdotal evidence of local agents who have reported high levels of demand and shortages of houses coming to the local market (and sub-markets) is hardly surprising. But there is little quantification of these market signals and it is scarcely a robust evidential platform sufficient to give confidence that a more than tripling increase in annual delivery to around 350 pa is realistic in the medium to long term, especially as this would be located primarily in the rural settlements which are generally the least sustainable locations where unsustainably long distance commuting would be likely to be increased.

9. In the Parish Council’s view the identification of such a high level of need and supply has not been robustly shown by the latest evidence and is aspirational and highly “optimistic” in the light of the HEDNA conclusions. Moreover, the ability to deliver such an accelerated supply increase has not been supported by firm evidence of likely market demand and/or building capacity.

10. It follows from the above that the Policy SS2 is not informed by a sufficiently robust and credible assessment of objectively assessed housing needs and, while it may have been positively prepared, it is not otherwise consistent with national planning policy in the NPPF and PPG.

11. Notwithstanding MBC’s updated evidence, the Parish Council sees no reason to amend the representations it made in relation to the Focussed Changes. For ease of comprehension the wording of the PC’s most relevant Representations are attached hereto as Appendix A.

12. Finally the Parish Council would note that the HEDNA report has been the primary evidence of housing need in the drafting and publication of its Regulation 16 final draft NP which will go to referendum on 15 February 2018. If successful the NP will itself become part of the Development Plan for the Borough and hence is likely to be a material consideration in considering planning applications until such time as the emerging Local Plan is found sound and adopted. The NP contains a commitment to review if the adopted Local Plan is approved as submitted (ie as per TAHR need), but this would not be the Parish Council’s preferred outcome.

LCHH FOCUSED CHANGES REPRESENTATIONS RE POLICY SS2 & SS3 – July/Aug 2017

REPRESENTATION

The Borough Council has considered updated evidence of Objectively Assessed Need (OAN) for Housing and Employment requirements during the 25 year plan period having regard to the joint L&L HEDNA (Jan.2017), and its own commentary on this in the Towards a Housing Requirement Report (TAHR – Jan + June 2017). Focussed Change FC1.1 notes the HEDNA reduced revised annual assessment of Borough-wide housing need of 170 dwellings pa 170 new dwellings pa (x 25 years = 4,250) but, having had regard to the TAHR, has determined to keep the Housing Requirement at the Draft Plan level of 245 dwellings pa (x 25 years = 6,125).

In this PC's considered view there is inadequate justification for preferring the TAHR annual and aggregate new housing figures. The draft LP rationale is housing and economic strategy; unmet housing need from other parts of the Housing Market Area; and the role which higher housing provision – above Melton's objectively assessed housing need - can play in supporting economic growth, delivering affordable housing, and new infrastructure, including in particular the Melton Mowbray Transport Strategy.

LH+H PC's reading of the complex background evidence is that there is little objective and convincing evidence of Housing Need being required at the higher FC1.1 level. Table 88 of the HEDNA report identifies a Borough-wide Demographic Need of just 134 new homes pa, and has already included additional elements including 20 pa as an "Affordability Adjustment" and 16 pa "to support Economic Growth" to reach the 170pa figure.

Additional new housing at the 245 pa level proposed by FC1.1 is not objectively justified and will have perverse and harmful effects on the three rural villages of Long Clawson, Hose and Harby, which are situated in the more remote and sparsely populated northern outer reaches of the Borough. As such these settlements are in intrinsically less sustainable locations of the Borough where oversupply of new housing against the OAN would be unsustainable and contrary to the aims and expectations of the NPPF.

The PC has been developing its own NP (now at Regulation 16 stage) and has been keen to work positively with the Borough to meet a justified and reasonable share of housing need. But there are real environmental, traffic and infrastructural constraints in all three villages for which an over-inflated Housing Requirement is harmful and difficult to accommodate without significant further infrastructure investment. As a result, when taking account of the HEDNA OAN, the PC revised its own NP village housing needs downwards to meet the HEDNA requirement plus flexibility allowance in line with NPPF guidance. By using the inflated Borough- wide figure of 6,125 and making no adjustment to the split between Melton town and the Rural Areas (currently proposed at an overall ratio of 65:35%) FC1.1 would lead to an unsustainable overprovision of new housing in the LCH&H parish (and arguably elsewhere in other remoter rural villages).

SUGGESTED CHANGE TO LOCAL PLAN

Amend the OAN and related Strategic Policies (and related justifying text) to reflect the composite and up-to-date HEDNA requirement of 170 new dwellings pa (4,250 in total) and make corresponding adjustments to all the plan's Housing Delivery and Site Allocation proposals. (LCH+H PC is prepared to work positively with the Council and other PCs to achieve a package of suitable detailed amendments before or during the LP Examination in Public).

If it was determined that such pro rata reduction in the level of new housing for Melton town would be insufficient to sustain necessary highway and other infrastructure investments, and to provide an adequate level of Affordable Housing, the PC suggests that consideration be given to amending the geographic apportionment between town and rural areas to boost the numbers of new homes in the town and reduce them further in the villages. In our view this would make for a more sustainable solution to that proposed in FC1.1 as it would focus housing provision in the most sustainable locations, help provide Affordable Housing where the need is greatest, and provide the potential for more focussed infrastructure investment via S106 or CIL.