

Matter 3: Overall Requirements for Housing and Employment Land and the Long-Term Growth Strategy

Representation by John Moore

Reference: ANON-7VBY-7H4P-B

1 Appendix included with this representation

Word Count = 1456

1.00 The proposed housing requirement figure of 6125 has not been informed by credible evidence.

1.01 I have participated actively in the local plan review process, including as a regular member of the Residents' Reference Group, but remain unconvinced by Melton Borough Council's long term growth strategy.

1.02 The growth strategy is based on aspiration but without firm evidence to support its goal of transforming Melton Mowbray from a market town with a thriving food sector into a “knowledge-based” economy.

1.03 It should also be noted that the strategy has been coloured by the prospect of developer contributions to support a partial bypass for Melton Mowbray, a major driver in the local plan process over the years.

1.04 The housing requirement figure of 6125 (equivalent 245dpa) assumes that there will be substantial local growth in employment opportunities to provide a demand for well above trend population growth. This is a high risk strategy which, if housing growth is delivered in isolation, would result in Melton Mowbray and its surrounding villages increasingly becoming dormitory settlements for neighbouring cities such as Leicester and Nottingham.

1.05 At the Emerging Options consultation a mean average figure of 190dpa was identified as being the normal demographic rate of growth which would also allow for a proportionate increase in employment. Such a level of housing and population growth would have been broadly in proportion to that experienced over the periods 1996-2004 and 2001-2011, and well above that for 2011-2015

1.06 During the period 1996-2004 there were 1473 housing completions throughout the borough at a mean average build rate of 184 dwellings per annum¹. However, it should be noted that the median annual figure was approximately 160 with well above trend rates of completions recorded in 1997/98 and 1998/99.

1.07 Comparative data from the 2001 and 2011 censuses overleaf shows that the borough's population increased by 2510 over the period, with an average of 187 new households added annually:

¹ *Melton Borough Community Profile*, Leicestershire County Council, August 2005

Census Household and Population Statistics	Households	Population
2001 Census ²	19615	47866
2011 Census ³	21490	50376
Increase 2001-2011	1875	2510
Average Annual Increase 2001- 2011	187.5	251

1.08 Melton Borough Council's annual monitoring reports in 2015 and 2016 provide details of Five Year Land Supply performance. For what amounts to the first five years of the Melton Local Plan period 2011-2036 there were 502 housing completions throughout the borough. In none of these years were there more than 157 completions. The three middle years saw a mean average of 65dpa:

Report Year	Housing Completions
2011/2012	157
2012/2013	64
2013/2014	52
2014/2015	78
2015/2016	151

1.09 The HEDNA Objectively Assessed Need figure of 175dpa is therefore a credible starting point for setting the borough's housing requirement although meeting that requirement over the plan period might prove challenging. A figure of 245dpa is simply unrealistic.

1.10 The NPPF requires that local planning authorities identify objectively assessed housing need⁴ (the OAN), and that Local Plans translate those needs into land provision targets.

1.11 It is evident that the average demand for new housing in Melton Borough is well below the 245dpa proposed. As can be seen from paragraphs 1.05, 1.06 and 1.07 above, average annual demand as measured by completions has fallen from 184 dpa in the period 1996-2004 (with an average of 187 households formed in the overlapping period 2001-2011) to an average of 100 completions during the period 2011-2015. Bearing this in mind, the HEDNA OAN figure could prove to be on the high side

2 2001 household count as given on page 10 of *Melton Borough Community Profile*, Leicestershire County Council, August 2005

3 2011 household count as given in paragraph 2.2.1 of the Submission Draft Melton Local Plan 2011-2036

4 There are alternative definitions of housing need: need-as-aspiration and need-as-demand. The first definition would normally produce a much larger number than the second, with major practical implications for plan targets and land allocations. Planning Practice Guidance does not explicitly tie the crucial concept of objectively assessed need to one or the other definition but it is generally considered that OAN mainly relates to need-as-demand.

2.00 The reference in draft policy SS6 to specific locations as potential alternative sites for housing development is unjustified.

2.01 Policy SS6 (Alternative Development Strategies and Local Plan Review) aims to provide reassurance that the spatial strategy contained in the Local Plan can be delivered by alternative site options. It is preceded by paragraph 4.7.3 which states that, if the Council identifies that the strategy is not delivering against the identified target, it will explore ways of addressing any shortfall. Initially this would involve considering the reserve sites identified in the Local Plan but, if these sites prove not to be suitable or deliverable, a partial review of the plan may be required to consider further options and strategic approaches to delivery.

2.02 This is reflected in the first paragraph of policy SS6 which states that, should there be persistent shortfalls in delivery or if there are changes to objectively assessed development needs, the Council will consider making an early review of the Local Plan to identify alternative development sites.

2.03 However, the second paragraph of policy SS6 rather precludes carrying such a review by pre-selecting alternative or long term options in order that the task can be carried out quickly. It identifies specific, named locations which it will prioritise but these are not “reserve sites” in the local plan. They are simply other sites that have been considered in the context of the plan's spatial strategy⁵.

2.04 The NPPF advises in paragraph 153 that in order to respond flexibly to changing circumstances Local Plans might either be reviewed in whole or in part. It does not limit the basis for such a review to housing. Paragraph 161 states that reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments. It may be that land allocated for economic development proves to be unsuitable for one reason or another but may have alternative uses.

2.05 The draft Melton Local Plan contains at least one allocated economic development site, Holwell Works, which is being carried forward from the Melton Local Plan 1999. Paragraph 6.12.1 recognises that Holwell Works represents significant opportunities and challenges for the borough. One such challenge is that for at least the past 18 years there has been no apparent interest in developing it for economic uses. Indeed the draft local plan recognises this in paragraph 6.12.3 when it states that it is yet to be established if the Holwell Works site is viable for employment opportunities and that it may have potential for other land uses. Given that it relates well to the settlement of Asfordby Hill such land uses might include housing.

2.06 Reference in policy SS6 to particular named but largely untested alternative large-scale development options would prejudice the review and consideration of alternative development strategies. A key part of the draft local plan strategy is to focus growth on the town of Melton Mowbray with development of sustainable urban extensions. It would not be possible to maintain the local plan's strategic approach by simply substituting any of the named “previously considered large scale site options at Normanton airfield, Dalby airfield and Six Hills”.

2.07 It would also be unsafe to expect to be able to rely on the Council's 2015 study *Assessing Large Scale Development Site Options*. Circumstances can and will change and additional large scale site options could become available. Further, the Study only considered the potential large

5 Assessing Large Scale Development Site Options, Melton Borough Council, 2015

scale site options at a basic level. For example, in respect of Dalby Airfield it listed six potential “advantages” of the Great Dalby/Melton Mowbray Airfield site, three of which were misinformed: the site was claimed (1) to be close to employment opportunities at the Old Dalby Industrial Park which is actually 8.7 miles away by road and located near the village of Old Dalby; (2) to have access to a fast and frequent bus service to Melton Mowbray, one which runs just six times a day Monday to Saturday only; and (3) that there are no direct impacts on heritage assets despite English Heritage (now Historic England) having advised the Council in writing in 2014 that the former airfield site houses an important Cold War Thor IRBM complex⁶. Notwithstanding its claimed advantages, the site was not supported as it was considered to be too remote from the main urban area, unlikely to contribute to a Melton Mowbray bypass, too reliant on private car use and with the potential for pluvial flooding. Subsequently, the site has only been assessed at a very superficial level where even known constraints including flood risk have not been identified.

2.08 Unlike the Melton Mowbray North and South Sustainable Neighbourhoods which have been extensively scrutinised, not least through the local plan process, the alternative large scale site options have not been assessed to anything like the level to enable them to be accelerated through the review process. They have not been subject to detailed examination nor to public consultation and are no more than hypothetical options for housing development.

2.09 The references to specific locations as potential alternative or long term options should therefore be removed from draft policy SS2.

⁶ My letter to the Local Plan Manager at Melton Borough Council dated 14 November 2014 enclosing a copy of English Heritage's advice is attached as Appendix 1

Appendix to Matter 3: Overall Strategy

1. Letter to the Local Plan Manager, Melton Borough Council dated 14 November 2014

Appendix 1

Letter to the Local Plan Manager, Melton Borough Council dated 14 November 2014

[Redacted]
Local Plan Manager
Regulatory Services
Melton Borough Council
Parkside
Melton Mowbray
LE13 1GH

Dear [Redacted]

re Melton SHLAA Site ID MBC/126/13 – Former Airfield South of Melton Mowbray

I write further to my email to the planning policy team of 10 November 2014 in which I expressed concern at what appear to be significant discrepancies in the way the above site has been recorded in the 2014 SHLAA. I enclose a copy of the email and a comparison with the 2012 SHLAA for your information.

I promised to forward information about the former airfield which I trust you will find helpful. There is a considerable history from the 1980s onwards of proposals for a “new village” which culminated in a call-in public inquiry in 2002 at which point the application was withdrawn. There can be no doubt that the former airfield continues to perform poorly in assessments of its potential sustainability.

In addition to apparent discrepancies, the 2014 SHLAA has overlooked that the site contains a heritage asset of considerable significance. I have enclosed for your information the opinion of English Heritage following a recent wind farm application on adjacent land. Most of the former Melton Thor Missile Base is contained within Site ID MBC/126/13.

I trust that the conclusion in the 2014 SHLAA that the site is potentially developable within the plan period is an oversight that will be corrected at the earliest opportunity. It appears to have informed the Issues and Options phase of the new Melton Local Plan which on page 42 identifies Dalby Airfield as a possible site for large scale development.

Yours sincerely

JRW Moore

Encs:

Melton Local Plan Public Inquiry *New Village Topic Paper*, Melton Borough Council, May 1996;
How the Proposed New Village Came About 1986-2001, Appendix One, GDAG KM-5;
English Heritage Consultee Response regarding the proposed Crown Hill Wind Farm, 2014;
Comparison of Melton SHLAAs 2012 and 2014.