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MATTER 3: Overall requirements for housing etc.

This Matter is of paramount importance to the soundness of the Plan.

3.1 – Has the housing requirement of 6,125 dwellings (2011-36) (equivalent to 245 dpa) as set out in policy SS2 been informed by a robust, credible assessment of objectively assessed needs and is it positively prepared and consistent with national planning policy?

No – Absolutely not. The figure of 6,125 dwellings *disregards* a robust, credible assessment of objectively assessed need.

i) Is 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 need for affordable housing?

Yes, BUT - HEDNA 2017 is more than an appropriate starting point. It is the best, most recent and relevant evidence available. The unsoundness however is that MBC have significantly deviated from its recommendations, so as to maintain the number of houses in and around Melton Mowbray in order to fund the distributor road.

ii) Uplift from the HEDNA OAN figure – is it soundly based?

No - the uplift from the HEDNA FOAN figure for Melton of 4,250 (170 dpa) to 6125 (245 dpa) is not soundly based.

There are significant questions raised by others over the sequence of events and how we were advised at a Parish Council meeting in early February 207 that MBC were going to continue using the higher figure despite HEDNA.

HEDNA includes, for example, uplifts for planned economic growth, inward migration, an ageing population, housing affordability, and affordable housing need so it measures full objectively assessed need. The best evidence at this point was therefore clearly for 4,250 houses (170dpa over 25 years).

We are of the view that that the TAHR was commissioned in order to justify keeping the target of 6,125, which would be a case of commissioning evidence to fit pre-determined policy. The order and speed of events in early 2017 – particularly us being told as early as 8th February 2017 that the number would stay at 6,125 – indicates this is what happened, and that was unsound.

TAHR 2017 would have to be a very convincing indeed to justify disregarding the newer, best-evidenced FOAN target in favour of the old. This is a 44% increase to the housing target! But TAHR is not nearly so convincing. It seeks to justify retention of the 6,125 target on four main grounds:

- 1** To fill a further 3,420 jobs by 2036 – this is highly optimistic based on the growth scenarios set out in HEDNA.
- 2** To better meet affordable housing need. This was countered or even comprised as a policy when in June 2017 lowered their affordable housing target from at least 1,775 affordable homes to only 1,300 – reducing the overall affordable percentage they would require from developers from 37% to c21% - again in order to fund the distributor road. Affordable housing is the *only* percentage uplift in TAHR claiming to justify an increase to 6,125 / 245 dpa. No other uplift factor (migration, economic boost etc.) results in such a high figure. Even at 245 dpa the Plan no longer meets assessed need for affordable housing. The only possible justification for 245 dpa has disappeared.
- 3** To contribute to the cost of the Melton Distributor Road. I can see why this road is desirable to alleviate congestion and encourage economic activity, but the benefit would be greatly lessened by the addition of about 13,500 people and their cars to the Borough. The MDR is what it says, a distributor road not a 'by-pass' as it is sometimes misleadingly called - it will mainly service the many new houses built to finance it and given the number of roundabouts that will required to service the new development there are significant questions over its ability to alleviate congestion and the environmental impact of the road.

- 4 To compensate for an ageing population unsuited to physical, unskilled and low-paid work. There is no evidence that this is necessary. Census 2011 reveals that despite a slightly older population the percentage of population who are economically active in the Borough is 74.5% compared to a national average of about 69%. Whether by necessity or choice, Melton residents are working to an older age than in most other areas. I also don't think it is sound (or ethical in terms of equality) to assume either that the over-60s are incapable of such work or that young people should do it instead. That some employers have difficulty recruiting into poorly-paid jobs was perhaps the least surprising fact I learnt from TAHR.

It is striking that after claiming to take all these considerations into account TAHR arrives at a figure of 230 – 280 dpa (average 255) very close to the same housing figure of 245 dpa that MBC had already decided on. Magic. In considering soundness, the Examiner might ask whether this represents a remarkable convergence of evidence or an unsound manipulation of it to avoid altering plans already made.

Suggested change: Adopt the HEDNA FOAN of 4,250 / 170 dpa and adjust housing requirements and allocations accordingly. Much other criticism then vanishes, because where policy follows the evidence it is usually sound.

iii) HEDNA and Affordable Housing

Yes – HEDNA's estimate for 1,750 affordable homes is robust. Accordingly, I have to say: **No** – the Plan's lowered target of 1,300 is **not** soundly based, it is too low. I do understand that the reduction was to an extent forced by the later viability study (I think June 2017) and a tough choice between affordable housing and developer contributions to the MDR. For this I blame the rules around viability not MBC and I cannot see what the Examiner can do about it.

Total number aside, the distribution of affordable housing in the new Policy C4 is unsound because of the heavy weighting against affordable provision in Melton Town, especially the new MMSNs where the real potential to build affordable homes exists.

To be clear, I live in Value Area 1 and fully support a 40% requirement there. What I object to is the low requirements elsewhere, especially 15% in the MMSNs. The thinking seems to be that because house prices are higher in eg. Value Area 1, building is more profitable therefore developers can bear a higher percentage of affordable homes. The unsoundness here is building so many 'affordable homes' where it is most expensive to live, losing the intended benefit to the people who need them.

Obvious and evidenced 'unaffordability' factors in the villages are low job opportunity, distance from work, supermarkets and leisure, higher heating costs (towns really are 1-2 degrees warmer), possibly lack of a mains gas supply (as in Somerby), and little if any public transport. Almost nobody manages to live out here without doing a lot of miles by private car – expensive and polluting.

Suggested change: The spatial strategy should be changed to align affordable homes with locations where the cost of living is lowest. This could be done either 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, or a combination of the two.

3.2 - Section 4.7 and Policy SS6

Taken in isolation on their wording, yes - they **could** be a sound basis for addressing a future failure to supply necessary housing. However as 6,125 is too high a number for the Borough they would only be sound if this meant failure to achieve a target of 4,250.

Suggested change: The plan should make explicit that SS6 sites will only be activated for consideration if the Borough appears unlikely to meet the Plan housing target (be that 6,125 or preferably the better-evidenced 4,250) or *possibly* if the whole HMA has that problem.

Suggested change: 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.

According to the 'Melton Times' the Six Hills site might not need Policy SS6 anyway:
16th Nov 2017:

Planned new garden village near Melton would also include elite sports centre The garden village scheme is not one of the allocated sites in the council's draft Local Plan, which provides for 6,125 new homes to be built up to 2036. But Jim Worley, the council's head of regulatory services, said: "The site is referenced in the Local Plan under policy SS6 as one of the alternative approaches we would consider, alongside many others, if the Plan needs reviewing because of either increased requirements or a failure of delivery of the plan's current proposals. "The applicants, Gladman, made representations on the Draft Local Plan and this will allow them a 'seat' at the Local Plan Examination." He added: "Gladman's representations to the Local Plan set out why they believe we should be making significantly greater provision for housing in the Local Plan than at present, and that the Six Hills site would be additional to all other housing allocations in Melton and surrounding villages, rather than an alternative approach to provision or a replacement of these allocations." Read more at: <http://www.meltontimes.co.uk/news/business/planned-new-garden-village-near-melton-would-also-include-elite-sports-centre-1-8247022>

This would be at least 1,500 dwellings I believe. All I will say about is that whatever the FOAN and whatever the number of houses in the Plan, all housing developments should count towards it. Homes are homes whichever policy they rely on. It would be unsound to go through the lengthy and costly process of assessing FOAN only to ignore it as soon as a big new proposal comes in. If MBC really mean 'Build as many as possible' it would be better if they just said so.

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

Yes, but – only if subject to the change suggested under 3.2.

3.4 Unable to say. However, I believe that greater support should be provided through policy for retention of existing employment sites and expansion on land close or nearby existing employment sites.

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