

EXAMINATION – MATTERS AND QUESTIONS MELTON LOCAL PLAN EXAMINATION STATEMENT ON BEHALF OF: DAVIDSONS DEVELOPMENTS LIMITED AND THE MELTON TOWN ESTATE

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 This statement is made on behalf of Davidsons Developments in relation to their land interests to the south of Melton. 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 Whislt 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. For the proposed southern link road, this will be delivered in association with the proposed development of a 2,000 home new Sustainable Neighbourhood. Davidsons Developments Limited has set out proposals to deliver 1,500 homes along with a new local centre and primary school that would secure the delivery of a key part of the southern link road between Burton Road and Dalby Road and between Kirby Lane and Leicester Road.
- 3.1.8 The report also considers the level of housing provision required to support affordable housing provision. In order to deliver 70 affordable homes a year assuming an average affordable housing contribution of 25%



- affordable housing on sites would require a housing allocation of around 280 dwellings a year to secure the required affordable housing. This provides further justification to provide for the uplifted level of housing provision as set out in the Pre-Submission Draft Plan.
- 3.1.9 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.
- 3.1.10 In terms of affordable housing requirements, Focused Change 6 proposes amendments to Policy C4 to provide around 1,300 new affordable homes between 2011 and 2036. Minimum affordable housing targets are set out for different areas, including a target of 15% affordable housing at the proposed Melton Sustainable Neighbourhoods. The Focused Change explains that the level of affordable housing provision sought reflects assessments set out in the Council's Local Plan and CIL Viability Study.
- 3.1.11 The assessment of accordable housing requirements is considered to be generally robust. Given the scale of infrastructure requirements associated with the Melton South Sustainable Neighbourhood, the provision of 15% affordable housing provision could be challenging. It is important that the Council takes a flexible approach to affordable housing provision at the Sustainable Neighbourhoods taking account of the key priority to secure the delivery of the southern distributor road. Policy C4 appropriately acknowledges that the Council will have regard to market conditions, housing needs, housing mix, demonstrable economic viability and other infrastructure requirements.
- 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 No comment.



- 3.3 Are the references in Policy SS6 to specific locations as potential alternative or long term options justified?
- 3.3.1 No comment.
- 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 It is considered that the proposed provision of 51 hectares of employment land as set out in Policy SS2 is appropriate and justified. for the South Melton Sustainable Neighbourhood, Focused Change FC13.1 shows some 20 hectares of land for employment uses as part of the wider Sustainable Neighbourhood. Davidsons Developments Limited has interests in land to the south of Leicester Road, adjoining the existing industrial estate that could be made available for employment uses in the early part of the plan period.