8 January, 2018

Matters and Questions Melton Local Plan Examination

Dear Examiner,

Thank you for the opportunity to comment on the Plan in the context of Matters and Questions. I am a Somerby resident and a member of the Neighbourhood Plan there, so when examples are necessary to illustrate my points, I will reference my Parish or village, but I believe observations may also apply for the other rural parts of the Borough.

Matter 3: Overall requirements for housing and employment land

- 3.1 Housing requirement for 6,125 dwellings set out in Policy SS2 is it informed by a robust, credible assessment of objectively assessed needs and is it positively prepared?
- 3.1.1 No, the data is not robust for the 6,125 housing requirement figure and this figure adversely effects the sustainability of the Plan:
- The SA made clear that significant and cumulative negative effects upon the Borough's environment is the direct result of the 6,125 (245 dpa) target, and most adverse environmental effects could be avoided by adopting the HEDNA number of 4,250 homes.
- The reduction in affordable homes to 1300 from HEDNA's objectively assessed estimate of 1,750 is inconsistent with Strategic Objective 1, to meet the housing needs of the community including affordable housing.
- i) I believe HEDNA (2017) is an appropriate starting point, and end point, especially for a a balanced, deliverable and sustainable Plan.
- ii) The only meaningful benefit for accepting the uplift to 6,125 over the more recent 2017 HEDNA is that it produces the highest employment growth, and this is an aspiration not a certainty. I believe it is an unrealistic aspiration in the time frame of the Plan considering it requires both very high growth in existing Borough businesses and new start-ups. It also ignores the fact that manufacturing businesses (and retailers), because of technology are doing more with fewer employees. The HEDNA number at 4,250 already has applied an uplift to boost the economy which is more achievable.
- iii) HEDNA's affordable estimate is robust, however the Policy C4 is not sound because of the low affordable allocation given to Melton Town and in Melton Sustainable Neighbourhoods. While I support affordable housing in rural areas the costs of living and transport has not been realistically considered.

Change:

- -Adopt the 2017 HEDNA and revise housing requirements and allocations across the Plan.
- -Consider the aspirational employment growth and associated housing requirements over a longer time-frame than twenty years.
- -Rebalance the rural-urban affordable strategy allocating a higher percent in the town and sustainable neighbourhoods where the costs of essential services will be lower.

3.3 SS6 sites as potential alternatives or long term options

Yes, I think these large scale sites can play a role in the Borough's development, as alternatives in the current Plan and as longer term options.