



MELTON LOCAL PLAN – PRE SUBMISSION DRAFT (NOVEMBER 2016)

For official use only
Respondent Ref:
Date Received:

Melton Borough Council proposes to submit the Melton Local Plan (MLP) to the Secretary of State of Communities and Local Government for independent examination. Before submitting the MLP, the Council is required to publish the document and invite the public to make representations on its 'soundness'. The MLP, once adopted will be the development plan for Melton Borough.

This form has two parts:

- Part A: Personal Details
- Parts B and C: Your representation(s).

When making representations, please use a separate Part B form for each policy or paragraph you wish to comment on. Before completing the form you should read the accompanying Guide to Making Representations. Please ensure that your representation relates to the correct test of soundness (details can be found in the Guide to Making Representations)

Completed forms should be returned to the address below no later than Monday 19th December, 2016. Representations received after this deadline will not be accepted.

Planning Policy Team
Regulatory Services
Melton Borough Council
Parkside, Station Approach
Melton Mowbray
Leicestershire
LE13 1GH

Alternatively, you can access this form on the Council's website
http://www.melton.gov.uk/localplan/site/index.php and print it out or complete it electronically and e-mail your response to
planningpolicy@melton.gov.uk

Representations can also be made via the Council's on-line consultation portal -
https://meltonboroughcouncil.citizenspace.com

PART A: ABOUT YOU/YOUR ORGANISATION (If you are an agent, please complete the personal details of your client in 1 and complete agent's details in 2).

1. Personal Details
Full Name:
Davidsons Developments Ltd.
Organisation (if applicable)
Address:
C/O Agent
Postcode:
Email:
Contact Number:

2. Agent's Details (If applicable)
Full Name & Company:
Mr George Machin
Organisation/Client Representations on Behalf Of
GraceMachin Planning & Property
Address:
5 Malin Hill Plumptre Square Nottingham
Postcode:
NG1 1JK
Email:
[REDACTED]
Contact Number:
[REDACTED]

Number of Representations Enclosed:

3

Signature:

[REDACTED]

Date:

19th December 2016

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Respondent Ref:	Representation Ref:
<b>Name/Organisation:</b>	Davidsons Developments Ltd.

**PART B: YOUR REPRESENTATION** (This section will need to be completed for each representation made. Please photocopy or download from the council's website Part B of the form as required.)

**3. Which part of the Melton Local Plan: Pre-Submission Draft does your representation relate to?** (Please enter the paragraph/policy number)

Paragraph:  Policy:  Policies Map:

**4. Do you consider that the Melton Local Plan: Pre-Submission Draft is?** (Please tick the appropriate box)

1. Legally Compliant: Yes  No

2. Sound: Yes  No

3. Complies with Duty to Co-operate: Yes  No

*\*The considerations in relation to the Local Plan being "sound" are explained in paragraph 182 of the National Planning Policy Framework. If you have entered "No" in relation to 4(2), please go to question 5. In all other circumstances, please go to question 6*

**5. Do you consider that the Melton Local Plan: Pre-Submission Draft is unsound because it is not any of the following?** (Please tick the appropriate box)

1. Positively Prepared  2. Justified  3. Effective  4. Consistent with National Policy

**6. Please give details of why you consider the Melton Local Plan: Pre-Submission Draft is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Melton Local Plan: Pre-Submission Draft or its compliance with the Duty to Co-operate, please use this box to set out your comments.** (Please continue onto a separate sheet if you require more space)

Policy SS2, which sets out the Development Strategy for the delivery of new homes, is supported in principle. In particular, the objective to deliver at least 6,125 new homes across Melton Borough between 2011 and 2036, thereby meeting the housing needs of all communities, is supported by our client. The NPPF seeks to "boost significantly the supply of housing" (paragraph 47) and it is considered therefore that this overall target for new homes should be seen as a minimum.

However, the content of Appendix 5 does not make clear how this housing target has taken into account the backlog of housing need across the area (as demonstrated through the Strategic Housing Land Availability Assessment, 2015, which indicated a housing land supply of just 1.9 - 2.5 years). Whilst it is recognised that this position has recently been updated through the Five Year Housing Land Supply Assessment of November 2016, we question the robustness of this assessment and resultant calculation of housing land supply.

Policy SS2 seeks to establish housing delivery targets for each 5 year period, in order to achieve the overall requirement to 2036. This shows that 492 dwellings were completed in the five year period 2011-2016, which represents a shortfall of 723 dwellings (as at 2016) against the identified housing requirement of 245 dwellings a year. Appendix 5 sets out the monitoring framework for the emerging plan and confirms that the Council has used the Liverpool method to spread the shortfall across the remainder of the plan period.

We would suggest however, that the Council should be utilising the Sedgefield Method to the calculation of housing requirements, with the established shortfall from 2011 – 2016 being made up in the next 5 year period 2016 – 2021. This would meet the requirements of the National Planning Practice Guidance (NPPG), which stresses that Council's should seek to make up shortfalls at the earliest opportunity. By applying the Sedgefield Method and a 20% buffer for persistent under delivery, the five year requirement for 2016 - 2021 would increase to 2,338 no. dwellings. We would also stress that, at this stage, only limited weight can be attached to the proposed allocations in the emerging Local Plan, and therefore the calculation of a five year land supply should only take account of likely completions from sites with the benefit of planning permission and anticipated windfall developments. On this basis there would be a supply of 3.55 years for the period 2016 - 2021.

As stated above, the evidence base to the emerging local plan includes a recent updated assessment of five year housing land supply (dated November 2016), along with a Delivery Trajectory for the plan period 2011 – 2036. The basis and underlying assumptions to the trajectory are not clear and appear to indicate a phased approach to development, with significantly higher completion rates anticipated for the period 2019/20 to 2022/23, with this level of delivery reducing towards the end of the plan period. A peak level of completions is shown in 2020/21 of around 770 no. dwellings. There is no evidence to support these ambitious annual completion rates, particularly when compared to historic under-delivery.

**7. Please set out what change(s) you consider necessary to make the Melton Local Plan: Pre-Submission Draft legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this change will make the Melton Local Plan: Pre-Submission Draft legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Please continue onto a separate sheet if you require more space)**

The evidence base which underpins Policy SS2, particularly the most recently published 5 year housing land supply and Delivery Trajectory should be amended, to reflect the use of the Sedgefield Method of housing supply and to provide a clearer trajectory of delivery based on the annual housing requirement of 245 no. dwellings per year.

**Please note:** Your representation should cover succinctly all the information, evidence necessary and supporting information necessary to support/justify the representation and suggested change, as there will not normally be a subsequent opportunity to make further representations based on this original representation.

**After this stage, further submissions will only be at the request of the Inspector based on the matters and issues they identify at the examination.**

**8. Can your representation seeking a change be considered by written representations or do you consider it necessary to participate at the oral part of the examination? (Please tick the appropriate box)**

Written Representations

Participate at the Oral Examination

**9. If you wish to speak at the examination, please outline why you consider this to be necessary:**

Davidsons Developments Ltd has interests in several landholdings across Melton Borough and therefore it will play a key role in the delivery of housing to meet the local plan objectives. It is important therefore that they are represented at the examination sessions.

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**PART C: WHO YOU REPRESENT**

To help us collate the responses to this consultation, we would be grateful if you could tell us which category best describes who you are representing (Please tick the appropriate box)

Melton Borough Resident	<input type="checkbox"/>	Planning Agent/Planning Consultant	<input type="checkbox"/>
Developer	<input checked="" type="checkbox"/>	Utility/Service Provider	<input type="checkbox"/>
Government Organisation	<input type="checkbox"/>	Amenity Group	<input type="checkbox"/>
Other Organisation	<input type="checkbox"/>	Residents Group	<input type="checkbox"/>
Business	<input type="checkbox"/>	Town/Parish Council	<input type="checkbox"/>
Other (Please state)	<input type="text"/>		

**Do you want to have further involvement in the Melton Local Plan?** (Please tick the appropriate boxes)

If you wish to be notified at the address/e-mail provided in Part A when the Melton Local Plan is submitted to the Secretary of State for Communities & Local Government	<input checked="" type="checkbox"/>
If you wish to be notified at the address/e-mail provided in Part A when the Inspector's Report is available to view	<input checked="" type="checkbox"/>
If you wish to be notified at the address/e-mail provided in Part A when the Melton Local Plan is adopted	<input checked="" type="checkbox"/>
If you/your organisation wish to be included in future consultations on the Melton Local Plan	<input checked="" type="checkbox"/>
If you/your organisation <b>do not</b> wish to be included in future consultations on the Melton Local Plan	<input type="checkbox"/>

Thank you for taking the time to submit representations on the Melton Local Plan: Pre Submission Draft (November 2016). It should be noted that representations cannot be treated as confidential.