

Our Ref: P1368

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Mr Ian Kemp
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Dear Mr Kemp

Examination of the Melton Local Plan 2011-2036 – Matters 2, 3 and 5

I write in response Matters and Questions for the Examination of the Melton Local Plan 2011-2036 on behalf of Tata Steel (UK) Limited.

In relation to the questions raised in Matters 2, 3 and 5, we would refer the Planning Inspector to our representations to the pre-submission draft and the subsequent Focused Changes consultations. However, there are a couple of new, material factors that have arisen since our original representations that we wish to comment on here. These factors relate to Matter 3 and Matter 5 and are set out below:

Matter 3: Overall requirement for housing and employment land

Question 3.1 relates to the housing requirement figure of 6125 dwellings (245dpa) as set out in Policy SS2. In our representations to Focus Change 1 we identified that the number of houses to meet the affordable housing need (i.e. 280dpa) and the upper end of the employment based range (274dpa) as set out in the Towards a Housing Requirement for Melton Borough January 2017 were consistent. Further to this it was explained that as the Sustainability Appraisal Addendum identified no additional environmental implications of delivering 274-280 dpa when compared to the 245 dpa being promoted by the Council, then we consider the higher figure should be taken forward in order to make the plan Sound.

In the Council's 'Focused Changes Responses to Representations Received: Focused Change 1' the Council make the following response to our comments:

"It would be unrealistically ambitious to expect the market to sustain delivery at 274-280 dpa. The Council considers its evidence for 245dpa robust and proportionate".

In this context, we would refer the Planning Inspector to Paragraphs 4.2-4.9 of the 'Melton Borough Council's Response to Initial Question 4, Housing Land Supply' dated 20th December. These

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paragraphs set out why the Council consider that planning for 350 completions per annum over the next five years is achievable. Reasons for this include:

- Settlements have a distinct offer
- There are effectively three housing sub markets allowing from multiple outlets from individual housebuilders
- Melton is an attractive place to live due to things like good schooling.
- The main housebuilders have confirmed a clear appetite.

Whilst we acknowledge that this relates to a review of the next 5 years, all of these things will continue to apply after the first 5 year period and, if housebuilders have had the success expected, we can see no reason why their appetite would not endure for the remainder of the plan period. As such a relatively modest increase in the housing requirement of around 30dpa to 274-280dpa does seem a long way from being "*unrealistically ambitious*".

It is our view that to take proper account of employment factors and affordable housing need, the housing requirement should be increased. This approach is required by Paragraph 47 of the National Planning Policy Framework.

Matter 5

Our comments here do not directly relate to the Inspectors questions, but are driven by new, material factors that have arisen since our previous representations in support of residential allocation ASFH1 and ASFH2, which are both owned by Tata Steel (UK) Limited.

The main change is that the Asfordby Neighbourhood Plan (ANP) has now had received a positive letter from the examiner (end of June 2017) and has been successful at referendum (October 2017). Despite this, we understand that the ANP is yet to have been made and is subject to a legal challenge. The challenge relates to the inclusion of a residential allocation in Asfordby Hill on an existing employment site and the progress of this challenge will need to be monitored through the examination of the Local Plan.

We note that Neighbourhood Plan does not include ASFH1 or ASFH2 as residential allocations. However, we maintain our position that this does not mean these allocations should not continue to be included in the Melton Local Plan. Indeed, Melton Borough Council has submitted their plan in this context and we understand they continue to support these residential allocation.

We would refer the Planning Inspector to our previous representation in relation to assisting with their consideration as to why these sites should be considered deliverable; however, for the purpose of this letter we would refer the Planning Inspector to the representations received by third parties to these allocations through the pre-submission consultation in order to assist in their consideration of the relationship between the emerging Local and Neighbourhood Plan.

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In terms of the representations received, there is only one direct objection. This objection is from the Asfordby Parish Council and this objection is based on one matter only. This states that the “*site lies with the Asfordby Hill/Valley and Kirby Bellars Area of Separation making the extension of the site unsuitable*”. A review of this objection reveals it is factually incorrect and this is confirmed in the Neighbourhood Plan proposal map. The site is not in the Area of Separation as defined by the Neighbourhood Plan or Local Plan.

What is particular interesting to note is that Asfordby Parish Council raise no other objection to these allocations, including their exclusion from the Neighbourhood Plan or any other strategic or technical matters. It is, therefore, reasonable to conclude in this regard that the Parish Council is not concerned about these allocations in this context.

I trust the above is clear.

Yours sincerely



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