



Ref:

(For official  
use only)

## **Melton Local Plan – Proposed Modifications Consultation – Representation Form**

*Following the Examination hearing sessions held in January and February 2018, Ms Mary Travers, the independent Planning Inspector appointed on behalf of the Secretary of State, has requested that the Council now undertake consultation on a number of Main Modifications (MM) required to make the Plan sound. The Inspector will consider all of the representations that are made on the proposed Main Modifications before reaching her final conclusions on any changes that need to be made to the Local Plan in order for it to be sound and capable of adoption. Her reasons will be set out in her report to the Council which will be published in due course.*

*Details of what we are consulting on can be found on the Proposed Modifications Consultation page of the Local Plan website at [www.meltonplan.co.uk/mods](http://www.meltonplan.co.uk/mods)*

*To participate in this consultation please complete the following form and return it to Melton Borough Council's Planning Policy team. Please complete both part A and part B. Comments may be made on Main Mods (MM), Additional Mods (AM) and Policies Map Changes (PMC). If you wish to comment on more than one MM, AM or PMC you will need to complete additional part B form for each additional one you are commenting on.*

*Please return forms electronically to [PlanningPolicy@melton.gov.uk](mailto:PlanningPolicy@melton.gov.uk) or alternatively post your responses to*

*Planning Policy, Melton Borough Council,  
Parkside, Station Approach, Burton Street,  
Melton Mowbray, Leics, LE13 1GH*

**Part A – Personal Details**

If you are responding on behalf of yourself, or your own organisation, please fill in all the 'Personal Details' fields. If an agent is appointed, please complete only the Title, Name and Organisation boxes in the Personal Details column, but complete all the 'Agents Details' column.

	Personal Details	Agents Details (if applicable)
Title	Mr	Mr
First Name	Robert	Mike
Surname	Galij	Downes
Job Title (where relevant)	Planning Director	Director
Organisation (where relevant)	Barratt Homes North Midlands	Aspbury Planning Ltd
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Contact Telephone		
Email Address		

Did you comment at Pre-Submission Stage of the Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
If yes, please insert your representation number (You can find your representation number on the website or by clicking <a href="#">here</a> . 430v				
Did you comment at Focused Change Stage of The Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
If yes, please insert your representation number (You can find your representation number on the website or by clicking <a href="#">here</a> . – 145				
Do you wish to be notified of the subsequent stages of the Local Plan?				
Publication of Inspector's Report	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
Adoption of the Local Plan	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

**Part B – Your Representation**

**Please use a separate sheet for each representation**

1) To which part of the consultation does this representation relate?

**Main Modification**

**v**

**Additional Modification**

**Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Local Plan.**

**Policies Maps**

If you are commenting on a Modification, please insert the MM, AM or PMC number.

**MM1**

Please provide comments below, being as precise as possible. Comments can support, as well as object.

The focus of our representation relates to the Council's Housing Trajectory at Figure 6 and the stepped approach to housing delivery as set out in the revisions to Policy SS2 – Development Strategy. The following comments restate the concerns submitted on behalf of Barratt North Midlands in further response to Matter 6 - commenting on the alternative Five Year Supply Methodologies put forward by Melton Borough Council.

National Planning Policy Guidance – ID 3-035 -20140306 – indicates that Local planning authorities should aim to deal with any undersupply within the first 5 years of the plan period where possible. Where this cannot be met in the first 5 years, local planning authorities will need to work with neighbouring authorities under the duty to cooperate. The approach put forward by Melton Borough Council in MM1 is however an approach that is completely at odds with NPPG guidance to deal with undersupply within the first 5 years of the plan period where possible. Not only do the Council seek to spread past under delivery across the remainder of the plan period (Liverpool approach) but they also set out a three step phasing approach which limits their delivery obligations for the purposes of 5YHLS through to 2026, effectively backloading the bulk of their requirement to the last 10 years of the plan period which is contrary to national policy objectives to boost housing delivery.

Figure 6 - The Housing Trajectory indicates that the deliverable housing supply for the period 2019 – 2025 is potentially in excess of 400 units per annum (and substantially more from 2019- 2023) . The trajectory also indicates a planned delivery which rises steadily from 170 in 2018-2019 through to 325 by 2023/24. In this plentiful predicted supply and planned delivery scenario prepared by the Council there should be no justification for setting a stepped requirement (on

which a 5 year supply calculation is based) as low as 170 through to 2021 and rising only to 245 to 2026. This is a substantial and unnecessary downgrade on formal delivery requirement. Whilst this will limit the Councils exposure to 5 year supply challenge there is little pressure on the Council to secure the housing completions that are allegedly deliverable in this period, thus further emphasising the ‘backloading’ approach to housing delivery and consequent pressure to deliver high numbers year on year with little flexibility to address a faltering plan at that late stage in the plan period.

Main Modification 8 proposes changes to Policy SS6 which sets out circumstances in which a review of the plan will be triggered. This modification has been derived with input from participants at the examination including ourselves which incorporates a Housing Delivery Test that triggers a plan review if:--

*The Housing Delivery Test indicates that delivery is below 75% of the housing requirement as set out in the housing trajectory, over the previous three years;*

However, as the stepped housing requirement is set ‘artificially’ low and extends right through to 2026 as the Council propose in SS2, then this review trigger is pretty much meaningless at 75% of an already low stepped requirement to 2026. In this situation any consistent underperformance might not actually trigger a plan review until 2029, at which point delivery of the overall plan requirement becomes almost impossible towards at the back end of the plan period.

The Modification as currently drafted is far too conservative in its approach to housing delivery and applies little or no onus on the Borough Council to secure housing delivery in the middle year of the plan – which follow the historical under delivery accumulating from the earlier years of the Plan period. The problem with heavily backloaded plans is that if they fail, then there is no realistic limited timescale to rectify the position with a plan review and/or release of further sites.

Whilst there is an acknowledgement that delivery aspirations have to be realistic for a plan to be found sound, this approach to delivery is not positive and negates the triggers to secure plan review until such time as it is probably too late. This approach to stepped delivery can only be described as back loading onto an already back loaded strategy that will fail to boost significantly the supply of housing!

If you are objecting, please set out what further changes you consider necessary to make the plan sound.

If the Council are to deliver the Overall Housing Requirement of the Plan (a minimum of 6125 dwellings) and meet the Framework's objective to boost significantly the supply of housing, they should adopt targets that are more challenging and be subject to controls that are effective in triggering an early review of an underperforming plan. The current controls, as set out above are ineffective if the low stepped requirement is adopted and implemented alongside a Liverpool approach.

Barratt's proposed changes would still support a stepped approach but consider that the stepped housing quantum should be increased going forward to realistically reflect the emerging supply claimed within the housing trajectory and combine with the Sedgefield approach to 5 year supply calculation. Barratt consider that 'Step 1' should reflect the first 7 years of the plan to March 2018 and based on 170 dwellings per annum to reflect the historical targets and the delivery constraints of an out of date local plan.

The second 'step' from March 2018 – March 2023 should however step up to a 245 dpa requirement to acknowledge the substantially enhanced supply which reflects the impending adopted status of the plan, its allocated sites securing planning permission and the Melton Mowbray Sustainable Neighbourhoods starting to deliver housing completions. The residual requirement for the remainder of the Plan period from March 2023 through to 2036 would then come in at 295 dwellings per annum, albeit the predicted spike of post adoption supply and delivery alongside application of the Sedgefield approach for the period 2018 - 2023 should effectively reduce actual delivery requirements at the later end of the plan period.

If the Council has any genuine confidence in the supply trajectory it has set out in the Modification then its stepped requirement must be reflective of the available supply and therefore a 5 year supply based on the Sedgefield approach should be achievable. This should apply the right balance of boosting supply and realistic delivery targets to step increase delivery (as the trajectory indicates) in the short to medium term, whilst maintaining reasonable review triggers to 'kick in' if the local plan sites fail to deliver against a more realistic housing delivery target.

The recent Inspector's decision in respect of the Land at Hoby Road, Asfordby – Reference APP/Y2430/W/17/3167407 - (which has now led to this site being proposed allocated through these Main Modifications to the Plan) considers the up to date position on addressing 5 year housing land supply in paragraphs 30- 36 of the Decision. In paragraph 31 the Inspector comments upon the Council's proposed approach to making up the housing delivery shortfall over the full plan

period to 2035 (Liverpool Approach). Inspector David Nicholson is unequivocal in his response which clearly supports the Sedgefield approach.

*....While there may be circumstances where this is appropriate, as it was not suggested that the Council would need to work with neighbouring authorities to meet the undersupply under the duty to cooperate, this would not accord with the PPG36 and, on the evidence before me, I find that the shortfall should be dealt with in the first 5 years. I have noted that the Council has never delivered at the rate that this would require, but to approach shortfall in this way would be to admit defeat before even starting and run counter to the imperative in NPPF§47 to boost significantly the supply of housing.*

The views of this S73 Inspector are considered to be wholly consistent with National Policy guidance and reflect the above comments on behalf of Barratt Homes who consider that a stepped Sedgefield approach to housing land supply should also be supported by The Local Plan Inspector.

## **Part B – Your Representation**

**Please use a separate sheet for each representation**

1) To which part of the consultation does this representation relate?  <b>Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Local Plan.</b>	<b><u>Main Modification</u></b>	<b><u>v</u></b>
	<b><u>Additional Modification</u></b>	
	<b><u>Policies Maps</u></b>	
If you are commenting on a Modification, please insert the MM, AM or PMC number.		<b>MM5</b>

Please provide comments below, being as precise as possible. Comments can support, as well as object.

The Council have proposed a number of changes to the text of Policy C1 (B), and adjusted the wording of the qualifying criteria for reserve sites which consequently make the criteria more stringent and bureaucratic and will complicate the process of bringing Reserve Sites forward when under-delivery elsewhere requires additional site release.

Fundamentally, with the exception of one site in Melton Mowbray, the Reserve Site list still fails to include sites in the second and third most sustainable settlements in the Borough in Bottesford and Asfordby respectively, even though alternative / additional sites are available and deliverable, including the Barratt landholding off Belvoir Road which has previously been identified as suitable for development. If under performance is likely to occur, it is more likely to occur on the larger allocations in the larger settlements and so reserve sites should be identified within these settlements accordingly. The Inspector has been made aware of delivery concerns regarding the largest Bottesford Allocation BOT 3 at Rectory farm, yet this policy still fails to address this issue in identifying an obvious and available fallback site in the settlement.

If you are objecting, please set out what further changes you consider necessary to make the plan sound.

The Reserve site list should include more sites and specifically include sites within the highly sustainable settlements of Bottesford and Asfordby including the Belvoir Road landholding at Bottesford with an indicative capacity of 200 dwellings.

## **Part B – Your Representation**

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1) To which part of the consultation does this representation relate?

**Main Modification**

**v**

**Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Local Plan.**

**Additional Modification**

**Policies Maps**

If you are commenting on a Modification, please insert the MM, AM or PMC number.

**MM6**

Please provide comments below, being as precise as possible. Comments can support, as well as object.

The proposed amendments to policy SS3 are supported with the exception of the insertion of the word 'proven'. Criteria 1 of the policy clearly requires the provision of substantive evidence to demonstrate need for additional housing in the rural areas and the term 'proven' is not defined, explained or quantified in the context of the policy amendment. Without appropriate qualification it is a subjective and very onerous term that lacks justification.

If you are objecting, please set out what further changes you consider necessary to make the plan sound.

Delete the term 'proven' from criteria 1 of revised policy SS3.

### **Declaration**

I Understand that all comments submitted will be considered in line with this consultation and that my comments will be made publically available and I may be identifiable to my name/organisation.

I acknowledge that I have read and accepted the information and terms specified under the Data Protection and Freedom of Information Statement.

Date **26.07.2018**

### **Data Protection and Freedom of Information Statement**

The personal information you provide on this form will be processed in accordance with the requirements of the General Data Protection Regulation 2018. It will be used only for the preparation of Local Development Documents as required by the planning and Compulsory Purchase Act 2004, save for requests of such information required by way of enactment. Your name, organisation and representations will be publicly available when displaying and reporting the outcome of this statutory consultation stage, and cannot be reasonably treated as confidential. Other details, such as your address and other contact details will be treated as confidential.

The Deadline for responses is 20<sup>th</sup> June, 2018.



You should not include any personal information in your comments that you do not wish to be made publicly available.

Your details will remain on our database and will be used to inform you of future planning policy matters and procedures relating to this Local Plan. If at any point in time you wish to be removed from the database or have your details changed, contact Planning Policy at [PlanningPolicy@melton.gov.uk](mailto:PlanningPolicy@melton.gov.uk) or by ringing the Council on 01664 502502.