

Melton Local Plan Examination - Further Response on Matter 6 – Five Year Supply Methodologies

Barratt Homes North Midlands

On behalf of Barratt Homes North Midlands we acknowledge that there are housing delivery issues and a significant delivery shortfall that may mitigate against the recommended unadulterated Sedgefield approach to addressing previous under supply as set out in National Planning Policy Guidance – ID 3-035 -20140306 – which 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 preferred alternative put forward by Melton under Methodology 7 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 completely contrary to national policy objectives. Barratt cannot support this negative approach

The Councils (alleged) identified annual housing supply as set out in tables M6 - T1- T3 and sets out a total available supply of 242 dwellings for the period 2018-19 rising to 546, 542, 632 and 601 dwellings respectively for the subsequent years through to 2022-23. The Council's Preferred Methodology suggests a stepped delivery of 170 dwellings per annum (dpa) rising only to 245 dpa from 2021. This approach suggests two scenarios – firstly that the Council actually has no confidence in the delivery from the alleged annual supply set out in the tables, or secondly that they are seeking to make their 5 year housing land supply (8.8 years under Methodology 7) as defensible as possible to challenge by setting themselves an extended low delivery trajectory. Barratt are of the opinion that the reality is probably a combination of both factors, an exaggerated deliverable supply and an over-cautious stepped approach that puts very little pressure on the Council to secure much needed delivery from the portfolio of site allocations and commitments in the Local Plan, yet leave them comfortably above The 5 year supply threshold, below which the local plan housing policies are rendered out of date. Thus whilst housing and affordability needs remain very high in the Borough, Methodology 7 supports a low delivery trajectory right through until 2026 and little pressure upon the Council to secure higher delivery rates commensurate with current needs.

Barratt's preferred position would be to adopt the Sedgefield Approach yet support some form of stepped delivery as per Methodology 5 or 6. In table M6-2A. On balance they would support a three

stage approach with the timeframes set out in Methodology 6 on the basis that Stage 1 should reflect the first 7 years of the plan to March 2018 and be based on 170 dwellings per annum to reflect the historical targets and the delivery constraints of an out of date local plan.

The second stage from March 2018 – March 2023 should however step up to a 220 dpa requirement to acknowledge the substantially enhanced supply which reflects the adopted status of the plan, its allocated sites securing planning permission and the Melton Mowbray Sustainable Neighbourhoods starting to deliver housing completions. If the Council has any genuine confidence in the latest supply trajectory it has produced then its stepped requirement must be reflective of the available supply and a 5 year delivery figure in the order of 365 dpa through to March 2023 (using the Sedgefield approach) should be achievable. The residual requirement for the remainder of the Plan period from March 2023 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 would effectively reduce actual delivery requirements at the later end of the plan period.

The Council and attendees have consulted, at the Inspector's request, to amend Policy SS6 to set a clear mechanism that triggers a review of the local plan if housing delivery falls 20% or more below planned targets for three successive years. However, if the planned targets are set artificially low and extend to right through 2026 (as the Council propose in Methodology 7) than any underperformance (against these low step thresholds) might not trigger a review until 2029, at which point delivery of the overall plan requirement becomes almost impossible towards the back end of the plan period.

Barratt and many other respondents have raised consistent concern about the Council's approach to its housing allocations outside of the Melton Urban Area and have promoted the inclusion of additional sites in sustainable locations such as Bottesford and Asfordby. In the event that these sites are not supported for inclusion at this examination by the Inspector then the trigger clauses put forward in the revised Policy SS6 would enable the sites to be reconsidered in a local plan review. However that review may be way too late to save a failing plan if the Council's preferred methodology is adopted.

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 challenging and be subject to measurable controls that trigger early review of an underperforming plan as sought by the Inspector in her earlier questions to the Council. These controls are however almost meaningless and ineffective if the low targets proposed in Methodology 7 are adopted and implemented alongside a Liverpool approach. This approach to

stepped delivery can be described as back loading onto an already back loaded strategy that will fail to boost significantly the supply of housing.

The suggested Barratt modification to Methodology 6, steps up the delivery challenge at a time when the Local Plan's housing supply is allegedly coming on stream according to the Council's tables. If these allocated sites do not deliver, then other sites must come forward through review to boost the immediate supply to meet immediate needs. The Inspector will be fully aware of the suitable, available and deliverable alternative sites put forward including the Barratt North Midlands landholding in Bottesford.