



Our Ref: P1368

Date: 12 March 2018

Grosvenor House
75-76 Francis Road
Edgbaston
Birmingham B16 8SP

Mr I Kemp
16 Cross Furlong
Wychbold
Droitwich Spa
Worcester
WR9 7TA

T 0121 455 9455

F 0121 455 6595

Dear Mr Kemp

Melton Local Plan – 5 Year Housing Land Supply Methodology

Harris Lamb Planning Consultancy has been instructed by Tata Steel (UK) Limited to submit representations in response to the recent consultation in relation to the additional information prepared by the Council with regard to the 5 year housing land supply methodology.

Our comments are as follows:

- It is acknowledged that the National Planning Policy Framework and the Planning Practice Guidance do not set a fixed methodology and we have seen different methodologies supported in different locations based on their individual circumstances. That said, with the fundamental objective of the Framework being to boost significantly the supply of housing, it is our view that to meet this objective the starting position should be a positive one (i.e. Sedgefield, no stepped trajectory, etc.). If the circumstances in a particular authority require an alternative method to be adopted then this needs to be clearly demonstrated.
- The above notwithstanding, it is considered that the Council's preferred approach is not in line with the objective to boost significantly the supply of housing. In short, this is because the Council have first reduced the housing requirement in the early years to make it what they consider achievable, but then the Council look to further dilute the 5 year supply target in the early part of the plan period by dispersing the shortfall in delivery against the already reduced annual requirement across the remainder of the plan period.
- Endorsing the Liverpool approach now is likely to lead to the Council seeking to utilise the Liverpool method for years to come.

- The supply figures identified by the Council show a significant number of deliverable sites in the next five years. Indeed these are the highest figures across the plan period and sufficient for the Council to demonstrate a 5 year supply in all but 1 of the 7 methodologies presented. This is at odds with the stepped trajectory and use of the Liverpool approach to dealing with the shortfall as advocated by the Council.
- The Council have stated that they have given consideration to what the development industry might reasonable deliver on the ground. However, even when we look at the Council's submissions in this regard, in response to the Inspectors initial question 4 it is evident that they concluded 350 completions per annum over the next 5 years is achievable. This alone would suggest that the Council's preferred 5 year supply methodology, which produces an annual requirement of 268 once the shortfall and 20% buffer have been applied, is overly pessimistic.
- Regardless of which methodology is employed, the figures and arguments presented by the Council, clearly confirm the need to provide certainty through the allocation of a sufficient number of sites within the Local Plan to meet the needs identified. Any alternative which devolve this approach in part or in full to the Neighbourhood Plans would result in delays in the identification of sites and undermine the delivery of housing in the early parts of the plan period.

In summary, it is our view that a more positively prepared approach should be taken that targets higher delivery in the short term. Ideally this would involve a change in the stepped trajectory, but as a minimum the Sedgfield method should be employed in order to ensure that any reduced housing target progressed in the early years is actually met in the early years of the plan.

I trust the above is clear, should you require anything else please do not hesitate to contact me.

Yours Sincerely



**Sam Silcocks BSc (Hons) MA MRTPI
Associate**

sam.silcocks@harrislamb.com

DIRECT DIAL: 0121 213 6003

Mobile: 07827 313543

LONDON | STOKE-ON-TRENT | WORCESTER
0207 430 1455 | 01782 272555 | 01905 22666



RTPI
mediation of space - making of place

