



**MELTON LOCAL PLAN EXAMINATION:
DAVIDSONS DEVELOPMENTS LIMITED**

Response to M6-2 Proposed Five Year Supply Methodology

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1. Introduction

- 1.1 This submission is made on behalf of Davidsons Developments Limited in relation to the paper M6-2 prepared by the Council following the Examination sessions setting out their Proposed Five Year Supply Methodology. The response should be read in conjunction with our Statement prepared for Matter 6.
- 1.2 The paper sets out 7 alternative methodologies which result in a five year supply for the period 2018-2023 ranging from 4.5 years to 8.8 years. The Council's preferred approach applies both the Liverpool approach to dealing with the shortfall and a three step phasing. This results in 8.8 years supply for the five year period from 2018 and a surplus of in excess of 1,000 homes.
- 1.3 As set out in our Statement on Matter 6, we consider that the calculation of five year land supply should apply the Sedgfield approach to addressing the shortfall and that this is the approach that is most consistent with guidance in the NPPF.

2. Comments on the Council's Preferred Methodology

- 2.1 At the Examination sessions it was accepted by the Council that the lapse rate should correctly be applied to those allocations the subject of permission as well as other permissions. This results in a lapse rate of 201 dwellings as opposed to the originally proposed 57 dwellings. This revised lapse rate is applied in the alternative methodologies 2, 4, 5, 6 and 7. The revised approach to the lapse rate is supported.
- 2.2 The fact that the Council's preferred methodology results in a supply just short of 9 years for the five year period to 2023 highlights the inappropriateness of this approach to address what is a relatively limited shortfall in provision over this period if the Sedgfield approach is applied.
- 2.3 As we set out in our submission on Matter 6, the Council's housing trajectory as set out at Appendix A to their updated land supply statement sets out assumptions on delivery from components of supply that are based on detailed discussions with landowners and developers.
- 2.4 This shows the expected delivery slightly below the five year requirement derived from the Sedgfield approach – a supply of 2,563 dwellings against a requirement of 2,606 dwellings.

- 2.5 The Council's case for applying the Liverpool approach and a three step phasing is their concerns that the annual delivery derived from the Sedgefield approach will not be achieved. This ignores the evidence obtained from the Council through discussions with developers that these higher levels of provision can be achieved.
- 2.6 Again, as discussed at the Hearing session in to Matter 6, the use of historic build rates to inform what is likely to be achievable in the future has limited value in the context of Melton Borough. Historic rates of housing delivery in the Borough have been clearly constrained by the lack of an up-to-date local plan that inevitably limits supply through the lack of plan-led sites. Reliance on historic build rates also ignores the clear message from the Government that Council's are expected to ensure a step change in the delivery of housing through their local plans to address the housing crisis.
- 2.7 We remain firmly of the view that the Sedgefield approach is the correct approach to assessing the five year housing requirement and dealing with shortfalls in provision. The calculation of the five year requirement should not be seen as a technical exercise. It is about establishing the relevant requirement to deliver the homes people need. The failure of the Council to deliver sufficient homes results in a shortfall that means housing needs are not being addressed and this shortfall therefore needs to be corrected at the earliest opportunity, as advised in the NPPF.
- 2.8 Methodology 2 applies the Sedgefield approach and the updated position on lapse rates. This results in a 4.5 years supply and a shortfall of some 244 dwellings.
- 2.9 To address this shortfall and ensure that the plan provides for a five year supply on adoption, the Council should bring forward the reserve sites identified in the Plan as identified in Policy C1(B). The Policy identifies seven reserve sites with a total capacity of some 562 dwellings. A mechanism to deal with underdelivery against identified housing requirements is therefore already enshrined in the strategy of the plan. This represents a simple and logical solution as opposed to the Council's contrived suggestion to apply the Liverpool approach along with stepped delivery to secure an unnecessarily excessive 8.8 year supply.
- 2.10 The Council's approach flies in the face of the clear Government imperative to boost housing supply and ignores the real housing current housing

needs resulting from the Council's failure to deliver sufficient housing since 2011.

- 2.11 As discussed at the Hearing Sessions, the proposed sustainable urban extensions included in the plan are relatively small scale compared with other larger SUEs identified in plans for other Leicestershire authorities. Both the northern and southern SUEs already have partial consent and for the southern SUE an application for the majority of the site is submitted and ready to be approved. Concerns about the delivery of the SUEs as a justification to back phase housing delivery are therefore unfounded.
- 2.12 In its paper M1 -2 on Main Modifications Suggested to Ensure Alignment with Neighbourhood Plans, the Council is suggesting that Site Long4, Sandpit Lane Long Clawson becomes a reserve site. To ensure that the Council can demonstrate a five year land supply on adoption this site should continue to be included as an allocation.
- 2.13 At the Examination sessions we made the case for land at Bescaby Lane, Waltham on the Wolds to be substituted for WAL3, East of Melton Road as a more appropriate reserve site. The Bescaby Lane site should be included as an allocation to ensure the Council can demonstrate a five year land supply.