

MELTON LOCAL PLAN EXAMINATION
MATTER 6 – HOUSING LAND SUPPLY : COMMENTS ON DIFFERENT
METHODOLOGIES FOR CALCULATING 5 YHLS

This commentary is made for and on behalf of the Home Builders Federation (HBF) which should be read in conjunction with our representations to the pre submission Local Plan consultation dated 19 December 2016 and focused changes consultation dated 23rd August 2017.

It is agreed that the 20% buffer applied in all Methods is correct.

The HBF is not supportive of the Council's preference for Method 7 representing a 3 step housing trajectory and Liverpool approach to recouping shortfalls. Method 7 is a "double whammy" to meeting housing needs by back loading unmet needs onto an already back loaded trajectory contrary to the aims of national policy.

It is the HBF's opinion that any shortfall against the OAHN of 170 dwellings per annum since the start of the plan period should be met as soon as possible using the Sedgefield approach in accordance with the NPPG (ID 3-035). This is set out in Methods 1, 2, 5 & 6. Any alternative approach to delay meeting unmet housing needs from earlier in the plan period is failing those households who needed both market and affordable homes since the start of the Plan. This is not just a theoretical mathematical exercise because there are households who need homes now and it is unreasonable and unequitable to expect them to wait until later in the plan period before their current housing needs are addressed. Methods 1 & 2 illustrate that using an annualised housing requirement and Sedgefield approach a 5 YHLS is achievable subject to lapse rates.

It is the HBF's opinion that a lapse rate should be applied to all sites as set out in Methods 2, 4, 5, 6 & 7.

Therefore using a Sedgefield approach and a lapse rate applied to all sites as set out in Method 2 the Council's 5 YHLS is slightly below 5 years at 4.5 years (-244 dwellings). However this is a comparatively small deficit which could easily be remedied by bringing forward reserve sites identified in Policy C1(B). There are 7 sites identified with a capacity for 562 dwellings. This is the HBF's preferred approach. The Council's alternative arguments for a Liverpool approach and / or a stepped trajectory are unjustified. The proposed Sustainable Urban Extensions (SUEs) are relatively small scale in comparison to other SUEs elsewhere in the Leicester & Leicestershire Housing Market Area. Furthermore both the Northern and Southern SUEs have the benefit of planning consents in part. The Council is also ignoring its own evidence on delivery rates based on its detailed discussions with landowners and developers.

If the HBF's preference for Method 2 is rejected and a stepped trajectory has to be considered then the HBF preference is a 2 rather than 3 step housing

trajectory as set out in Method 5. Method 5 illustrates that using 2 stepped housing trajectory and Sedgefield approach a 5 YHLS of 7.7 years is achievable. However it is the HBF's opinion that the time period of 12 years for the first step in Method 5 is too long. The time period for the first step proposed in either Method 6 (on adoption of the Plan) or Method 7 (10 years) are more appropriate. It is believed that a variation of Method 5 with a shorter time period for the first step in the housing trajectory would result in 5 YHLS of either 5.4 years (using Method 6 time period) or 6.5 years (using Method 7 time period). This variation of Method 5 reflects the spirit of the NPPF to boost housing supply in order to meet housing needs as soon as possible.