

## MATTER 5: Other Housing Allocations

### 5.1 Overall has the allocation of the sites in Policy C1(A) been based on a clear, robust process of site assessment and informed by sustainability appraisal?

**No** - the site allocations are not based on a clear, robust process of site assessment or informed by sustainability appraisal. Please see the following under i) to iv) .

#### i) Has an appropriate selection of potential sites been assessed?

**No** - an appropriate selection of potential sites has been *identified* but the assessments of them have not been meaningfully applied (if at all) during site selection. See point ii) below.

#### ii) Has an appropriate methodology been used and has it been applied consistently?

**No** - an appropriate methodology has not been applied consistently. I say this because of substantial differences between the 'scoring' of sites in the Sustainability Appraisal and in the Evidence Base which was actually used to inform the Spatial Strategy. Methodology appears to me to have been adjusted to maintain the format of the Plan.

#### iii) Are the reasons for selecting the preferred sites and rejecting the others clear and sufficient? Would any inaccuracies in the assessments significantly undermine the overall conclusions?

**No** - the reasons for selecting the preferred sites are not clear and sufficient, for the reasons given above. Inaccuracies do significantly undermine the overall conclusions, particularly under the headings of **biodiversity, landscape, heritage, employment and flood risk**. Negatives under these headings have been consistently 'underscored' in the Evidence Base causing insufficient weight to be given to corresponding parts of national planning policy (including, but not limited to, NPPF paras 30, 34, 35, 37, 99, 100, 101, 110, 126, 129, 165, 169, 170).

**Suggested change:** Adopt the HEDNA housing target of 4,250 houses. This will allow a more discerning process of site selection. Re-assess the draft policies and sites using the SA scores not the Evidence Base scores. **iv) Has a reasonable balance been struck between the residual requirement figure for each of the settlements in Table 4 and the allocation of sites to meet the residual requirement as closely as possible?**

**No**, a reasonable balance has not been struck between the residual requirement and the allocation of sites. This is not because the requirement / allocation proportions are wrong (though they are) but because the residual requirement itself is too high. This in turn follows from MBC's insistence on 6,125 houses rather than the better-evidenced 4,250 within HEDNA.

**Suggested change:** Adopt and plan for the HEDNA FOAN of 4,250 houses. Follow the evidence.

### 5.2 Overall will the allocations provide sufficient flexibility to help deliver the spatial strategy?

**Yes**, easily, they are more than necessary, because the spatial strategy seeks to deliver an unsoundly high number of houses (6,125 as opposed to 4,250 - **Matter 3**). Also, site allocations to Service Centres and Rural Hubs significantly exceed the residual requirement even based on a target of 6125; residual requirement adds up to only 855, whilst actual allocations total 1049 + 403 reserve.

### 5.3 Are the specific policy requirements for the site allocations in Appendix 1 justified and effective? Is there reasonable assurance that the development of the allocations will be sustainable and in accordance with national planning policy?

**No** - There is not reasonable assurance the allocations will be sustainable or in accordance with national policy, because proportionate evidence has not been used in site selection. **(See 5.1 (iii) above for of accord with the NPPF).**

**5.4 Is the identification of 'reserve sites' in Policy C1(B) appropriate in principle?**

The wording of Policy C1(B) has been amended in 'focussed changes' and is now meaningful when it wasn't before ie. Linked to failure to deliver housing in the relevant settlement. Therefore, the identification of the sites can be appropriate in principle – but this is subordinate to 5.5 below.

**5.5 Has the basis for their identification been robust? Is there clear justification for the identification of the individual sites as reserve sites?**

**No** – For the reasons given at 5.1 above.

**5.6 Are the policy criteria of Policy C1(B) justified and effective? How will criteria iii) and iv) be assessed?**

**No** - Because although the words of the policy could be effective, the allocations overall are unsound. See 5.1 and 5.5 above.

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I hope that this is helpful in your inspection of the Melton Local Plan and that you are able to incorporate the proposed changes.

Yours sincerely

**JD Brown**