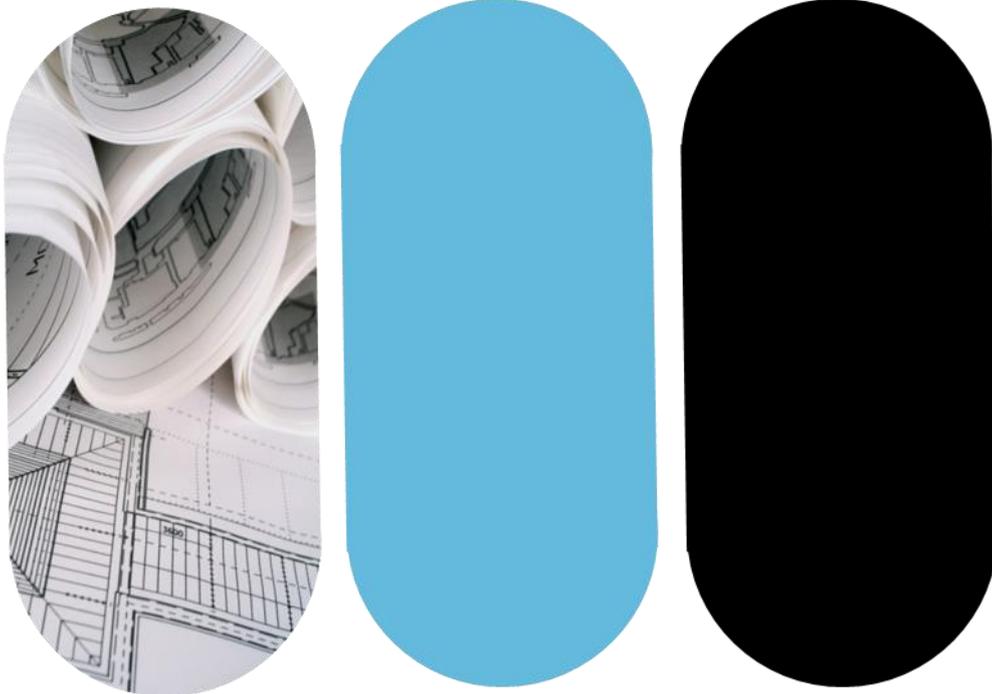


**WRITTEN STATEMENT IN RESPECT OF THE MELTON LOCAL
PLAN EXAMINATION JANUARY 2018**

MATTER 6: HOUSING LAND SUPPLY

On Behalf of Pendimo Development Land & Planning Ltd



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1. Paragraph 6.2

Question:

Is there robust evidence underpinning the calculation of the land supply for the Plan period? In particular:

- i) *Is it justified to make good the shortfall in delivery since 2011 over the remainder of the Plan period (the Liverpool approach)?*

Response:

- 1.1 The issue of historic housing shortfall (housing not delivered over previous years against the identified annual requirement figure) must be addressed and cannot simply be ignored. There are two common methods for addressing housing shortfall; these are the Liverpool method (where the shortfall is distributed evenly across the whole plan period) and the Sedgfield method (where the shortfall is made up over the first 5 years of a plan period).
- 1.2 The Government's preferred approach is the Sedgfield method, as this most closely aligns with the requirements of paragraph 47 of the NPPF to *'boost significantly the supply of housing'* and the objective of the 20% buffer which is to be *'moved forward from later in the plan period.'* In respect of this issue, the NPPG states as follows:
- '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.'*
- 1.3 Based on the Graph A – Net Dwelling Completion Rates in Melton Borough 1994/95 to 2016/17 provided by the LPA in response to the Inspector's Initial Questions for the Council document, it is clear that the recent recession (widely accepted as starting Dec 2007 and ending June 2009) had limited impact on house-building in Melton Borough. A significant drop in house-building was seen between 2012 – 2015, some 3 years post-recession. As alluded to at para 3.10 of the Five Year Land Supply and Housing Trajectory Position Update (December 2017), it is considered that the vast majority of the borough's historic shortfall can be attributed to the complete absence of any sort of development plan since the adoption of the 1999 Melton Local Plan, which only allocated land up to 2006.
- 1.4 Since the extent of backlog in the Borough is due to a failure of the Council to provide contemporaneous plan coverage, it is not acceptable to simply argue that the provision of 483 dpa (distributing the shortfall across the first 5 years – Sedgfield Approach) is an unrealistic target. In fact, the 483 dpa only captures shortfall as far back as 2011; there is likely to have been significant shortfall against the housing requirement between 2006 (the end of the 1999 Plan period) and 2011.

- 1.5 It is considered that to expand the size of the Melton Sustainable Neighbourhoods would only result in additional delivery towards the back end of the plan period, therefore the Council must allocate additional medium/large-scale sites in the most sustainable Service Centres.

Question:

- iv) *Does the evidence indicate that reasonable conclusions have been drawn about site capacities, having regard to any specific viability, infrastructure or other barriers to delivery?*

Response:

- 1.6 Please refer to other Written Statements prepared by Marrons Planning on behalf of Pendimo Development Land & Planning Ltd in relation to Matters 2 and 5.