



**Somerby Parish Council's submission to the
MELTON LOCAL PLAN EXAMINATION.
MATTERS AND QUESTIONS.**

To be read in conjunction with the submissions from Carl Powell & Mary Ann Donovans. (NP leads for Somerby Parish).



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MELTON LOCAL PLAN EXAMINATION MATTERS AND QUESTIONS

Note 1: It is implicit that in answering the following questions, if respondents identify a soundness deficiency in the Plan (as amended by the Focused Changes) they should make clear how the Plan should be changed.

Note 2: Policy references are to the principal policies at issue but other parts of the Plan may also be relevant.

Matter 6: Housing Land Supply

6.1 Apart from a housing trajectory for the Plan period, what other summary and tabular information about the components of the housing land supply, the five year land supply and the implementation strategy for housing should be included in the Plan?

The LP needs to show the total housing on the reserve sites (643) and compare to the 6250 target (=+10%.) Add the potential of the other possible large sites in 4.7.4. This will show the certainty, or otherwise, of being able to deliver the total housing requirement.

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

i) are the allowances for existing commitments and for windfalls adequately justified? Has appropriate consideration been given to lapse rates for planning permissions?

There doesn't appear to be an actual number to show what the assumed lapse rate will cause – this needs to be included so that we can objectively assess

ii) is there any dispute that a 20% buffer should be added to the supply to address persistent under-delivery?

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Possibly – but evidence would have to be shown that the current lapse rate is as high as 20%. If it is so, then the allowance would seem reasonable

iii) is it justified to make good the shortfall in delivery since 2011 over the remainder of the Plan period (the 'Liverpool approach')?

Yes - The Liverpool approach is a reasonable to deal with the shortfall since 2011.

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?

[Note: the details of individual sites will be considered under Matters 4 and 5]

*No - See **Matter5** which indicates that there are inaccuracies and omissions in the data used to identify Housing land supply. In addition little or no real assessment has been given to the the capacity of the rural infrastructure to cope with the added pressure the larger housing sites, due to insisting on 245 dpa, will make on utilities and highways. E.g. In Somerby there are 2 preferred sites and 1 reserve totalling 105 dwellings in a village where there are already pressures on the foul water drainage system, congestion on the High Street, an electricity supply prone to power cuts and a "superfast" broadband which is often "superslow"!*

Suggested change

Adopt and plan for the HEDNA FOAN of 4,250 houses. Adjust allocations in rural for the lower requirement. Carry out SEA, Use the data to inform the delivery of housing land supply.

6.3 Is the housing trajectory as set out in MBC/HS1 (dated 30 May 2017) based on robust evidence about deliverability and achievability of development of the sites over the Plan period? In particular, has it been shown that it is realistic to plan for delivery of an average of 347 dpa over the five year period starting 2017/18 or an average of 359 dpa over the 5 year period starting 2018/19? Is there robust, credible evidence demonstrating the capacity of the development sector to complete and sell this quantity of housing in the Borough in the next 5/6 years? If not, how should the Plan be changed to ensure that it is deliverable and therefore effective?

Possibly not - Much depends upon how site appraisals were carried out for all the SHLAA sites. This was done as a paper exercise initially but whether it was followed up as required by NPPF para 173 is unclear, or does it remain a "wish list"?

The 347 / 359 is to correct for 'under-delivery' since 2011. It is for this reason that development in villages has been frontloaded, as it is potentially easier and faster. In addition the contributions from S.106 in 'rural premium' areas is greater. (A % of an expensive house is more than a % of a house in a cheaper area. Once again the point that the HEDNA figures would be more easily deliverable. LPs are supposed to be aspirational but also realistic (NPPF para 154). There is no reason to set a harder-to-achieve target unless evidence indicates it is necessary - which it doesn't.

Suggested change

Make explicit the deliverability of the SHLAA site which will become policy when the LP is accepted. Adopt and plan for the HEDNA FOAN of 4,250 houses. Adjust allocations in rural for the lower requirement.