



ASPBURY
Planning
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Melton Local Plan Examination 2018

Matter 6

Response to Inspector's Questions on behalf of
Barratt David Wilson Homes

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 Council's 5 Year Land Supply and Housing Trajectory Update – MBCHS1A is a well-informed document containing pretty much all of the required information and commentary on the housing land supply position and the approach that Melton Borough propose to take in the five year supply calculation.

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?

Barratt do not question the suggested windfall allowance which is considered to be reasonable. There does not however, appear to be any consideration of a lapse rate for planning permissions.

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

There should be no dispute whatsoever that a 20% buffer should be added to housing supply to address persistent under-delivery in the Borough since the Council have failed to deliver their annual completions targets – current or previous – in any of the years since the 2011 base date of the local plan.

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

Government guidance as set out in the NPPG at paragraph Reference ID: 3-035-20140306 states that 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 co-operate. This guidance clearly promotes the Sedgefield as opposed to the Liverpool method of calculating and addressing 5 year supply.

Melton Borough are not looking to other authorities to assist with addressing their undersupply position. The SHLAA studies that the Council have undertaken indicates that there are no insurmountable environmental constraints or policy designations (e.g. Green Belt) that would prevent Melton Borough from identifying additional sites for short term development to try to reverse the widening delivery shortfall that has prevailed since the 2011 start date of the local plan. Indeed paragraph 2.11 of the 5 Year Land Supply and Housing Trajectory Update – MBCHS1A indicates that historical completion rates, developer build capacity and expectations informed by developer feedback appear to form the basis of the Borough Council's justification to latterly promote the Liverpool approach and enhance their 5 year supply position.

There is increasing Government focus on boosting the housebuilding industry towards building the 300,000 dwellings per annum as promoted by the Chancellor Philip Hammond. If this target is to be achieved, then local authorities must play their part in making even more land available now to enable the housebuilding industry to at least get close to delivering those numbers. This means more sites in more locations where sustainable development can be accommodated. Barratt for their part as one of the leading volume housebuilders in the country and the region do have capacity to build more homes in Melton Borough yet are constrained by supply restrictions through application of the Liverpool approach and claims of 7.7 years supply.

Whilst MBC will point to its delivery strategy being underpinned by two large urban neighbourhoods requiring a lead in time that will inhibit short term delivery, Barratt promote that the historical position of underperformance in Melton Borough and the Government's push for increased housebuilding nationally does not justify applying the Liverpool approach.

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]

This question is best addressed on a site by site basis and Barratt have raised concerns about capacity and delivery of a major site allocation in Bottesford based on scant supporting information on site accessibility. On a general level Barratt have also raised also concern in response to Matter 3 that the affordable target of 37% as set out in Policy C4, is considered to be a potential constraint upon both delivery and viability in many sites across the Borough.

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?

Barratt consider that the Whole Plan Housing Trajectory as set out in Graph C is unrealistic in terms of its delivery expectations for the period 2019/20 to 2022/23 and this trajectory has been 'assembled' to promote a position of a five year land supply surplus. They do consider however that completion rates in the order of 350 dwellings per annum are capable of being delivered and sustained for an extended period but this requires the allocation of further sites in the short and medium term in sustainable settlements beyond Melton Mowbray which is expected to a deliver at least 200 dwellings per annum for the next 10 years. This brings us back to considering Bottesford and Asfordby as the next largest and most sustainable settlements and critically examining why the Council are not maximising the opportunities that these settlements may offer for additional sustainable growth which has been the consistent theme of the Barratt case for change to the plan to ensure that it is deliverable and effective.