

Gladman Developments Ltd

Matter 5 Hearing Statement

Melton Local Plan

Other Housing Allocations



January 2018

Matter 2 – Other Housing Allocations

Question 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? In particular:

- (i) has an appropriate selection of potential sites been assessed?**
- (ii) has an appropriate methodology been used and has it been applied consistently?**
- (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?**
- (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?**

1.1.1 The responses to these questions and the appropriate methodology for selecting sites is largely covered in other Hearing Statements submitted by Gladman. Points i), ii) and iv) are covered in Matter 2. In brief, it is considered that the Council has arbitrarily applied housing requirements to each settlement based on population, rather than their sustainability credentials as demonstrated through their evidence base.

Question 5.2

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

1.1.2 It is Gladman's opinion that the allocations will not provide sufficient flexibility. Please see Hearing Statements 3 and 6.

Question 5.4

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

- 1.1.3 In principle, Gladman do not object to reserve sites being identified in the MLP. Since Gladman promote the identification (and preferably the allocation) of the Six Hills Garden Village (SHGV) through Policy SS6, which is itself a reserve policy of sorts, it would be perverse to do so.
- 1.1.4 However, consideration needs to be given to the function of these sites in the context of the Plan.
- 1.1.5 The purpose of the SHGV proposal is principally to provide a sustainable location to meet the needs of Melton and particularly the additional homes arising out of an OAN of 280 dwellings per year. The balance of homes provided on the site would be to meet the pressing unmet needs of the other Leicestershire Authorities, including Leicester City which up to the period of 2015/16 has already accrued a backlog of some 2,917 dwellings. It is therefore a site to meet defined needs now.
- 1.1.6 The C1 (b) sites are to perform a different function. Whilst it is stated they are there to provide "flexibility", they will essentially be required in a future scenario that allocated sites in the MLP, fail. The revised text for the policy in the Focussed Changes, states permission on these sites:
- "...will be approved where the proposal helps to meet the identified housing target for the settlement, and it is demonstrated that allocated sites and existing permissions are unable to do so..."** (emphasis added)
- 1.1.7 Seven sites are identified in the Focussed Changes list and therein lies Gladman's concerns with the soundness of the Draft Policy. In line with the above wording of the policy, there would appear to be an assumption that sites allocated in those settlements will fail, when in actual fact one cannot predict the settlements in which future sites will be required due to failure.
- 1.1.8 Whilst the reserve sites would assist in meeting the needs of the borough, providing 40 homes in Long Clawson as a fall back, for example, would do little to assist in the failure of sites in Asfordby. Bearing in mind the proposed wording of the policy, it would appear these sites could be resisted by the Council, were they minded to do so, if an application were to come forward. Utilising the example above, if the sites in Long Clawson all deliver but those in Asfordby fail and the LONG5 site were then proposed for development, one would expect a very significant amount of objection from local residents (as is currently the case with applications and allocations in the village). The application could therefore presumably fail under part (iii) which specifically requires the support of the community.
- 1.1.9 On this basis, it is hard to see how Policy C1(b) is justified without evidence that those will be the specific sites needed in the future. Indeed, there is an absence of an explanation as to how those sites have been selected as reserves over others. If a reserve policy is to be pursued, a reserve site

for each settlement should be identified or the policy should be a criteria-based policy which permits the identification of reserve sites in the event that allocations in C1(A) fail.

- 1.1.10 Accordingly, whilst the principle for the identification of reserve sites is not objected to, it is not considered that the policy as drafted (and the sites identified) are justified or sound.

Question 5.5

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

- 1.1.11 As stated above, it is not considered the sites identified are supported by sufficient evidence to justify their inclusion in the plan. The policy should be modified to identify a reserve site for each settlement or be reworded to form a criteria based policy.

Question 5.6

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

- 1.1.12 As also stated above in relation to Question 5.4, Gladman do not consider Criterion (iii) is justified. Applications for planning permission should not be determined on a measure of their apparent popularity. The Criterion should be deleted.
- 1.1.13 In addition, Criterion (iv) refers to the wider public benefits arising from the development. The principal public benefit of any reserve site coming forward when there is an absence of a five year housing land supply or a failure of sites in a settlement is, of course, the provision of the housing to meet needs. There should be no requirement for these sites to demonstrate any wider public benefit in this regard and so the Criterion should be deleted.