



**EXAMINATION – MATTERS AND QUESTIONS  
MELTON LOCAL PLAN EXAMINATION  
STATEMENT ON BEHALF OF:  
DAVIDSONS DEVELOPMENTS LIMITED**

**MATTER 7: Other Policies for Communities**

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**MATTER 7:**

**7.1 Does the Plan adequately address the needs for all types of housing and the needs of different groups in the community? In particular:**

**i) does Policy C2 (Housing Mix) give clear and sufficient guidance about the basis on which planning applications will be determined in order to meet the Plan's expectations in this regard?**

7.1.1 Policy C2 advises that the Council will seek to manage the delivery of a mix of house types and sizes and that residential proposals should seek to provide an appropriate mix and size of dwellings to meet the needs of current and future households. Focused Change FC5 proposes amendments to the Policy including the need to have regard to market conditions, housing needs, economic viability and site specific circumstances. The Focused Change also makes it clear that the 2016 Melton Housing Needs Study is to be used as the evidence for the identified optimum housing mix. It should be noted that this study will be out of date before the end of the plan period.

7.1.2 Davidsons Developments Limited raised concerns at the submission stage that the policy needs to be applied flexibly, taking account of the particular circumstances of sites and market conditions. The proposed Focused Changes help to allay these concerns, emphasising that site specific circumstances will be taken into account in determining the requirements for housing mix on sites. It is important that Policy C2 is applied with sufficient flexibility to ensure that appropriate developments are not frustrated unnecessarily and that the plan recognises that the Housing Needs Study will be up-dated from time to time during the plan period.

**ii) is Policy C3 consistent with the Written Ministerial Statement (March 2015) (the Planning Update Statement) and Planning Practice Guidance on optional technical standards for housing?**

7.2.1 Policy C3 advises that the Council will particularly support residential developments where the national space standard is applied to dwellings up to and including 3 bedrooms.

- 7.2.2 Pegasus Group made representations to the Submission Draft Plan raising concerns that the proposed policy was not adequately justified.
- 7.2.3 The Written Ministerial Statement, March 2015 advises that the optional national technical standards should only be required through any Local Plan policies if they address a clearly evidenced need and any impacts on viability have been considered. The National Planning Practice Guidance (NPPG) advises that where a need for internal space standards is identified, local planning authorities should provide justification for requiring a policy taking account of need, viability and timing (ID: 56-020).
- 7.2.4 The justification set out at paragraphs 5.7.1-5.7.4 of the plan, does not provide sufficient specific evidence to justify the inclusion of the policy in the plan. Reference is made to the Melton Housing Needs Study, August 2016 by JG Consulting (MBC/HM1). This report summarises the consideration of a policy on Space Standards at paras 47-53 (pages 11-12), 65-67 (page 14) and sets out the assessment at paras 8.1-8.46 (pages 153-163). The assessment notes small homes at high densities is not a feature of the Melton housing stock (para 49) and the case for adopting space standards is mixed (para 52). The report does not provide a sufficiently robust evidence base to justify the inclusion of the policy in accordance with the NPPG. The report does not establish a clear local assessment of need justifying the policy.
- 7.2.5 In terms of viability, it is noted that the Revised Local Plan and CIL Viability Study, May 2017 by Cushman and Wakefield (MBC/WP5), used the nationally described space standards as part of its assessment. The conclusions of the study advise that the plan should make clear that policies will be implemented flexibly with viability and delivery considerations taken into account. The report notes that for the SUEs, these large scale sites are subject to a different and generally more complex set of delivery challenges and that experience elsewhere has shown that flexibility in the approach to planning standards and section 106 obligations can help to accelerate delivery (page 87).
- 7.2.6 Neither the Housing Needs Study or the Viability Study appear to have considered the implications of seeking the optional standards on delivery rates as recommended in the NPPG. If the Inspector is satisfied that there is sufficient evidence to justify the policy, transitional arrangements should be considered so that any outline or detailed applications in the pipeline or

subsequent reserved matters applications should not be subject to the nationally described standards.

**iii) having regard to the robustness of the evidence, does the Plan make adequate provision for the housing needs of the Gypsy and Traveller and Travelling Showpeople communities? Will the committed sites meet these needs? How will the needs of people who have permanently ceased to travel be addressed?**

**iv) are the criteria in Policy C6 justified and consistent with national planning policy?**

7.4.1 No comment.

**v) are the requirements of Policy C8 for self-build and custom-build housing justified and deliverable?**

7.5.1 Policy C8 sets out a requirement for developers to supply at least 5% of self-build dwelling plots on sites of 100 dwellings or more. The House Builders Federation has raised concerns in relation to a number of local plans on the approach to seeking an element of self-build on sites.

7.5.2 The concern with the suggested approach is that it merely changes housing delivery from one form of housebuilding company to another without any additional contribution to boosting housing supply. If self-build/ custom build plots are not developed the policy would result in delay in the delivery of housing.

7.5.3 There are also a number of practical difficulties with making provision for self-build on larger sites in relation to health and safety implications, working hours and length of build programmes.

7.5.4 There are also questions over whether self-build plots on larger sites would actually be attractive to those seeking this type of build. This was an issue noted by the Inspector on the Cornwall Local Plan. Here the Inspector commented that there must be considerable uncertainty as to whether plots on large new housing estates would be attractive to self-build/custom builders (para 168).

7.5.5 A further question is whether there is sufficient evidence of need to justify the requirements as set out in the policy. Again, for the larger SUEs, the

Council needs to recognise the range of requirements set out in various policies could raise issues of viability that need to be taken into account.

**vi) in all other respects are the Plan's policies for communities soundly based?**

7.6.1 No comment.