

FOCUSED CHANGES RESPONSES TO REPRESENTATIONS RECEIVED: Focused Change 6

Representor Name	Focused Change/Policy	Summary of Representation	MBC Response
Shout 4 Residents	FC6	Affordable Housing <ul style="list-style-type: none"> • Are the houses to be affordable for local people to buy? • Local Need 	Yes, low cost affordable homeownership options will be part of the affordable housing offer for residential development in the Borough over the Local Plan period.
Michelle Galloway (obo Davidsons)	FC6	The 15% affordable housing requirement for the SSN should be changed from 'minimum' to 'maximum' to reflect the Revised Local Plan and CIL study results, May 2017.	No modification recommended. Many sites across the Borough have secured higher % returns of affordable housing and provide evidence that the minimum %'s are achievable. Developers and house builders are to take these %'s as the lowest limit we would accept, unless in exceptional circumstances, a site specific viability assessment shows that the targets are not deliverable.
Elaine Elstone (Tetlow King)	FC6	Likely that national planning policy is set to change to introduce new definitions of affordable housing that reflect a wider range of models to assist people into housing that meets their needs.	The text set out at paragraphs 5.8.1 to 5.8.4 provides context to the Affordable Housing reasoned justification and policy C4. The text in 5.8.4 currently sets out examples of intermediate housing; it is not an exhaustive list.
Dr J Warwick	FC6	Priority for affordable housing should be given to local people.	The Local Plan states that an Affordable Housing and Housing Mix Supplementary Planning Document will set out guidelines on many items, including local connection. This document will be formulated and implemented post adoption of the Local Plan. In addition, one of the main objectives of the Melton Borough Council Choice Based Lettings Allocations Policy (June 2014) is " to make best use of affordable housing to meet the needs of the local community".
Matthew Williams, Secretary to the Wymondham and Edmondthorpe Neighbourhood Plan Group	FC6	40% affordable housing considered too high in Wymondham parish. No correlation between evidence of need and policies of Local Plan.	Policy C4 on affordable housing provision states that in applying the minimum target for affordable homes regard will be given to market conditions, housing needs, demonstrable economic viability and other infrastructure requirements. Wymondham is considered to be sustainable and classified as a service centre. As such commuting has been taken into account. The Melton Borough Council Housing Needs Study (2016) shows evidence of affordable housing need in the Wymondham parish and supports the policy requirement of 40%.
Martin Lusty. WOTWTA NP Group	FC6	In support	Support noted.
Carl Powell	Para 5.8 and policy C4	Objects to reduction of affordable housing provision in SS4 and SS5. Wants it increased to 25% in Melton North and South. Supports 40% affordable housing in Somerby Parish	Evidence that affordable housing in the Borough is needed is available and was used in the plan making (HEDNA, 2017 and Melton BC Housing Needs Study, 2016). However, when setting policy requirements, the viability of development also needs to be considered. The Revised Local Plan and CIL Study, May 2017 found that any more than 15% affordable housing on eligible residential developments in both the northern and southern sustainable neighbourhoods and 5% - 10% in Melton Mowbray is not viable. The targets are set as a minimum and can be increased having regard to market conditions and demonstrable economic viability evidence. The support of a 40% affordable housing requirement on eligible residential developments in the Somerby parish is noted. It is intended to develop affordable housing in rural areas which will be held in perpetuity. The details of this will be set out further in a Supplementary Planning Document, which will be formulated and implemented post Local Plan adoption.

Robert Anthony Fionda	FC6	Lack of evidence for affordable housing in villages. Demand greatest in town and poor in villages. Wymondham – Problematic in selling and renting properties.	The HEDNA, Jan 2017 shows a need for 70 affordable housing dpa . This need is across the whole Borough not just in the urban area of Melton. The detailed ward level MBC Housing Needs Study, Aug 2016 shows the identified need for affordable housing is approx. 50% in Melton and approx. 50% in the rural areas (figure 4.17). The Rural Housing Need surveys, where they have been undertaken in Parishes across the Borough, show a high level of affordable housing need, when calculated over the 25 year plan period. There will still be unmet affordable housing need. Problems with the sale or let of properties can sometimes be due to the mix of tenure; type or size of properties. Affordable housing can comprise low cost homeownership options as well as rented housing. This allows for sites to be more viable. A large amount of affordable housing will still be delivered in the urban areas. Although the affordable housing % requirement is lower in the urban areas; the sites are larger and so the number of affordable homes forecast to be delivered is larger.
Robert Sparham	FC6 5.8.10	SA objectives of 9: social inclusion and 10: poverty and deprivation will not be met by BOT3 as extra expense of access road.	No evidence has been provided to suggest that the site would experience viability issues such that housing mix and affordable housing policies could not be achieved. The alternative suggested, land at Belvoir Rd is not considered suitable for development for a series of reasons. A written promotion agreement is currently being prepared and signed by the 4 landowners. Agent has been asked to represent the site on behalf of all 4 landowners. No viability issues have been raised by owners or agent.
Mrs Debbie Adams	FC6 Policy C4	Only the SN's will be able to afford the high mitigation costs by reducing AH. Gladmans (planning application 15/00910/OUT) decision set benchmark.	The Gladman planning application was determined on its own merits, having regard to the relevant evidence available at that time . The decision to accept a reduced level of affordable housing in this location has been supported by subsequent viability evidence produced for the local plan.
Colin Love (Professor)	Appendix 6	The distribution of affordable housing within the Borough should be determined by the location of actual need and not by developer contributions to infrastructure issues.	The % of affordable housing requirement in the Sustainable Neighbourhoods would be higher if the infrastructure costs were not as high. However, the % in the villages, inc. Bottesford would still be the same to meet evidenced need, even if the affordable housing at Melton was met in full.
Aspbury Planning (on behalf of Barrett / David Wilson Homes)	FC6	Objects to minimum targets on affordable housing. Also questions viability – the difference to residential values and the added burden of the planned introduction of CIL.	No modification recommended. Many sites across the Borough have secured higher % returns of affordable housing and provide evidence that the minimum %'s are achievable. Developers and house builders are to take these %'s as the lowest limit we would accept, unless in exceptional circumstances, a site specific viability assessment shows that the targets are not deliverable.
Terence Joyce	Appendix 6	Only build in rural locations proven to have a valid need.	Affordable housing will be developed where there is evident need. Strategic Objective 1 of the Local Plan is to “Help provide a stock of housing accommodation that meets the needs of the community, including the need for affordable housing”. Households who do not have their own transport will not be penalised by not enabling affordable housing to be developed in rural areas. Currently, not every household in rural areas of the Borough have their own transport and instead make use of other options.
Laurence Holmes (on behalf of Richborough Estates and Leicester County Council)	Policy C4	Support the reduction in the affordable housing requirement for the NSN from 37% to 15%. Support flexibility of Policy C4.	Support noted
Laurence Holmes (on behalf of Taylor Wimpey, William Davis, Barwood, Leicestershire County Council, Richborough Estates)	FC 6 / Policy C4	Support the reduction in the affordable housing requirement for the NSN from 37% to 15%. Support flexibility of Policy C4.	Support noted

Peter Wilkinson (on behalf of Mrs S Noble)	Policy C4	Use of postcode areas to determine 'value areas' is not particularly refined	Postal areas provide easily identifiable geographical boundaries and one in which land registry data can be enumerated. As such they provide a widely accepted means for assessing the geographical distribution of market strength.
Lilian Coulson (on behalf of Mr and Mrs N J Spick)	Policy C4	The affordable housing percentages need to be reduced to allow much needed housing to be developed. They must not be stated as a 'minimum'.	The Revised Local Plan and CIL Viability Study, May 2017 is a whole plan wide viability study and has taken into account the combined costs of development with CIL to determine the percentage affordable housing requirements which are viable. No modification recommended. Many sites across the Borough have secured higher % returns of affordable housing and provide evidence that the minimum %'s are achievable. Developers and house builders are to take these %'s as the lowest limit we would accept, unless in exceptional circumstances, a site specific viability assessment shows that the targets are not deliverable.
Colin Love (Professor)	FC6	At least 20% affordable housing - and a requirement that this is provided in the areas where it is needed, not just a blunt requirement in every part of the Borough. Since most of the employment is in Melton, and there is a high level of low paid employment in the Borough, I would expect to see most of the 'affordable' housing targeted to Melton - and of course, other areas where there is evidence of a proven need.	The affordable housing percentages are informed by the viability study – the study found that a general target of 20% would not be viable in parts of the Borough. Affordable housing needs are found across the Borough, not just in Melton. Even at the percentages in the draft policy, most of the affordable housing will be provided in the town, as this is where the most housing numbers overall are to be delivered.
Colin Love (Professor)	FC6	The target for Affordable housing should reflect need, not ability of developers to pay for it or diversion of funds to bring about MMDR. Revert to 37%, not 15%.	If development is made unviable because of affordable housing requirements or infrastructure (or a combination of both), they will not proceed and 0 affordable houses will be achieved. It is necessary to accommodate cost of the MMDR within the development as without this infrastructure they cannot proceed, except possibly a very small quantity, which again would result in less supply of AH, not more.
RHB Ranns for Croxton Kerrial and Branston Parish Council	FC6	<ul style="list-style-type: none"> • use of target and not requirement introduces a lack of clarity. • Affordable housing in villages will not be affordable, particularly in value areas 1 and 2. 	The housing will be affordable in comparison to market housing in the same area. A whole plan viability assessment has been undertaken. Any residential developments will need to meet these affordable housing targets unless in exceptional circumstances a site specific viability assessment shows that the targets are not deliverable.
Laurence Holmes (obo Richborough Estates & LCC) (ANON-7VBY-7HEF-J)	FC6	Policy C4 – Affordable Housing Provision: support the reduction in the affordable housing requirement for the NSN from 37% to 15%. However, reaffirm their support for the flexibility demonstrated by draft Policy C4, namely that the provision of affordable housing will be subject to economic viability, market conditions and other infrastructure requirements.	Support Noted
Sue Green obo HBF	FC6	Differential rates of affordable housing - supported. Reduction from 37% to 15% affordable housing provision on the SUEs - supported. Object to the word "minimum" in Policy C4.	Support noted for differential rates of affordable housing and reduction from 37% to 15% affordable housing provision on the SNs.No modification recommended. Many sites across the Borough have secured higher % returns of affordable housing and provide evidence that the minimum %'s are achievable. Developers and house builders are to take these %'s as the lowest limit we would accept, unless in exceptional circumstances, a site specific viability assessment shows that the targets are not deliverable.
Adam Murray	FC6, Wymondham	Support Focused Change insofar that it relates to the confirmation that the requirement for affordable housing provision begins at 11 dwellings however concern is raised that affordable housing target is expressed as 1300. This should be expressed as a minimum.	Support noted. As per national guidance, all housing targets are minimums.