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**BY EMAIL ONLY: idkemp@icloud.com**

Dear Mr Kemp

## **MELTON LOCAL PLAN EXAMINATION**

### **MELTON BOROUGH COUNCIL DOCUMENT M6-2 PROPOSED FIVE YEAR SUPPLY METHODOLOGY FOR MELTON BOROUGH – 19TH FEBRUARY 2018**

I refer to your email of 27 February 2018 to Phill Bamford of Gladman Developments Limited in respect of the above matter.

On behalf of Gladman Developments Limited our submissions in respect of the Council's document entitled: M6-2: Proposed Five Year Supply Methodology for Melton Borough – 19th February 2018 are set out below.

#### **Representations**

In our view, adopting Method 7 will not significantly boost the supply of housing in the Borough. Method 7 is simply a method by which the Council attempts to demonstrate a 5 year supply and it is firmly submitted that the Council's approach does not reflect the provisions of Paragraph 47 of the Framework. The solution is clear more deliverable land needs to be identified for the 5 year period and more land needs to be identified for the Plan period as a whole as advanced in our Hearing Statement relating to Matter 6.

The Council states that the local circumstances in Melton are highly relevant. We agree and set out below some summary points to provide an appropriate context for these further submissions:

- The Council identified a deliverable supply of 2,034 dwellings in MBC/HS1A from a base date of 1 April 2017 (that being our preferred base date for the reasons set out in our Hearing Statement on Matter 6 and as explained in oral submissions at the Hearing). The figure of 2,034 dwellings was the product of the Council's discussions with land owners, developers and agents and on average it equates to 407 dwellings per annum; it represents a figure that the development industry is telling the Council and Examination will be delivered. Furthermore, the housing trajectory in Table 4.4 of MBC/HS1A noted that delivery is expected to reach 632 dwellings in 2021/2022' this

being the high point of the whole Plan period according to Graph C (Trajectory) on Page 25 of MBC/HS1A.

- Hourigan Connolly identify a deliverable supply of 1,763 dwellings from a 1 April 2017 base date in our Hearing Statement for Matter 6 and on average that equates to 353 dwellings per annum.
- The Council now say that using a 2018 base date, the deliverable supply (after the application of lapse rates which it now applies to both allocated and non allocated sites with planning permission) is 2,362 dwellings and that equates, on average, to 472 dwellings per annum.

It is fairly clear that the Council's approach is not aspirational contrary to Paragraph 154 of the Framework. The Council claim that they are simply being realistic with regard to likely delivery rates having regard to Paragraph 154 of the Framework and in that respect the Council points to past delivery rates in defence of its approach of a stepped housing requirement.

However, past performance is no indication of future performance particularly in a climate where the government expects Local Planning Authorities to boost significantly the supply of deliverable housing land to secure the delivery of much needed new homes. In that respect, it is fairly clear from Appendix 2 of ID1D and it was evident from the oral submissions at the Hearing that many of the major volume house builders operate in the Borough and others are willing to develop in the area if opportunities became available. Moreover, as detailed above the evidence of the development industry is that a step change in housing delivery is achievable in the Borough and that evidence takes into account the time it will take for the Sustainable Neighbourhoods to come on stream.

In this Borough pointing to past rates of delivery isn't terribly helpful or instructive. Those past rates of delivery are a product of the bank of planning permissions that were available at the time and are not reflective of the large areas of land already released for development and planned to be released for development through allocations.

In summary terms there simply is no credible justification for adoption of a stepped requirement in Melton. The development industry is set to deliver significant numbers of new homes in the Borough.

Accordingly, we remain of the view that the appropriate base date for the housing land supply calculation is 1 April 2017 and not 1 April 2018 as advanced by the Council. Furthermore, we remain of view that the Sedgefield method should be adopted here with the undisputed 20% buffer being applied to both the requirement and the accumulated backlog.

What is evident however is that to achieve a deliverable 5 year supply of housing land and to deliver an appropriate level of housing over the Plan period further land needs to be allocated for housing (see Table 5 and 7 of our Hearing Statement on Matter 6). In that respect our client's site at Six Hills could assist and would deliver new housing quickly (see Gladman Developments Limited's Hearing Statement relating to Matter 5).

Yours sincerely



**MARC HOURIGAN BA (Hons) BPI MRTPI**  
**Executive Director**

cc: P Bamford Gladman Developments Limited