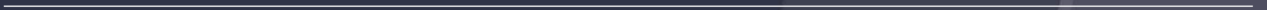
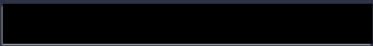


# Planning Statement for Melton Local Plan Partial Review.

## Regulation 18 Issues and Options Consultation.

On behalf of Davidsons Developments Ltd.

Date: 5 January 2024 | Pegasus Ref: P23-2742





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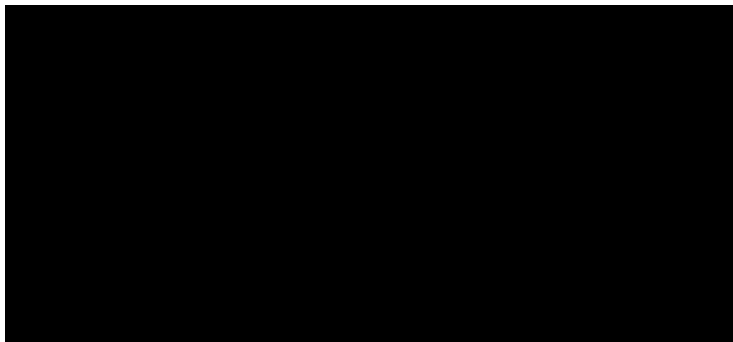
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# 1. Introduction

- 1.1. These representations are submitted to the Melton Local Plan Partial Review Issues and Options Consultation by Pegasus Group on behalf of Davidsons Developments Ltd, in relation to their interests south of Station Road, Old Dalby.
- 1.2. Davidsons have previously engaged in the preparation of the adopted Local Plan and have submitted this site through the Call for Sites, most recently in 2019. We welcome the opportunity to input into the Local Plan review.

## Consultation Respondent Details



**Organisation:** Davidsons Developments Ltd

## 2. Housing Need and Requirement

- 2.1. The current housing requirement in the adopted Local Plan is out of date and needs to be updated. It also needs to be extended to cover at least fifteen years at adoption of the new Local Plan.
- 2.2. In order to overcome these fundamental issues, the Council should commit to undertaking a full Local Plan update as soon as the partial review is completed to address the changes in circumstance that have occurred since the previous Local Plan was adopted in 2018.

### Housing Needs

- 2.3. Policy SS2: Development Strategy sets out a housing requirement of 6,125 dwellings between 2011 – 2036 with a stepped housing trajectory which increases from 170 dwellings per annum through 245 to 320, averaging 245 overall. This was based on an Objectively Assessed Need of 170 homes a year.
- 2.4. The current Local Housing Need figure for Melton, derived from the standard method is 185 homes a year, 15 homes a year or 9% higher than the objectively assessed need that informed the current Local Plan. This is a significant change in circumstance which needs to be addressed through the Local Plan update.

### Leicester's Unmet Needs

- 2.5. Melton has also signed up to the Leicester and Leicestershire Statement of Common Ground which apportions an element of Leicester's unmet needs to Melton in addition to this. The Statement of Common Ground identifies a need to plan for 300 homes a year in Melton. This suggests the housing requirement for the Borough needs to be at least 55 homes a year higher than the current Local Plan average requirement of 245 homes a year, a 22% increase.
- 2.6. This is also a further significant change which need to be reflected in the Local Plan housing requirement for the Borough and addressed through the Local Plan review.

### Plan Period

- 2.7. The plan period also needs to be extended by at least five years. The current local plan runs to 2036. This leaves 13 years covered by the current Local Plan and this is below the government's requirement for a 15 year time horizon at adoption of a Local Plan.
- 2.8. The Council's own Five-Year Review acknowledges at paragraph 2.2.6 that the policy is silent about growth rates to be delivered beyond 2036 and that this means the Local Plan policies will only be looking ahead over 10 years at adoption, rather than the required 15 years set out in the National Planning Policy Framework (the Framework).
- 2.9. The plan period needs to be extended to at least 2041.

## Housing Requirement

- 2.10. The minimum required 300 homes a year set out in the Statement of Common Ground to meet Leicester's unmet need over a plan period 2023 to 2041 would suggest a housing requirement of 5,400 homes, an additional 2,215 homes to those required by the current Local Plan. It is also important to include at least 10% contingency, increasing this figure to 2,755 homes.
- 2.11. The Five Year Review sets out a level of headroom in the current housing numbers when supply is taken into account. At paragraph 2.2.4 the review notes that the forecast housing provision for the plan period is 1,750 dwellings more than the local plan target, which is describes as 'significant headroom'. This is only significant headroom over the current Local Plan period and against the current housing requirement.
- 2.12. The current over supply within the current plan period needs to be considered against the Council's long term housing needs to 2041 to ensure the local plan review is robust and meets the tests of soundness. Once the current housing needs and unmet needs from Leicester are taken into account over an appropriate time horizon to 2041, this is no longer headroom, it is necessary supply which needs to be supplemented with additional land.

### 3. Additional Housing Sites

- 3.1. In light of the comments above about the need to review the housing requirement and extend the plan period, there is also a need to consider allocating additional sites to meet the additional needs.
- 3.2. Outside of the Main Urban Area of Melton Mowbray, the most sustainable location to identify additional sites is the Borough's Service Centres. These are the villages that have been identified in the adopted Local Plan as having the essential services and facilities (primary school, access to employment, fast broadband, community building) and regular public transport, as well as a number of other important and desirable services such that they are capable of serving basic day to day needs of the residents living in the village and those living in nearby settlements.
- 3.3. Davidsons Developments Ltd have a suitable, achievable and available site in Old Dalby, one of the Borough's Service Centres. The site is located east of village, adjacent to the settlement edge, south of Station Road in Old Dalby. A site location plan is attached at Appendix A.
- 3.4. The Land South of Station Road, Old Dalby is a 3.66 hectare site, currently in agricultural use, with the potential to deliver approximately 80 homes in the short to medium term. It would offer a natural extension of the village and is within walking distance of services and facilities in the village as well as the successful Old Dalby Trading Estate and Crown Business Park, which is located to the east of the site. This existing employment area is safeguarded in the existing Local Plan and contributes to the local economy and sustainability of Old Dalby village.
- 3.5. Development of this site could respect the separation and tranquillity between the village and the Old Dalby Trading Estate in line with the adopted Local Plan Policy EN4. The business parks are not visible from the site due to the landscape and raised railway line to the east of the site and there would continue to be a clear separation between the village and business parks which would be reinforced through the masterplanning of the site. It would therefore be possible to avoid coalescence by maintaining the principle of separation and retaining a tranquil part of the landscape safeguarding the character of settlement.
- 3.6. A concept masterplan demonstrating this is attached at Appendix B for consideration. It is strongly recommended that the local plan review addresses the latest housing needs position and includes a small number of additional allocations to meet the on-going needs. Beyond the Main Urban Area of Melton Mowbray, the Service Centres offer the most sustainable locations to do this. This site in Old Dalby is a small scale deliverable site which would help ensure the Council continues to meet housing needs beyond the current plan period.

## 4. Housing Mix

- 4.1. The consultation document proposes to amend the current policy to bring the housing mix table into the policy from the reasoned justification, update it with the most up to date evidence and make the policy wording more definitive with less exception clauses, such as removing “having regard to market conditions and economic viability”.
- 4.2. We ‘strongly disagree’ with this proposed amendment to the mix policy and suggest an alternative approach.
- 4.3. This proposed change will have significant impacts on the viability of development and will constrain the ability of developers to respond to the individual circumstances of each site in terms of housing needs, market conditions, design and economic viability. This flexibility to respond to the site specifics of a site is essential to the deliverability of the Council’s development strategy.
- 4.4. There will be situations where a site is located in an area where it is not appropriate to deliver the ideal mix identified through the Housing Needs Assessment. For example, there may be a specific local need for a different mix of homes, a need to adjust the mix to achieve efficient use of the site or ensure integration with the character of an area and this will require a different approach.
- 4.5. There will also be situations where delivering the ideal mix will undermine the viability of a site and if the mix policy is made more definitive and includes no flexibility to consider this then the affordable housing offer will be impacted. This will either mean less affordable housing will be deliverable or the tenure of the affordable housing will need to be adjusted i.e. less social and affordable rented homes.
- 4.6. The inclusion of the table into the policy is cautioned against as this is based on evidence at a point in time and will make it harder to use any updated evidence. The current approach of including the table in the supporting text and highlighting the need to refer to this or any update to inform the mix is a better approach which allows new evidence to be used straight away.
- 4.7. The consultation document itself notes that these changes may have unintended consequences such as reducing the viability meaning less or different types of affordable housing and inappropriate development/design in certain situations. It is essential that an alternative approach is used to update the plan to avoid this.
- 4.8. It is suggested that the current wording ‘having regard to market conditions, housing needs and economic viability, taking account of the site specific circumstances and the housing mix information’ is kept in the policy to avoid the unintended consequences identified above.
- 4.9. It is also suggested that the mix table is updated with the new evidence and referred to as the ‘preferred mix’ to avoid the problems encountered at appeal whilst maintaining the flexibility needed to respond to site specific issues.

## 5. Affordable Housing

- 5.1. The consultation document proposes to amend the affordable housing policy with a new requirement figure based on the most up to date housing need and viability evidence. It is also proposed to update the threshold for the affordable housing requirement to align with the national definition of major development except in rural areas where the threshold would be reduced to 5 dwellings or more. Finally, it is proposed that the policy is updated to reflect the new national affordable housing definitions.
- 5.2. The proposal to bring the affordable housing policy up to date taking account of new evidence and the latest national guidance and definitions is logical and understood. It is essential that the updated policy takes account of both need and viability evidence. It is important that the viability evidence considers the implications of the proposed mix policy on viability along with all other proposed planning obligations.
- 5.3. We agree the amendments are needed but would welcome the opportunity to comment on the proposed changes before the Pre-Submission Local Plan is prepared and published. At this stage the Council will be within the formal process of the Examination, and it is considered important that developers and land promoters are given the opportunity to informally input into the development of this important policy to ensure it is viable.



## 6. Self and Custom Build

- 6.1. The consultation document proposes to reduce the threshold from 100 dwellings, to 20 as long as it is justified, viable and considers local needs. The proposals also include the introduction of a timeframe for the plots to be sold, for example six months at which point the developer could build out the plots. It is also proposed that community-led self/custom build housing will be supported as long as it is justified and considers local needs.
- 6.2. The Council's preferred option is to also add local-specific criteria:
- Encourage a diverse provision of self/custom builds by supporting smaller and more affordable options.
  - Encourage exemplar sustainable housing options.
  - Require developments above the threshold to allocate suitable plots at the entrance of the scheme, to avoid unnecessary disruption to self/custom builders.
- 6.3. It is considered that Option 1, the proposal to delete this policy and promote self and custom builds through other Local Plan policies, is the most appropriate approach.
- 6.4. We 'disagree strongly' with Option 2 and the proposal to reduce the threshold from 100 dwellings to 20. The Council does not appear to have an adequate monitoring process for self and custom builds and therefore has no evidence to show that this policy change is required.
- 6.5. The reduced threshold needs to be considered in light of the viability evidence and practicalities or the evidence of need. This will increase the complexity of developments and the current threshold reflects this. Reducing the threshold will have resource implications for the Council at a time when resources are already tight. It is suggested that an alternative approach should be considered of maintaining the current threshold and including a criteria based policy for self and custom build developments. The proposal to allow plots to be used by the site developer after a six month period is impractical for a smaller site where the developer will potentially be getting ready to complete a development in that timescale. This will increase the complexity of developments and the current threshold reflects this. Reducing the threshold will have resource implications for the Council at a time when resources are already tight.
- 6.6. There is also an important role for monitoring in relation to self and custom build homes as often these types of developments are being delivered through individual or small housing applications but there is no data collection if the applicant does not identify themselves as a self or custom builder. Could applicants be asked whether they are self or custom building or including an element of this within their development, so this information can be captured, and the full extent of the outstanding demand could be understood.



- 6.7. We 'disagree strongly' with Option 3 and the proposal to include plots at the entrance of a scheme, this part of the site is key to integrating the development with the existing community, setting the tone of a development and securing house sales. This approach would conflict with the principles of good design. The proposed policy change takes no account of the practicality of such a proposal or health and safety requirements for a construction site.

## 7. Biodiversity and Geodiversity

- 7.1. The consultation document proposes updating the current policy to reflect the Biodiversity Net Gain legal requirements and new evidence and guidance from the Local Nature Recovery Strategy, reference to the mitigation hierarchy and split the policy into more logical parts.
- 7.2. The amendments are logical in principle, but we would welcome the opportunity to review the proposed policy amendments before the plan is finalised for Pre-Submission consultation.

## **8. Ensuring Energy Efficiency and Low Carbon Development**

- 8.1. The consultation document sets out a preferred option to review each part of the policy considering the revised building regulations, other regulatory changes and wider local plan policies.
- 8.2. The proposal to reduce the complexity and duplication of standards is supported. Building standards should not be dealt with through local plan policies. It is important that the new more focused policy is deliverable, based on the evidence and taken into account in the viability assessment of the plan.
















## Appendix A: Site Location Plan





## Appendix B: Concept Masterplan



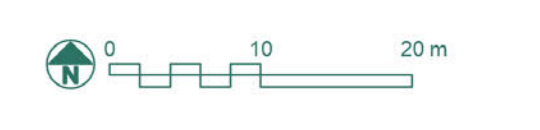
- Key**
-  Application site boundary
  -  Existing (retained) trees & hedgerow
  -  Indicative proposed planting
  -  Open space
  -  Indicative surface water attenuation basin
  -  Existing Public Right of Way
  -  Proposed pedestrian/cycle link
  -  Potential for equipped play/LEAP
  -  Proposed street
  -  Shared surface street
  -  Lane
  -  Private drive
  -  Proposed Building

**Land Budget**

- Gross Site Area 3.68 ha/ 9.09 acres
- Residential Area 2.63 ha/ 6.49 acres
- Open Space 1.05 ha/ 2.6 acres

**Indicative Capacity**

- Approx 81 homes (at an average density of 31dph)



**nineteen47**  
 CHARTERED TOWN PLANNERS  
 & URBAN DESIGNERS

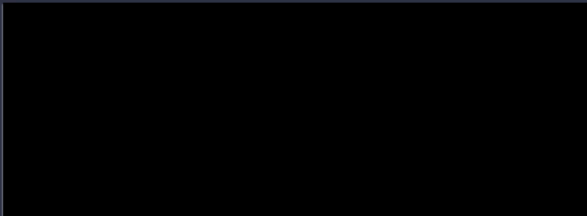
Project: Station Road, Old Dalby

Drawing Title: Masterplan

Project Code	Drawing No	Rev
n2048	005	
Date	Drawing Scale	
22.12.2023	1:500 @ A1	



Town & Country Planning Act 1990 (as amended)  
Planning and Compulsory Purchase Act 2004



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