

## **Long Clawson, Hose and Harby Parish Council – March 2018**

### **Melton Local Plan Comments on MBC's paper responding to Inspector's post-Examination Questions**

#### **Matter 3 and 5 – ALIGNMENT OF LOCAL AND NEIGHBOURHOOD PLANS**

##### **1. Overview**

- 1.1. These comments respond to MBC's paper replying to questions raised by the Inspector, Ms M Travers, following the end of the public examination sessions. They should be considered in the context set by our written representations prior to the Examination, our Neighbourhood Plan and our amplification thereof, made during the public sessions. Site specific comments remain as previously described in these representations and our Neighbourhood Plan.
- 1.2. Our comments made at the public hearing on strategic vs non strategic policies in the local plan for Housing Allocation remain as stated. That is, that the minimum housing requirement defined by MBC in the local plan is the element of policy that should be strategic. All NP's in preparation and approval should meet these minimum levels. Then NP's which are already well progressed to examination and beyond contain the community detailed site allocations and supersede any site references in the local plan.
- 1.3. In our view NP's from their first draft stage to Referendum, should contain all approved planning applications for their area and meet the minimum required housing number for their designated area as stated in the local plan plus a contingency of at least 15%. The minimum housing requirement should be met by allocated sites of 10 houses or more, as windfall sites are in addition to this to meet the local plan overall target. In our view, these are mandatory criteria for an NP and ensure an equitable spilt of development across the Borough.
- 1.4. It should be remembered when assessing the local plan five-year land supply, that MBC already have 2235 dwelling approved for development as shown in their latest five-year land supply methodology dated 19 February 2018. Therefore, in our view, minor changes to designated areas allocations in the local plan do not put the overall plan at risk, nor do they open up the plan to legal challenge.
- 1.5. The most notable update, from our perspective, since the public examination is that the Long Clawson, Hose and Harby Neighbourhood Plan passed referendum on 15 February 2018, with a 43.9% turnout and a Yes vote of 90.2% - very strong engagement with and endorsement of the plan. (Note that the previous two NP referendums held by MBC have had less than 20% turnout.)
- 1.6. It should also be remembered that MBC's own response to Regulation 16 consultation of our NP, said that if the NP inspector accepted our plan then they would support the NP site allocations.

2. Detailed response to MBC conclusion addressing the details in MBC's paper dated 23 February 2018.

2.1. We note the Council's discussion of possible scenarios to gain alignment. We support the general sentiment in Approach 3 where an NP that has passed examination takes precedence over the local plan and that development in areas of the Borough without finalised NP's are covered by local plan site allocations.

2.2. In our view the detailed exceptions in MBC's conclusion are flawed and do not allow the essence of the Localism Act to be followed through via the well progressed NP's in the Borough:

- *Asfordby and Asfordby Hill* - after hearing the representations at the public examination, it is difficult to understand why this designated area does not meet its minimum housing target and that MBC continue to promote a lesser number for this area despite the NP and developers showing an over supply of housing available in the designated area.
- *Long Clawson* - more than meets its minimum requirement for housing via the NP (target 111 (if 6125 housing target is approved as part of this plan), actual NP sites 127). No reserve site is required and it should be clear under the review policy of the local plan that if it is identified that actual delivery is falling short then the NP review process should identify replacement site(s) to make up the shortfall. This should be true for true for all NP's that have been adopted at the point of review.

Also, see previous representations on the local plan and NP detail for the evidence that LONG4 is not suitable for development under any circumstances. We reject that LONG4 should be made a reserve site.

And see representations not to renumber sites in the local plan as this causes confusion in the community.

Note site boundary representation for LONG 1 to match the approved housing development line in the planning application should be included in the local plan.

- *Hose* – we reject the proposal to swap the sites between the local plan and the NP. See our previous detailed representations and our NP on this matter. In summary MBC themselves show the sites NPHOS2 and NPHOS3 as developable in SHLAA 2017 and that this could be in the life of the plan. These sites have been selected by the community and agreed via the referendum. Site HOS2 in the local plan only delivers 35 homes and a planning application has not yet been made for this site, it is therefore not in the approved planning applications for the five year land supply, and we therefore believe it does not make a material difference to the overall deliverability of the local plan to support the NP site allocation in Hose.
- *Harby* – we refer you to our previous representations on Harby sites. In summary, Harby more than meets its minimum requirement for housing via the NP (target 78 (if 6125 housing target is approved as part of this plan), actual NP sites 128 all of which are approved planning applications) therefore no reserve sites are required for this village. Although site allocations (excluding reserve site in local plan only) are the same in Harby NP and the local plan the detail for HAR2 and HAR4 are not correct

and should be amended to match the approved planning application site boundaries and housing quantities.

- *Broughton and Dalby* – remain with NP allocation as this plan is moving forward to referendum and no reserve sites are required as per points above.
- *Frisby* – as noted here site boundaries are to be redrawn to match the approved applications. It is our view that this should be done on all sites across the local plan.

3. We remain concerned that the paper produced by MBC focuses on Housing Allocation and does not address the alignment of other policies on review periods and addressing shortfall process to be driven by NP's if in place, environmental, transport and local issues policies where NP's have additional input to the local plan, housing design in rural communities and limits to development.

4. We remain open to further input on any changes to the draft local plan that may result from this part of the Examination process.