

Chapter 5, Policy C2

Name	Representor Number	CH5PC2Q3: Response	CH5PC2Q4: Representor's Suggested Changes	MBC Response	MBC Suggested Modifications or Proposed Changes
Mrs Joyce Noon - CPRE Leicestershire	365	Not consistent with NPPF 154	The pre-submission draft (Table 9 - below) does not reflect the housing mix of the 2014 SHMA.	The Melton Borough Council Housing Needs Study (MBC HNS) (August 2016) updates the evidence for the housing mix of the 2014 SHMA (as stated in the Local Plan).	
Andrew Granger & Co Ltd	368	In respect of Policy C2: Housing Mix, we fully support its requirement for new development to deliver a range of housing types and sizes.		Support noted	
Carl Powell	231	There is nothing to object to in policy C2, the intention is admirable.	none	Support noted	
Colin Love	173	<p>To my understanding, presently both of these Regulations are voluntary - not mandatory.</p> <p>It can be considered that within the current text of the Local Plan it is difficult, if not impossible, to see how the MBC could enforce a private developer to undertake building even to Standard M4(2).</p> <p>Of course, the MBC can, for itself, set and build to the standard of M4(3). But it seems totally wrong that the Melton Plan only refers to retirement, sheltered and care homes as being required to be built to standard M4(2).</p>	<p>The text should indicate that special preference will be given to developers who undertake to build all new houses to the Regulation M4(2) standard as a minimum.</p> <p>The text should also indicate that special preference will be given to planning applications that include bungalows - also built to M4(2) standards as a minimum.</p>	The Local Plan and CIL Viability Study report states that technical work produced by EC Harris in 2014 revealed the impact of these standards was to represent a cost uplift on standard build costs of less than 1% on build cost, nonetheless it could be argued as deterring investment where such schemes are marginal. Due to this, a modification is proposed to policy, which encourages the technical standard to be met rather than required.	Modification proposed which reads as: Proposals for retirement homes, sheltered homes and care homes will be supported and encouraged to meet the technical standard for access of Building Regulations 2015 Part M4(2). Proposals for wheelchair accessible dwellings, where the council is responsible for allocating or nominating residents, will be encouraged to meet the technical standard for access of Building Regulations 2015 Part M4(3).
Colin Wilkinson (on behalf of Asfordby Parish Council)	380	Asfordby Parish Neighbourhood Plan Policy A17 sets out a suitable housing mix to be achieved to best fit the future needs of the parish. Planning Practice Guidance (Reference ID: 41-043-20140306) advises local planning authorities not to duplicate the planning process.	Policy C2 be modified so that there is no duplication of the policies and proposals of the Asfordby Parish Neighbourhood Plan.	1.9 sets out how the Neighbourhood Plans relate to the Local Plan. Unless a Neighbourhood Plan is adopted, we need to have our own policies and proposals.	

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Diana and Anthony Taffs	294	Bottesford - Finally, whilst I am not opposed to any development it has to be far fewer than you proposed and the right mix of houses so that young people get a chance, not all 4 to 5 bedrooms making a lot of money for the developers and ruining our village by turning it into a town by adding on very modern houses all around the outskirts of the village.		<p>Bottesford, along with many other villages in the Borough, has been identified for taking a proportion of the dwellings needed across the whole of the Borough over the plan period. An extensive and comprehensive assessment was undertaken to determine the number of dwellings.</p> <p>The housing mix table for market and affordable housing currently shows a higher percentage of 2 and 3 bedroom homes required.</p>	
Diane Orson	214	I believe the policy on paper is sound but it does not reflect reality.	Applicants/ Developers should demonstrate the need for the type of accommodation they are proposing. It should match the boroughs requirements for that area and not the applicants requirement for an uplift in funds	The Borough's housing needs are considered prior to the granting of any planning permission.	
Guy Longley, Pegasus Group on behalf of Davidsons Development	395	Paragraph 5.5.7 and Table 9 sets out the optimum housing mix identified in the Melton Borough Council Housing Needs Study. It is important that the policy is applied flexibly taking account of the particular circumstances of sites. It would not be appropriate for the Council to seek to secure the mix indicated in the Housing Needs Study on each site proposed for allocation. The appropriate mix of housing on a particular site will be influenced by site specific circumstances including the nature and mix of housing in the surrounding area and economic viability of the site.	Additional text should be included at paragraph 5.5.7 to make it clear that the Council will take a flexible approach to housing mix on sites taking account of particular site circumstances, and that the optimum housing mix represents an overall aspiration that will be applied flexibly.	Policy C2 1st paragraph already states "...having regard to market conditions, housing needs and economic viability".	

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Jo Althorpe on behalf of Stephen Lee and the VB Trust	402	<p>Through Policy C2, the Council is seeking to exercise a level of control (manage) over “the mix of house types and sizes”. The policy fails to recognise that neither the Council nor the developer can control the purchasing decisions of individual households, as in the private sector people can choose the type and size of property they wish to buy.</p> <p>The importance of providing a mix of dwelling types and sizes, which is essential to ensure that there are homes suitable for a variety of households is recognised. However, there needs to be flexibility within Policy C2 to take account of market demand for housing, not simply market need. The Policy does not reflect national planning policy, particularly in respect of paragraph 50 and the need to plan for future housing based on market trends and local demand.</p>	The first paragraph of Policy C2 should be removed – “We will seek to manage the delivery of a mix of house types and sizes to balance the current housing offer, having regard to market conditions, housing needs and economic viability”.	The evidence from the Melton Borough Council Housing Needs Study was used to produce the housing mix table. As part of this study, qualitative and quantitative research was undertaken, which included interviews with estate agents and analysis of land registry data. This was to identify demand for different types and sizes of property. Therefore, market signals were used not just demographic changes.	
LCC (Highways, Education, Early Years, Waste, Property Assets, LLFA, Libraries & Culture, LRERC)	405	<p>Policy C2 – Housing Mix</p> <p>35. The provisions relating to Housing Mix are broadly welcomed in that, in addition to market conditions/economic viability they take account of the needs of the ageing population and people with specific accommodation requirements.</p>		Support noted	
Leicester Diocesan Board of Finance	407	We fully support the requirements outlined within Policy C2: Housing Mix, which state that new development must deliver a range of housing types and sizes.		Support noted	

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Leigh Higgins	128		Consider adding positive element for current Rural Settlements should they meet this policy criteria.	Comments noted	<p>Minor modification to be made to SS3 on this matter rather than C2 to compliment C4 to read as: Outside of those sites allocated through the local plan, planning permission will be granted either for small scale development of up to</p> <ul style="list-style-type: none"> • 10 dwellings in Melton Mowbray and in Service Centres; • 5 dwellings in Rural Hubs; and • 3 in 'Rural Settlements'; <p>and/or where it has been demonstrated that the proposal enhances the sustainability of the settlement(s) to which it relates and, either on it's own or, through repeated application, will not result in a level or distribution of development that is inconsistent with the development strategy. The Council expects proposals to meet the following criteria:</p> <p>2. The development provides housing or economic development which meets a local need as identified in a Neighbourhood Plan or appropriate community-led strategy, SHMA or economic needs assessment; and...</p>
Lance Wiggins (on behalf of G S Developments (Leicester) Ltd	404	This policy is supported, however it is felt that in relation to the Part M Building Regulations references, these should be altered to allow for future revisions. Accordingly, it would be useful to add 'Part M4(2) and any subsequent revisions' and 'Part M4(3) and any subsequent revisions'.		Comments noted	Modification proposed to add 'Part M4(2) and any subsequent revisions' and 'Part M4(3) and any subsequent revisions'.

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Melanie Steadman	284	This is a whole assumption. There has been no assessment of the individual needs of the Rural Services Centres and their own housing mix. In Clawson we have a higher % first-time buyer houses than Melton. Do we need any more - the current ones are difficult to sell.	A more extensive assessment of the housing needs in the villages. A borough wide assessment seems to have been based on statistics for Melton, which is an entirely different environment to the villages surrounding it.	The Melton Borough Council Housing Needs Study (MBC HNS) (2016) was the evidence base for the housing mix table. The housing study was a Borough wide assessment, which included an assessment of the villages and used both quantitative data and qualitative information.	
Michelle Colclough	45	Where is the mix of housing for growing established families? What happens when families housed in smaller footprint homes require larger spaces? Social housing often comes with large family accommodation required. Where will they live?		As older residents either downsize or no longer need a property of their own, this will free up properties for growing families to move into.	
Michelle Colclough	45	I support the need for housing to support the elderly population of the borough, it is much needed. However, placing older residents on the outskirts of the town centre seems a strange policy. It would be a 30-45 minute walk in the town for a fit active person. In reality, it will encourage the use of cars to drive into town, and for short journeys which will raise the CO2 emissions.		Residents are able to choose where they would like to live. Even with social and affordable housing, we operate a Choice Based Lettings Scheme. If a resident chose to live on the outskirts of town; they can choose to use public transport; walk or drive, like anyone else.	
R H B Ranns	242	5.5.6 and 7 identify a Borough wide housing needs study, which has been translated into Table 9, and is then applied Borough wide. Where a housing needs survey has been done for a specific area or village this is better evidence of need and should take precedence.	Policy C2 Para 1 third line "delete housing needs" and insert "the local housing needs survey, or if one has not been executed, the borough wide housing need"	For the Local Plan, the Borough Housing Needs Study is used as it shows the housing mix need over the whole plan period - up to 2036, whereas the Rural Housing Needs Surveys only show the need for the next 5 years. Both the Melton Borough Housing Needs Study and the Rural Housing Needs Surveys are used in determining planning applications.	

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Richard Simon, Clerk to BPNP Steering Group	429	Supported in Principle – subject to comments above (see under chapter 5)	<p>5.5.1 Melton has a very distinctive mix of housing, with few smaller 'entry level' properties such as terraced houses or flats and a large proportion (40%) of larger, detached houses.</p> <p>5.5.2 A limited offer in terms of housing mix has implications for affordability and demand for affordable housing.</p> <p>The windfall housing numbers, 10 for Service Centres, 5 for Rural Hubs and 3 for Rural Settlements are insufficient to provide an element of affordable housing as the minimum house number for this is 11 dwellings. (Policy C4). Whereas Service Centres will get affordable housing through larger developments and Rural Hubs may also benefit from housing in the adjacent Service Centres, Rural Settlements will not have any affordable housing unless it is specified and shown to be viable. The numbers of houses in windfall developments should be increased to ensure an element of affordable housing and a ceiling placed on development within the plan period so that the smaller settlements are not overwhelmed.</p> <p>5.5.3 Furthermore, Melton has an ageing population, (over the 2011-36 period the number of people aged 65 and over is projected to increase by 92% with a higher (192%) increase in the number of people aged 85 and over), with many households residing in large and potentially unsuitable properties, increasing the need to provide smaller homes suitable for downsizing households. This in turn would release existing family housing stock back into the market. Houses for the elderly and empty nesters need to be freehold and in a range of sizes to suit all needs. If only small houses/bungalows are provided, house blocking will occur.</p> <p>5.5.4 The Local Plan aims to ensure that the new housing provided in the Borough over the next 20 years best meets the changing needs of the population. An appropriate mix of housing is necessary to secure mixed and balanced communities where people's needs and aspirations for new housing are met. The policy seeks to provide greater choice in the housing market.</p> <p>The allocation method results in 55 out of the 74 villages in the Borough having no housing allocation and relying on windfall alone. How will this give location housing choice?</p> <p>The numbers permitted in the smaller locations do not allow</p>	<p>The housing mix policy relates to developments of 10 or more dwellings and so restricts the development of affordable housing. The number will not be increased because it would compromise the viability of development of smaller sites. House blocking by the elderly and empty nesters is already occurring because of them occupying larger properties. Thus the need to allow the development of smaller and accessible properties, which are currently lacking in the Borough. We have identified villages which are more sustainable communities for housing allocations due to their public transport links and amenities. The appropriate mix of housing is across the Borough as a whole not for every site.</p>	

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			<p>for affordable housing, how will this give an appropriate mix of housing?</p> <p>5.5.5 To offer a mix of housing suitable for a wide variety of housing needs and to balance the current stock, the Melton Local Plan will encourage a mix of property types on developments of 10 or more dwellings.</p> <p>As mentioned above the small settlements with only 3 or 5 house developments permitted, as proposed, will not meet this requirement. Why is the figure in 5.5.5 not adjusted to 11 dwellings so that it corresponds to Policy C4.</p> <p>5.5.6 Melton Borough Council's Housing Needs Study which examines the housing needs of the Borough at a detailed ward level, shows that the greatest need for both market and affordable housing is for two and three bedroom houses and bungalows. The low proportion of smaller homes currently available in the Borough makes it difficult for older people who want to downsize, those on low incomes and benefits, and younger people who want to find their first home. There is still a need for some medium and larger family homes,</p> <p>although we expect to see less of these types of homes than in the past. We also need to ensure that the design of new houses addresses the different needs of people in our community, including older people and those with disabilities.</p> <p>The Housing Needs Study for different wards should be reflected in the housing proposed for those areas. For example Bottesford tends to command higher house prices than much of the Borough and given the generally low paid employment opportunities in the Parish there is a higher need for affordable housing and smaller open market dwellings for first time buyers.</p>		
Richard Crosthwaite (Gladman Developments)	443	Gladman note the intention of the draft policy and would request that supporting text is provided to ensure that it is applied flexibly on a case by case basis. The SHMA can only ever provide an indication of housing mix for the wider area at a fixed point in time and should not be used to prescribe standards for individual sites coming forward over the whole of the plan period.		Policy C2 1st paragraph already states "...having regard to market conditions, housing needs and economic viability".	

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Richard Simon	266	Supported in Principle – subject to comments above (C1b)		Support noted	
Robert Galij BA (Hons) BTP MRTPI, Planning Director - Barratt David Wilson Homes North Midlands	430	Concern is expressed over references to "accessible dwellings" and "technical standard for access" via Building Regulations in the context of NPPF/NPPG and their application which should reflect evidence of need and viability. Where is this evidence and viability testing - in Local Plan terms ?	In the absence of evidence of need and viability testing - through the Local Plan process - the final section of Policy C2 commencing ..."Proposals for wheelchair accessible dwellings..." and reference to ..."accessible housing"... in the second part of Policy C2 commencing ..."residential proposals for developments"... , should be deleted.	<p>The Melton Borough Housing Needs Study identifies over the 2011-36 period a need for 36 specialist units of accommodation for older people (generally considered to be sheltered or extra-care housing) per annum. This figure represents c.15% of all housing provision proposed in the emerging Local Plan. The HNS identifies that this type of accommodation should be split roughly 50:50 between the market and affordable sectors".</p> <p>The MBC HNS also states a need in the Borough for wheelchair accessible dwellings of 260 of the total 6125 homes needed (c.4% of total provision).</p> <p>The viability of delivering these homes has been re-assessed in the Local Plan Viability update by Cushman and Wakefield.</p>	
Robert Ian Lockey	170	Whereas it is reasonable to apply a housing mix requirement for large sites, it is ridiculous to do so for small sites. Many small sites could be given over entirely to low-cost (market or affordable) housing.	Planning should determine housing mix on a site by site basis, and facilitate permission for sites aligned to housing needs.	The housing mix requirement is only on sites of 10 or more dwellings, as already set out in 5.5.5 of the pre-Submission version of the Local Plan.	

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Susan E Green	109	<p>The latest SHMA Report August 2016 by JG Consulting provides insufficient justification for the Councils proposals on housing mix set out in Policy C2.</p> <p>Moreover the Written Ministerial Statement (WMS) dated 25 th March 2015 confirmed that "the optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG". It is noted that Policy C2 – Mix and C9 – Healthy Communities refer to adaptable homes. If the Council wishes to implement the higher optional standard of M4(2) adaptable / accessible homes of the Building Regulations the NPPG (ID 56-007 and ID 56-003) confirms such a policy requirement should be justified based on need and viability tested. The Council should provide such evidence.</p>		<p>The report of August 2016 by JG consulting is the Melton Borough Housing Needs Study. It is not a Strategic Housing Market Assessment.</p> <p>The Local Plan and CIL Viability Study report states that technical work produced by EC Harris in 2014 revealed the impact of these standards was to represent a cost uplift on standard build costs of less than 1% on build cost, nonetheless it could be argued as deterring investment where such schemes are marginal. Due to this, a modification is proposed to policy, which encourages the technical standard to be met rather than required.</p>	<p>Modification proposed which reads as: Proposals for retirement homes, sheltered homes and care homes will be supported and encouraged to meet the technical standard for access of Building Regulations 2015 Part M4(2). Proposals for wheelchair accessible dwellings, where the council is responsible for allocating or nominating residents, will be encouraged to meet the technical standard for access of Building Regulations 2015 Part M4(3).</p>