

Matter 5/107

**North West Leicestershire District Council
Local Plan Examination**

Statement on Behalf of

Mosaic Estates (respondent ref. 107)

**Day 4
(Tuesday 10th January 2017 – 10 a.m.)**

**Matter 5
Housing Land Supply**



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Our comments on this matter are provided within the context that there can be no absolute certainty over the deliverability of allocated sites, and on large strategic allocations, there is always the risk of slippage in timescales due to the up-front infrastructure required to deliver.

It is intrinsically recognised that the Plan Examination is progressing in the context of some doubt over future housing and employment needs. The Inspector who considered the Land South of Greenhill Road (Examination Document EX13) was unequivocal in his view that based on his consideration of the OAN figure, and past undersupply, the Council could not demonstrate a 5 year supply of housing land. Even if this position has shifted over the last year, it is clear that the ability of the District to maintain a deliverable 5 year supply of housing land is marginal and there is little wriggle room. This context of uncertainty is to be dealt with through a trigger mechanism for early review of the plan in the event that growth fails to take place at a pace that accords with the plan trajectory, or if assessment of future economic growth needs reveal a requirement for additional housing and / or employment land.

Within such a context it is important that the Plan overall establishes an appropriate framework for accommodating both identified growth needs, but also any additional growth, alongside, or above the Plan provision. We note that the Local Plan housing growth requirements are a minimum requirement not a ceiling. It is essential in this context of uncertainty that the Local Plan imparts sufficient flexibility – within the scope of the Frameworks policy and principles – to meet growth needs over the plan period.

With reference back to our comments on Matter 2, it is incumbent upon the plan to ‘encourage’ the effective use of previously developed land, provided that it is not of high environmental value.

There is a clear, and so far, missed, opportunity to look at the potential of sustainably located previously developed sites, outside of defined settlement limits, to additionally meet the needs for both housing and employment growth. This would not only meet the requirements of national policy, but would also provide additional flexibility in site selection. As it stands, the failure to identify potential, previously developed site opportunities, despite a heavy reliance on the allocation of greenfield sites would not accord with the Framework, and does not reflect a positively prepared plan.

We have identified the potential of a previously developed, former brickworks sites on the edge of Heather and Ibstock to contribute to meeting the housing and employment growth need of the plan. The Plan does not identify any available or other potential sites in Heather. To help ensure the housing requirements of the Plan are met and in order to maintain the vitality and viability of this specific settlement, this previously developed site should be considered positively.

Given its location in close proximity to two settlements that are identified within the Plan’s settlement hierarchy and offer a range of services and facilities to meet the day-to-day and more diverse needs of existing and future residents with good access

to transport links including public transport, the site is a sustainable location for residential development. It is available, suitable and achievable. The form of development that could be achieved on the site would not be inconsistent with local character.

The site is not subject to any environmental constraints that would otherwise prevent its redevelopment. The whole of the site lies within Flood Zone 1 meaning it is not subject to any elevated risk of flooding. There are no known ecological, air, noise, heritage or landscape issues that present an unusual difficulties or could not be addressed. As a former brickworks, the site would be required to be assessed for contamination but initial studies and a review of the site's history have not identified any matters for concern. There are no overriding constraints in terms of access. The existing site access road from Mill Lane could be utilised to serve any new development on site.

The site is available for development and deliverable within the Plan period. The site's development can assist the Council in achieving its housing targets. There is developer interest in the site and a committed landowner. Accordingly, the site is 'developable' in reference to the definition set out at footnote 12 of the NPPF, which states that *'sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.'*

The opportunity for the Council to carry out a comprehensive review of the potential future development of all deallocated employment sites, to make the best and most efficient use of resultant brownfield land, has been missed. This omission emphasises the fact that this element of the Plan has not been positively prepared.