

**CLLR. DR. DAVID BIGBY**

**RESPONDENT NUMBER: 5**

**EXAMINATION OF THE NORTH WEST LEICESTERSHIRE LOCAL PLAN**

**COMMENTS ON ADDITIONAL DOCUMENTS SUBMITTED BY NWLDC FOLLOWING ADJOURNMENT  
(EX76)**

**1. Affordable Housing on Brownfield and Previously Developed Sites**

With regard to NWLDC's response f) to the Inspector's request for "consideration of how a MM might be made to Policy H4 to enable the affordable housing thresholds or percentages to be adjusted for brownfield sites in preference to individual viability assessment and negotiation", I am particularly concerned about this proposal with respect to Ashby de la Zouch.

The Council is proposing that the minimum affordable housing contribution for development sites in Ashby should be reduced from 30%, for developments of 15 or more dwellings for greenfield sites, to only 15%, for 30 or more dwellings OR sites of 1Ha or more for previously developed and brownfield sites. Presumably, their evidence for this is taken from their consultant's viability assessment reports LP09 and 10. However, under item q, the Council confirms that for the Arla Diary site in Ashby, which is undoubtedly a previously developed brownfield site, "the section 106 Agreement is currently going through due process but on the basis of the report to Planning committee it will include a requirement for 30% affordable housing (i.e. up to 46 dwellings)."

This casts significant doubt on the Council's viability assessments and indicates that it would be wise to retain the current wording in Policy H4 for affordable housing, at least for Ashby, allowing individual viability assessments and negotiation of brown field sites with a presumption in favour of 30%. Indeed, at the time that the Arla application was considered, had the council's policy accorded with this new proposed policy, Ashby would have been deprived of 23 affordable homes, the provision of which has been accepted as viable by the applicant, at a time when there is an unprecedented need for such housing in Ashby. Furthermore, should this MM be adopted as it stands, the Council would have little grounds to oppose an application to reduce the affordable housing on this site which would be to the significant detriment of those on the very long social housing waiting list.

Also, this proposed Main Modification would, as it stands, be contrary to Policy H5 of the emerging Ashby de la Zouch Neighbourhood Plan which has already been through an extensive local consultation process. The Ashby NP calls for at least 30% of homes on developments comprising **11 or more** dwellings to be high quality affordable homes (greenfield and brownfield).

**2. Affordable Housing Thresholds in Ashby, Coalville and Castle Donnington**

In section e) of EX76, the Council has tried to justify why only an affordable housing threshold of 15 or more units was tested in the viability assessment for the main settlements and not 11 or more as for the smaller settlements (Policy H4). They state that they decided to "keep the slightly higher threshold in Ashby de la Zouch, Castle Donington and Coalville, not least in recognition of the fact that in these settlements most development was likely to be significantly above a threshold of 10 or less (or 11 or more as used in Policy H4) and so applying a lower threshold would have limited impact on the provision of affordable housing". The only argument put forward for the higher threshold is that currently there are no 11-14 sites proposed in these areas. I would contend that, whilst this may be the case currently, there is absolutely no certainty that such sites will not come

forward for future development during the Plan period. Should this be the case then the difference in threshold between the larger and smaller areas would result in a significant loss of much needed affordable homes within the larger settlements of the District, particularly Ashby which bears 25% of the District's social housing waiting list. As stated above, the emerging Ashby Neighbourhood Plan, which has been extensively consulted upon, has adopted the lower threshold for Ashby in recognition of the local need and the possibility of smaller sites becoming available within the area during the Plan period. It would therefore be sensible to bring the Local Plan into line with the emerging Ashby Neighbourhood Plan and use a threshold of 11 or more units in Policy H4.

### **3. Masterplan for Money Hill**

I would suggest that the Council's proposed wording of additional paragraph viii) in Policy H3 (see EX76 section g) is inadequate as it fails to provide a sufficient level of detail for the scope of the Masterplan such as is included for the Masterplan in Ashby's emerging Neighbourhood Plan. Also, it does not take into account the emerging Ashby NP's stated requirement that the Masterplan is agreed in "conjunction with the Town Council".

It would seem very sensible for the District Council to use similar wording to that already incorporated in Ashby's emerging NP (Policy H2) to avoid future doubt and ensure compatibility between the two Plans.

### **4. Housing Numbers in Ashby and HEDNA**

The new MM proposed in section g) for Policy H3a assumes acceptance of the Council's previously proposed MM2 to increase the Housing Allocation within Money Hill from 1,750 to "about 2,050". As the HEDNA has found that the District housing need is 780 dwellings fewer than the 10,400 included in the Publication version of the Plan, there is no proven need for the additional houses proposed under MM2. These were already in addition to the 10,400 stated as the requirement in Policy S1 and cannot be delivered within the Plan period due to the River Mease SCA limitations. Therefore, the new proposed MM for Policy H3 should revert to no more than 1750 dwellings for Money Hill as per the original consultation. Arguably it should be reduced to 970 (1,750-780) which would go some way towards rebalancing the new housing distribution across the District. Of course, in that event Ashby's Limits to Development would have to be redrawn correspondingly to reduce the size of the Money Hill development.

Cllr. Dr. D. Bigby 12/2/2017