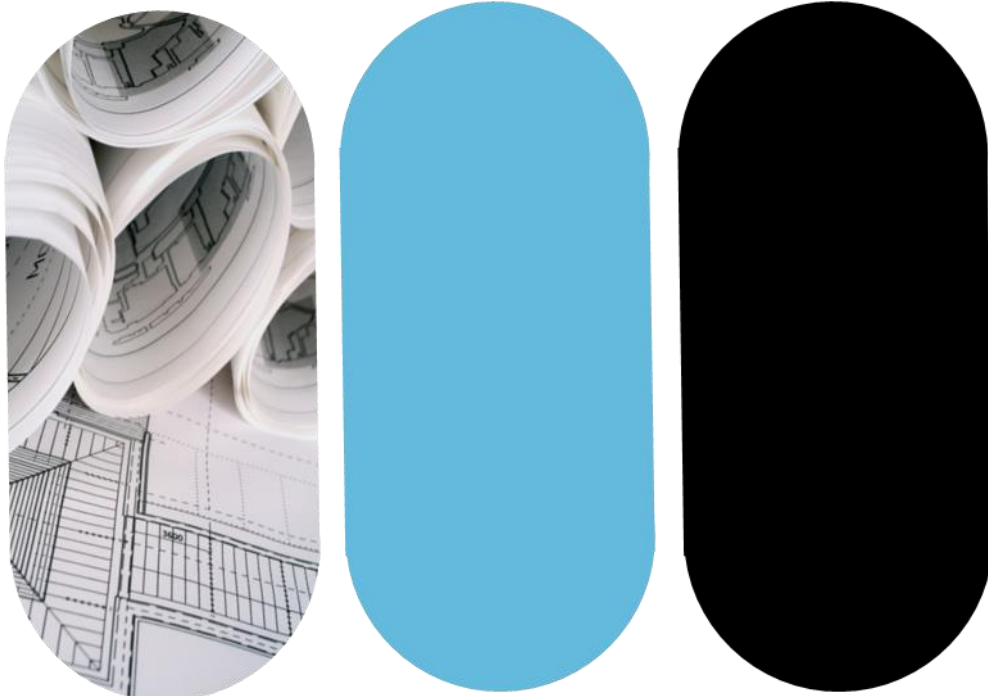


**WRITTEN STATEMENT IN RESPECT OF THE EXAMINATION OF  
THE MANSFIELD DISTRICT LOCAL PLAN 2013 - 2033 (APRIL  
2019)**

**MAIN MATTER 5 – WHETHER OR NOT THE PROPOSED  
STRATEGIC URBAN EXTENSIONS AND EMPLOYMENT  
ALLOCATIONS ARE SOUNDLY BASED AND DELIVERABLE IN  
THE PLAN PERIOD AND WHETHER OTHER POLICIES FOR  
EMPLOYMENT AND THE ECONOMY ARE SOUNDLY BASED**

On Behalf of Hallam Land Management Ltd



## 1. INTRODUCTION

- 1.1 This Written Statement is made on behalf of our client, Hallam Land Management Ltd, in respect of its interests in Land at New Mill Lane, Mansfield, as part of the forthcoming examination (EIP) of the Mansfield District Local Plan 2013-2033.

## 2. MAIN MATTER 5 – WHETHER OR NOT THE PROPOSED STRATEGIC URBAN EXTENSIONS AND EMPLOYMENT ALLOCATIONS ARE SOUNDLY BASED AND DELIVERABLE IN THE PLAN PERIOD AND WHETHER OTHER POLICIES FOR EMPLOYMENT AND THE ECONOMY ARE SOUNDLY BASED

- 2.1 The representations made below follow the form of the specific questions raised in the Inspector's Matters and Issues paper for the Examination.

*Issue – Are the strategic site and employment allocations soundly based?*

### *Pleasley Hill Farm (Policy SUE1)*

*4. Are the overall scale and mix of uses for the site justified and is any further flexibility to accommodate additional uses justified? Should the housing yield be a minimum figure?*

- 2.2 Pleasley Hill Farm (SUE1) is anticipated to deliver 210 homes during the plan period and is allocated for a total of 660 dwellings (450 outside of the plan period).
- 2.3 It is imperative that the overall scale of the SUE is realistic particularly when this Local Plan is highly dependent upon a few relatively large strategic sites. An over optimistic approach can lead to under-delivery soon after adoption and therefore a failure of the plan.

2.4 In terms of when the site is expected to deliver new homes, the Council envisages 10 units by April 2024/25. Due to the reasons outlined later within these representations, this is very unlikely to be achievable and thus we suggest the SUE will only start to deliver later within the plan period, around 2027/28.

2.5 Therefore it is suggested that greater flexibility is required as the plan needs to identify and allocate reasonable alternatives to ensure there are no housing land supply issues for the Council in the near future.

*6. Would the development have any adverse effect on landscape character and/or the form and character and setting of Pleasley village?*

2.6 It is considered that there would inevitably be adverse impacts on the landscape character and setting of Pleasley. Paragraph 9.43 of the Site Selection Technical Paper (August 2018) identifies that development of the site will lead to an increase in the coalescence between the Mansfield urban area and the settlement of Pleasley. There would also be a substantial loss of grade 2 agricultural land which would impact upon the local landscape character.

*8. Is the site allocation soundly based having regard to paragraph 8.4 of the plan and the viability study which indicate that the site is not viable? What interventions would be necessary to ensure that the site is deliverable?*

2.7 As paragraph 8.4 of the plan indicates, evidence suggests that this site is not currently viable when taking account of the policy and infrastructure requirements needed.

2.8 There are a number of highway improvements that are associated with this SUE going forward which lead to serious concerns regarding viability. The Site Selection Technical Paper (September 2018) states that a total contribution to these improvements is estimated at around £5.4 million

pounds.

*9. Are any further safeguards or mitigation measures necessary to achieve an acceptable form of development? Are any main modifications necessary for soundness?*

- 2.9 Significant mitigation measures will be required to achieve an acceptable form of development. The site is located in a high value landscape and the design and layout will be required to reflect this (as indicated in the Sustainability Appraisal Addendum).
- 2.10 The Site Selection Technical Paper identifies that development would lead to the loss of a substantial amount of Grade 2 agricultural land and there is potential for regionally significant archaeology on site. Whilst we appreciate there may be technical considerations that need to be addressed through the planning application, appropriate evidence in respect of matters such as archaeology should be frontloaded in order to ensure sites can be viably developed. No evidence has been provided by the Council with regards to archaeology, which is of concern given the site has potential for regional significance. There is therefore a high chance that the archaeological potential on the site could result in significant mitigation costs, which, in an area of relatively low land values such as Mansfield, could easily render the development unviable.
- 2.11 The Sustainability Appraisal Addendum also highlights that the site is 75m from Cotton Plantation Local Wildlife Site (LWS) with the potential for negative effects. This will need to be mitigated against in order to achieve an acceptable form of development.
- 2.12 In addition, as there are currently no planning permissions or indeed planning applications submitted in respect of this site, it is highly likely that there will be other technical considerations that need to be taken into account that may render the site unviable and undeliverable, or simply

delay the delivery of dwellings within the plan period.

***Land off Jubilee Way (Policy SUE2)***

- 2.13 Land off Jubilee Way (SUE2) is anticipated to deliver 425 homes during the plan period (a total allocation of 800). As previously stated, the overall scale and projected trajectory needs to be realistic to ensure the plan is sound. Due to the constraints and viability issues relating to this SUE, it is unlikely that the site will start to deliver housing in 2024/25. We therefore suggest delivery at this site will commence later within the plan period, circa 2027/28.

*11. Is the site allocation soundly based having regard to paragraph 8.4 of the plan and the viability study which indicate that the site is not viable? What interventions would be necessary to ensure that the site is deliverable?*

- 2.14 There are significant costs associated with providing the level of mitigation needed in ecology terms, the work associated with levelling out the site (land levels on site vary greatly), and also the improvements that will be required to the sports provision on site. Sport England should be clearly involved in the strategy and identification of associated costs for the improvements to the Rugby Club and Golf Clubs.

- 2.15 It is understood that access to the site can be made off Jubilee Way. However, significant highway infrastructure improvements are required to a number of nearby junctions. Further evidence needs to be provided by the County Council in respect of these associated costs.

*14. Are any further safeguards or mitigation measures necessary to achieve an acceptable form of development and are any main modifications necessary for soundness?*

- 2.16 It understood that the site will have a major impact on the nearby

Strawberry Hills Heath SSSI, local wildlife site and potential nightjar and woodlark habitat. It is therefore important that appropriate provision is made for the protection and enhancement of biodiversity. A number of substantial technical considerations that need to be taken into account before the site can be considered suitable for allocation.