



Ref:

(For official
use only)

NORTH WEST LEICESTERSHIRE LOCAL PLAN

Proposed Modifications Consultation - Representation Form

Following the Examination hearing sessions held in January and March 2017, Mr Brian Sims BSc CEng MICE MRTPI, the Independent Planning Inspector appointed on behalf of the Secretary of State, has requested that the Council now undertake consultation on a number of **Main Modifications** (MM) required to make the Plan sound in the light of new documentary evidence provided since the Plan was submitted for examination. This is without prejudice to the Inspector's ultimate conclusions and recommendations on the Plan and whether there will be any further hearings after the public consultation.

Details of what we are consulting on, and why, can be found on the Proposed Modifications Consultation page of the Council website at www.nwleics.gov.uk/localplanmysay.

You can participate in the consultation online via our [consultation website](#).

Alternatively, you can complete the following form. Please complete both Part A and Part B.

If your comments relate to more than one MM you will need to complete a separate Part B of this form for each representation.

For questions where there are multiple choice answers, please indicate your choice by placing a 'X' in the appropriate box(es).

PART A – Personal Details

If you are responding on behalf of yourself, or your own organisation, please fill in all the 'Personal Details' fields. If an agent is appointed, please complete only the Title, Name and Organisation boxes in the Personal Details column, but complete all the 'Agent's Details' fields.

	Personal Details	Agent's Details (if applicable)
Title		MR.
First Name		NICK
Last Name		GRACE
Job Title (where relevant)		PARTNER
Organisation (where relevant)	BRACKLEY PROPERTY DEVELOPMENTS LTD & ROSAMOND PATTINSON 1991 DECLARATION OF TRUST.	GRATEMATHIN PLANNING & PROPERTY.
Address Line 1		S MALIN HILL
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		NE1 1JQ
Telephone		
Email address		

Did you comment at publication stage of the Local Plan?	<input checked="" type="radio"/> Yes	<input type="radio"/> No
If yes, what was your representor ID number? (You can find your Representor ID on our Examination webpages)	Nº 84.	

Do you wish to be notified of subsequent stages of the Local Plan?		
Publication of Inspector's Report	<input checked="" type="radio"/> Yes	<input type="radio"/> No
Adoption of the Local Plan	<input checked="" type="radio"/> Yes	<input type="radio"/> No

PART B – Your Representation

Please use a separate sheet for each representation

1. To which part of the consultation does this representation relate?

Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Publication Local Plan

✓	Main Modification
	Additional Modification
	Policies Maps
	Sustainability Appraisal Reports
	HEDNA
	Other new documents and evidence

If you have chosen 'Sustainability Appraisal Reports,' 'HEDNA' or 'Other new documents and evidence' please identify the specific document:

2. Main or Additional Modification number to which your representation relates (or paragraph number if you are commenting on another document).

POLICY EC 2
NEW
EMPLOYMENT
SITES.

3. Please provide comments below, being as precise as possible. Comments can support, as well as object to the MM concerned with reference to the new documentary evidence listed on our website – www.nwleics.gov.uk/localplanmysay. (Expand the box if needed)

SEE ATTACHED STATEMENT.

4. Please set out suggested revised wording if you consider further changes are necessary to make the Plan sound. *(Expand the box if needed)*

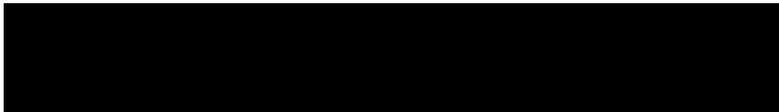
SEE ATTACHED STATEMENT.

Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publically available and may be identifiable to my name / organisation.

I acknowledge that I have read and accept the information and terms specified under the Data Protection and Freedom of Information Statement.

Signed:



Date:

29TH JUN 2017.

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 1998. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004, save for requests of such information required by way of enactment. Your name, organisation and representations will be made publicly available when displaying and reporting the outcome of this statutory consultation stage, and cannot be treated as confidential. Other details, including your address and signature, will be treated as confidential.

You should not include any personal information in your comments that you would not wish to be made publicly available.

Your details will remain on our database and will be used to inform you of future planning policy matters and procedures. If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.

Please send completed forms to planning.policy@nwleicestershire.gov.uk or Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ
(Please note that responses should be returned to the Planning Policy Team and not the Programme Officer).

The deadline for responses is Monday 24 July 2017

**North West Leicestershire Local Plan – Proposed Modifications
Consultation – July 2017**

Submitted by

GraceMachin Planning & Property

On behalf of

Brackley Property Developments Ltd

And

**The Rosamond Pattinson 1991 Declaration of Trust
(Responder Ref 84)**

24 July 2017

Part B – Your Representation

Main Modification – Policy Ec2 – New Employment Sites

We have made a series of representations on the Local Plan and appeared at Hearing Sessions during the first half of 2017.

These representations have outlined the absolute need to ensure that this Local Plan does not fail to meet the needs and demands of existing and new businesses who wish to expand and re-locate to North West Leicestershire.

More specifically to Castle Donnington which has as an excellent long term track record of delivering employment land.

The delivery of employment land has provided provide job security for many in North West Leicestershire and also provided new life opportunities for many people in the District.

We have supported the allocation of land ‘East of Carnival Way’ Castle Donnington which is immediately available, deliverable and has prospective occupiers ready to ‘take’ new space.

Although, it is noted that NWLDC are still not proposing a specific allocation on land ‘East of Carnival Way’ in Castle Donnington as we will set out below we are fully supportive of the proposed ‘main modifications’ to **Policy Ec2 – New Employment Sites** which we believe gives a clear basis for a planning

application to be submitted on this land imminently and for it to be supported in principle by the Local Planning Authority.

The newly formed Paragraph 1.13 of the Local Plan states,

“In terms of this Local Plan we have co-operated with our partners across the HMA/LLEP on a variety of matters including: Establishing housing and employment requirements through a Housing and Economic Developments Needs Assessment (HEDNA)”

As *Brackley Property Developments Ltd* set out in February of this year (2017) in the context of the HEDNA report the identified shortfall of B1/B2/small B8 units was / is in the order of 13Ha.

The Council’s response to this shortfall still rather avoids the findings of the HEDNA report with regard to the need for additional employment land.

The strategy of still choosing not to allocate additional land still remains ‘peculiar’, and **without the MM to Policy Ec2 outlined below there would still be a definite need for this shortfall to be addressed through an additional employment allocation.**

Again, as previously submitted this should logically be at Castle Donnington.

It is worth highlighting in the wider context of these representations that on Page 19 under the heading ‘Key Issues – Economy’ it states

“Support for economic growth will require the provision of additional land and premises across the district...”

Further relevant main modifications in the plan state under the heading ‘Business Needs’ the following at paragraph 5.4 & 5.5 (Page 23):

A Housing and Economic Needs Development Assessment (HEDNA) has been undertaken for the Leicester and Leicestershire Housing Market Area (HMA) which identifies the future housing and employment needs for the district. Whilst the HEDNA was completed towards the end of the process of preparing this Plan it was considered and subjected to public consultation as part of the evidence base and provides the basis for the housing and employment provision made in this plan. (Para. 5.4)

The HEDNA has identifies a need for 66 hectares of employment land (comprising those uses which fall within Class B1, B2 and B8 of less than 9,000sq metres (as defined by the Use Classes Order 2015)... (Para. 5.5)

Paragraph 5.8 (a further MM) states:

Policy S1 recognises that there is a need to undertake an early review of the Local Plan. This is because whilst the current total provision of employment land is about 29 hectares, there is a mismatch between the type of land identified as being required in the HEDNA and the actual provision. There is a clear shortfall of about 29 hectares when compared to the HEDNA requirement for Class B1, B2 and B8 of less than 9,000sq m. This reflects the fact that the HEDNA was completed towards the end of the process of preparing this plan. In addition, it is apparent that not all of the other HMA will be able to accommodate their housing needs within their boundaries. This Council is committed to working with the other HMA authorities to agree how and where this unmet need will be accommodated. It may, therefore, be necessary for additional provision to be made for housing (and / or employment) when this work is completed.

Policy S1 – Future housing and economic needs now sets out that over the plan period to 2031 provision will be made to meet the housing and employment land needs of the district as identified in the January 2017 HEDNA.

For employment land this means provision will be made for 66 hectares of land for employment purposes (B1, B2 and B8 of less than 9,000 sq m).

It has been noted that the plan also now states that NWLDC will commence a review of this Local Plan by the end of January 2018 or within 3 months of the adoption (whichever is the later).

Linked to Policy EC2 (and land ‘East of Carnival Way’, Castle Donnington) is **Policy S3 – Countryside** which states that land outside the Limits to Development is identified as countryside where those uses listed (a) to (s) below will be supported, subject to those considerations set out in criteria (i) to (vi) below.

Specifically it references Policy Ec2 under the (s) heading by stating:

“Employment land in accordance with the provisions of Policy Ec2”

and

“Developments in accordance with (a) to (s) will be supported where:

(vi) The proposed development is accessible, or will be made accessible, by a range of sustainable transport”.

Proposed MM to Policy Ec2 – New Employment Sites

We are fully supportive to the proposed wording as set out under section ‘2’ which states:

“Where evidence indicates an immediate need or demand for additional employment land (B1, B2 and B8) in North West Leicestershire that cannot be met from land allocated in this plan, the Council will consider favourably proposals that meet the identifies need in appropriate locations subject to the proposal:

- (a) Being accessible or will be made accessible by a choice of means of transport, including sustainable transport modes, as a consequence of planning permission being granted for the development; and*
- (b) Having good access to the strategic highway network (M1, M42/A42 and A50) and an acceptable impact on the capacity of that network, including any junctions; and*
- (c) Not being detrimental to the amenities of any nearby residential properties or the wider environment*

The plan also now states:

*“The provision of this site (Money Hill) **will result in a shortfall compared to HEDNA** (excluding an allowance for the potential loss of existing employment land) of about 13 hectares.*

***This will be addressed through** the review of the Local Plan committed to in Policy S1 (taking into account of any additional employment land which might be redistribution to the district from elsewhere in the HMA) and through **the determination, against Ec2 of any planning applications which come forward in the meantime** “*

Castle Donnington is a ‘Key Service Centre’ where (as the Local Plan states)

“a significant amount of development will take place” (Page 27)

Given that no additional employment allocations have been made by way of a main modification to **Policy Ec2 - New Employment Sites** the proposed wording is welcomed.

It is necessary, in order to provide certainty that the delivery of additional employment land will be brought forward by way of new planning applications to meet immediate needs and demands.

The policy wording allows and enables additional employment development to come forward such as that for which we have occupier interest for small B8 uses at Castle Donington that couldn't be accommodated at Money Hill due to occupier demand for the specific location.

Now that the Council will take a pragmatic and positive approach to such proposals when considering planning applications, in order to enable job creation and growth of local industry we **SUPPORT** the modifications to **Policy Ec2**.

Nick Grace BA (Hons) Dip TP MRTPI
Partner at GraceMachin Planning & Property
24 July 2017

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