



North West Leicestershire District Council
Council Offices
Whitwick Road
Coalville
Leicestershire
LE67 3FJ

SENT BY E-MAIL AND POST

24th July 2017

Dear Sir / Madam

NORTH WEST LEICESTERSHIRE LOCAL PLAN MAIN MODIFICATIONS CONSULTATION

Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. We would like to submit the following representations in response to the Council's proposed main modifications.

MM1, MM3 & MM6

It is disappointing that the housing requirement has been reduced from 10,400 dwellings to 9,620 dwellings. As set out in previous representations it is the opinion of the HBF and other interested parties that the latest HEDNA under estimates OAHN and therefore the revised housing requirement is too low.

MM8 & MM9

There is also a likelihood of future unmet housing needs across the wider Leicester & Leicestershire HMA which at this time remains unresolved. Therefore the policy commitment to an early review is essential to the soundness of the North West Leicestershire Local Plan. The specified timetable for the commencement of this review and the submission for examination of the reviewed Plan as set out in **Policy S1** is supported.

MM10 & MM12

It is agreed that the proposed modifications of **Policies S2** and **S3** will provide some limited flexibility to overall HLS. However as set out in previous HBF submissions the Council was requested to provide flexibility via sustainable redevelopment of brownfield or other sites. It is unlikely that many opportunities to develop previously developed land exist and the main modifications make no reference to other sites. It is recommended that a further modification is made to include other sites not just previously developed land.

MM13, MM14, MM18, MM19, MM20 & MM25

The updates to HLS are noted.

MM17 & MM27

The uncertainty caused by the HS2 route is acknowledged therefore the principle of the addition of reserve sites in **New Policy H3d** are welcomed. The HBF make no comment on any specific sites selected.

MM30 & MM31

The modifications to Policy H4 on affordable housing concerning site thresholds, target percentage provision differentiated by site location and brownfield / greenfield are still not fully aligned with the Council's latest viability evidence (see Table on page 28 & paras 4.1.1 – 4.1.3 Proposed Publication Version Local Plan Viability Review dated 17 June 2016 by Cushman & Wakefield). The HBF object to the word "minimum" to describe the target provision for affordable housing. The Council's latest viability evidence demonstrates that the proposed affordable housing provisions are the maximum (rounded to the nearest 5%) not the minimum which is viable. In Castle Donnington small greenfield sites are unviable at 30% affordable housing provision and in Coalville small greenfield sites are unviable at 20% affordable housing provision. For brownfield sites the rounding up to the nearest 5% ignores the fact that these sites are unviable and therefore 0% is more appropriate than 5% as set out in the HBF representations to the pre-submission Local Plan consultation previously developed sites should be excluded from Policy H4. It is recommended that further modifications are necessary to Policy H4 including the deletion of the word "minimum" possibly replaced by "up to".

In conclusion it is hoped that these representations are of assistance to the Council and Inspector in informing the next stages of the North West Leicestershire Local Plan. In the meantime if any further information or assistance is required please contact the undersigned.

Yours faithfully
for and on behalf of **HBF**


Susan E Green MRTPI
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