

NORTH WEST LEICESTERSHIRE LOCAL PLAN PARTIAL REVIEW

PUBLICATION (REGULATION 19) CONSULATION CONSULTATION RESPONSE ON BEHALF OF THE CADWALLADER FAMILY LAND AT GRIMESGATE, DISEWORTH Contact: Adam Murray BSc (Hons) MSc MRTPI, PROJECT REF.: P/300/C34 JANUARY 2020





Established in 1989, East Midlands property experts Andrew Granger & Co. are a wide multi-disciplinary consultancy featuring residential sales and lettings, commercial, rural and professional services.

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Project Location:

The Cadwallader Family Land at Grimesgate Diseworth DERBYSHIRE DE74 2QD

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1. Introduction

- 1.1. Andrew Granger & Co. LTD specialises in the promotion of strategic land for residential development and commercial uses. As a company, we are heavily involved in the promotion of client's land through various Local Plan representations throughout the country, and we also have vast experience in contributing to the Neighbourhood Plan process.
- 1.2. On behalf of the Cadwallader Family, we are seeking to work with North West Leicestershire District Council in promoting the Land at Grimesgate, Diseworth (**Appendix 1**) for formal allocation for residential development.
- 1.3. This document provides a written submission to the North West Leicestershire Local Plan Partial Review: Publication Draft Consultation (Regulation 19 consultation) and is framed in the context of the requirement for the Local Plan to be considered legally compliant and sound. The tests of soundness are set out at Paragraph 35 of the National Planning Policy Framework [NPPF] (Adopted February 2019), which states that for a development plan to be considered sound it must be:
 - Positively prepared providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need for neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
 - Justified an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
 - Effective deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by a statement of common ground; and
 - **Consistent with national policy** enabling the delivery of sustainable development in accordance with the policies in the Framework.

2. Planning Policy Context

- 2.1. Policy S1: Future Housing and Economic Development Needs of the adopted North West Leicestershire Local Plan states that provision will be made for the development of a minimum of 9,620 dwellings across the plan period.
- 2.2. The policy also commits the Council to undertaking a Local Plan Review and assisting in accommodating unmet residential development needs where appropriate. It states the following:

'The Council will continue to work collaboratively with the Leicester and Leicestershire Housing Market Area (HMA) authorities to establish the scale and distribution of any additional provision that may be necessary in North West Leicestershire and elsewhere in the HMA as a result of the inability of one or more authorities to accommodate its own needs as identified in the Leicester and Leicestershire HEDNA.

The District Council will commence a review of this Local Plan (defined as being publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country Planning ((Local Planning) (England) Regulations 2012) by the end of January 2018 or within 3 months of adoption of this Local Plan (whichever is the latter). The Plan Review will be submitted within two years from the commencement of the review. In the event that this review plan is not submitted within two years then this Local Plan will be deemed out of date.'

- 2.3. **Policy S2: Settlement Hierarchy** classifies settlements across the District on the basis of their suitability for development, with different classifications being appropriate for differing levels of development. Diseworth is identified as a 'Sustainable Village' where a limited amount of growth is to take place within the defined Limits to Development. These Limits to Development are drawn tightly around settlements at this level of the hierarchy.
- 2.4. **Policy S3: Countryside** identifies that land outside the identified Limits to Development will be classified as 'Countryside'. Residential development on greenfield sites identified as countryside will only be considered acceptable for the purposes of agriculture, forestry and exceptions sites.

3. Site & Development Potential

- 3.1. The proposed development site is located north-west of the village centre of Diseworth, accessed via Grimesgate. Diseworth is located approximately 0.6 miles to the south of East Midlands Airport between the A453 and the A42 and is located within the Leicestershire International Gateway a key location for growth and significant employment opportunities. Diseworth is located at the heart of the UK logistics network which is commonly referred to as 'The Golden Triangle' and is uniquely placed in terms of its proximity to Derby (approx. 14 miles), Nottingham (approx. 14 miles) and Leicester (approx. 18 miles).
- 3.2. It is also located within close proximity to a wider range of local services and employment opportunities found in Castle Donington (approx. 3.6 miles), Kegworth (approx. 3 miles), Long Whatton (approx. 2.4 miles), Shepshed (approx. 5.4 miles) and Loughborough (approx. 9.4 miles).
- 3.3. The site extends to approximately 1.14 hectares (2.81 acres) and consists of a single field of Grade 3 agricultural land clearly marked by mature boundary vegetation. The site is bordered to the south by existing residential properties, to the east by Grimesgate, and to the north and west by open countryside. A Public Right of Way traverses the site and runs from Grimsegate to Ashby Road in the north, as shown in Figure 1.



Figure 1: Map indicating the Public Right of Way crossing the proposed development site.

3.4. The proposed development site is not subject to any statutory landscape, ecological or heritage designations, and the Environment Agency's Flood Map for Planning shows the site lies within Flood Zone 1 (lowest probability of flooding).

- 3.5. Diseworth is served by a number of local services and facilities which are within an appropriate walking distance from the proposed development site. These include Diseworth C of E Primary School, a Village Hall, the Plough Inn, and St. Michael and All Angels Church.
- 3.6. Furthermore, the proposed development site is within walking distance of bus stops located on Grimesgate/Clements Gate adjacent to the former Bull and Swan Pub. These stops are served by the Skylink bus service which runs between Nottingham, Derby, Castle Donington, Leicester and Coalville. The bus calls at the village on an hourly basis on weekdays between 7am and 7pm, with the final service calling at the village at approximately 10:30pm.
- 3.7. We consider that the site has the capacity to accommodate approximately 25 dwellings, including vehicular access, pedestrian links, public open space, car parking and electric charging, landscaping and drainage. Any potential development scheme would provide a range of property types and sizes, including starter homes and bungalows. Figure 2 below provides an Indicative Site Layout showing how the site could accommodate a potential development of 25 units, including a proportion of affordable housing.



Figure 2: Indicative Site Layout

3.8. Therefore, we consider the site to be in a highly sustainable location, close to a wide range of services and employment opportunities. It represents an opportunity to deliver a suitable, available achievable and viable source of housing land that can be developed now and make a valued contribution towards meeting the District's housing needs.

4. Comments on the Local Plan Partial Review: Publication Draft

- 4.1. On behalf of our client, the Cadwallader Family, we wish to make the following observations on the North West Leicestershire Local Plan: Partial Review Publication Draft consultation document.
- 4.2. In respect of the Council's reasoning for delaying the substantive review of the Local Plan, it is accepted that there is a significant amount of uncertainty relating to the future development requirements of the District. This inhibits the Council's ability to produce a substantive Local Plan Review which would meet the tests of soundness set out in the Framework.
- 4.3. For example, it is accepted that there is significant uncertainty regarding the future housing requirement of the District that is derived from the Government's standard methodology. At a national level, Government's advice to Councils is to utilise 2014-household projections as part of the standard method because this results in a higher housing requirement than 2016-household projections. However, for North West Leicestershire, the opposite situation exists; 2014-household projections result in a housing requirement of 368 dwellings per annum compared to the 2016-household projections which result in a requirement of 529 dwellings per annum. The base date of the data has implication as to whether the housing requirement for the District can be met by the adopted Local Plan, which has a requirement of 481 dwellings per annum.
- 4.4. Furthermore, the Government has stated that an updated approach to the standard methodology will be published in Autumn 2020, which is expected to use 2018-household projections. It is logical to assume that the 2018 data will result in an increase to the housing requirement for North West Leicestershire. However, it is uncertain what this is likely to be.
- 4.5. In addition, Leicester City Council have still not declared the extent of any unmet housing need that cannot be met within their administrative boundaries, that would need to be redistributed across the other authorities within the Housing Market Area [HMA]. It has been accepted by a number of Inspectors during recent examinations of other Local Plans within the HMA, that altering the housing requirement to include any unmet need, at this stage, would prejudge the work that Leicester City Council is current undertaking to establish an accurate housing capacity. As such, it would appear reasonable to delay the substantive review of the Local Plan until further clarity is available.
- 4.6. However, in light of the factors discussed above, it is our view that the proposed amendment to Policy S1 does not appropriately reflect the range of circumstances which may result in a change to the development requirements of the District and, therefore, may necessitate an early review of the Local Plan. For example, the proposed policy does not currently allow for any increase to the housing requirement for the District as a result of changes to the standard methodology, or any other circumstances other than unmet need arising from elsewhere in the HMA. Appendix 2 includes examples of Local Plan Review policies included within recently adopted Local Plans elsewhere in the HMA, which more appropriately reflect the circumstances which may necessitate an early review.

4.7. Therefore, it is our view that the revised wording for Policy S1 should be amended as follows:

'Policy S1: Future housing and economic development needs

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 Leicester and Leicestershire Housing and Economic Development Needs Assessment (January 2017).

This means that:

- Provision will be made for the development of a minimum of 9,620 dwellings (481 dwellings per annum) which is the Objectively Assessed Need (OAN) and Housing Requirement for the District;
- Provision will be made for 66 hectares of land for employment purposes (B1, B2 and B8 of less than 9,000 sq. metres);
- Provision will also be made for 7,300 sq. metres for shopping purposes

In the event that there are changes to the objectively assessed need for development or the spatial distribution of growth across the HMA, the Council will undertake a review of the Local Plan.

<u>A full or partial update of the Local Plan will be submitted for Examination within 18 months</u> of the following:

- (a) <u>The adoption by the Council of a Memorandum of Understanding (MoU) or Statement of</u> <u>Common Ground (SoCG) which proposes a quantity of housing or employment</u> <u>development to 2031 that is significantly greater than the housing requirement or</u> <u>employment need identified in this Local Plan; or</u>
- (b) In the absence of an adopted MoU or SoCG, 12 months from the date of publication of a Local Plan for Leicester City (defined as publication of an invitation to make representations in accordance with Regulation 19 of the Town and County (Local Planning)(England) Regulations 2012) that includes satisfactory evidence of an unmet local housing need; or
- (c) <u>Changes occur to the objectively assessed need for development within North West</u> <u>Leicestershire resulting from updates to the Government's standard method.'</u>
- 4.8. In light of the above, the proposed wording for the supporting text for Policy S1 will also need to be amended to clearly set out the circumstances in which criteria (c) i.e. the publication of the Government's update to the standard method and the potential increase to the identified housing requirement for the District that may occur as a result.
- 4.9. As stated in our previous representations, it is our view that when the Council undertakes the substantive Local Plan Review that our client's land at Grimesgate, Diseworth would be an appropriate location to accommodate development to meet the requirements of the District.

4.10. The National Planning Policy Framework and the adopted Local Plan are both underpinned by a 'presumption in favour of sustainable development'. It is therefore considered rational to direct development towards locations that are within close proximity to a wide range of employment opportunities and local services and facilities. The Leicester & Leicestershire Strategic Growth Plan [SGP] identifies the northern part of North West Leicestershire (together with the northern part of Charnwood Borough) as the 'Leicestershire International Gateway', this is an area of major employment opportunities and is identified as a location for future growth across the County. The SGP states the following:

'The Leicestershire International Gateway is focused around the northern parts of the A42 and the M1, where there are major employment opportunities – notably East Midlands Airport, East Midlands Gateway (strategic rail freight terminal) and HS2 station at Toton nearby. The authorities have already made provision for strategic new housing developments at Ashby, Coalville and Loughborough and these need to be completed as a matter of priority for people to live close to their places of work.

Overall, we estimate that the area has the potential to accommodate about 11,000 new homes. Improvements to the A42, the M1, railway lines and services – all set out in the Midlands Connect Strategy – support this opportunity'

- 4.11. Diseworth is located within the Leicestershire International Gateway (a strategic growth location identified in the Leicester & Leicestershire Strategic Growth Plan) and is within an appropriate walking distance to East Midlands Airport and contains a comparatively wide range of services and facilities.
- 4.12. The landowners have undertaken a number of technical studies which have identified no technical constraints to development on the site.
- 4.13. A Noise Assessment was completed in May 2018 and identified the following key conclusions:
 - It is evident that the site lies to the south of the main flightpaths and is well outside of the 54db noise contour and is not particularly affected by aircraft movements to and from the airport. At night, the site similarly lies outside of the 48db noise contour. The site also lies well outside of the area used to define the need for noise mitigation measures. Therefore, occupiers of the new development would not be significantly annoyed by aircraft noise and there is no specific requirement for enhanced noise insulation for the building's facades or windows to reduce sound levels from aircraft
 - Assessment indicates that at an indicative distance from the carriageway edge of Grimesgate, standard thermal double glazing would be sufficient to enable all internal noise criteria to be met
 - Garden used for amenity purposes would have an unscreened outdoor noise level of approximately 55db or less which would satisfy the BS8233/WHO outdoor criteria of

55db. Therefore, any site layout can be adopted on the site without the outdoor noise criterion being exceeded.'

4.14. A Preliminary Ecological Appraisal was completed in April 2018 and concluded the following:

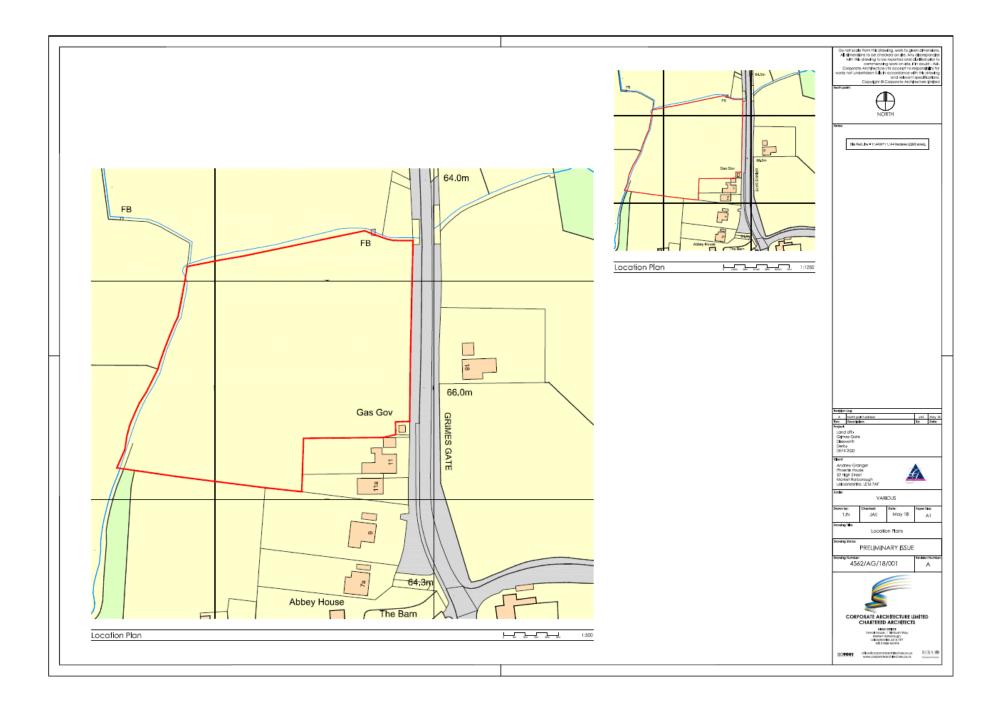
'The site was dominated by heavily grazed poor semi-improved grassland, with mature ash and sycamore trees and species poor hedgerow boundaries. A stream was located along the western boundary running south. The site was considered to have local value in terms of the ecological features it supported, including habitats of low/moderate value to protected species.'

- 4.15. Any future application for development on the site would be supported by Protected Species Surveys, including Great Crested Newt and Water Vole surveys, and any mitigation measures could be incorporated into the Proposed Site Layout.
- 4.16. An Archaeological Desk Based Assessment has identified that 'there are no archaeological features recorded within the site and the evidence suggests that the potential for archaeological deposits is low'. The site does contain ridge and furrow earthworks; however, the Indicative Site Layout (Appendix 3) demonstrates how the site could be developed to retain the ridge and furrow within an area of Public Open Space.
- 4.17. The Indicative Site Layout shows how the site could be developed to deliver up to 25 dwellings, including vehicular access, pedestrian links, public open space, car parking and electric charging, landscaping and drainage. Any development scheme could provide a range of property types and sizes; and the Indicative Layout shows how the site could accommodate a mix of 2, 3, 4 and 5 bedroom properties, including a proportion of affordable housing. A detailed Access Design and Speed Survey has been completed to identify a safe and suitable access to the site from Grimesgate. The Site Layout shows how the access could be positioned to ensure maximum visibility on both sides of the carriageway.
- 4.18. Consequently, we consider that the site represents an appropriate, available, achievable and viable source of housing land that can deliver residential development in the short-term and assist in achieving growth in the Leicestershire International Gateway.

5. Conclusion

- 5.1. We accept the Council's reasoning for delaying the substantive review of the Local Plan, it is noted that there is a significant amount of uncertainty relating to the future development requirements of the District which would inhibit the Council's ability to produce a substantive Local Plan Review that would meet the tests of soundness set out within the Framework.
- 5.2. Notwithstanding the above, it is our view that the proposed amendment to Policy S1 does not appropriately reflect the range of circumstances which may result in a change to the development requirements of the District and, as such, may necessitate an early review of the Local Plan. For example, the proposed policy does not currently allow for any increase to the housing requirement for the District, as a result of changes to the standard methodology, or any other factor which may result in an increase in the development requirements. As such, we have proposed a revised policy which includes a series of triggers which would justify a review of the Plan.
- 5.3. It is our view that when the Council undertakes the substantive Local Plan Review that our client's land at Grimesgate, Diseworth would be an appropriate location to accommodate development to meet the requirements of the District.
- 5.4. Andrew Granger & Co would like to remain involved throughout the preparation of the North West Leicestershire Local Plan: Partial Review and therefore requested to be informed of any future consultation opportunities and when the document is submitted for Examination.

APPENDIX 1: SITE LOCATION PLAN



APPENDIX 2 – LOCAL PLAN REVIEW POLICIES

Harborough Local Plan (Adopted April 2019) Blaby District Local Plan: Delivery DPD (Adopted February 2019) Melton Local Plan (Adopted October 2018)



12 Implementation, monitoring and review

IMR1 Monitoring and review of the Local Plan

- 1. The Council will monitor, through the preparation of its Annual Monitoring Report, the delivery and effectiveness of policies of this Local Plan against specific performance indicators and targets set out in Appendix K: Monitoring Framework.
- A full or partial update of the Local Plan will be commenced (defined as the publication of an invitation to make representations in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012) within 6 months of the following:
 - a. the adoption by the Council of a Memorandum of Understanding (MOU) or Statement of Common Ground (SoCG) which proposes a quantity of housing or employment development to 2031 that is significantly greater than the housing requirement or employment need identified in this Local Plan; or
 - b. in the absence of an adopted MOU or SoCG, 12 months from the date of publication of a Local Plan for Leicester City (defined as publication of an invitation to make representations in accordance with Regulation 19 of the Town and Country (Local Planning) (England) Regulations 2012) that includes satisfactory evidence of an unmet local housing need; or
 - c. conclusion of a review in response to specific trigger points as set out in the monitoring framework, including identification of significant and persistent shortfalls in the delivery or supply of housing against the housing requirement.
- 3. Any full or partial update of the Local Plan triggered by 2. above will be submitted for examination within 30 months from the date it commenced.

12.1 IMR1 Explanation

12.1.1 It is important that this Local Plan is capable of being implemented and that the delivery and effectiveness of its policies against objectives and timescales are monitored. It is also important that the Local Plan continues to be relevant in terms of the social, economic, and environmental conditions and in respect to changing national and regional planning policies.

12.1.2 The supporting information under each policy sets out how it will be delivered. Most policies will be delivered through the development management process, and the Council will ensure that it continues to offer a high quality and efficient service to all applicants, whether they be householders or major developers, to assist in the timely delivery of sustainable development. Where required supplementary planning documents, development briefs or master plans may be prepared, potentially in partnership between the Council and a developer in order to support the development of specific sites or to provide clarity on the implementation and delivery of policies.

5 LOCAL PLAN REVIEW

LPR1 Local Plan Review

- 5.1 Blaby District lies within the Leicester and Leicestershire Housing Market Area. The Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA) was published in January 2017. It sets out the long term objectively assessed need (OAN) for new housing in each of the local authority areas in the HMA up to 2036. The Council is also mindful that the introduction of the Standardised Methodology contained in the National Planning Policy Framework may have further implications for the OAN.
- 5.2 In order to plan for the level of objectively assessed need identified, the local authorities in the Leicester and Leicestershire Housing Market Area (HMA) area are working collaboratively to prepare the joint Leicester and Leicestershire Strategic Growth Plan. The Strategic Growth Plan is expected to be finalised by late 2018.
- 5.3 The District Council will take account of the implications of the Strategic Growth Plan in its next Local Plan which is due to commence on adoption of the Delivery DPD as set out in its latest Local Development Scheme. Policy LPR1 reflects this commitment.
- 5.4 In addition, in the circumstances that the delivery of housing is significantly and persistently short of the expectation set out in the housing trajectory, a Local Plan Review will be commenced to identify alternative or additional development sites.

POLICY LPR1 LOCAL PLAN REVIEW

The circumstances in which a new, full or part, Local Plan will commence (defined as being publication of an invitation to make representations in accordance with Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012) are specified as follows:

- a) The adoption by the Council of the Strategic Growth Plan and the Memorandum of Understanding, which proposes a quantity or spatial approach that is significantly different to that set out in the Local Plan, unless there is sufficient flexibility already provided for within the Plan; or,
- b) Changes occur within the HMA to the objectively assessed need for development or the spatial distribution of growth across the HMA, including Blaby, unless there is sufficient flexibility already provided for within the Plan; or,
- c) Where monitoring of targets against the housing trajectory identify significant and persistent shortfalls in the delivery of housing.

The new, full or part, Local Plan will be commenced within 6 months of the occurrence of one of the above circumstances and should be submitted for examination within three years from the commencement of the review.

- the current time, the majority of the site is in active use and not available for development. The majority of the land is owned and occupied by the Ministry of Defence Animal Centre (DAC). The DAC is a key part of Melton Mowbray heritage and has for many years made a significant contribution to Melton Mowbray's economy.
- 4.8.6 Melton Borough lies within the Leicester and Leicestershire Housing Market Area. <u>A Housing and Economic Development Needs Assessment (HEDNA)</u> for the L&L area was published in January 2017, which sets out the long term objectively assessed need for new housing in each of the local authority areas up to 2036. <u>A Joint Statement of Co-operation</u> between the L&L housing market area authorities was also agreed concurrently to commit the parties to continue to work collaboratively and has been updated by a version dated November 2017.
- 4.8.7 This collaborative working is taking place through the preparation of a joint Leicester and Leicestershire Strategic Growth Plan. The Plan, which is expected to be finalised in Summer 2018, will include a vision for Leicester and Leicestershire to 2050 and will set out the scale and spatial distribution of future development in the HMA.
- 4.8.8 Should the Strategic Growth Plan set out a scale and spatial distribution of development for this Council which is significantly different to that set out in the Local Plan, an early review or partial review of the Local Plan will be brought forward to address this matter, unless there is sufficient flexibility already provided for within the plan. Should a review be required, it will be commenced within 6 months of any adoption by the Council of the Strategic Growth Plan and Memorandum of Understanding. As and when there is any update to the objectively assessed development needs across the HMA, a similar approach will be applied.
- 4.8.9 In undertaking any review, the Council will work with the qualifying bodies that have or are preparing any Neighbourhood Plans to ensure that any revisions to the local plan and neighbourhood plans align.

Policy SS6 – Alternative Development Strategies and Local Plan Review

Melton Borough Council is committed to meeting its requirements for housing, employment and other development and infrastructure. The Council will regularly monitor delivery of new development in the context of policies and targets within this plan. Where monitoring identifies significant and persistent *shortfalls* in the delivery of housing and employment, infrastructure or spatial distribution that deviates significantly from the plan strategy, or there are changes within the HMA to the objectively assessed need for development or the spatial distribution of growth across the HMA, the Council will consider a full or partial review of the Local Plan to identify alternative or additional development sites.

Any plan review arising from the above should be carried out quickly. The Council will prioritise exploring potential alternative or long term options in terms of their suitability, availability, infrastructure and deliverability.

The circumstances in which a review (defined as being publication of an invitation to make representations in accordance with Regulation 18 of The Town and Country Planning (Local Planning)(England) Regulations 2012) will be carried out are specified as follows:

- The adoption by the Council of the Strategic Growth Plan and the Memorandum of Understanding, which proposes a quantity or spatial approach that is significantly different to that set out in the Local Plan, unless there is sufficient flexibility already provided for within the Plan; or
- years from adoption and every 5 years subsequent to the completion of the Review; or
- changes occur within the HMA to the objectively assessed need for development or the spatial distribution of growth across the HMA including Melton; or
- Where, when demonstrated by the Monitoring Framework (Appendix 5), that:
 - the Housing Delivery Test indicates that delivery is below 75% of the housing requirement as set out in the housing trajectory, over the previous three years; or
 - (ii) The circumstances for review specified in Polices SS4 and SS5 above in respect of the masterplanning and delivery of the Melton Mowbray Sustainable Neighbourhoods, become applicable

The review will be commenced within 6 months of occurrence of one of the above circumstances.

Where there is a made Neighbourhood Plan, the review will carried out in consultation with the NP 'qualifying bodies' and, where applicable, solutions prepared via the NP revision process. If a NP is in preparation but not made, the Council will inform the qualifying body who may consult with their community to identify alternative proposals for consideration.

APPENDIX 3 – ILLUSTRATIVE SITE LAYOUT

