

21 April 2021
Response on Behalf of Davidsons Developments.docx



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

David Bainbridge

By email only to: planning.policy@nwleicestershire.gov.uk

Wytham Court
11 West Way
Oxford OX2 0QL
T: +44 (0) 1865 269 000
F: +44 (0) 1865 269 001
savills.com

Dear Sir / Madam

**Hugglescote and Donington le Heath Neighbourhood Plan 2019-2031, Submission October 2020
Response on Behalf of Davidsons Developments Limited**

I write on behalf of Davidsons Developments Limited who are managing and developing the site on behalf of Wilson Enterprises Limited (herein referred to as Davidsons), in respect of the above.

I would be grateful if you would accept and acknowledge receipt of this submission, which includes the response form.

Introduction and Background

Davidsons is a family owned and managed company with over three generations of experience, knowledge and success in homebuilding. It is this commitment, along with their unwavering dedication to quality, that has afforded them an unrivalled reputation as one of the country's leading housebuilders and place makers.

As a responsible business, Davidsons are committed to working with local people and communities, engaging on relevant considerations for place-making. Davidsons are delivering new places to live at South East Coalville and wider area including at Hugglescote.

To this end Davidsons is an important stakeholder in the planning for, and delivery of, new places in the neighbourhood plan area , wider district and beyond.

We welcome the opportunity to consider and comment on the emerging policies for the neighbourhood plan.

Neighbourhood planning gives communities the power to develop a shared vision for their area, with plans that can shape, direct and help to deliver sustainable development and we are supportive of this.

Our comments below are based on the structure of the consultation document. We have only provided comments where we consider them to be relevant and hence we have not commented on every aspect of the consultation document.



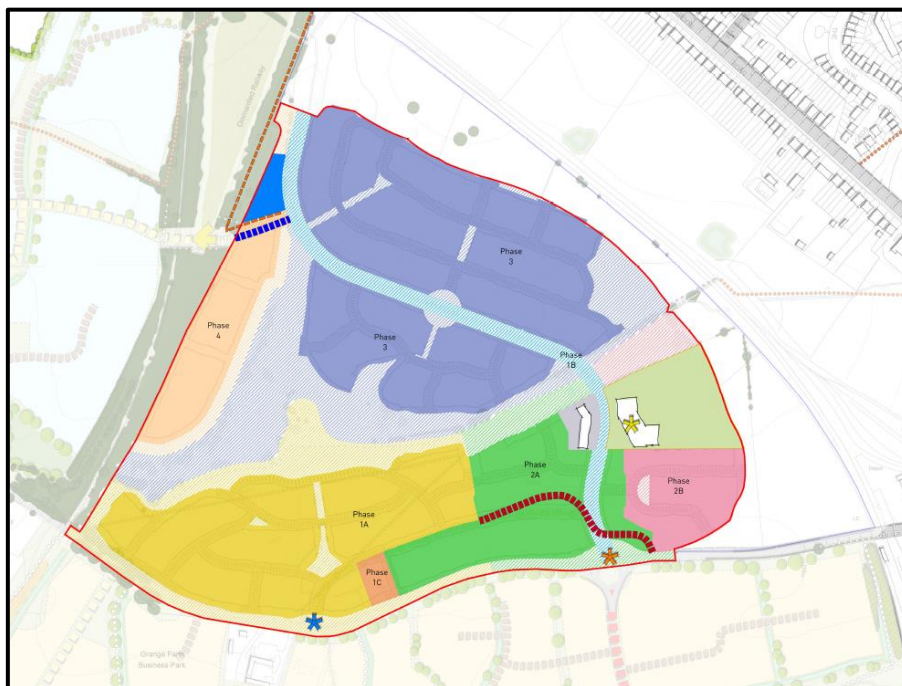
Purpose of the Document

Neighbourhood Plans are to contain non-strategic policies such as more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies. Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area. We would welcome confirmation of this matter.

POLICY G2: SOUTH-EAST COALVILLE DEVELOPMENT SCHEME

As you will know, Davidsons are delivering parts of this wider strategic development, which is allocated within the Local Plan, and have established an excellent working relationship with the Parish and District Council. There is land that is unlikely to be required for the future link road which has been reserved for such a future road link around the existing development. This land can be made available for development within the overall masterplan-led development as the County Council are now looking at the potential option of utilising the approved Spine Road which runs through the current site and we consider it is appropriate for the neighbourhood plan to acknowledge this and to identify this land for development. The land, outlined in blue, is between phases 2 and 3 and the rail line, shown in the extract plan below.



Davidsons would like to discuss this additional development land with the Parish Council. This surplus land is capable of being planned for a modest expansion of the development area for new homes and associated development. This is a positive opportunity to create additional place-making on land that would otherwise have been a road.

The land is already allocated in the Local Plan as part of the South East Coalville development. With minimal adjustment to the currently approved Masterplan an enhanced scheme it can be delivered in a sustainable manner.

For this reason we consider that express reference should be made to the additional land that should be identified in the neighbourhood plan as suitable for additional development as a formal allocation in line with the Local Plan.

POLICY G3: Design

We support the principles set out in this proposed policy in respect of design. However, we would ask for clarification on what the neighbourhood plan means by 'new and innovative green technologies'. We consider chimneys are an appropriate design feature but not for every dwelling and we would ask that this is stated in the neighbourhood plan. Where roads in developments are to be adopted it is important to acknowledge the standards for adoption set-out by Leicestershire County Council. Has the County Council commented on this proposed policy?

Electric vehicle charging points are supported but not necessarily 100% for provision for 1-3 bedroom properties and not 200% for 4+ bedroom properties. This will not necessarily be supported by take-up and presents issues for infrastructure and design, for example where parking is in parking courts or alongside streets.

POLICY H1: HOUSING MIX

In the context of strategic-scale development at South-east Coalville, it is not appropriate for housing mix to specifically meet the latest assessment of identified local needs in Hugglescote and Donington le Heath. This would not be proportionate and we would suggest that this new development is creating a new market and diversifying the market locally. We would ask that this policy does not seek to require a mix arising from local needs when the development is strategic in scale.

Furthermore, 4 and 5 bed houses have a role to play in meeting the needs of purchasers. It is not considered appropriate to explicitly reference as being "a minority of the total" and such mix should be considered as part of the overall mix.

POLICY H2: AFFORDABLE HOUSING

We consider it is not necessary to provide a policy on affordable housing in addition to that which is within the North West Leicestershire Local Plan, adopted November 2017. There are no local dynamics which dictate any difference to the policy in the Local Plan which is already in force.

If a new policy were to be prepared it will need to take into consideration the Government's announcement on First Homes, found at:

<https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-first-homes-proposals-in-changes-to-the-current-planning-system>

The Government's response to a previous consultation set out an intention to change the planning system to ensure that First Homes are delivered across England. This included an intention to set out in policy that 25% of all homes delivered through developer contributions as part of planning obligations agreed under section 106 of the Town and Country Planning Act 1990 should be sold as First Homes.

First Homes must be discounted by a minimum of 30%. Local authorities and neighbourhood planning groups can require higher minimum discounts at 40% or 50% if need can be evidenced through the most appropriate method available to them (either in the local or neighbourhood plan, an emerging policy or, where appropriate, a Supplementary Planning Document).

National Planning Policy Framework

Paragraph 29 of the NPPF, February 2019, states:

"Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies."

This is something Davidsons embraces and wishes to be more closely involved in at Hugglescote.

Paragraph 31 of the NPPF, states:

“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”

This is relevant for Local Plans and Neighbourhood Plans alike. To satisfy the Basic Conditions, Neighbourhood Plans need to demonstrate a robust evidence base. There is an absence of evidence to justify some of the proposed policies in this plan, leaving policies without justification.

Monitoring and Review

We acknowledge the explanation on monitoring and review but we consider this is insufficient. The proposed neighbourhood plan includes policies which are capable of being measured, and which should therefore specifically be monitored and reported on. This requires resource and dedication by the neighbourhood plan body beyond publication of an Annual Monitoring Report prepared at the District level.

We request further consideration or monitoring of the outcomes of the policies within the neighbourhood plan and evaluation of the effectiveness of policies in a review of the neighbourhood plan within a defined period of time.

Whilst there is no statutory requirement to review or update a neighbourhood plan, it is nonetheless appropriate to set out a timescale for review of the neighbourhood plan and we note the proposal of 2025. We would ask for clarification that this is to conclude the review in 2025 and not just commence the review in 2025. Guidance on this matter is set-out at paragraph 084 of the Planning Practice Guidance. In view of the potential changes at the national level and the emerging new plan for the District we consider it is appropriate for a review of the neighbourhood plan to conclude by 2025 and we request inclusion of this as a commitment in the plan.

Planning White Paper

The Planning White Paper (PWP) was published for consultation on 6 August 2020. The PWP proposes significant changes to the planning system which each and every local planning authority, neighbourhood plan body and relevant stakeholders will need to reflect upon and act accordingly.

We acknowledge that the neighbourhood plan was prepared/published ahead of the PWP and that the Government does not expect development plans to wait on national-level changes but in the local context of the development plan policies and in light of our concerns that the neighbourhood plan will not deliver a plan for sustainable development, it is right to pause progress.

We do accept that it is not for neighbourhood plans to progress strategic matters but where there is absence of an up to date strategic policy framework and the Government intends to bring in a new national-level policy framework there is reason to pause progress to allow strategic planning to catch-up and then reflect upon this in revisions to the neighbourhood plan.

Conclusion

We are grateful for the opportunity to comment on the emerging vision, objectives, policies and aspirations for the neighbourhood plan. We support local engagement and we support neighbourhood planning.

We hope you find our comments helpful, as they are offered in a constructive and positive manner, and we look forward to hearing from you.



Yours faithfully



David Bainbridge
Planning Director

Encl. Response form

Copy: Davidsons Developments Limited



Ref:

(For official use only)

HUGGLESCOTE AND DONINGTON LE HEATH NEIGHBOURHOOD PLAN

Submission Consultation – Response Form

Hugglescote and Donington le Heath Parish Council have submitted the Hugglescote and Donington le Heath Neighbourhood Plan to North West Leicestershire District Council. In accordance with Section 16 of the Neighbourhood Planning (General) Regulations 2012*, we are now consulting on the neighbourhood plan, and would like your comments. The consultation period will run for six weeks from Friday 12 March until the end of Friday 23 April 2021.

The submission plan and supporting documents can be viewed at https://www.nwleics.gov.uk/pages/hugglescote_neighbourhood_plan

You can make representations to the Neighbourhood Plan by completing the form below and emailing it to planning.policy@nwleicestershire.gov.uk or posting it to Planning Policy, North West Leicestershire District Council, Council Offices, Whitwick Road, Coalville LE67 3FJ.

All responses must be received by the District Council by the **end of 23 April 2021**.

*Including amendment regulations; The Neighbourhood Planning (General) (Amendment) Regulations 2015 and The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016.

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		David
Last Name		Bainbridge
Job Title (where relevant)		Planning Director
Organisation (where relevant)	Davidsons Developments Limited	Savills
Address Line 1	C/o Agent	Wytham Court
Address Line 2		11 West Way
Address Line 3		Oxford
Address Line 4		
Postcode		OX2 0QL
Telephone		██████████
Email address		██

Do you wish to be notified of the Council's decision on the Neighbourhood Plan proposal?

Yes

No

PART B – Your Representation

In the left column below, please state which part of the Neighbourhood Plan your representation relates to (for example which section, page or policy). In the right column, please submit your comments.

You can comment on as many different parts of the Neighbourhood Plan as you wish (please add more lines if required).

Section, page or Policy (please specify for each comment)	Comments
	Please see letter from David Bainbridge at Savills on behalf of Davidsons Developments Limited.

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: David Bainbridge, Savills on Behalf of Davidsons Developments Limited

Date: 21 April 2021

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. It will be used only for the preparation of the Hugglescote and Donington le Heath Neighbourhood Plan as required by the Neighbourhood Planning (General) Regulations 2012*, 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.

*Including amendment regulations; The Neighbourhood Planning (General) (Amendment) Regulations 2015 and The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016.

Please send completed forms to planning.policy@nwleicestershire.gov.uk or Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Friday 23 April 2021