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## STATEMENT SUBMITTED ON BEHALF OF ROSCONN STRATEGIC LAND (36)

### 2. VISION, OBJECTIVES AND SPATIAL STRATEGY

b) Is the Spatial Strategy of the Plan justified and effective, in particular respect to:

ii) the chosen settlement hierarchy:

1) within the district

2) having regard to the proximity of towns in the neighbouring Districts

iii) the defining of the scale and Limits to Development

1) Coalville

2) Village settlements

iv) the overall distribution of development in particular between Coalville and Ashby del la Zouch

#### ***Settlement Hierarchy***

The aim of the settlement hierarchy is to direct and apportion housing development to those settlements most able to accommodate it, measured against the role and function of each settlement and their sustainability (based on the level of existing services and facilities and their physical accessibility). This is an entirely appropriate approach that Rosconn Strategic Land (RSL) support. Indeed they accept that the settlement hierarchy itself as set out in Policy S2 is soundly based.

It is of course critical that the settlement hierarchy is then appropriately reflected in the Plan's policies, and particularly in the identification of housing sites to meet identified needs through the plan period. However, there is currently a clear mismatch between the proposed settlement hierarchy in Policy S2 and the actual delivery that will result from the sites identified in Policies H1 and H2, which arises from the level of existing commitments, rather than a planned strategy of delivery.

That concern particularly relates to a number of the identified Sustainable Villages where the Plan does not make adequate provision to address local market and affordable housing needs, and support the existing services and facilities and the rural economy, in order to ensure the continued sustainability of those villages in the long term in accordance with the requirements of the NPPF.

#### ***Limits to Development***

Policy S2 defines Sustainable Villages as settlements that have a range of services and facilities where a "*limited*" amount of growth will take place. It provides no guidance as to what level of growth would be acceptable, except to restrict it to locations within the defined Limits to Development. Whilst the hierarchy necessarily groups comparable settlements together, there is still considerable variation in the level of services provided in each of the Sustainable Villages. It

is, therefore, sensible not to provide an exact quantification of what an appropriate scale of development might be, as it is likely to be determined by the settlement and site-specific circumstances.

However, the policy does consider the specific needs of individual settlements or the potential for specific sites within or adjacent to such settlements to deliver sustainable development within the plan period. That does not accord with the NPPF, which requires planning authorities to take a balanced view of socio-economic benefits of development in a given location and whether the relevant environmental, technical and infrastructure matters can be addressed, rather than seek to impose a blanket constraint to development outside of contrived limits to development.

Indeed, in practice the proposed limits to development to the Sustainable Villages are very tightly drawn. They are based on only accommodating the development needs identified in Policy S1, despite that being a **minimum** requirement (which has in any case been challenged – refer to Position Statements in relation to Matters 1 and 3), resulting in a serious tension between the policies. On that basis, whilst it is accepted that less development will be directed to Sustainable Villages than towns and centres higher up within the Settlement Hierarchy, Policy S2 will significantly restrict any new development in Sustainable Villages that is not already identified under Policies H1 and H2 (i.e. already has the benefit of a planning permission or resolution to above) and does not, therefore, effectively address the future needs of those settlements.

Consequently, the current spatial strategy approach and emphasis of Policy S2 to “*limited*” growth and reliance on tightly defined Limits to Development will have a significant negative impact on the role and function of a number of the Sustainable Villages in the District. This is particularly relevant to Heather, where minimal development is proposed within the plan period and is clearly insufficient to meet the housing needs of the community, or to sustain the existing services and facilities in the long term to ensure that it remains a sustainable village to the benefit of the existing and future residents. Moreover, the single specific site now included within the housing trajectory (Mill Lane, Heather) physically relates much more closely to the settlement of Ibstock than to Heather, albeit that it is substantially outwith the Limits to Development for either settlement.

RSL’s concern in this regard is illustrated by their recent experiences in relation to an outline planning application for the provision of 36 dwellings at Heather. That application was refused solely on the grounds that the site lies outside of the defined limits to development, even though the Officer’s Report concluded that the proposal would represent sustainable development with significant socio-economic benefits and minimal environmental harm, and recommended approval accordingly. This clearly epitomises the tension in the policy approach that has been taken.

### ***Distribution of Development***

Table 2 in Background Paper 4 Update (EX/17) highlights that almost 45% of completions and existing commitments in the District are focussed on the Coalville Urban Area. The proposed development allocations (Policy H3) further exacerbate this issue by again focussing on the Coalville Urban Area and Key Service Centres. Table 5 in the Background Paper examines the position in relation to future growth, and the total supply in Coalville represents just over 36% of the total growth in in the District, with a further 37% in the Key Service Centres. Furthermore, these quantum of development do not take account of the substantial growth planned beyond the plan period in these same locations, as identified within the housing trajectory (Background Paper EX/19). A relatively small proportion of the future development proposed in the District will be directed to other sustainable locations, such as the Sustainable Villages. Indeed, Table 2 of the Background Paper confirms that completions and existing commitments in these settlements

is less than 10% of the total for the District.

That is despite the recognition in the Local Plan that the Sustainable Villages are suitable locations for development to facilitate limited growth. Indeed, future development is required in these settlements. NPPF that states (para 54) *“In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs”*. Furthermore, para 55 continues: *“To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities”*.

The imbalance in the provision that is proposed in the Sustainable Villages also needs to be taken into account. The Housing Trajectory and Policies H1 and H2 highlight that the growth directed to the Sustainable Villages is very much focussed on only a few locations, most notably Moira, Appleby Magna and Ravenstone. In comparison, whilst Heather is similar in scale, nature and function to those settlements, it has accommodated very little development in recent years and minimal development is now planned in the rest of the plan period to 2031 that actually is not related to the settlement itself.

The overall strategy of urban concentration should not be undermined, but clearly the suitability and capacity of the Sustainable Villages identified in the settlement hierarchy in Policy S2 for development should be underpinned by planned growth as a means of meeting local housing need and supporting their economies.

Indeed, the development of small to medium scale sites in stronger market areas, such as Heather, have the ability to significantly improve the likelihood of the Council delivering the scale of development needed to meet its housing requirement, given the concerns of the strength of the housing market at Coalville and the clear risk of market saturation given the scale of development proposed there.

### **Omission Site**

The Plan’s spatial strategy will have a significant negative impact on the role and function of a number of the Sustainable Villages in the District, such as Heather, and additional development allocations should be identified in these locations to address the concerns outlined above. Indeed, if the housing requirement in Policy S1 increases (refer to Position Statement in relation to Matter 3) and/or the supply over the 5 year or plan period reduces (refer to Position Statement in relation to Matter 5), then additional allocations will be required to ensure the Plan’s soundness. It is, therefore, suggested that the Council should look to Sustainable Villages to address those likely changes in need and supply, focusing on those locations not currently planned to accommodate further development, such as at Heather.

There is a clear opportunity to expand the village to the west to the north of Swesptone Road. Indeed, recent planning applications submitted by RSL have demonstrated that it is an entirely suitable development site in an accessible and unconstrained location, and that the development proposals are entirely appropriate in design, landscape, ecology, heritage, drainage and highways terms. Notably, neither application attracted any environmental or technical based objections from statutory consultees.

The site is not subject to any landscape or ecological designations, and it is very much contained by the existing woodland planting to the west. The landscape and visual impact of development

on the site will be relatively limited as key landscape features will be retained, the visual envelope is very contained, and the proposed public open space and strategic landscaping can positively respond to the landscape character and visual amenity.

The development can be readily integrated with the existing built form, maintaining key links to the village and the existing services and facilities therein. Moreover, the nature of the site means that its delivery can be phased to meet housing needs as they arise, which is considered to be an appropriate strategy to reflect the likely demand in this location and the scale of facilities available or that might be extended to support such. Notably the RSL's recent application for the development of the full site to provide 135 dwellings (now at appeal) proposes to reintroduce a frequent and convenient bus service to the village, which would be of great benefit to existing and future residents alike, and enhancing the sustainable merits of the village.

The site's development would constitute "sustainable development" that would result in a number of significant economic, social and environmental benefits of the local area and wider District. As such, RSL's objections to the Plan highlighted that the site should be allocated under Policy H3.

### ***Conclusion***

For the reasons set out above, it is considered that the spatial strategy is neither justified or effective, or indeed consistent with national policy, and the Plan is, therefore, unsound. To remedy that Policy S2 should be appropriately modified to appropriately reflect the role and development needs of Sustainable Villages identified in the Settlement Hierarchy and not seek to limit development where this is in accordance with the objectives of the NPPF by imposing contrived limits to development. Moreover, specific development allocations should be proposed in key Sustainable Villages to ensure that they remain such in the long term/ RSL's site at Heather is an entirely appropriate opportunity to do so.