



## **NORTH WEST LEICESTERSHIRE LOCAL PLAN EXAMINATION**

### **STATEMENT ON BEHALF OF WILLIAM DAVIS LIMITED**

#### **MATTERS 2B – SPATIAL STRATEGY OF THE PLAN**

##### Introduction

William Davis' position from its August 2016 letter was that the scale of allocations for development in Coalville – given it is the district's only principal town – was not soundly based and that the proposed use of the area of separation policy over a large parcel of land in the area of Stephenson's Green is providing an artificial means of restricting Coalville's ability to deliver a more appropriate level of housing. The suitability of the Stephenson's Green site is covered in the statement and masterplan submitted in connection with matter 8.

##### Matter 2B Issues

###### 1&2. 'Reasonable alternatives' and 'Chosen Settlement Hierarchy'

The spatial strategy of the Plan itself is not criticised in that it correctly identifies Coalville as the principal settlement within the district. However, it is William Davis' view that insufficient reflection of Coalville's status and opportunities that development would provide to support the settlement is taken through into the site allocation policies. It is also the case William Davis considers the scale of development in Ashby does not reflect what is the lesser status of that settlement and its environmental constraints.

###### 3. Definition of Scale and Limits at Coalville

In conjunction with the position statement on matter 8, William Davis considers the Local Plan unsound on the matter of how settlement limits have been defined around Coalville and the scale of development that is proposed for it in the context of it being defined as the only principal town in the district. As set out in August 2016, not only is Coalville the main settlement in the district, each town centre is described as the principal one on the district which has been the subject of variable performance. It has a growth corridor which is designated as being important and the Local Plan recognises the potential for housing and economic opportunities as being necessary to re-vitalise the town centre. There is no recognition of the need for additional housing to provide consumer expenditure and activity to re-vitalise the town centre – including the objectives to provide additional goods comparison floorspace.

Whilst the level of provision of additional housing at Coalville should be increased, the Council's proposals to provide an area of separation (as it sees it) between Coalville and Whitwick provides an artificial means of restricting housing development in the district's largest settlement on what would otherwise be (without Policy En5) an appropriate housing site. William Davis' concerns about how the Council is intending to operate Policy En5 as a quasi Green Belt policy (see position statement on matter 8) are relevant considerations.

It is clear from recent appeal decisions including the Richborough case in a green wedge that Policy En5 proposals should be considered as a housing policy and that in the context of more housing being potentially required the long term protection of land from housing development is unsound. The circumstances where the HEDNA identifies significantly more housing land to be provided in the Plan period; Coalville being suitable in strategic terms for more growth but unable to make a significant contribution because of the En5 policy should be avoided. At present with the current strategy within

the Local Plan Policy En5 is working against the otherwise sensible strategy of providing significant growth at Coalville.

It is therefore recommended that the Inspector does not confirm the policy relating to development limits around Coalville including En5 and suggests – whether in the context of a Local Plan ‘review’ as currently suggested in Policy S1 or the options set out by William Davis in its statement on matter 1 that suitable land be available for allocation without the constraint of Policy En5.

#### 4. Distribution of Development between Ashby and Coalville

William Davis notes the figures for the distribution of housing growth in the update to background paper 4. This suggests in tables 5 and 6 that the percentage of dwellings anticipated to be built in Coalville will be some 36.4% and Ashby 25.7%. The current percentage of dwellings at Coalville in the 2011 census is 40% and 13% at Ashby. It is clear, therefore, that as far as the Local Plan is concerned over a quarter of the proposed completions are intended to be at Ashby. There appears to be no strategic reason why Ashby is proposed to receive such a large proportion of growth compared to Coalville. In addition due to the specifically identified needs to bolster Coalville town centre and respond to its growth corridor, there is no reason why Coalville should not receive greater proportion of growth than the percentage of population within the district it currently has. The current housing proposals will simply maintain rather than enhance Coalville’s position at the expense it would appear of enhancing Ashby for which there is no strategic justification.