

Persimmon Homes makes the following additional statements in response to the Inspector's Matters

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

i) Reasonable Alternatives

1. The Plan is not sound in respect of reasonable alternatives in respect of the distribution of development to Ashby de la Zouch over Coalville. In providing this statement Persimmon Homes is entirely aware that the Sustainability Appraisal (SA) is not tested for soundness, and that assumptions made by decision makers in preparing the SA may be different to that of Persimmon Homes. In this context, the decision making process within the SA, and any relative subjective scoring or assessment is not the focus of Persimmon Homes' comments, as this is a matter for the decision maker. However, where there are errors of fact, inconsistencies or statements without evidence, the SA cannot be relied upon as decision makers should not in those circumstances reach different conclusions based upon erroneous assumptions. On this basis, Persimmon Homes limits its comments to areas where the SA is erroneous, inconsistent or unsubstantiated by evidence.

Erroneous assumptions made on the Coalville Housing Market

2. Paragraph 7.12 of the SA sets out that after committed development there is 800 dwellings to be distributed in the District, and reasonable alternatives are presented for this in paragraph 7.2.1. An assessment of those alternatives is then undertaken and the conclusions presented in paragraphs 7.2.2 (1a to E). The preferred choice is then set out with the reasoning in Section 7.4 of the SA. However, it is here (and within the testing of those options) that the errors exist.
3. Paragraph 7.4.2 sets out that one of the reasons for discounting distributing the 800 dwellings to Coalville is that the **Council "considers that the housing market in Coalville may not be robust enough to support additional development"**. It goes on to explain that demand for housing is lower in Coalville and that directing more development to Coalville could **"saturate the market"**. These are bold statements prepared by the Council, and yet no evidence supports those assumptions.
4. Persimmon Homes is a national house builder and has committed to delivering new homes in Coalville, and this is in the context of that already planned. There is no lower demand, or saturation of the housing market in Coalville and the Council has not published any evidence to justify this position. The assumption is therefore without credibility and erroneous. Persimmon Homes, is not a promoter of sites, where the intention is to resell the land with planning permission. Persimmon Homes intends fully to deliver new homes quickly and boost supply. On this basis, a national house builder does not take on lightly the significant investment made to promoting the site and preparing a planning application in Coalville.
5. The assumption on the housing market in Coalville is therefore erroneous and flawed.

Erroneous Assumptions made in respect of Coalville and Landscape Impact

6. Paragraph 7.4.7 of the SA that explains the reason for not selecting the option of further growth at Coalville over Ashby de la Zouch is fundamentally erroneous. It states that while the option would support growth and regeneration at Coalville, ***“it has the potential for negative effects on landscape, and it is unclear whether substantial housing growth could be delivered at Coalville”***.
7. In respect of the comments made on Landscape, these are not founded in evidence. As set out in Matter Statement 8 Persimmon Homes has provided the examination the evidence that the Council published in the form of its Settlement Fringe Assessment that demonstrated that further development can be accommodated in Coalville without detriment to the landscape. In fact, that was the single purpose of the study, and it has been ignored. The statement in the SA is therefore erroneous and undermines the assumptions made.
8. Furthermore, the assumption, if built around the restrictive approach proposed by Policy EN5 (Area of Separation), is flawed, as the overly restrictive approach employed by EN5 is not consistent with national policy, as has been demonstrated by the Preston City Local Plan examination (referred to in Matter Statement 8 of Persimmon Homes).
9. In respect of the assumptions of whether Coalville could take further housing growth, there is no evidence (as set out above) to substantiate this statement. As such it is erroneous.

Errors and Omissions in Access and Travel

10. The assessment of strategic options for distributing the additional 800 units has been considered in the context of access and travel in the SA. This is principally assessed under Objective 7, within Appendix B of the SA. The Appendix has no page numbers, but under Objective 7 all the options are appraised.
11. In respect of Coalville, the SA outlines that there is congestion on the A511, particularly in the town at peak periods. This counts negatively towards this assessment. It also states within the significance section of Objective 7 that focusing more growth at Coalville will increase congestion.
12. However, this assessment fails to acknowledge the potential of significant infrastructure improvements available in Coalville at the congested A511/Broom Leys junction. Persimmon Homes has a planning application in currently that proposes significant remodelling of this particularly acute problematic junction that is identified in the Infrastructure Development Plan for improvements. The proposals put forward by Persimmon Homes significantly resolve the traffic and congestion issues at this junction for the benefit of the town. This information is with the Council alongside a County Highways statutory response (date March 2016) confirming the Broom Leys – Stephenson Way junction will exceed capacity by 2024 with significant Peak Am Pm queuing without Persimmon Homes proposed mitigation strategy. None of it which is referred to. This is a considerable omission in respect of the assessment of the options.

Conclusion

13. Persimmon Homes has not focused on subjective assessments within the SA where two decision makers can justifiably reach different conclusions. The above commentary focuses on points of fact and error in the SA where decision makers cannot reach differing conclusions. The outcome of this is that the SA does not support the conclusion that Coalville should be discounted for accommodating the additional 800 dwellings as the evidence does not support it.