

NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL

CABINET – 18 OCTOBER 2011

Title of report	NORTH WEST LEICESTERSHIRE CORE STRATEGY
Key Decision	a) Financial No b) Community Yes
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Purpose of report	To outline for members the response to the recent consultation and recent developments which may affect the Core Strategy and to advise on how the Council can move forward with the Core Strategy
Reason for Decision	To provide a direction of travel for further work and discussions
Council Priorities	<p>These are taken from the Council Delivery Plan:</p> <p>Pride in the Community Improving our Town Centres Green Footprints Challenge</p>
Implications:	
Financial/Staff	Allowed for within existing budgets
Link to relevant CAT	Place Shaping Local Prosperity Cleaner Greener
Risk Management	A risk assessment of the project has been undertaken. As far as possible control measures have been put in place to minimise these risks, including monthly updates to the Corporate Leadership Team.
Equalities Impact Assessment	The Core Strategy will have to ensure that any policies have taken account of any diversity and equality issues. Therefore all new policies will be subject to an Equality Impact Assessment as part of their preparation.
Human Rights	None discernible

Transformational Government	Not applicable
Comments of Head of Paid Service	The report is satisfactory
Comments of Section 151 Officer	The report is satisfactory
Comments of Monitoring Officer	The report is satisfactory
Consultees	None
Background papers	<p>Report to Cabinet 1st March 2011 which can be viewed at http://minutes.nwleics.gov.uk:81/aksnwleicester/users/public/admin/kab12.pl?cmte=CBT&meet=43&arc=71</p> <p>The Localism Bill which can be viewed at http://services.parliament.uk/bills/2010-11/localism/documents.html</p> <p>Planning Policy Statement 3 (Housing) which can be viewed at http://www.communities.gov.uk/publications/planningandbuilding/pps3housing</p> <p>Draft National Planning Policy Framework which can be viewed at http://www.communities.gov.uk/documents/planningandbuilding/pdf/1951811.pdf</p> <p>Leicester & Leicestershire Housing Requirements Study which can be viewed at http://www.nwleics.gov.uk/pages/evidence_base</p> <p>Appeal Court decision in respect of Cala Homes (South) Limited and Secretary of State for Communities and Local Government dated 27th May 2011</p> <p>Local Planning Regulations – consultation which can be viewed at http://www.communities.gov.uk/documents/planningandbuilding/pdf/1951747.pdf</p> <p>Responses to consultation. Hard copies are held by the Planning Policy team and can be viewed on request. A summary of responses can be viewed in Room 100.</p> <p>Planning Policy Statement 12 (Local Spatial Planning) which can be viewed at http://www.communities.gov.uk/documents/planningandbuilding/pdf/pps12sp.pdf</p>

Recommendations	<p>THAT CABINET:</p> <p>(I) NOTE THE RESPONSES TO THE LATEST CONSULTATION AS OUTLINED IN SECTION 3 OF THIS REPORT;</p> <p>(II) CONFIRM ITS PREVIOUS CONCLUSIONS TO PROTECT THE GREEN WEDGE AND NOT TO ALLOCATE A SITE FOR STRATEGIC DISTRIBUTION IN THE DISTRICT;</p> <p>(III) AGREE TO EXTEND THE PLAN PERIOD TO 2031 AS SET OUT IN SECTION 4 OF THIS REPORT AND;</p> <p>(IV) AGREE TO A HOUSING REQUIREMENT OF 388 DWELLINGS PER ANNUM (9,700 DWELLINGS FOR THE PERIOD 2006-2031) AS SET OUT IN SECTION 4 OF THIS REPORT; AND</p> <p>(V) AGREE TO THE DISTRIBUTION OF HOUSING ACROSS THE DISTRICT AS SET OUT SECTION 4</p>
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1.0 INTRODUCTION

1.1 Members will recall that a number of reports have been considered by previous Cabinet meetings in relation to the Council's emerging Core Strategy. The Core Strategy is the first document to be produced as part of the Council's Local Development Framework (LDF). It is the most important document as it will set out a framework to guide future development across the district. The last report was considered by Cabinet at its meeting on 1st March 2011.

1.2 At the meeting Cabinet agreed the following:

- The plan period should remain as 2006 to 2026.
- The overall development strategy should remain as per previous consultations, with a Coalville focus.
- The housing numbers should be reduced to approximately 8,000 dwellings across the district to reflect historic rates and new household projections.
- The amount of dwellings in Coalville should be reduced by 700, to be redistributed to other parts of the district subject to a further consultation exercise.
- 1 strategic development site should be identified in the district, being Bardon Grange.
- The Green Wedge should be protected and re-designated as an Area of Separation, to prevent the coalescence and protect the identity of individual villages.
- No provision should be made in the Core Strategy for a site for Strategic Distribution.

1.3 Cabinet also agreed that further consultation be undertaken in respect of the conclusions agreed by Cabinet and that the Director of Services in consultation with the appropriate Portfolio Holder be delegated authority to consider the responses to the consultation prior to consideration of the Core Strategy by Council.

1.4 The purpose of this report is to:

- advise members of recent legal and other considerations which potentially affect the Core Strategy;
- outline the responses to the latest consultation; and

- in view of the above, recommend how the Council can move forward on the Core Strategy.

2.0 LEGAL AND OTHER ISSUES UPDATE

- 2.1 Members will be aware that the Government has proposed to revoke all Regional Spatial Strategies (RSS). The legislation to enable this to happen is included as part of the Localism Bill which is currently making its way through Parliament.
- 2.2 Members will also be aware that the Government's proposal to revoke RSS has been the subject of a number of legal challenges. The result of the latest of these was announced on 27th May 2011 (4 days before the latest round of consultation began –see section 3 below).
- 2.3 This latest challenge concerned whether those making planning decisions under the Planning Acts (including local planning authorities) are entitled to have regard to the Government's proposal to abolish RSS. In this instance the Court of Appeal ruled that whilst it would be lawful to have regard to the proposed abolition of RSS when determining planning applications, this is not the case when preparing planning policies. The judgement states (paragraph 24) *"It would be unlawful for a local planning authority preparing, or a Planning Inspector examining, development plan documents to have regard to the proposal to abolish regional strategies. For so long as the regional strategies continue to exist, any development plan documents must be in general conformity with the relevant regional strategy"*.
- 2.4 Members will appreciate that this decision is potentially significant in terms of the Core Strategy, particularly in respect of the issue of housing numbers as Cabinet has previously agreed to using different (lower) figures from those contained in the RSS. This issue is considered in more detail at section 4 of this report.
- 2.5 Another aspect of the government's planning reforms is to replace all existing Planning Policy Statements/Guidance with a single National Planning Policy Framework (NPPF). A draft NPPF was published in July 2011. It is anticipated that the final version will be published by April 2012. It is interesting to note that the draft NPPF does not contain any reference to Local Development Frameworks (LDF) or Core Strategies. Instead reference is made to 'Local Plans'. However, the legislation which establishes LDFs is to stay in place even when the Localism Bill gains Royal Assent and is enacted. There is currently no Government guidance as to how it wishes Local Planning Authorities to move towards having Local Plans instead of Core Strategies and other Development Plan Documents.
- 2.6 Irrespective of what local planning documents are called, the key points to note from the draft NPPF in respect of this are:
 - Each Local Planning Authority is required to produce a Local Plan with any additional development plan documents only being used where clearly justified.
 - Policies should only be included which set out how a decision maker will respond to a development proposal.
 - The Local Plan should set out strategic priorities for the area including policies to, amongst other factors, deliver housing and economic growth, the provision of infrastructure and protection and enhancement of the natural and built environment.

- Local Plans will cover a 15 year period from adoption and indicate broad locations on a key diagram and land use allocations on a proposals map.
- The Local Plan should be supported by an evidence base which is proportionate.
- Local Planning Authorities are required to work collaboratively with other public bodies to address cross boundary and strategic issues.
- Local Plans will be subject to public examination where the four key tests are:
 - Positively prepared
 - Justified
 - Effective
 - Consistent with national policy

- 2.7 These points largely repeat existing guidance although the second point suggests a move away from spatial planning unless in the context of a development proposal – in effect reverting to what pre-LDF Local Plans were expected to do.
- 2.8 On the basis of the draft NPPF it would be potentially open to the Council to produce a single document rather than a Core Strategy followed by an Allocations and Development Management Policies Development Plan Document as has previously been proposed. However, in view of the work undertaken so far and the pressing need to ensure that the Council has in place an up to date plan as quickly as possible, it would be most appropriate to continue with the preparation of the Core Strategy with a view to getting this adopted as soon as possible. To prepare a single document now would mean significant delays which would leave the Council without an up-to-date agreed strategy for the district and hence vulnerable to speculative applications and appeals.
- 2.9 A report will be brought to a future meeting of Cabinet to agree a revised Local Development Scheme which will set out the Council's programme for plan production.
- 2.10 The Government has also published for consultation purposes new 'Local Planning Regulations' governing the production of local planning documents. As with the NPPF there is no reference to LDF or Core Strategies but instead reference is made to development plan documents. Amongst other changes, Inspectors' reports following Public Examination will no longer make binding recommendations and the Inspector will only be able to recommend modifications where invited to do so by the local planning authority. However, the Inspector will still have the ability to decide that a plan is not acceptable for one of the reasons outlined above in paragraph 2.6.
- 2.11 Work has also continued in respect of the evidence base to support the Core Strategy. Members will recall that a Detailed Water Cycle Study has been commissioned. This will be particularly important in terms of helping to address issues associated with the River Mease Special Area of Conservation and, potentially, the distribution of new housing development. It had been envisaged that this study would have been completed by late August. However, due to some technical issues with the modelling which is being used this report has been delayed. It is anticipated that this report will be completed by December.
- 2.12 Additional transport modelling work has been commissioned from Leicestershire County Council using a county wide transport model which has been created. This work is looking at different development scenarios and is iterative (i.e. the outcome of one scenario may generate outcomes which require further work) such that an exact timetable has not yet been established.

- 2.13 The report to 1st March Cabinet noted that a Housing Requirements Study had been commissioned for the Leicester and Leicestershire Housing Market Area (HMA). This work, at least insofar as it relates to projections for individual districts, has now been completed. The implications of this study are considered in section 4 of this report.

3.0 RESPONSES TO LATEST CONSULTATION

- 3.1 The consultation undertaken in view of the conclusions of the 1st March Cabinet meeting took place between 31st May 2011 and 29th July 2011 (this was extended from an initial deadline of 12th July to allow for some issues which had been experienced in respect of the delivery of the Council's *Vision* magazine which was, in part, used to promote the consultation).
- 3.2 In addition to the use of *Vision*, Officers also attended each of the Community Forum meetings that took place during June and July.
- 3.3 As noted previously the Appeal Court decision regarding the Government's proposed abolition of RSS was released just before the consultation commenced. Whilst it was apparent that the Court decision was of relevance to the consultation it was not considered necessary to delay the consultation.
- 3.4 The consultation generated some 1750 responses. Of these 1576 took the form of a standard letter prepared by the Whitwick Action Group. All individual responses were acknowledged as they were received. For members information the decision of Cabinet will be communicated in writing (either via e-mail or in a letter) to all those who responded to the latest consultation.
- 3.5 The consultation asked four specific questions:
- Should we have a target of 8,000 or 10,200 new homes? (Question 1)
 - Do you support our proposal to not build on the Green Wedge? (Question 2)
 - How should we distribute the remaining 35 homes per annum across the rest of the district [outside of Coalville]:
 - a) equally distribute to each of the settlements listed?[Ashby, Castle Donington, Ibstock, Kegworth and Measham] or
 - b) Distribute to each of the settlements listed in some other way? or
 - c) Distribute to the various other villages across the District? or
 - d) A combination of b) and c)? (Question3)
 - Do you agree that we should not allocate land for strategic distribution? (Question4)
- 3.6 A summary of the responses to these questions is set out at Appendix 1 to this report. Appendix 2 of this report summarises the responses from a range of key stakeholders.
- 3.7 The issue of housing numbers is dealt with in section 4 of this report. In terms of how the remaining 700 dwellings should be distributed outside of Coalville, the responses do not show a clear consensus but instead some support for all of the options. The issue of distribution is considered in Section 4 of this report.
- 3.8 The consultation responses demonstrate that there is significant support for the proposed approach in respect of both the Green Wedge and Strategic Distribution. In view of this there should be no change in the approach from that previously agreed by Cabinet.

4.0 KEY ISSUES FOR CABINET DECISION

- 4.1 Members are aware that the final decision on the Core Strategy is a decision for the Full Council. As outlined at paragraph 2.8 it is considered essential that the Council move forward on the Core Strategy as quickly as possible. The following issues, therefore, require that Cabinet give a steer on how they wish to proceed.

Plan Period

- 4.2 The report to 1st March Cabinet concluded that it would be appropriate to retain a plan period of 2006-2026.
- 4.3 Since Cabinet considered the earlier report it has become apparent from Core Strategies elsewhere in the country that Inspectors are suggesting that a minimum period of 15 years after adoption is required. This reflects advice in PPS12 (*Local Spatial Planning*) and in the emerging NPPF.
- 4.4 It should be noted that a limited number of aspects of the evidence base (for example, retail capacity and employment land requirements) have used an end date of 2026. However, other aspects of the evidence base do not have an end date. Therefore, whilst it would clearly be better to have a consistent end date, it is considered that in light of the latest developments outlined above that the plan period should be extended.
- 4.5 The 1st March report referred to a possible end date of 2033 as this was the date to which the latest government household projections, which informed the revised housing figures presented to Cabinet. However, the Housing Requirements Study provides projections to 2031.
- 4.6 In view of the completion of the Housing Requirements Study and the conclusions in the following section, it is now proposed that 2031 would represent a logical plan period end date.

Housing Requirements

- 4.7 At the 1st March Cabinet it was agreed to reduce the housing requirements figure for the Core Strategy from the 10,200 dwellings (510 per annum) in the RSS to 8,000 (400 per annum) dwellings. This reduction was justified on the grounds that new evidence (i.e. the 2010 household projections) was available. It was considered that this complied with the advice in PPS3 (*Housing*) that any housing numbers will still need to be justified and that this should be done “*in line with current policy in [Planning Policy Statement] PPS3*”.
- 4.8 As has been noted already, the Appeal Court has ruled that in preparing a Core Strategy (or other development plan document) it would be unlawful to take account of the proposed revocation of RSS.
- 4.9 Notwithstanding this, it remains the case that PPS3 advises that a variety of evidence be used to determine an appropriate level of housing. Amongst the factors identified in PPS3 are “*The Government’s latest published household projections ...*”.
- 4.10 The draft NPPF states that “*Local Plans should be prepared on the basis that objectively assessed development needs should be met, unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole*” and “*to use an evidence-base to ensure that*

their Local Plan meets the full requirements for market and affordable housing in the housing market area...".

4.11 As previously noted the Council has worked, in the spirit of co-operation required in the Localism Bill, with other Leicestershire authorities to commission evidence for the Leicester and Leicestershire HMA. This evidence was prepared by independent consultants who were asked to prepare forecasts covering a range of different scenarios using the latest Government household projections and also looking at a range of other evidence as advised in PPS3 (paragraph 32). It is considered that this could provide the Council with evidence of its "objectively assessed development needs" referred to in the draft NPPF.

4.12 Having regard to the availability of this new evidence, the Council has the option of either continuing with the figures of the RSS or using locally determined alternative figures, based on evidence as required by PPS3 and the draft NPPF. The advantages and disadvantages of each approach (irrespective of the figures) are considered below.

<u>Source of Figures</u>	<u>Advantages</u>	<u>Disadvantages</u>
RSS	<ul style="list-style-type: none"> • Have previously been tested and approved. • Would not raise issues of conformity with the RSS. 	<ul style="list-style-type: none"> • More recent evidence shows that RSS requirements are too high. • Local communities have previously rejected the RSS requirements as being too high having regard to the impact on the local area.
Locally determined	<ul style="list-style-type: none"> • Uses more up to date evidence than the RSS. • Locally determined figures more in line with spirit of 'Localism'. 	<ul style="list-style-type: none"> • Would not conform to RSS – increases risk that Core Strategy will be found 'unsound'.

4.13 Essentially the key issue from the above is that a Core Strategy figure based on the RSS is more likely to be found 'sound' than if locally determined figures are used.

4.14 A number of other local planning authorities across the country have proposed to use different (lower) housing figures than those contained in their respective RSS. At the subsequent Public Examinations Inspectors are generally coming down in favour of the figures in the respective RSS. In some instances, this is because the alternative figures suggested by the local planning authority have not been adequately evidenced. The availability of the Leicester and Leicestershire HMA helps to address this issue as this evidence is both more up to date than those figures used to inform the RSS and has been objectively assessed.

4.15 However, Members should be fully aware that there would still be a risk that at a Public Examination an Inspector would consider this to be 'unsound'.

- 4.16 If Members consider that alternative figures should be used, then it is necessary to consider what these should be.
- 4.17 An initial officer assessment of the latest household projections suggested that a figure of 8,000 dwellings for the period 2006-2026 (or 400 dwellings per annum) would be justified. This was the figure agreed by Cabinet in 1st March 2011. Based on a longer plan period to 2031 (as discussed above) this would give an overall requirement of 10,000 dwellings.
- 4.18 The Leicester and Leicestershire HMA study has looked in more detail than this initial assessment and has looked at a range of different scenarios. As such it is considered that this study is robust and would provide a suitable basis for the housing figures for use in the Core Strategy.
- 4.19 The scenarios assessed as part of the study were:
- Main trend-based demographic projection (PROJ 1)
 - Zero net-migration (also known as natural change where only the housing requirements of the existing population are considered)(PROJ 2)
 - Zero employment growth (the amount of housing to maintain current employment levels) (PROJ 3)
 - 5% employment growth – 2006 to 2031 (the amount of housing to allow for 5% growth in employment) (PROJ 4)
 - 10% employment growth – 2006 to 2031 (the amount of housing to allow for 10% growth in employment) (PROJ 5)
 - Projection linked to past housing delivery (PROJ 6)
 - Government published projections to provide a comparison and a check
- 4.20 Figures were produced for each 5 year period for 2006 to 2031. The figures for each scenario, both an annual figure and a total, for the period 2006-2031 are set out below.

	Dwellings per annum	Total dwellings for 2006-2031
Trend based	352	8,800
Zero net-migration	155	3,875
Zero employment growth	256	6,400
5% employment growth	322	8,050
10% employment growth	388	9,700
Housebuilding rates	356	8,900
Government published projections	377	9,425

- 4.21 By way of comparison the RSS annual figure from 2006 to 2026 was 510 dwellings per annum, 10,200 dwellings in total. If these figures were rolled forwards 5-years to 2031 then the total requirement would be 12,750 dwellings.
- 4.22 As can be seen the various scenarios produce a varied range of results from 3,875 dwellings up to 9,700 dwellings, although the majority are over 8,000 dwellings.
- 4.23 Appendix 3 of this report sets out a comparison of the merits of each of these scenarios.

- 4.24 For the reasons set out in Appendix 3 the zero net-migration and zero employment growth scenarios are not reasonable options. Of the remaining scenarios neither trend based nor housebuilding rates are considered to be a suitable basis for determining growth on their own. The Government based projections have the advantage of being 'official' projections but are trend based and do not take account of social, environmental and economic factors.
- 4.25 In terms of the employment growth scenarios both of these would accord with the Government's planning for growth agenda. It should be appreciated that economic forecasting is inherently difficult to undertake and any predictions are subject to considerable uncertainty. Such forecasts should merely be regarded as an indicator as to what might happen rather than a predictor of what will happen. For this reason it was considered that it was not necessary for the Leicester and Leicestershire HMA study to be based on any specific forecast, but that it should instead be based upon different growth scenarios.
- 4.26 Of the two remaining projections in view of the importance attached by the Government to achieving economic growth it is considered that the higher figure of 10%, whilst representing a significant challenge from the current position, would be an appropriate figure to use and aspiration to achieve.
- 4.27 Taking the 10% employment growth scenario as the basis for the housing requirements in the Core Strategy up to 2031(9,700 dwellings) and taking account of new builds between 2006 and 2011 (1,347 dwellings), dwellings under construction as at 31st March 2011 (122 dwellings) and dwellings with planning permission as at 31st March 2011 (1,097 dwellings) the residual requirement is 7,134 dwellings. This compares to a figure of 5,958 dwellings in the March Cabinet report, but is over a longer time period. Based on information in the Council's Strategic Housing Land Availability Assessment (SHLAA) it is considered that this requirement will be able to be met.

Housing Distribution

- 4.28 As noted above the consultation did not generate a consensus on the issue of housing distribution outside of Coalville. In view of the proposal to extend the plan period and the revised housing figures, officers have undertaken further work on this issue.
- 4.29 Members will recall that the RSS requires that in respect of new housing development this should be "located mainly at Coalville". There is no accepted definition of what "mainly at" means. However, it is reasonable to assume that it means at least 51% of all new development in the district should take place in the Coalville area.
- 4.30 Having regard to this, and available evidence relating to a range of factors including the distribution of existing dwellings; the potential availability of sites; previous build rates across the district and the distribution of jobs, a suggested distribution is set out below.

Settlement	Dwellings
Coalville	5,000
Ashby de la Zouch	1,400
Castle Donington	1,000
Ibstock	500
Kegworth	450
Measham	450
Rest of district	900
Total	9,700

4.31 Whilst Cabinet are asked to support this proposed distribution it should be noted that other on-going work, particularly the Detailed Water Cycle Study, the transport work, assessment of infrastructure and Sustainability Appraisal/Strategic Environmental Assessment may require some further adjustments. However, on the basis of current available evidence it represents an appropriate distribution.

4.32 In order to be consistent with previous reports the following table takes account of developments since 2006 and commitments in order to identify the amount of housing that still needs to be allocated in each settlement.

	Total no of dwellings required 2006 – 2031 (a)	Built 2006-11 (b)	Under construction at 31 March 2011 (c)	Planning permission at 31 March 2011 (d)	Granted or resolved to approve since 31st March 2011 (e)	Remaining (a-b-c-d-e) (i.e. dwellings still to find)
Coalville	5,000	583	65	207	86	4,059
Ashby	1,400	384	11	62	383	560
Ibstock	500	34	3	224		239
Kegworth	450	35	5	146	80	184
Castle Donington	1,000	48	1	2	275	674
Measham	450	42	7	59		342
Rest of district	900	221	30	122		527
Total	9,700	1,347	122	822	824	6,585

5.0 NEXT STEPS

5.1 As noted above work on the evidence base is still on-going. It is currently envisaged that the 'final' version of the Core Strategy will be taken to Council for approval in early 2012. Following approval by Council the following provides an outline of the steps which will need to be taken thereafter:

- Publication of Core Strategy for formal consultation (6 weeks minimum period);
- Submission of Core Strategy to Secretary of State;
- Public Examination;
- Receipt of Inspector's Report; and
- Adoption by Council

- 5.2 It is currently anticipated that adoption of the Core Strategy is likely to be in early/mid 2013. A further report will be brought to Cabinet in the near future which will propose a revised Local Development Scheme to set out the Council's proposals for the production of not only the Core Strategy, but also other possible Development Plan Documents (or possibly a single Local Plan as suggested in the draft NPPF). This will also consider the likely approach to the preparation of the Council's Community Infrastructure Levy (CIL).

APPENDIX 1 – summary of responses to individual questions

Question 1 - Should we have a target of 8,000 or 10,200 new homes?

Majority of responses support the figure of 8,000 although some would prefer to see this reduced further.

There was also support for the target of 10,200 as the RSS figures are the most robust evidence base. A reduction to 8,000 new dwellings would not be in conformity with the RSS, there is no evidence to support a figure lower than that in the RSS, especially in light of the latest legal challenge to the Government's proposed revocation of RSS. Reflecting past build rates is not considered pro-active planning for growth.

Some suggestions for a higher figure of 12,240 (10,200 plus a 20% allowance), to provide choice and competition. Reference made to the plan period which needs amending as it should not be restricted to coincide with the RSS.

Some concerns regarding the impact on the Leicester & Leicestershire HMA if NWLDC uses lower figures than those in the RSS. Any housing targets should not be set until the housing requirements study has been completed.

Question 2 - Do you support our proposal to not build on the Green Wedge?

Majority of responses to this question support the proposal not to build on the Green Wedge. Opinion is that the Green Wedge provides separation between and identity to the surrounding settlements, as well as natural environment and public amenity value. Reference to the community engagement exercise conducted by the County Council which has revealed widespread and strong support for its existing Green Wedges.

Some concern that designation as Area of Separation may allow for development after 2026.

Some responses considered this to be a premature question in view of the fact that the housing figures have not yet been finalised and the proposal not to build on the Green Wedge is not based on any robust and credible evidence rather it is based on a reduced housing provision at Coalville which is not in general conformity with the Regional Plan. Furthermore, development of one large location (Bardon Grange) for new housing is a risky strategy whilst the Green Wedge is a sustainable location for development.

Acknowledged that avoiding development on the Green Wedge would mean more development across other settlements in the District.

Development at Broom Leys Farm could be considered without affecting the larger area of Green Wedge, as could the area between Green Lane and Hall Lane. Retaining the Green Wedge is not practical when the Council has less than 2 years housing land supply.

Question 3 - How should we distribute the remaining 35 homes per annum across the rest of the district [outside of Coalville]:

- a) **equally distribute to each of the settlements listed ?[Ashby, Castle Donington, Ibstock, Kegworth and Measham] or**
- b) **Distribute to each of the settlements listed in some other way? or**
- c) **Distribute to the various other villages across the District? or**
- d) **A combination of b) and c)?**

Some support for each of the options. More support for options (a) and (d). There was also significant support for an 'other' unspecified option.

Some support for development in villages and that this should not be limited to 35 per annum depending on the local area and need and should include social housing as this would keep local services going. Others noted that it would not be appropriate to distribute housing equally amongst the settlements listed without undertaking an assessment in relation to capacity and local need.

Development should be located to support jobs.

Any options should ensure that infrastructure is provided for as part of new development and that due consideration is given to the impact of development on the historic market towns of Ashby and Castle Donington.

Directing a large proportion of new housing to Coalville relies on the market sustaining levels of demand and potentially limits the range of housing for people in the rest of the District. Support for more development in Ashby due to its popularity and that Ibstock could support a Sustainable Urban Extension (SUE).

Some considered that the River Mease should not be given excessive weight as a solution will be found within the next 20 years and funded through additional development in the catchment. However, others suggested that reducing the housing figures for Ashby would not help fund a solution for the River Mease issue.

Question 4 - Do you agree that we should not allocate land for strategic distribution?

The majority of the responses support the approach not to allocate land for strategic distribution as there is enough warehousing in the District already. Specific opposition to the site at J24 as it would increase traffic congestion and the site is too remote.

There was some support for allocating a site at J24 as it would attract higher quality employers into the area and provide jobs for the new dwellings and there are good road and rail links, potential to reduce road traffic congestion and deliver environmental benefits. Furthermore, the PACEC study includes a specific recommendation to make provision for strategic distribution in North West Leicestershire and it is also backed up by other evidence.

Some considered that a Strategic Rail Freight Interchange (SRFI) would act as a driver for regeneration and a major catalyst for economic growth, attracting inward investment, supporting existing business and providing a sustainable alternative for existing freight distribution. A high quality, nationally significant facility for the district would see an increase in the areas economy and in turn raise the profile of the District as a destination for business growth and investment.

Also suggested that rail freight could be provided at Ashby, whilst other employment sites also promoted at Donington Park Race Track and land off Beveridge Lane Bardon.

APPENDIX 2 – summary of responses by type

Internal NWLDC Departments

*Street Protection
Economic Development Officer*

Concern that, with the Air Quality Management Area along Bardon Road likely to be amended to exclude Bardon Road, but amended around the Broom Leys Road/Stephenson Way junction, there may be limitations placed on the level of new development accessing this junction. Support for allocating land for SRFI use in view of the potential benefits to the local economy.

Statutory Consultees

*Leicestershire Constabulary
English Heritage
The National Trust
Environment Agency
Education Authority (LCC)*

Core Strategy should address infrastructure issues (i.e. school places, community safety / 'Secure by Design', environmental capacity). Some support for retention of Green Wedge policy and prevention of development on the Green Wedge. Level of housing proposed for Castle Donington could be reduced if no SRFI allocation is pursued. Whatever figure is pursued should be based on latest / best evidence at a settlement level. Remaining 35dw/annum provision should be used to address rural affordable housing need.

Support for not proceeding with SRFI allocation.

Interest / Amenity Groups / Organisations

*National Grid (no comments)
The Coal Authority (no comments)
Better Places Policy Team (LCC)
Leicestershire and Rutland Wildlife Trust
Theatres Trust*

Fewer dwellings should be built and the figure should be evidence-based. Ecological surveys need conducting before deciding on appropriate locations for building – both within and without Green Wedge. Local residents strongly support the retention of the Green Wedge. It should be recognised that the economic viability of new development could impinge upon the delivery of new infrastructure, including the Bardon road bypass and the Ashby Canal extension at Measham.

Should not allocate land for SRFI. Incomplete evidence as to whether allocating or not is appropriate.

Development Industry (inc. landowners)

*Ruth Cox (landowner)
St Modwen
Swift Valley Partnership (obo Money Hill Consortium)
Bidwells (obo Davidsons Group / Persimmon Homes)*

Bidwells (obo Davidsons Group)
Landmark Planning (obo Ibstock Brick)
Strutt & Parker (obo Building and Social Housing Federation)
Andrew Granger and co. (obo several landowners in NWLDC)
GVA
The Planning Bureau (obo McCarthy and Stone)
Capita Symonds (obo CLB (Ashby) Ltd re Holywell Spring Farm)
Jones Lang LaSalle (obo Ideal Country Homes)
Thomas Taylor Planning
Oxalis Planning (obo Parkridge Holdings (Ellistown) Ltd)
JVH Town Planning Consultancy (obo M Dingley)
JVH Town Planning Consultancy (obo Roxhill Developments)
Thomas Redfern
Pegasus Planning Group (obo Wilson Bowden)
Iceni Projects (obo Money Hill Consortium)
Jones Lang LaSalle (obo Bardon Aggregates)
Signet Planning (obo Peveril Homes)
Pegasus Planning Group (obo Donington Park Racing Ltd)
EMA
Amethyst Property (obo Nailstone Colliery)
Pegasus Planning Group (obo David Wilson Homes)
Pegasus Planning Group (obo Bellway Homes)
Pegasus Planning Group (obo Alexander Bruce Ltd)
Pegasus Planning Group (obo Maximus Strategic Land)
Bloor Homes Ltd
Pegasus Planning Group (obo Miller Homes)
Bidwells (obo Davidsons Group)
Barton Willmore (obo Taylor Wimpey)

Overall Summary of Development Industry

Housing Figures

RSS figures remain legally binding so these should continue to be used. When the Leicester & Leicestershire Housing Requirements Study (LLHRS) is published, or should other evidence become available, these figures can be used to provide a basis from which to plan in the future – but no support for delaying Core Strategy adoption until the LLHRS publication. Some concern over plan period not extending to 15 years if ending at 2026.

Development Strategy

General support for the proportion of dwellings in Coalville.

Stephenson Green promoters support development on Green Wedge. Other responses vary between “no development” and “retain the policy”. Consensus nonetheless that reliance on a single SUE which has failed to deliver housing for 20 years is risky, hence suggestions of including non-strategic housing land allocations across the district to enable flexibility of supply. Promoters of Ashby/Measham sites consider that increased development in River Mease Special Area of Conservation (RMSAC) catchment can unlock funding for a solution; however non-Ashby/Measham sites consider allocating land in RMSAC is premature until solution confirmed.

Support for Option “C” of Question 3 (i.e. Distribute to the various other villages across the District. Some concern that the split across non-Sub Regional Centre settlements currently as proposed does not rely on sufficiently robust evidence.

SRFI

Support for no allocation of SRFI (at this stage – Allocations DPD may be more appropriate) by non-promoters despite recognition of its economic benefits to the district and region. General feeling that if no allocation be made a reduction in dwelling provision for Castle Donington would also be merited. Promoters of M1-J24 and Sawley Crossroads sites recommend allocating land for SRFI use.

Other

Suggestion employment land allocations be made at Donington Park (25ha) and Beveridge Lane, Ellistown (30ha).

Individual Summaries of the Development Industry

Ruth Cox (landowner)

Ibstock a good location for growth as relieves pressure on Coalville.

St Modwen

RSS figures remain legally binding. Council should include non-strategic sites in Core Strategy since these are not dependent on significant infrastructure improvements.

Support no building on Green Wedge

Support option C in respect of Question 3.

Swift Valley Partnership (obo Money Hill Consortium)

Support no building on Green Wedge and increased level of development in Ashby to finance RMSAC solution

Bidwells (obo Davidsons Group / Persimmon Homes)

Bidwells (obo Davidsons Group)

Bidwells (obo Davidsons Group)

RSS figures remain legally binding. Council must plan for 15 years.

Retention of Green Wedge is not evidence-based and therefore the proposal is not supported.

Landmark Planning (obo Ibstock Brick)

RSS figures remain legally binding and are supported by SHMA. If Coalville cannot accommodate previously-envisaged and RSS-compliant dwelling numbers, other settlements in district should carry some burden.

Allocating SRFI use should be considered at Allocations stage.

Strutt & Parker (obo Building and Social Housing Federation)

Locally-derived housing figure should be evidence-based. Council should include non-strategic sites in Core Strategy to provide flexibility of supply.

Andrew Granger and co. (obo several landowners in NWLDC)

Should retain 10,200 figure until LLHRS is concluded. Council should include non-strategic sites in Core Strategy to provide flexibility of supply.

Support option C in respect of Question 3.

If not pursuing an SRFI allocation, should consider the effect on jobs market in area.

GVA

RSS figures remain legally binding. Relying on a single SUE is risky.

Do not support retention of Green Wedge policy. Evidence should clearly indicate why the non-Coalville provision is split as suggested.

Remaining 35dw/annum should be split according to evidence.

The Planning Bureau (obo McCarthy and Stone)

Increase in 65+ year olds by 8,300 between 2008 and 2023 means the Council should provide mechanisms in the Core Strategy to ensure an ageing population is catered for.

Capita Symonds (obo CLB (Ashby) Ltd re Holywell Spring Farm)

RSS figures remain legally binding and continuing with them is in accordance with Planning for Growth agenda.

Support not building on Green Wedge. Queries deliverability of housing provision figures in other 5 settlements.

Jones Lang LaSalle (obo Ideal Country Homes)

Level of provision in Measham insufficient to deliver (a) regeneration and (b) RMSAC solution.

Thomas Taylor Planning

Reduced dwelling provision figure needs evidencing. Council should include small housing sites in rural settlements in Core Strategy.

Support option C in respect of Question 3.

Oxalis Planning (obo Parkridge Holdings (Ellistown) Ltd)

Recommends allocating 30ha of employment land at Beveridge Lane to ensure new housing and new employment land are co-located where possible.

JVH Town Planning Consultancy (obo M Dingley)

Housing need has not diminished thus 10,200 figure should remain.

Support no building on Green Wedge.

Support option C in respect of Question 3.

Recommends allocating land for SRFI.

JVH Town Planning Consultancy (obo Roxhill Developments)

Recommends allocating land for SRFI, the entire land of which is in single ownership.

Thomas Redfern

Supports 8,000 dwellings.

Support no building on Green Wedge.

Support option C in respect of Question 3.

Support no allocation for SRFI.

Pegasus Planning Group (obo Wilson Bowden)

Recommends allocating land for SRFI or provide a policy that enables its delivery since the evidence is clear on the need; support for Sawley Crossroads site.

Iceni Projects (obo Money Hill Consortium)

RSS figures remain legally binding. Support reduced reliance on Coalville to deliver the development strategy.

Jones Lang LaSalle (obo Bardon Aggregates)

Support no building on Green Wedge. Relief road essential to delivery of Bardon Grange SUE.

Signet Planning (obo Peveril Homes)

RSS figures remain legally binding. Outcome of LLHRS crucial to determining any future level of need. Council should include small housing sites in rural settlements in Core Strategy.

Query deliverability of Bardon Grange. Support not building on Green Wedge.

Support no allocation for SRFI and concomitant reduction in dwelling provision for Castle Donington.

Pegasus Planning Group (obo Donington Park Racing Ltd)

Substantive evidence proves need for allocating 25ha of employment land at Donington Park.

East Midlands Airport

New dwelling figures must be evidenced.

Dwellings should be located in most sustainable location.

Airport should be promoted as a wider-than-NWLDC benefit in equal measure to SRFI proposal.

Amethyst Property (obo Nailstone Colliery)

RSS figures remain legally binding and fully evidenced. Recommends RSS + 20%.

Support not building on Green Wedge.

Support option C in respect of Question 3.

Recognises economic benefit to area of SRFI.

Pegasus Planning Group (obo David Wilson Homes)

Pegasus Planning Group (obo Bellway Homes)

Pegasus Planning Group (obo Alexander Bruce Ltd)

Pegasus Planning Group (obo Miller Homes)

RSS figures remain legally binding and fully evidenced.

No building on Green Wedge will necessitate spreading development across NWLDC.

Supports identification of Castle Donington, Ibstock, Measham and Ashby as sustainable settlements. Dispersal of remaining 35 dw/annum should be based on robust assessment of settlements' sustainability. Castle Donington relief road only deliverable with 800 dwellings.

Pegasus Planning Group (obo Maximus Strategic Land)
NWLDC must plan for 15 years.

Recommends allocating 30ha of employment land at Beveridge Lane.

Bloor Homes Ltd

If 8,000 fig is pursued it should be as a minimum, not a target. NWLDC must plan for 15 years. Council should include non-strategic sites in Core Strategy to provide flexibility of supply.

Figure of 35dw/annum needs evidencing, but directing towards RMSAC will unlock finances to fund a solution.

Barton Willmore (obo Taylor Wimpey)

RSS figures remain legally binding. New dwelling figures must be evidenced. NWLDC must plan for 15 years. Council should include non-strategic sites in Core Strategy.

Remaining 35dw/annum should largely be distributed in Ashby.

Parish and Town Councils

Question 1

Overall the target of 8000 new homes is considered sufficient and is preferable to the target of 10,200. There is also support for a further reduction in housing numbers if the planning process allows as well as a need for targets to be sustainable, with adequate infrastructure and to meet local need. One Parish Council (Measham) considers the target should be set at 10,200 houses.

Question 2

All Councils support the proposal not to build on the Green Wedge. Its entirety should be protected from development. Two responses also suggest that Hugglescote, Donington le Heath and Ellistown deserve the same consideration as Whitwick and Thringstone, with respect to areas of separation.

Question 3

There is equal support for Option C (distribute the 35 dwellings pa between the villages) and Option d (distribute the 35 dwellings pa between the settlements and the villages). There is also support for empty properties to be utilised and for affordable housing to be provided in the smaller villages to sustain these communities.

Question 4

The response to this question is mixed with some support for no allocation of land for strategic distribution. However there is more support for the allocation of land for strategic distribution given the need for further economic development and jobs due to the number of homes suggested within the District. It is suggested that land at Castle Donington would provide potential road and rail links.

Political Organisations

North West Leicestershire District Council Labour Group

Question 1

The lower figure of 8000 dwellings should be the target for the District with the proviso that this figure be reviewed within the first five years of the LDF. Wish to see a fairer distribution of housing

throughout the District, with more limited development at Bardon Grange, and the provision of necessary infrastructure prior to development.

Question 2

All Green Wedge designated land should remain as such.

Question 3

Do not support any of the proposed options and wish to see a fairer distribution of new housing with a focus on building near and adjacent to new employment areas. Also support affordable and social housing subject to local and community need.

Question 4

Land should be allocated for strategic distribution within the LDF as this would bring forward significant economic development, jobs and growth to the locality, the district and the region.

Other Local Authorities

Question 1

Responses advise that the revocation of the Regional Plan does not affect the evidence used to derive these figures, which was subject to an independent examination. The reduction in housing numbers to a target of 8000 dwellings is a significant decrease from the Regional Plan requirement and any alternative housing provision should be based on a robust and credible evidence base. It is suggested that there is no such evidence at this time and that any reduction in housing will also affect the wider Leicester and Leicestershire Housing Market Area. Also due to public and private financial circumstances and recent CIL regulations, there is uncertainty as to the delivery of the Bardon Relief Road.

Question 2

One response suggests that this question is premature due to the lack of robust evidence being used to identify housing numbers. In order to identify whether it is suitable to allocate land on the Green Wedge a full review of the land should be undertaken, using the Leicestershire Joint Green Wedge Review Methodology.

Leicestershire County Council advise that any encroachment into the Green Wedge should be minor and not compromise its purpose and function, and should be extended in parallel with any extension to an urban area. There is widespread public support for the retention of Green Wedges.

Question 3

Housing distribution should be based on a clear spatial strategy and should take into account issues such as limiting the need to travel by car, local need, capacity including infrastructure as well as environmental and other constraints. Leicestershire County Council raise concern in the reduction of housing numbers in Measham as it may limit the financial support available from developers to support improvements of the Ashby canal. In addition, significant issues are emerging in Ashby as a result of housing growth with the potential need for a new primary school.

Question 4

Two responses suggest that the proposal not to allocate land for strategic distribution deviates from current evidence base including the PACEC Study, the East Midlands Distribution Study and the Strategic Distribution Site Assessment Study. Leicestershire County Council resolved in 2008 that the inclusion of such a site in the LDF is premature and as it is an issue of sub-regional importance, the decision to allocate or not should be evidenced taking account of the impact of the decision beyond the Local Authorities boundary.

Public Responses

Question 1

A total of 64 (67%) responses support the target of 8000 dwellings as sufficient and as a maximum. A further 16 responses (17%) suggested that 8000 dwellings are preferable but should be reduced further due to the recession, the need to reuse and refurbish empty properties and because of inadequate infrastructure provision. The remaining responses either did not know, considered the targets to be unclear or misleading, did not support either of the targets or were of the view that the target should be zero. Only 1 response supported the target of 10,200 dwellings.

Question 2

A total of 99 responses (98%) support the proposal not to build on the Green Wedge. A number of these responses also support the protection of Greenfield sites as well as other green areas separating towns and villages. Only 2 responses did not support the protection of the Green Wedge, the reasons being the district's shortfall in housing land supply and it is considered that the Green Wedge site is in a sustainable location.

Question 3

A total of 33 responses (33%) support the distribution of the remaining houses between the settlements and villages. The number of responses supporting distribution equally between Ashby, Castle Donington, Ibstock, Kegworth and Measham was 25 (29%). 8 responses support distribution to the villages and only 3 responses support distribution to settlements in some other way. Of the 16 other responses, comments include support for development in smaller villages, including social housing, to help sustain communities, as well as no support for additional development in the Coalville, Hugglescote and Whitwick area or Castle Donington or the district as a whole. There was also support for new housing development to be located near the centres of employment such as Bardon and East Midlands Airport.

Question 4

A total of 74 responses (79%) support the proposal not to allocate land for strategic distribution. There were 16 responses (17%) supporting the allocation of land for strategic distribution, generally because sources of employment are needed in the district. Other comments raised suggest that all types of employment land should be provided and the allocation of a strategic distribution site is a regional issue and should be considered by a wider range of bodies than just the local authority.

APPENDIX 3

Scenario	Annual requirement	Total requirement 2006-2031	Comments
Trend based	352	8,800	Whilst the trend based approach is useful in demonstrating what would happen if the future reflects what has occurred over the previous ten years, in reality this is unlikely to be repeated exactly, as this scenario assumes, in the future. Potentially this could result in an under estimation of requirements.
Zero net-migration	155	3,875	Whilst the natural change approach is useful in demonstrating what would happen to the population with no in and out migration, it does not offer a realistic scenario, because migration will always occur within and across the Housing Market Area (for economic and other reasons). The housing requirements in Leicestershire (and for each district) will be, therefore, significantly underestimated.
Zero employment growth	256	6,400	This option is 'economic' driven. It looks at the level of working population that exists at the beginning of the Plan period and estimates the number of new households required to keep this level constant. The reason that additional households are needed is due to low levels of natural change (i.e. the difference between numbers of births and deaths), which, over time, results in a reduction in the 'employed' population as the population ages. Whilst this scenario is useful in showing the level of households required to maintain current employment levels it is unrealistic in that it doesn't allow for any employment growth. Whilst the economy has experienced a downturn in recent years, it is reasonable to expect that growth will occur throughout the rest of the plan period overall. Furthermore, Government policy emphasises the need to plan for growth.
5% employment growth	322	8,050	This Option is an 'economic' driven scenario. It looks at the level of households required to achieve 5% employment growth for Leicester and Leicestershire. This is essentially the number of people (and consequently households) needed to provide an adequate labour supply to meet this level of growth.

Scenario	Annual requirement	Total requirement 2006-2031	Comments
			A 5% level of employment growth during the plan period is considered to be achievable in light of the current economic downturn. It would also accord with the Government's policy to plan for growth.
10% employment growth	388	9,700	This option is an 'economic' driven scenario. It looks at the level of households required to achieve 10% employment growth for Leicester and Leicestershire. This is essentially the number of people (and consequently households) needed to provide adequate labour supply to meet this level of growth. The depth of the current economic downturn makes this a challenging target. Some commentators suggest that growth is likely to be nearer 7%. However, Government policy emphasises the need to plan for growth.
Housebuilding rates	356	8,900	This projection is based on an assessment of house building rates since 2000/01. These peaked at 493 dwellings in 2001/02 but has since declined dramatically to about 230 in 2008/09 and 2009/10. Housebuilding rates have been driven by targets from previous strategic plans and on their own would not provide a suitable basis for determining future requirements.
Government published projections	377	9,425	The most up-to-date household projections are seen as a key data source in preparing housing requirements according to Planning Policy Statement 3. The 2008 based household projections were released by Government in November 2010 and are therefore current. According to the household projections, the annual housing requirement for the District of North West Leicestershire is 377. This is lower than the annual housing requirements set out in the RSS (510). Whilst the household projections are an important source of data, they are 'trend based' and do not take into account local social, environmental and economic factors. It is not dissimilar to the 10% employment growth scenario which has the advantage that it has considered economic factors.