

**NORTH WEST LEICESTERSHIRE LOCAL PLAN EXAMINATION  
POSITION STATEMENT OF NORTH WEST LEICESTERSHIRE DISTRICT  
COUNCIL**

**MATTER 2 – VISION, OBJECTIVES AND SPATIAL STRATEGY**



## **MATTER 2a – Is the Plan founded upon justified and effective Vision and Objectives?**

- 1 The Local Plan contains (Chapter 4) both Vision and Objectives. These set out the Council's aspirations for the future of the district. They have evolved throughout the period that the plan has been prepared, and before that as part of the preparation of the withdrawn Core Strategy, and take into account the requirements of national policy and the findings from the Sustainability Appraisal Scoping Report (LP/06) where Chapters 3 to 12 identify the environmental, economic and social characteristics of the district.
- 2 The objectives were included in the draft Local Plan and a number of changes were made in response to the comments received at that time.
- 3 The Vision was not included in the draft Local Plan but was included following a reappraisal of the plan using the PAS Self Assessment toolkit. The Vision recognises the unique economic opportunities available in the district which will continue its transformation started in the 1980's. It also recognises the challenges that exist in terms of regeneration and balancing growth with the importance of retaining key environmental assets which contribute to the character and appearance of the natural and built environment.
- 4 The number of objectives has, in accordance with recognised good practice, been kept to a manageable number and as a result they are broad brush. However, this does not detract from them and together with the vision they are considered to be realistic and achievable within the plan period and provide a framework for the plan and future planning decisions.

## **MATTER 2b – Is the Spatial Strategy of the Plan justified and effective, in particular with respect to:**

- 5 The Spatial Strategy of the Local Plan is set out in policies S1 (Future housing and economic development needs), S2 (Settlement hierarchy) and S3 (Countryside).
- 6 The Council consider the strategy is sound and will deliver the amount of development required to meet the identified needs and will create as sustainable a pattern of development as possible whilst also recognising the need to protect those more sensitive areas of the district.

### **i) Reasonable alternatives**

- 7 Paragraph 182 of the NPPF requires that "*the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*".
- 8 The preparation of the Local Plan has given due consideration as to the issue of reasonable alternatives.
- 9 It is important to recognise that it is only necessary to consider reasonable alternatives, not all alternatives. Furthermore, it is also appropriate to have regard to the context within which the plan was being prepared. Preparatory work on the Local Plan commenced in late 2013 following the withdrawal of the

Core Strategy. Even before the withdrawal of the Core Strategy the Council had taken on board the clear direction of travel set out in the NPPF to “*boost significantly the supply of housing*”. This often meant approving planning applications on sites which were the subject of significant opposition from local communities.

- 10 One effect of this is that when it came to determining the strategy for the Local Plan the vast majority of new development was already accounted for through planning permissions or resolutions. Therefore, when considering reasonable alternatives the Council was not starting with blank canvas which would lend itself to a wide range of alternative options to be considered.
- 11 The issue of reasonable alternatives is considered in Part 2 of the Sustainability Appraisal reports of both the draft Local Plan (LP/08) and the publication Local Plan (LP/05). It identifies reasonable alternatives which are then assessed, as well as what other potential alternatives were considered to be unreasonable and why. The preferred approach set out in the draft Local Plan and the publication Local Plan were both supported by the assessment undertaken as part of the Sustainability Appraisal.

ii) **The chosen settlement hierarchy:**

**1) Within the district**

- 12 The Council’s approach to identifying the settlement hierarchy is set out in Background Paper 2.
- 13 The Council considers the settlement hierarchy as set out in Policy 2 is sound and appropriate. There is no specific national planning guidance on how a settlement hierarchy should be defined but the NPPF does provide some guidance. In the Core Planning Principles set out in paragraph 17 it is identified that it is necessary to “*take account of the different roles and character of different areas, promoting the vitality of our main urban areas...*” and to “*actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable*”.
- 14 The Council’s approach has done this. The settlement hierarchy reflects the distribution of services and facilities and the population of the district. The larger settlements in population terms, which also have the best range of services and facilities, and is where most development is directed towards. Conversely smaller settlements with less services and facilities will see less development. This is consistent with the NPPF.
- 15 The Sustainability Appraisal Report (LP/05) notes generally positive, or at worst neutral effects, resulting from Policy S2.

**2) Having regard to the proximity of towns in neighbouring Districts**

- 16 In identifying the Settlement Hierarchy consideration was given to not only what services and facilities are available in any particular settlement, but also what public transport connections exist to other settlements which might have greater

range of services and facilities. These other settlements included not just those within, but also close to the district.

- 17 Representations 46/3/S2 and 47/2/ S2 suggest that the Settlement Hierarchy does not reflect the geography and relationship between the Swadlincote/Woodville area and Albert Village and Blackfordby respectively
- 18 Both Albert Village and Blackfordby are distinct, physical settlements in their own right with a limited range of services and facilities available within them. Albert village has a primary school, a public house and a recreation ground. Blackfordby has the same together with a community hall, place of worship and some local employment opportunities (primarily at the Forest Road pipeworks). It will be noted that neither has a shop, post office, GP surgery or pharmacy.
- 19 In many respects the level of service at Albert Village is similar to that at Griffydam which is categorised as a Small Village. Even the frequency of bus service is similar. However, it benefits from the fact that it is in close proximity to Swadlincote/Woodville and the extensive range of services and facilities available there. Whilst public transport is not as good as elsewhere this proximity does mean that if people choose to use their cars to access services and facilities in Swadlincote/Woodville the distances travelled and hence CO2 emissions resulting will be less than if travelling from more rural areas to a larger settlement such as in Griffydam.
- 20 In terms of Blackfordby it has a better range of services and facilities than Albert Village, including a more frequent bus service. However, in contrast to say Ibstock, Kegworth and Measham the range of services and facilities are more limited. It would not, therefore, be appropriate to designate it as a key Service Centre. It is recognised, however, that it benefits from its proximity to Swadlincote/Woodville much in the same way that Albert Village does. However, it is physically separated from Woodville and so cannot be considered as being part of the Swadlincote/Woodville Urban Area.

iii) **The definition of the scale and Limits of Development**  
**1 Coalville**  
**2 village settlements**

- 21 Limits to Development have been defined for the principal built-up areas of sustainable settlements (Principal Town, Key Service Centres, Local Service Centres and Sustainable Villages) where virtually all new development is to be directed. Their purpose is to:
  - a) provide certainty- by making it clear what will or will not be permitted and where.;
  - b) allow for a more managed approach to housing growth helping to check the unrestricted sprawl of built-up areas;
  - c) prevent neighbouring settlements merging into one another;
  - d) safeguard the countryside from encroachment;
  - e) help preserve the setting and special character of historic towns and villages;

- f) assists in urban regeneration, by encouraging the recycling of derelict and other urban land; and

22 Generally, open areas of countryside- agricultural land, meadows, woodland, rivers and lakes, and other greenfield land (with the exception of residential curtilages) are excluded. The following methodology generally applies:

- a) Where possible, boundaries should be clear and use physical features that are readily recognisable and likely to be permanent e.g. field boundary, building, road, stream, wall or fence;
- b) Boundaries should generally follow the curtilage of properties. Occasionally, the curtilage of the property is not well defined or so large that it appears to form part of the countryside surrounding the settlement. In these cases, the boundary should be defined so as to protect the landscape setting of the settlement;
- c) Isolated or sporadic development which is clearly detached from the principal built-up area should be excluded;
- d) Boundaries need not be continuous. It may be appropriate given the form of a settlement to define two or more separate areas;
- e) Boundaries include the sites identified by Policies H1, H2 and H3. As a result, boundaries have been updated throughout the plan preparation process to reflect ongoing planning decisions;
- f) Playing fields, environmental space, allotments, community gardens and associated buildings peripheral to built-up areas should not be included within the boundary;
- g) Public utilities (e.g. Sewage Treatment Works, electricity sub-stations) on the edge of a settlement should be excluded from within the boundary;
- h) Agricultural buildings may be included in development boundaries if they are well related in terms of scale and positioning to the rest of the settlement. Account will also be taken of the availability of defensible boundaries and the age of the building (i.e. how established the building is in the settlement).

23 The Local Plan makes positive provision for new development through policies H1, H2 and H3 for Housing and Ec1 and Ec2 for employment. The Plan deliberately ensures that the development needs of the district can be accommodated on specific, identifiable sites. It does not rely upon windfall sites to do this. However, the proposed Limits to Development still allow for such windfall opportunities to be realised. For example,

- 1. In most cases the Limits to Development include property curtilages in their entirety, they do not cut through property boundaries (as in the adopted Local Plan);
- 2. Sites identified in Policies H1, H2 and H3 result in the inclusion of adjoining land; and
- 3. Agricultural buildings have been included in development boundaries if they are well related in terms of scale and positioning to the rest of the settlement.

iv) **the overall distribution of development, in particular between Coalville and Ashby de la Zouch**

- 24 As already noted, in preparing the Local Plan the Council has not been working with a blank canvas. The vast majority of the new development requirements (both housing and employment) were already committed as a result of planning permissions or resolutions. The key question, therefore, in terms of distribution relates to how any residual requirements should be distributed.
- 25 In terms of housing, the Sustainability Appraisal Reports (LP/08 and LP/05) considered reasonable alternatives, including concentrating the residual development in Coalville or/and in Ashby de la Zouch. The option of directing the residual growth to Ashby de la Zouch (Alternative B) was supported.
- 26 In addition to considering issues in relation to sustainability, it is also necessary to have regard to issues of deliverability. The Viability report (LP/09) identifies that development in the Coalville area is less viable than other areas, particularly Ashby de la Zouch. Whilst there are now a significant number of developments underway in the Coalville area these viability issues have impacted upon deliverability in recent years. Putting more development in Coalville would represent a risk that the amount of development required would not be forthcoming. In contrast, Ashby de la Zouch is a more viable location but also one which attracts a premium in terms of house prices which impacts upon affordability. The provision of more housing in Ashby de la Zouch will provide an opportunity to increase the provision of affordable housing to help address this issue. Conversely, restricting development in Ashby de la Zouch will exacerbate the affordability issue.
- 27 Table 4 of Background Paper 4 (BP/04) notes that the proposed housing development would increase the percentage of dwellings in Ashby de la Zouch as a percentage of all dwellings from 13% to 16.2%, whilst Coalville would see a minor decrease from 40% to 39%.
- 28 However, the increase in Ashby de la Zouch is largely attributable to a shift from the less sustainable settlements in the district, rather than from Coalville to Ashby de la Zouch, as demonstrated by a decrease in dwellings in the rest of the district in between 2011 and 2031 from 23% to 20.1%.
- 29 In terms of employment development, section 10 of the Sustainability Appraisal (LP/05) considers a number of potential alternative employment sites. Section 10.3 explains the approach taken by the council in terms of identifying the preferred site at Money Hill which is based on a sequential approach using the proposed Settlement Hierarchy.
- 30 Further employment development in the Castle Donington area would be inappropriate having regard to the significant number of existing and proposed jobs in the locality. Data from the Business Register and Employment Survey (Office for National Statistics) shows that as at 2011 (the start date for the Local Plan) Castle Donington ward accounted for 23% of all jobs in the district. Increasing employment provision would only impact further upon the imbalance between housing and employment in this locality, whilst various physical and technical constraints (for example floodplain, noise contours at East Midlands

Airport) severely limit the opportunities for further housing over and above that contained in the plan.

- 31 Paragraph 10.3.4 notes that allocation of land at Money Hill will also help to offset the loss of employment which has occurred since 2011 as highlighted in paragraph 3.17 of Background Paper 6 (BP/06).

**v) The re-use of previously developed (brownfield) land**

- 32 The Local Plan identifies PDL (the former Arla dairy) as part of the proposed allocation at Money Hill. A number of sites listed under Policies H1 and H2 comprise PDL.

- 33 The table below identifies the amount of residential development on Greenfield and PDL from 2006/07 onwards:

**Greenfield and Brownfield Land Development**

	<b>PDL Sites</b>	<b>Greenfield Sites</b>	<b>Total</b>	<b>Percentage on PDL</b>
<b>2006/07</b>	273	63	336	81%
<b>2007/08</b>	326	27	353	92%
<b>2008/09</b>	219	16	235	93%
<b>2009/10</b>	216	11	227	95%
<b>2010/11</b>	122	64	186	66%
<b>2011/12</b>	71	163	234	30%
<b>2012/13</b>	77	288	365	21%
<b>2013/14</b>	108	320	428	25%
<b>2014/15</b>	177	500	677	26%
<b>2015/16</b>	384	448	832	46%

- 34 The percentage of new houses built on Previously Developed Land decreased from 2010/1, partly due to the change in the definition of PDL to exclude garden land. The increase in the number of dwellings built on PDL over the last three monitoring periods is partly attributed to the redevelopment of some former employment sites for housing.

- 35 The SHLAA (HO/06) includes a number of sites which are PDL. The NPPF identifies that pursuing sustainable development requires careful attention to viability and costs and that plans should be deliverable (para 173). In the

majority of cases these SHLAA sites are still in use for other purposes and there is insufficient evidence to demonstrate that these sites will come forward for development. Furthermore, the Viability study (LP/09) identifies that the land value and development costs of PDL sites are generally higher compared to greenfield sites (LP/10, pg. 33).

- 36 If those SHLAA sites that are currently in use or have planning permission are discounted, then the remaining PDL sites cumulatively would (even if deliverable) not be sufficient to meet the housing requirement. They would also result in development dispersed between different tiers of the Settlement Hierarchy (Policy S2). The Sustainability Appraisal identified that dispersing development around the district to smaller settlements would...*"have an adverse effect on the landscape and the built environment"* and would also be *"least attractive in terms of accessibility, and would increase reliance on car travel to access jobs and services"* (para 7.4.4).
- 37 The council considers amount of available brownfield land is not of a quantity to cumulatively meet the housing requirements and development of such sites would not be consistent with the Spatial Strategy of the Local Plan which is supported by the Sustainability Appraisal.

**vi) Sustainable patterns of transport**

- 38 As already noted, the Settlement Hierarchy seeks to direct development to the most sustainable locations as required by the NPPF. In considering what are the most sustainable locations as set out in Background Paper 2 this has involved looking at what services and facilities are available in different settlements, including as a key consideration the availability of public transport to other settlements.
- 39 In the context of North West Leicestershire this means bus services as there are not any passenger rail services within the district. As noted in the Sustainability Appraisal Scoping Report (LP/06) bus service provision is considered to be variable across the district.
- 40 Whilst most settlements have some form of bus service to a higher order centre elsewhere in the district or beyond (as North West Leicestershire is not self contained), frequency of services is particularly variable. For example, some settlements have a service only once every two hours whilst evening services are generally limited.
- 41 There is a strong correlation between those settlements which have the best range of services and facilities available and those with the best range and frequency of bus services. This can be seen from a review of the individual settlement proformas in Appendix 1 of Background Paper 2. This is then reflected in the Settlement Hierarchy.