

107/1152/0



# LOCAL PLAN

Ref:  
  
(For official use only)

## Publication Stage Representation Form

### North West Leicestershire Local Plan Proposed Submission

Please return this form to North West Leicestershire District Council either by post:

Planning Policy, North West Leicestershire District Council, Council Offices, Whitwick Road, Coalville LE67 3FJ or email [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk) no later than **5pm on 15 August 2016**.

This form has two parts-

**Part A** – Personal Details

**Part B** – Your Representation(s). Please fill in a separate sheet for each representation you wish to make.

### Part A

#### 1. Personal Details

#### 2. Agent Details

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below but complete the full contact details for the agent in 2.*

Title

First Name

Last Name

Job Title   
*(Where relevant)*

Organisation   
*(Where relevant)*

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

Email Address   
*(Where relevant)*

Mr

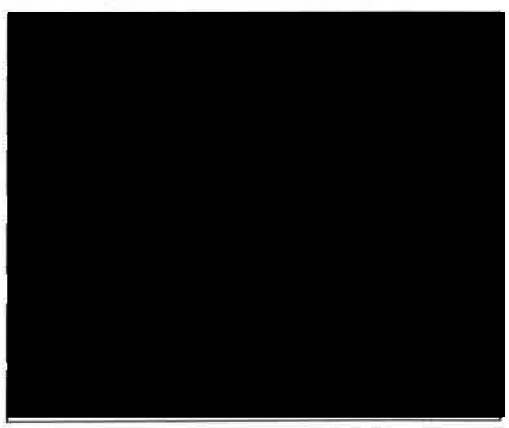
Bob

Woollard

Director

Planning & Design Group (UK) Limited

Pure Offices



The former Brickworks site, though historically associated with Heather, not least by its name, is also closely related to Ibstock. Both settlements are identified by the Plan as sustainable locations, being identified within the settlement hierarchy (see further comments below) and therefore suitable locations for new development.

Production work and related employment at the brickworks has now ceased. The site has been cleared. There is no realistic prospect of new employment uses being established on the site. The cessation of site operations has left behind a substantial brownfield site of approximately 4.6 hectares.

### **Policy S2 (Settlement Hierarchy)**

Heather is categorised by the Council as a 'Sustainable Village', the fourth tier of six in the defined settlement hierarchy. Heather lends itself well to this categorisation providing a good range of local facilities including a primary school, local convenience store, church, public house and a recreation ground, in addition to small scale employment opportunities. The day-to-day needs of many of Heather's residents can therefore be met without the need to travel outside of the settlement. The identification of Ibstock as a 'Local Service Centre' (tier three) is appropriate by virtue of its size and increased offer of services.

Whilst the supporting text provides a robust justification for Policy S2 and the hierarchy of settlements is considered to be broadly in accordance with the principles of the National Planning Policy Framework (NPPF), we do not agree with the levels of growth that may then be supported at or around the different settlements, based on this hierarchy. The Council's settlement hierarchy assesses 'Sustainable Villages' as having a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development. As drafted, this Policy would therefore not seek to identify nor support development opportunities that fall just outside of the settlement boundary, even if such a site had a close relationship with the settlement. It may negate otherwise suitable opportunities for redevelopment of previously developed (brownfield) sites, contrary to the principles of the NPPF.

Amendments to this policy are therefore required to ensure it has full and proper regard to such opportunities, maximising the prospects for the sustainable growth of 'Sustainable Villages'.

### **Policy S3 (Countryside)**

Policy S3 seeks to protect the intrinsic character and beauty of the countryside, the diversity of its landscapes, heritage and wildlife and its natural resources. However, the policy does not exclusively address typical countryside locations rather, as drafted, it presents a moratorium on all development outside of the defined development limits of settlements.

The inflexibility of the policy would mean that it would be incapable of recognising and responding to the diversity of character that together constitutes the 'countryside' within the District. It should rather recognise that outside of the tightly defined Limits of Development, many areas are transitional in character and host to sustainable locations for development.

The Local Plan's Settlement Hierarchy expressly supports the redevelopment of brownfield sites within 'Small Villages'. This support is repeated within Policy S3. To that end, it is consistent with national policy and guidance which states that, where

Given its location in close proximity to two settlements that are identified within the Plan's settlement hierarchy and offer a range of services and facilities to meet the day-to-day and more diverse needs of existing and future residents with good access to transport links including public transport, the site is a sustainable location for residential development. It is available, suitable and achievable. The form of development that could be achieved on the site would not be inconsistent with local character.

The site is not subject to any environmental constraints that would otherwise prevent its redevelopment. The whole of the site lies within Flood Zone 1 meaning it is not subject to any elevated risk of flooding. There are no known ecological, air, noise, heritage or landscape issues that present an unusual difficulties or could not be addressed. As a former brickworks, the site would be required to be assessed for contamination but initial studies and a review of the site's history have not identified any matters for concern. There are no overriding constraints in terms of access. The existing site access road from Mill Lane could be utilised to serve any new development on site.

The site is available for development and deliverable within the Plan period. The site's development can assist the Council in achieving its housing targets. There is strong developer interest in the site and a committed landowner. Accordingly, the site is 'developable' in reference to the definition set out at footnote 12 of the NPPF, which states that '*sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.*'

The opportunity for the Council to carry out a comprehensive review of the potential future development of all deallocated employment sites, to make the best and most efficient use of resultant brownfield land, has been missed. This omission emphasises the fact that this element of the Plan has not been positively prepared. Unless addressed, this omission therefore jeopardises the ability of the Plan to be found 'sound'.

*(Continue on a separate sheet/expand box if necessary)*

6. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Please see comments above.

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**Please note** your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested modification, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage.

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First Name

Last Name

Job Title   
*(Where relevant)*

Organisation   
*(Where relevant)*

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

Email Address   
*(Where relevant)*

Mr

Bob

Woollard

Director

Planning & Design Group (UK) Limited

Pure Offices



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