

REPRESENTOR 46

46/1/ch2/0



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 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		Mrs
First Name	R	Janet
Last Name	Meredith	Hodson
Job Title <i>(Where relevant)</i>	Operations Manager	Principal
Organisation <i>(Where relevant)</i>	Ravensbourn Container Systems Ltd	JVH Town Planning Consultants Ltd

Address Line 1

Line 2

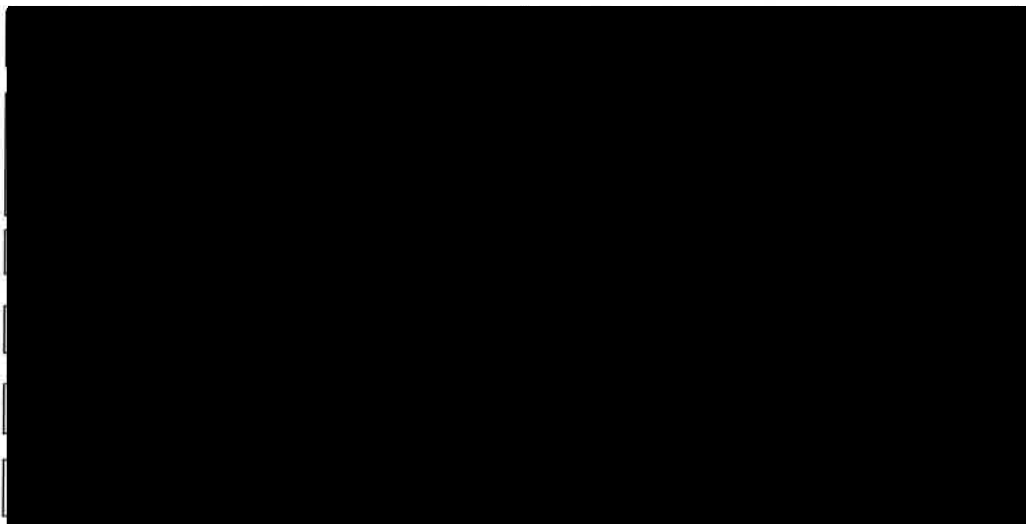
Line 3

Line 4

Post Code

Telephone Number

Email Address
(Where relevant)



Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	Chapter 2 context 1.16 Chapter 7 Housing	Policy	S1, S2, S3, H1, H2, H3, EC2	Policies Map	Proposals Map Insert 1 Albert Village
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4. Do you Consider the Local Plan is:
(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Chapter 2
Context
The Plan makes no mention of the presence of the urban area of Swadlincote/Woodville and the relevant geography. Clearly there is a close geographical relationship as shown on the Plan at Page 13. The Pan fails to recognise this.

Policy S1

We object to the policy as drafted.

The plan makes provision for 10,400 new dwellings over the Plan period. However the policy says that the long term level of housing needs remains to be established as part of the Leicestershire Housing and Economic Development Needs Assessment. It is unclear therefore why the level of 10,400 is proposed to be set in the plan until the overall level of need for the wider area is ascertained and properly planned for in the development plan. It is not clear how and where this Plan would provide any flexibility necessary, if the housing and employment requirements are not known. The Policy as proposed is therefore unsound. Para 1.16 of the Plan notes that the new HMA figures will be available in September 2016 so any delay is short lived.

Policy S2

We object to the settlement hierarchy as proposed in S2

We object to the settlement hierarchy as defined in the plan on the basis that it fails to take into account the relationship of land adjacent to Swadlincote and Woodville. Cleary land adjacent to Swadlincote and Woodville is in a sustainable location in close proximity to those centres where there are a full range of social and employment facilities. The proposal of South Derbyshire to locate new employment immediately north of the District Boundary supports this view, and which does not follow through into this local plan. The designation of Albert Village as a fourth tier settlement belies its position in close proximity to the urban area of Swadlincote and Woodville to which it is functionally related. To treat this area as a free standing village settlement does not deal with the reality of the situation in geographical terms. On this basis the settlement hierarchy needs to be amended to reflect the position of the land adjacent to Albert Village and the sustainability of the location. The text to the Policy makes no mention of the existence of Swadlincote and Woodville and the presence of this large urban area on the western extremity of the district. On this basis the sustainability of various locations has been artificially skewed by the presence of a boundary line which belies the geography of the area.

Policy S 3

We object to Policy S3

The area designated as countryside on the proposal map is objected to, with specific reference to the land north of Occupation Lane. This land as shown on the attached plans has been worked for minerals including coal and clay and is currently underused land. Given the close relationship between this land and the proposed employment development in South Derbyshire, this land should be excluded from the open countryside and a more logical edge to the urban area be made along Occupation Lane itself. There is no requirement for this land to be included within open countryside designation when it can play a valuable part in the delivery of regeneration in this locality providing both an employment and housing opportunity. Much of this land it already developed with existing employment uses and it would be logical therefore that is should be included within a development boundary and not remain part of open countryside

Chapter 7 Housing

Table 2

The figures in table 2 should not be relied upon. The purported completions figures, And the sites with planning permission are considered to be an overestimate of the position.

Sites with a resolution to grant permission are very significant number. However many of these sites have been available for a considerable time and show no sign of being brought forward. Although the Council indicate in para 7.8 that they accept that the figures are an overestimate of the supply, the resultant requirement for a further 800 dwellings to be allocated is in our opinion an underestimate of the situation.

Policy H1

We object to the allocations table in H1. The Policy indicates that all of these sites already have planning permission and that in the event that permissions lapse they will be renewed.

However if permissions lapse this will be because there is a problem with the delivery of the site and it should not be relied upon. It is not clear from the H1 list how many of these sites are completed or under construction.

Policy H2

The sites in H2 cannot be relied upon to deliver homes. Several of these sites have been subject to a resolution to grant for an extended period and have delivery issues. Some of the sites are directly affected by HS2, and the changes to HS2 proposed in July 2016 do not affect this part of the proposal. There is therefore significant doubt over the delivery of these sites and as a result they cannot be relied upon to deliver the housing numbers proposed in the Plan.

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We object to the proposed new allocations on the basis that they fail to take into account the land that adjoins Woodville and Swadlincote at Occupation lane. The allocations rely on a settlement hierarchy that we fundamentally question as set out in our comments above.

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Proposals Map

We object to the proposal map on the basis that it shows the Land North of Occupation lane as within the open countryside a designation which is inappropriate given the location of the land and relationship with the adjoining urban areas.

Insert Plan 1 Albert Village

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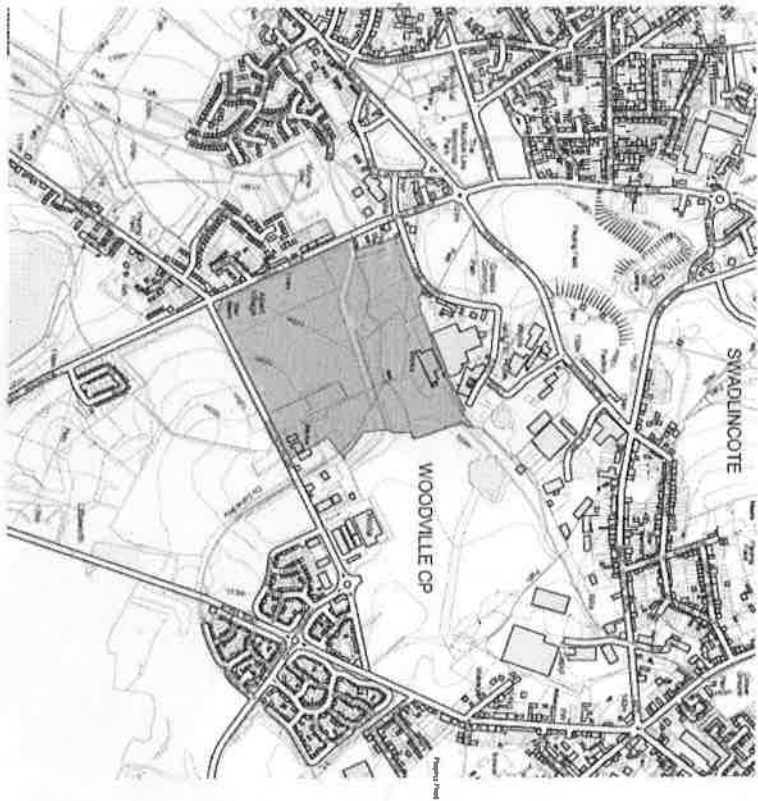
Attached

Masterplan of the land north of Occupation lane

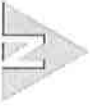
Context Plan.

Proposed Changes that are specifically sought

- Recognise the relationship between Swadlincote and the western part of the District
- Amend the housing requirement to the updated OAN
- Delete the resolution to grant sites from the Plan, where there is no progress towards a planning permission and make the commitment figures realistic
- Recognise the sustainability of the east of Swadlincote location
- Allocate the land North of Occupation Lane for housing and employment uses
- Remove the land from open countryside designation.



CONTEXT PLAN









Residential Development Proposal
of
Main Street/Occupation Lane
ALBERT VILLAGE
JTB TOWN PLANNING CONSULTANTS LTD
1:10,000
14/09/2015



MASTERPLAN

The drawing has been prepared to illustrate planning proposals for the proposed development. It does not constitute a contract. The client shall be responsible for the accuracy of the information shown. It does not constitute a contract. The client shall be responsible for the accuracy of the information shown. It does not constitute a contract. The client shall be responsible for the accuracy of the information shown.

- KEY**
-  PROPOSED RESIDENTIAL USE
 -  PROPOSED COMMERCIAL AND BUSINESS USE
 -  PROPOSED LANDSCAPE AND OPEN SPACE
 -  PROPOSED PARKING
 -  PROPOSED LANDSCAPE AND OPEN SPACE
 -  PROPOSED LANDSCAPE AND OPEN SPACE



THE TOWN PLANNING CONSULTANTS LTD
 Head Office Development Projects
 Main Street, Occupation Lane
ALBERT VILLAGE
 Ravensthorpe
 Calderdale
 West Yorkshire
 LS23 7EJ
 12000
 May 2013



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.

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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.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues he/she identifies for examination.

7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

We act for a land owner who can help deliver the future housing requirement for District and they are directly affected by the policies in the plan. Participation at the examination will enable us to fully explain our alternative suggestions to the strategy accompanied by evidence to support our position, which will assist the Inspector in arriving at a fully informed view and we will support our policy objections by making full and detailed responses to the questions that the Inspector will raise. We have a long and established planning knowledge of the area and the previous development plan proposals

Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:



Date:

15-8-2016

REPRESENTOR 46

46/2/S1/O



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Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
Email Address <i>(Where relevant)</i>		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

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4. Do you Consider the Local Plan is:
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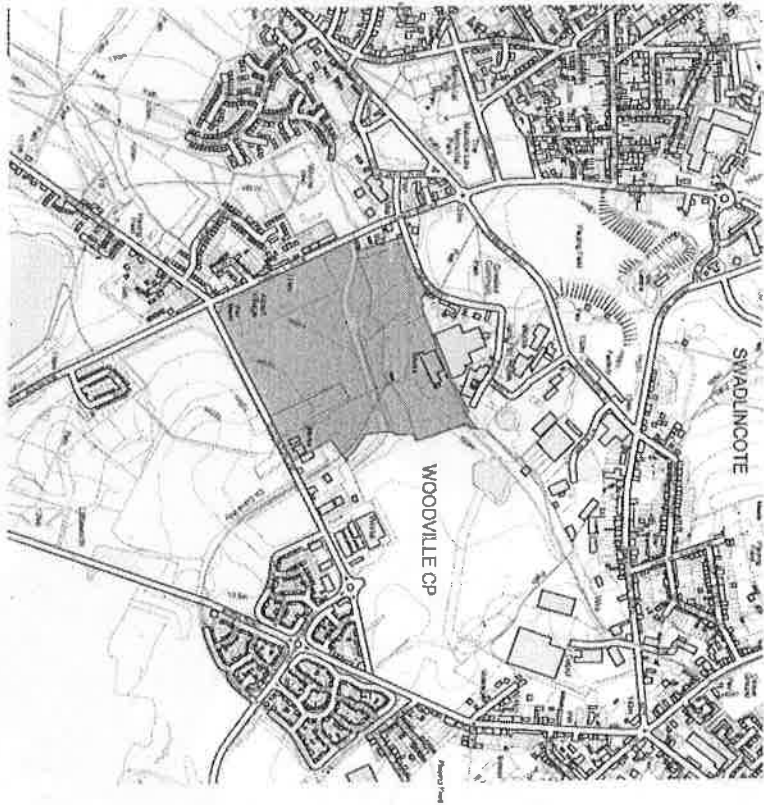
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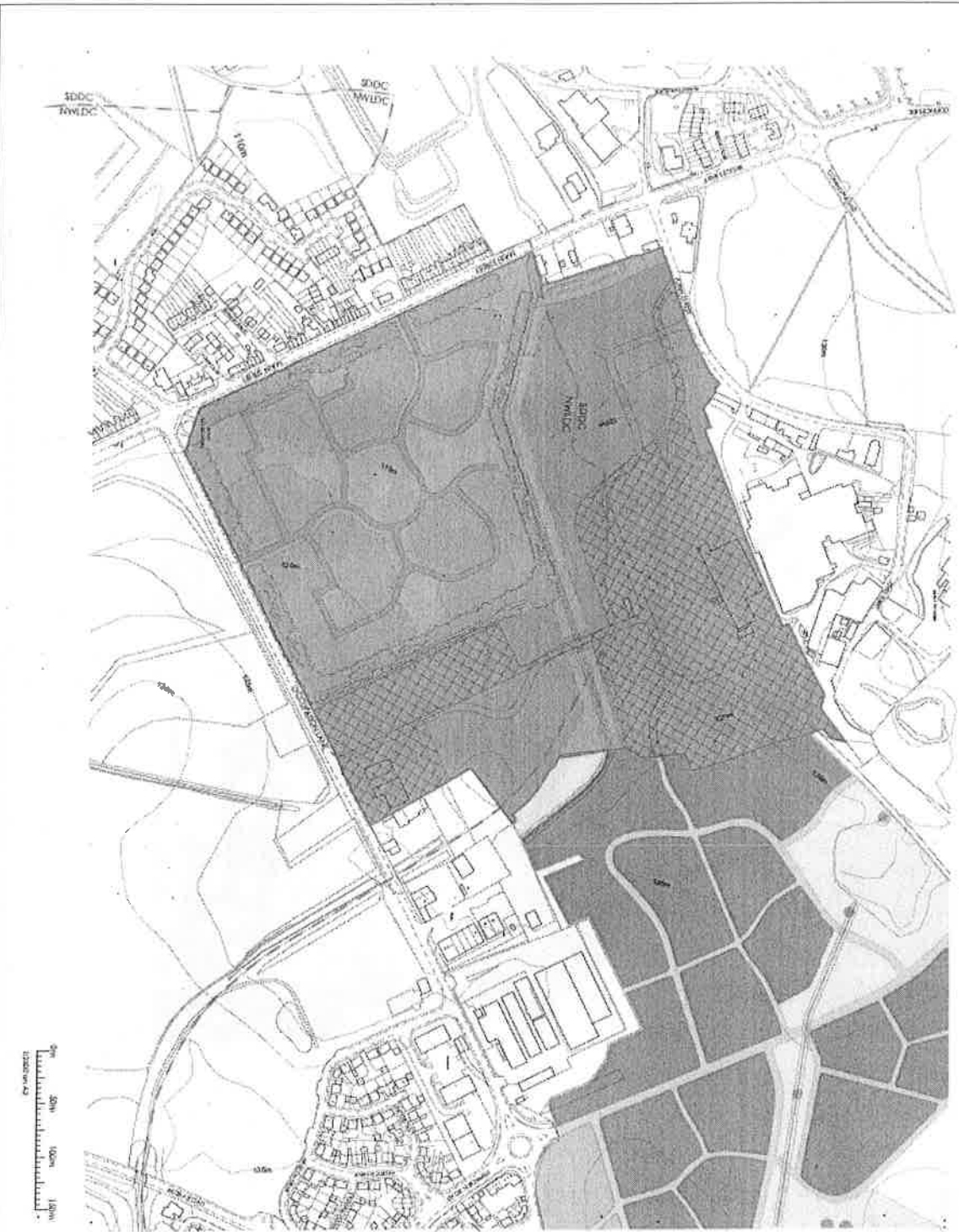
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






MASTERPLAN



The drawing has been prepared for the purpose of providing a visual representation of the proposed development. It does not constitute an offer of any financial product or service. All details are subject to change without notice. The developer is not responsible for any errors or omissions. All rights reserved. © 2015.

KEY

-  PROPOSED RESIDENTIAL USE
-  PROPOSED ALIENATED SPACE AND PROPOSED PARKING
-  DESIGN IMPROVEMENT USE
-  PROPOSED COMMUNITY USE
-  PROPOSED CURRENTLY SHOWN TO PROPOSED LAND

THE TOWN OF ALBERT CONSULTANTS LTD.
 4444 10th Street, Edmonton, Alberta
 T6C 1K5
 Phone: (780) 462-1111
 Fax: (780) 462-1112
 www.albertconsultants.com

Ravenstoun
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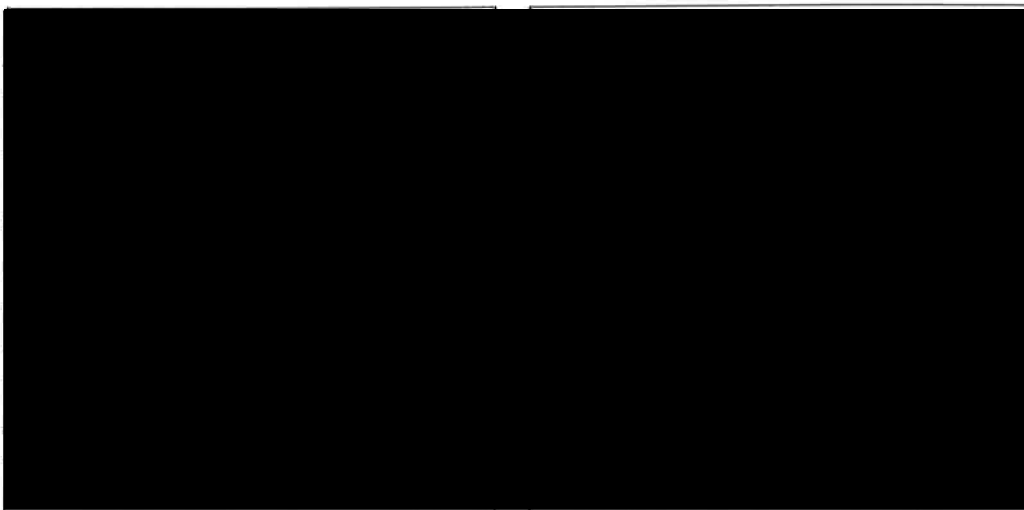
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However if permissions lapse this will be because there is a problem with the delivery of the site and it should not be relied upon. It is not clear from the H1 list how many of these sites are completed or under construction.

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The sites in H2 cannot be relied upon to deliver homes. Several of these sites have been subject to a resolution to grant for an extended period and have delivery issues. Some of the sites are directly affected by HS2, and the changes to HS2 proposed in July 2016 do not affect this part of the proposal. There is therefore significant doubt over the delivery of these sites and as a result they cannot be relied upon to deliver the housing numbers proposed in the Plan.

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Attached

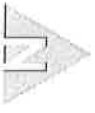
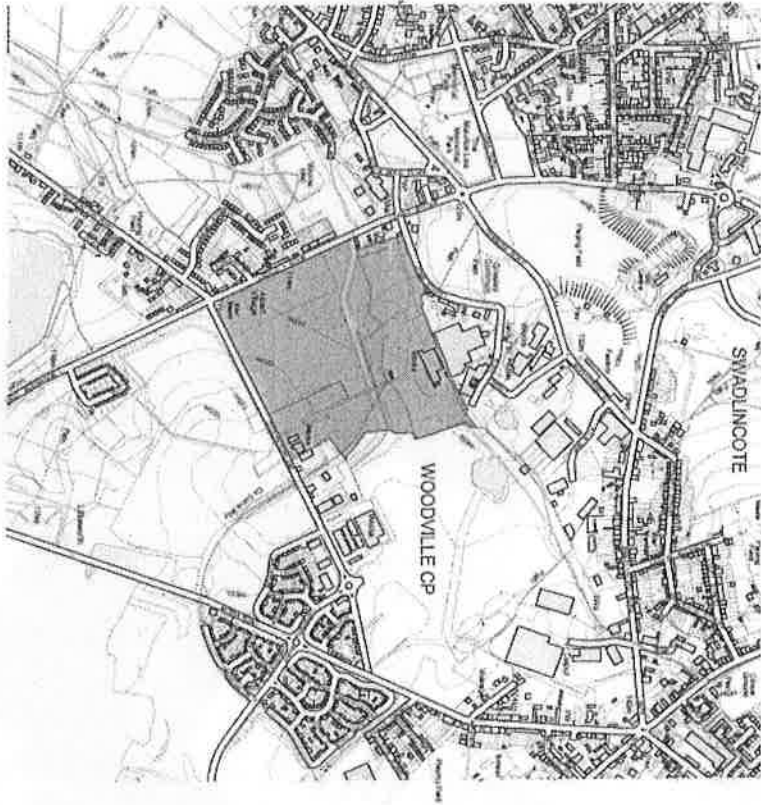
Masterplan of the land north of Occupation lane

Context Plan.

Proposed Changes that are specifically sought

- Recognise the relationship between Swadlincote and the western part of the District
- Amend the housing requirement to the updated OAN
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CONTEXT PLAN








Residential Development Proposal
of
Main Street/Occupation Lane
ALBERT VILLAGE
THE TOWN PLANNING CONSULTANTS LTD
1:10,000
166-2015

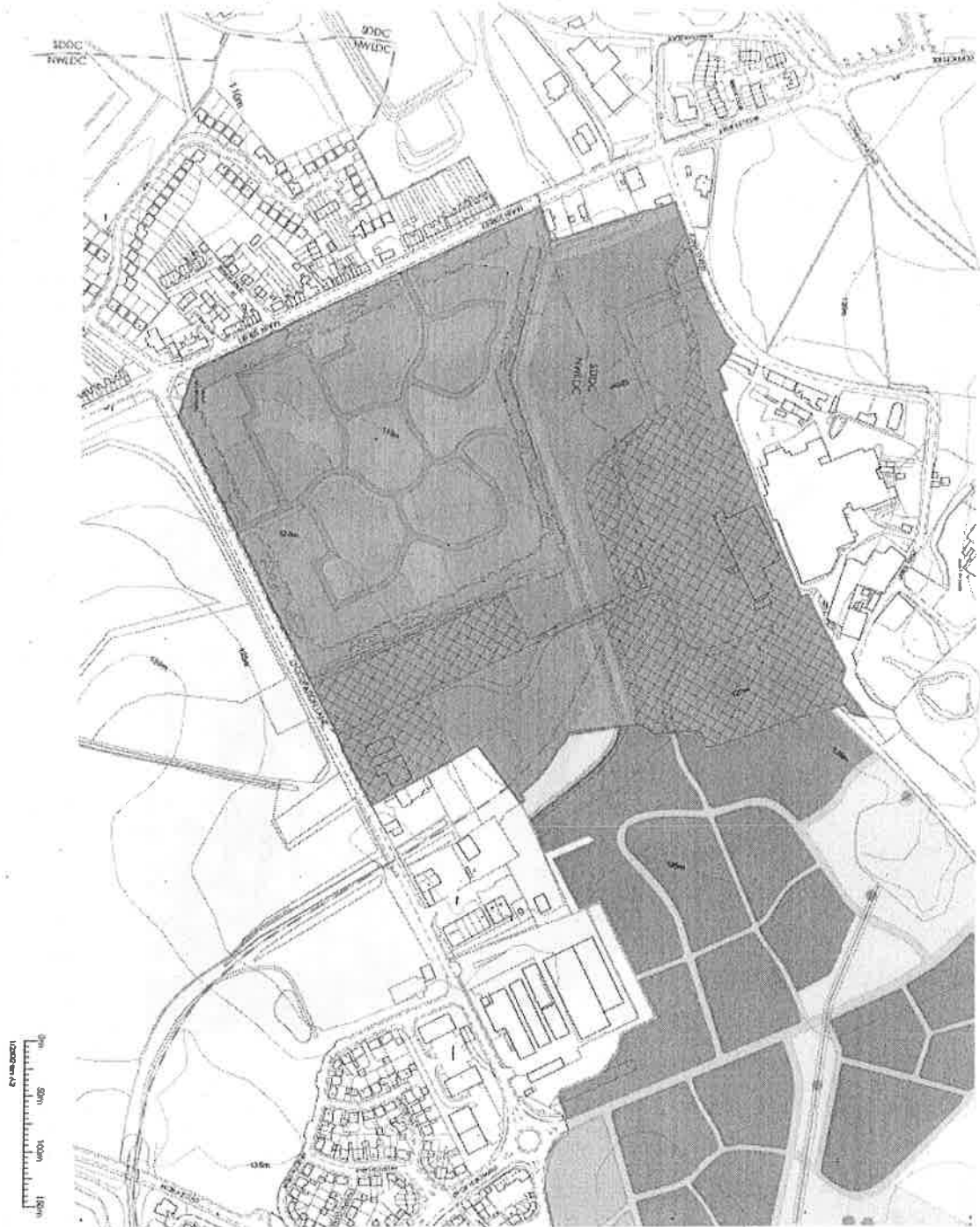
MASTERPLAN



The drawing has been prepared by the author for the purpose of illustrating the proposed development and is not to be used for any other purpose without the written consent of the author. It does not constitute a contract and no liability is accepted by the author for any error or omission. It is intended for use as a guide only and should not be relied upon for any other purpose.

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NO PART OF THIS PUBLICATION

- KEY**
-  HIGH DENSITY RESIDENTIAL USE
 -  HIGH QUALITY ALBERT VILLAGE AND SURROUNDING AREAS
 -  EXISTING PARKING USE
 -  HIGH DENSITY INDUSTRIAL USE
 -  RECREATIONAL/CLUBS/AMBIENT/RETAIL/COMMERCIAL LAND



FOR FURTHER INFORMATION CONTACT: RAVENSHOURN
 10000
 Albert Village Development
 Main Street/Occupation Lane
ALBERT VILLAGE
 Ravenshourn
 10000
 10000

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.

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

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Yes, I wish to participate at the oral examination

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Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:



Date:

15-8-2016

REPRESENTOR 46

4614/S3/0



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 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	<input type="text"/>	Mrs
First Name	R	Janet
Last Name	Meredith	Hodson
Job Title <i>(Where relevant)</i>	Operations Manager	Principal
Organisation <i>(Where relevant)</i>	Ravensbourn Container Systems Ltd	JVH Town Planning Consultants Ltd
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
Email Address <i>(Where relevant)</i>		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	Chapter 2 context 1.16 Chapter 7 Housing	Policy	S1, S2, S3, H1, H2, H3, EC2	Policies Map	Proposals Map Insert 1 Albert Village
--------------	--	--------	--------------------------------------	--------------	---

4. Do you Consider the Local Plan is:
(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Chapter 2
Context

The Plan makes no mention of the presence of the urban area of Swadlincote/Woodville and the relevant geography. Clearly there is a close geographical relationship as shown on the Plan at Page 13. The Pan fails to recognise this.

Policy S1

We object to the policy as drafted.

The plan makes provision for 10,400 new dwellings over the Plan period. However the policy says that the long term level of housing needs remains to be established as part of the Leicestershire Housing and Economic Development Needs Assessment. It is unclear therefore why the level of 10,400 is proposed to be set in the plan until the overall level of need for the wider area is ascertained and properly planned for in the development plan. It is not clear how and where this Plan would provide any flexibility necessary, if the housing and employment requirements are not known. The Policy as proposed is therefore unsound. Para 1.16 of the Plan notes that the new HMA figures will be available in September 2016 so any delay is short lived.

Policy S2

We object to the settlement hierarchy as proposed in S2

We object to the settlement hierarchy as defined in the plan on the basis that it fails to take into account the relationship of land adjacent to Swadlincote and Woodville. Cleary land adjacent to Swadlincote and Woodville is in a sustainable location in close proximity to those centres where there are a full range of social and employment facilities. The proposal of South Derbyshire to locate new employment immediately north of the District Boundary supports this view, and which does not follow through into this local plan. The designation of Albert Village as a fourth tier settlement belies its position in close proximity to the urban area of Swadlincote and Woodville to which it is functionally related. To treat this area as a free standing village settlement does not deal with the reality of the situation in geographical terms. On this basis the settlement hierarchy needs to be amended to reflect the position of the land adjacent to Albert Village and the sustainability of the location. The text to the Policy makes no mention of the existence of Swadlincote and Woodville and the presence of this large urban area on the western extremity of the district. On this basis the sustainability of various locations has been artificially skewed by the presence of a boundary line which belies the geography of the area.

Policy S 3

We object to Policy S3

The area designated as countryside on the proposal map is objected to, with specific reference to the land north of Occupation Lane. This land as shown on the attached plans has been worked for minerals including coal and clay and is currently underused land. Given the close relationship between this land and the proposed employment development in South Derbyshire, this land should be excluded from the open countryside and a more logical edge to the urban area be made along Occupation Lane itself. There is no requirement for this land to be included within open countryside designation when it can play a valuable part in the delivery of regeneration in this locality providing both an employment and housing opportunity. Much of this land it already developed with existing employment uses and it would be logical therefore that is should be included within a development boundary and not remain part of open countryside

Chapter 7 Housing

Table 2

The figures in table 2 should not be relied upon. The purported completions figures, And the sites with planning permission are considered to be an overestimate of the position.

Sites with a resolution to grant permission are very significant number. However many of these sites have been available for a considerable time and show no sign of being brought forward. Although the Council indicate in para 7.8 that they accept that the figures are an overestimate of the supply, the resultant requirement for a further 800 dwellings to be allocated is in our opinion an underestimate of the situation.

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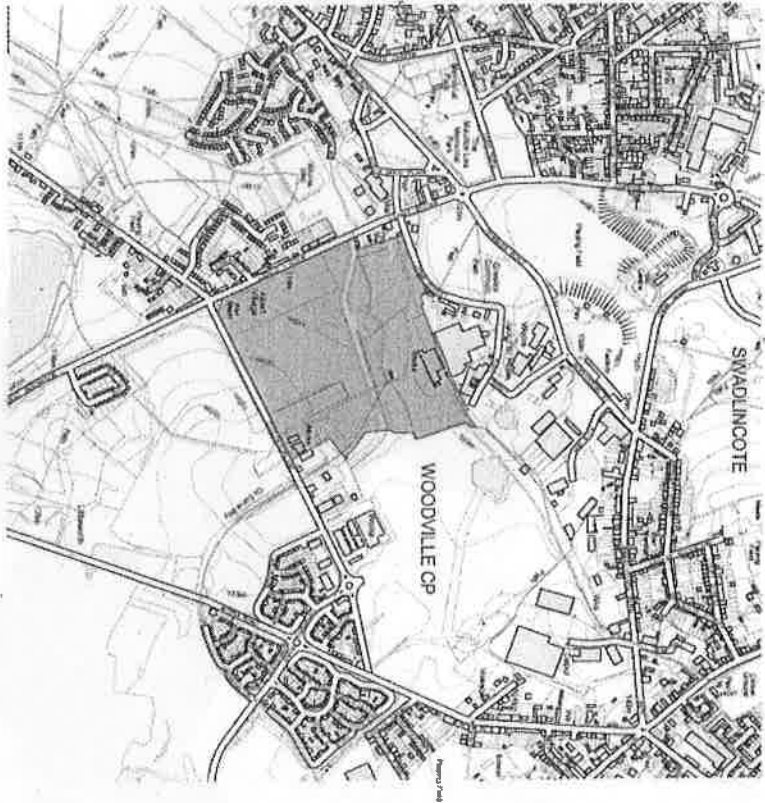
Attached

Masterplan of the land north of Occupation lane

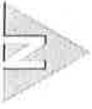
Context Plan.

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CONTEXT PLAN



Residential Development Proposal
of
Main Street/Occupation Lane,
ALBERT VILLAGE
JVA TOWN PLANNING CONSULTANTS LTD
1:10,000
19/09/2013

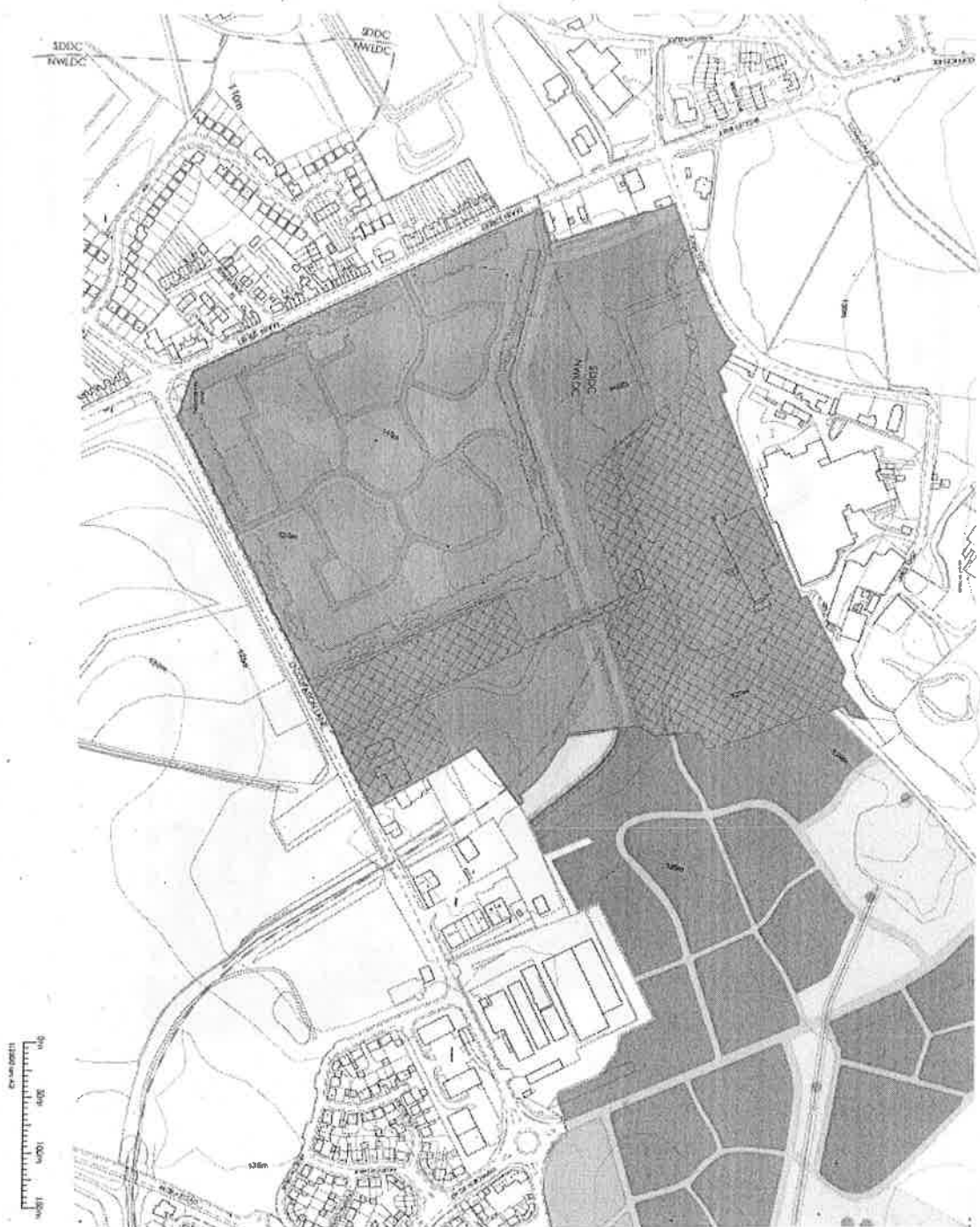
MASTERPLAN



The drawing has been prepared by the author's office for the purpose of showing the general concept between the subject site and its setting within the surrounding context. It does not constitute a contract. The drawing is for information only and is not intended to be used for any other purpose without the written consent of the author.

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 (SIGNED AND SEALED 12/2000)

- KEY**
- PROPOSED RESIDENTIAL USE
 - HIGH-CAPACITY ASSEMBLY SPACE AND STRUCTURE PLANNING
 - EXISTING INFRASTRUCTURE
 - PROPOSED INFRASTRUCTURE
 - PROPOSED GREENSPACE AND LANDSCAPE LAND
 - PROPOSED GREENSPACE AND LANDSCAPE LAND



THE TOWN PLANNING CONSULTANTS LTD
 Allied Development Process
 Main Street, Accrington Lane
ALBERT VILLAGE
 Ravensbourn
 1:2000
 Nov 2014

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9. Signature:



Date:

15-8-2016

REPRESENTOR 46

46/5/ch7/0



LOCAL PLAN

Ref:

(For official use only)

Publication Stage Representation Form

North West Leicestershire Local Plan Proposed Submission

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Title	<input type="text"/>	Mrs
First Name	R	Janet
Last Name	Meredith	Hodson
Job Title <i>(Where relevant)</i>	Operations Manager	Principal
Organisation <i>(Where relevant)</i>	Ravensbourn Container Systems Ltd	JVH Town Planning Consultants Ltd
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
Email Address <i>(Where relevant)</i>		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

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(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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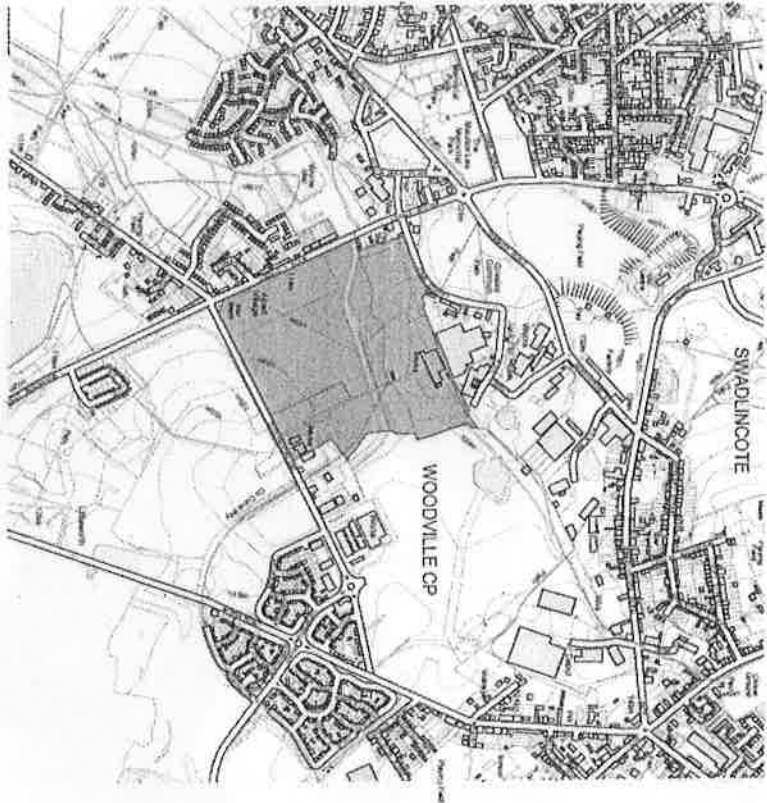
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Masterplan of the land north of Occupation lane

Context Plan.

Proposed Changes that are specifically sought

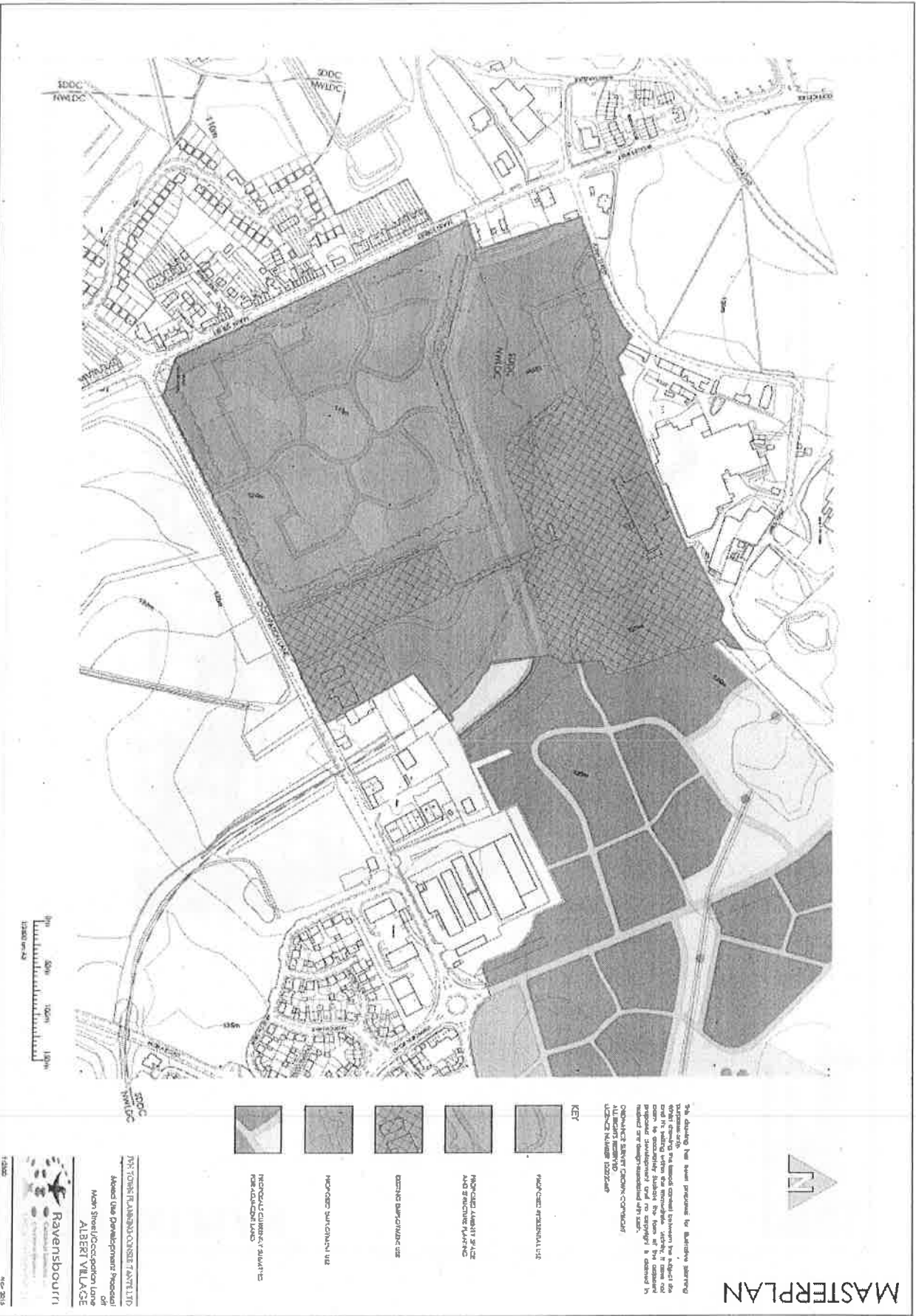
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CONTEXT PLAN








Residential Development Proposal
at
Main Street/Occupation Lane,
ALBERT VILLAGE
TSA TOWN PLANNING CONSULTANTS LTD
1:10,000
11/06/2015



MASTERPLAN

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DISCLAIMER: THE DRAWINGS ARE PROVIDED FOR INFORMATION ONLY AND NO LIABILITY IS ACCEPTED FOR ANY LOSS OR DAMAGE, WHETHER DIRECT OR INDIRECT, ARISING FROM THE USE OF THE DRAWINGS.

- KEY**
-  PROPOSED RESIDENTIAL USE
 -  PROPOSED LIGHT INDUSTRIAL AND BUSINESS PARKING
 -  EXISTING IMPROVED USE
 -  PROPOSED SANITARIAN USE
 -  PROPOSED CLIMATE SENSITIVE PROPOSED LAND

THE TOWN PLANNING CONSULTANTS LTD
 Agents for Development Project of
 Main Street/Accession Lane
ALBERT VILLAGE
 Ravensbourne
 Kent
 SE18 2JG
 12/08

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.

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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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7. If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the examination?

No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination

8. If you wish to participate at the oral part of the examination, please outline why you consider this to be necessary:

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9. Signature:



Date:

15-8-2016

REPRESENTOR 46

46/6/11/0



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:

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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	<input type="text"/>	Mrs
First Name	R	Janet
Last Name	Meredith	Hodson
Job Title <i>(Where relevant)</i>	Operations Manager	Principal
Organisation <i>(Where relevant)</i>	Ravensbourn Container Systems Ltd	JVH Town Planning Consultants Ltd
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
Email Address <i>(Where relevant)</i>		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	Chapter 2 context 1.16 Chapter 7 Housing	Policy	S1, S2, S3, H1, H2, H3, EC2	Policies Map	Proposals Map Insert 1 Albert Village
--------------	--	--------	--------------------------------------	--------------	---

4. Do you Consider the Local Plan is:
(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Chapter 2
Context

The Plan makes no mention of the presence of the urban area of Swadlincote/Woodville and the relevant geography. Clearly there is a close geographical relationship as shown on the Plan at Page 13. The Pan fails to recognise this.

Policy S1

We object to the policy as drafted.

The plan makes provision for 10,400 new dwellings over the Plan period. However the policy says that the long term level of housing needs remains to be established as part of the Leicestershire Housing and Economic Development Needs Assessment. It is unclear therefore why the level of 10,400 is proposed to be set in the plan until the overall level of need for the wider area is ascertained and properly planned for in the development plan. It is not clear how and where this Plan would provide any flexibility necessary, if the housing and employment requirements are not known. The Policy as proposed is therefore unsound. Para 1.16 of the Plan notes that the new HMA figures will be available in September 2016 so any delay is short lived.

Policy S2

We object to the settlement hierarchy as proposed in S2

We object to the settlement hierarchy as defined in the plan on the basis that it fails to take into account the relationship of land adjacent to Swadlincote and Woodville. Cleary land adjacent to Swadlincote and Woodville is in a sustainable location in close proximity to those centres where there are a full range of social and employment facilities. The proposal of South Derbyshire to locate new employment immediately north of the District Boundary supports this view, and which does not follow through into this local plan. The designation of Albert Village as a fourth tier settlement belies its position in close proximity to the urban area of Swadlincote and Woodville to which it is functionally related. To treat this area as a free standing village settlement does not deal with the reality of the situation in geographical terms. On this basis the settlement hierarchy needs to be amended to reflect the position of the land adjacent to Albert Village and the sustainability of the location. The text to the Policy makes no mention of the existence of Swadlincote and Woodville and the presence of this large urban area on the western extremity of the district. On this basis the sustainability of various locations has been artificially skewed by the presence of a boundary line which belies the geography of the area.

Policy S 3

We object to Policy S3

The area designated as countryside on the proposal map is objected to, with specific reference to the land north of Occupation Lane. This land as shown on the attached plans has been worked for minerals including coal and clay and is currently underused land. Given the close relationship between this land and the proposed employment development in South Derbyshire, this land should be excluded from the open countryside and a more logical edge to the urban area be made along Occupation Lane itself. There is no requirement for this land to be included within open countryside designation when it can play a valuable part in the delivery of regeneration in this locality providing both an employment and housing opportunity. Much of this land it already developed with existing employment uses and it would be logical therefore that is should be included within a development boundary and not remain part of open countryside

Chapter 7 Housing

Table 2

The figures in table 2 should not be relied upon. The purported completions figures, And the sites with planning permission are considered to be an overestimate of the position.

Sites with a resolution to grant permission are very significant number. However many of these sites have been available for a considerable time and show no sign of being brought forward. Although the Council indicate in para 7.8 that they accept that the figures are an overestimate of the supply, the resultant requirement for a further 800 dwellings to be allocated is in our opinion an underestimate of the situation.

Policy H1

We object to the allocations table in H1. The Policy indicates that all of these sites already have planning permission and that in the event that permissions lapse they will be renewed.

However if permissions lapse this will be because there is a problem with the delivery of the site and it should not be relied upon. It is not clear from the H1 list how many of these sites are completed or under construction.

Policy H2

The sites in H2 cannot be relied upon to deliver homes. Several of these sites have been subject to a resolution to grant for an extended period and have delivery issues. Some of the sites are directly affected by HS2, and the changes to HS2 proposed in July 2016 do not affect this part of the proposal. There is therefore significant doubt over the delivery of these sites and as a result they cannot be relied upon to deliver the housing numbers proposed in the Plan.

Policy H3 New allocations.

We object to the proposed new allocations on the basis that they fail to take into account the land that adjoins Woodville and Swadlincote at Occupation lane. The allocations rely on a settlement hierarchy that we fundamentally question as set out in our comments above.

We suggest that an allocation is made for 200 homes and open space on 9 hectares of land north of Occupation Lane making use of land in a sustainable location, that has been previously mined and remains underutilised. This should be a priority before resorting to greenfield lands in alternative locations which are in agricultural production and which may result in the loss of best and most versatile agricultural land.

Policy EC2

We object to EC2

There is a requirement to allocate land for employment to the order of 6 hectares.

Policy EC1 proposes that this is allocated at Ashby at Money Hill. Again there is no acknowledgement of the Swadlincote Woodville urban area or the proposed strategic employment zone proposed by South Derbyshire south of Swadlincote in their allocation Ref E1C.

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proposals make sense of the existing and proposed land uses in this sustainable location. There are already existing business enterprises on part of this land north of Occupation Lane and this should be confirmed through additional allocations as shown on the plan. The existing employment areas comprise around 2 hectares and an additional 3 hectares should be allocated. [shown blue of the attached master plan]

Proposals Map

We object to the proposal map on the basis that it shows the Land North of Occupation lane as within the open countryside a designation which is inappropriate given the location of the land and relationship with the adjoining urban areas.

Insert Plan 1 Albert Village

We object to Inset Plan 1 for Albert Village, the Village development boundary should be extended to the east to include the land identified north of Occupation Lane for a mix of housing and employment purposes as defined on the accompanying masterplan.

Attached

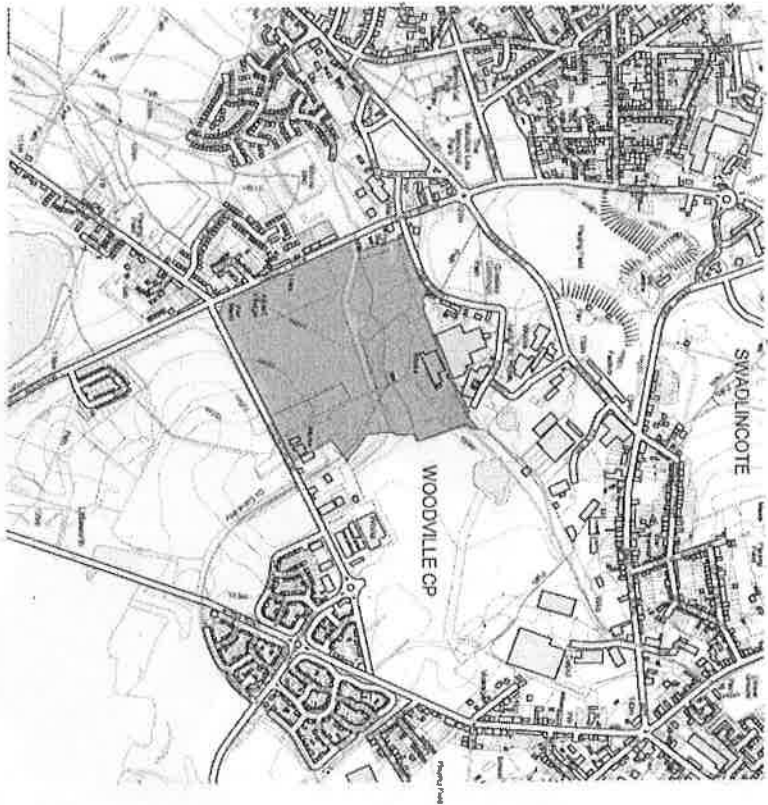
Masterplan of the land north of Occupation lane

Context Plan.

Proposed Changes that are specifically sought

- Recognise the relationship between Swadlincote and the western part of the District
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- Delete the resolution to grant sites from the Plan, where there is no progress towards a planning permission and make the commitment figures realistic
- Recognise the sustainability of the east of Swadlincote location
- Allocate the land North of Occupation Lane for housing and employment uses
- Remove the land from open countryside designation.

CONTEXT PLAN








Residential Development Proposal
of
Main Street/Occupation Lane,
ALBERT VILLAGE
TVA TOWN PLANNING CONSULTANTS LTD
1/10,000
1/6/2015

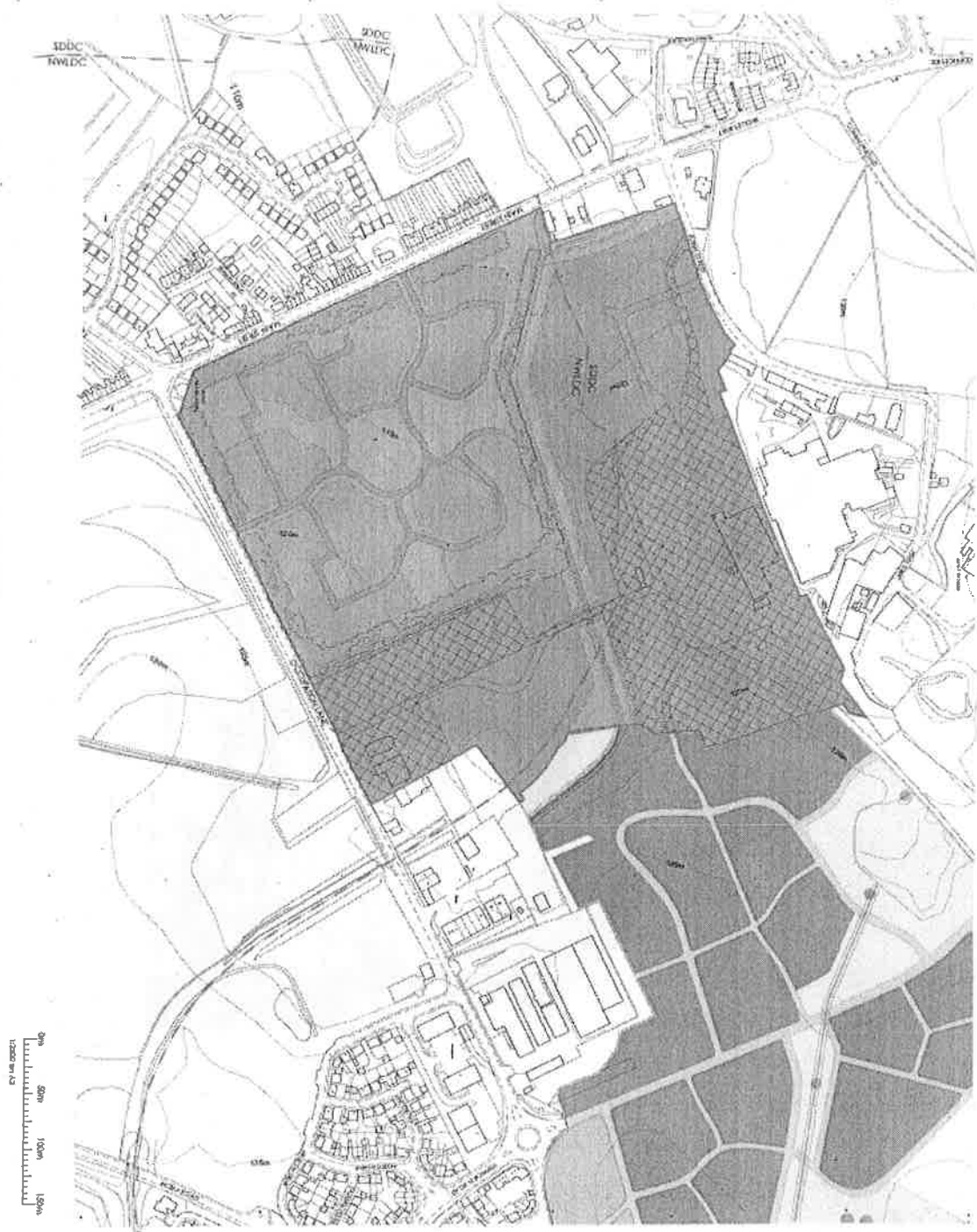
MASTERPLAN



The drawing has been prepared by BARRISON JENNIFER
 who is showing the broad general scheme. The extent of
 the work shown is not intended to be taken as a
 final or binding contract. It is intended to be used
 as a guide only. It is not intended to be used as a
 basis for any other work. It is not intended to be
 used as a basis for any other work. It is not intended
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KEY

-  PROPOSED RESIDENTIAL USE
-  PROPOSED LIGHTLY GRADE
AND PROPOSED PARKING
-  EXISTING IMPROVEMENTS
-  PROPOSED IMPROVEMENTS
-  PROPOSED CURBWAY SHALLOTS
PERPENDICULAR LAND



FOR TOWN PLANNING CONSULTANTS
 Albert Sheel Development Project
 Main Street/Cooperation Lane
ALBERT VILLAGE
 Ravensbourn
 Planning Services
 12001
 Nov 2013

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.

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- Recognise the relationship between Swadlincote and the western part of the District
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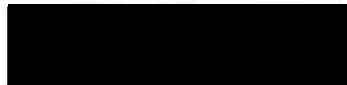
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9. Signature:



Date:

15-8-2016

REPRESENTOR 46

46/7/H2/O



LOCAL PLAN

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First Name	R	Janet
Last Name	Meredith	Hodson
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Organisation <i>(Where relevant)</i>	Ravensbourn Container Systems Ltd	JVH Town Planning Consultants Ltd
Address Line 1		
Line 2		
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Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	Chapter 2 context 1.16 Chapter 7 Housing	Policy	S1, S2, S3, H1, H2, H3, EC2	Policies Map	Proposals Map Insert 1 Albert Village
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4. Do you Consider the Local Plan is:
(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Chapter 2 Context The Plan makes no mention of the presence of the urban area of Swadlincote/Woodville and the relevant geography. Clearly there is a close geographical relationship as shown on the Plan at Page 13. The Pan fails to recognise this.

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We object to the policy as drafted.

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Policy S 3

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Chapter 7 Housing

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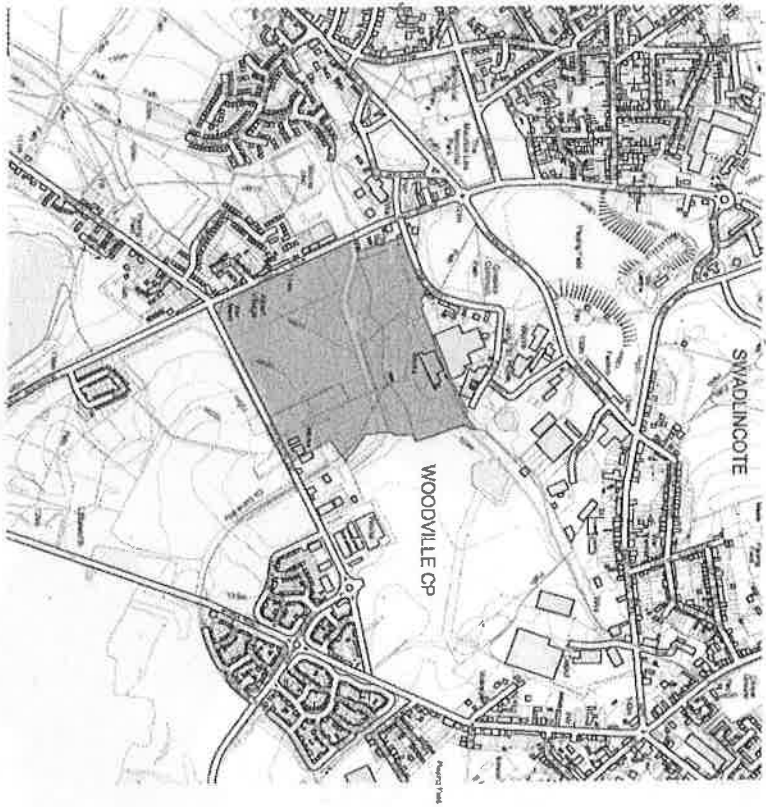
Masterplan of the land north of Occupation lane

Context Plan.

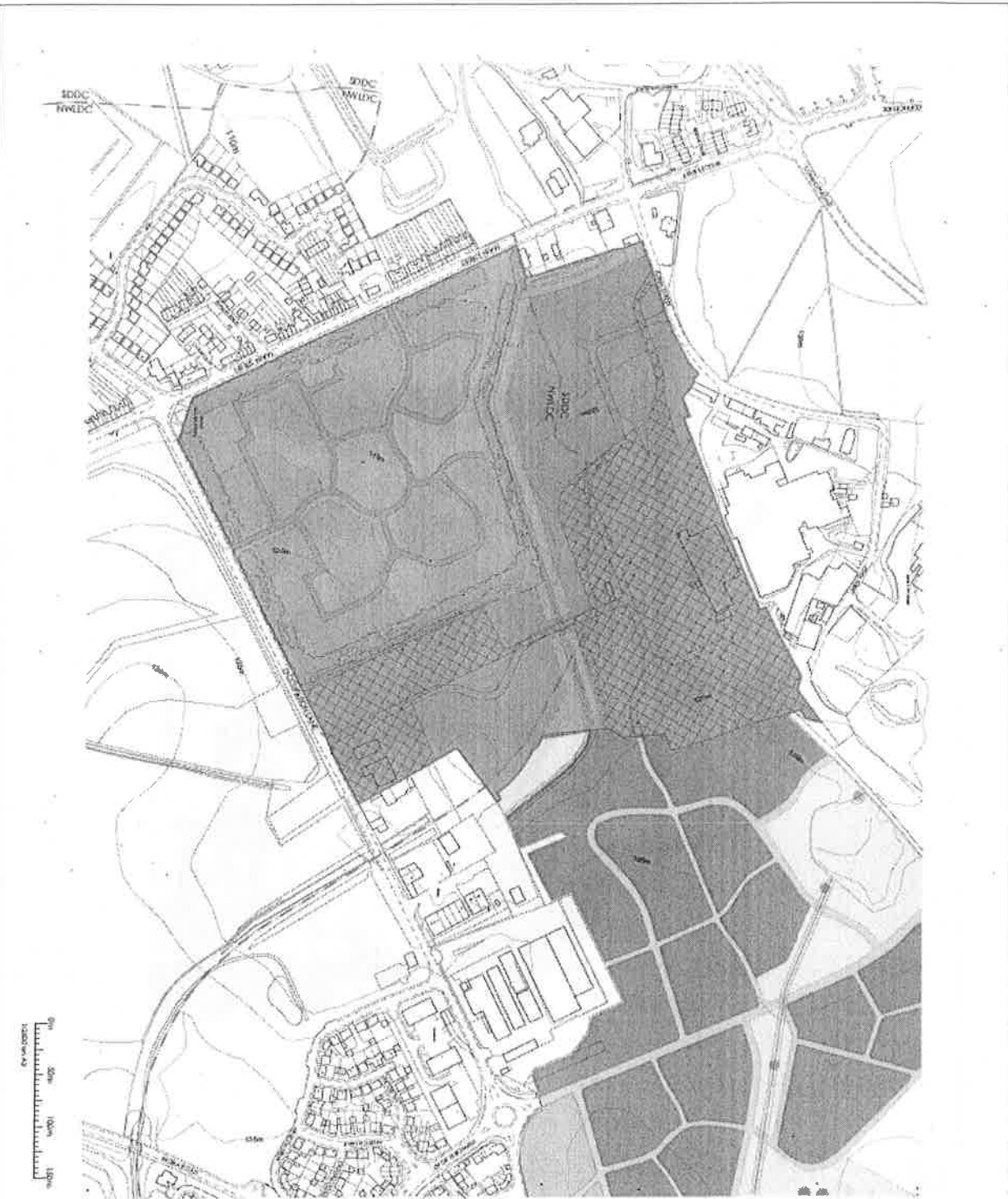
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CONTEXT PLAN








Residential Development Proposal
of
Main Street/Occupation Lane
ALBERT VILLAGE
TSE TOWN PLANNING CONSULTANTS LTD
1:10,000
14/07/2015



MASTERPLAN



The attached plan shows proposed for illustrative purposes only showing the layout of the site. It is not intended to be used for any other purpose. All rights reserved. No part of this document may be reproduced, stored in a retrieval system, or transmitted, in any form or by any means, without the prior written permission of the developer. All rights reserved.

- KEY**
-  PROPOSED RESIDENTIAL USE
 -  PROPOSED RESIDENTIAL USE AND STRUCTURE PLANNING
 -  EXISTING RESIDENTIAL USE
 -  PROPOSED COMMERCIAL USE
 -  PROPOSED COMMERCIAL USE FOR OUTDOOR LAND


Ravensbourn Group Limited
 Albert Village Development
 Albert Village
 15000

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9. Signature:



Date:

15-8-2016

REPRESENTOR 46
46/8/H3/0



LOCAL PLAN

Ref:

(For official use only)

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Last Name	Meredith	Hodson
Job Title <i>(Where relevant)</i>	Operations Manager	Principal
Organisation <i>(Where relevant)</i>	Ravensbourn Container Systems Ltd	JVH Town Planning Consultants Ltd
Address Line 1		
Line 2		
Line 3		
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Post Code		
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(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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The figures in table 2 should not be relied upon. The purported completions figures, and the sites with planning permission are considered to be an overestimate of the position.

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Policy H1

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The sites in H2 cannot be relied upon to deliver homes. Several of these sites have been subject to a resolution to grant for an extended period and have delivery issues. Some of the sites are directly affected by HS2, and the changes to HS2 proposed in July 2016 do not affect this part of the proposal. There is therefore significant doubt over the delivery of these sites and as a result they cannot be relied upon to deliver the housing numbers proposed in the Plan.

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We object to the proposal map on the basis that it shows the Land North of Occupation lane as within the open countryside a designation which is inappropriate given the location of the land and relationship with the adjoining urban areas.

Insert Plan 1 Albert Village

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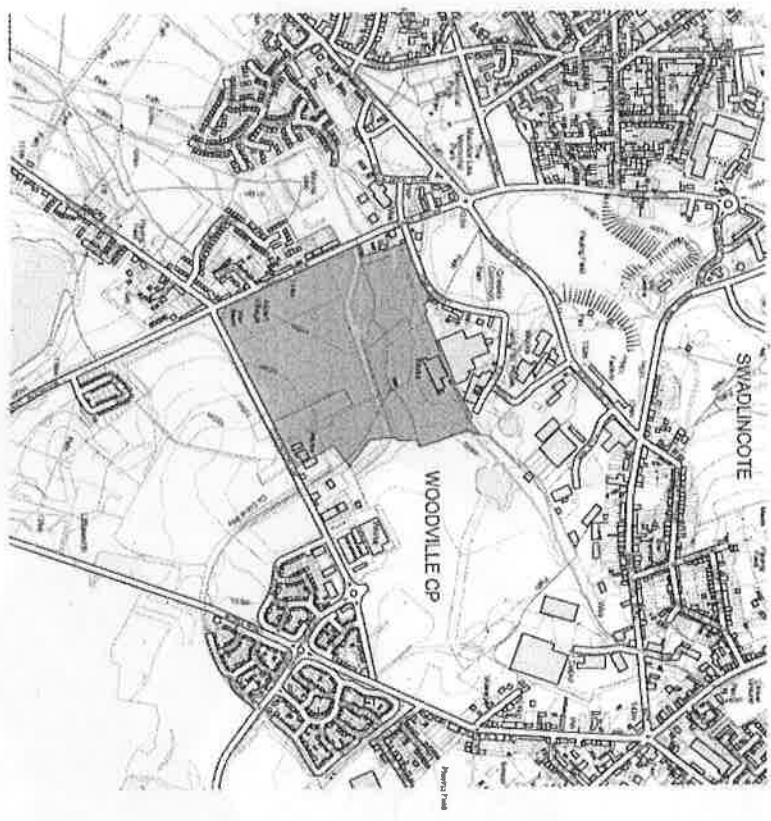
Attached

Masterplan of the land north of Occupation lane

Context Plan.

Proposed Changes that are specifically sought

- Recognise the relationship between Swadlincote and the western part of the District
- Amend the housing requirement to the updated OAN
- Delete the resolution to grant sites from the Plan, where there is no progress towards a planning permission and make the commitment figures realistic
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CONTEXT PLAN

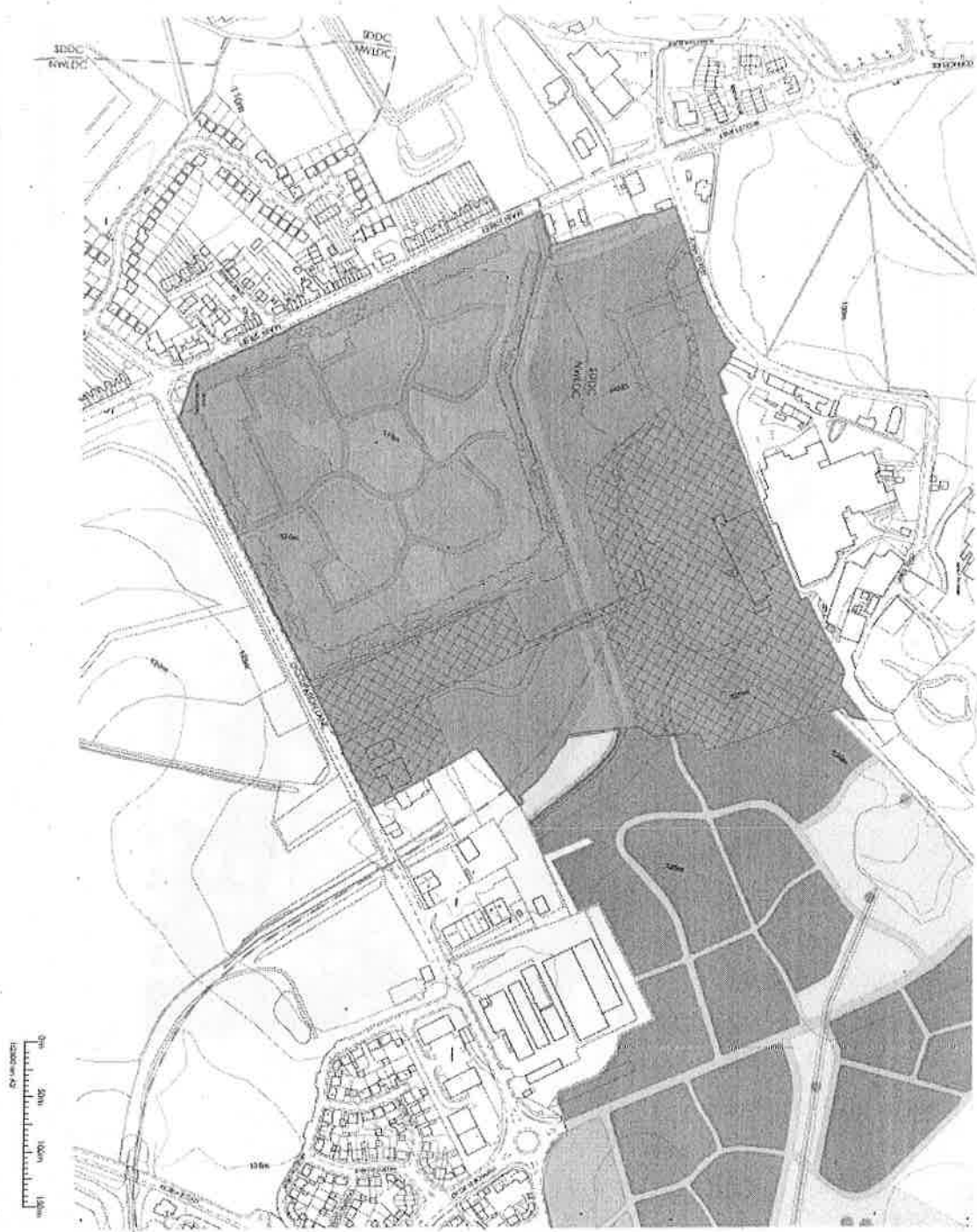
Residential Development Proposal
at
Main Street/Occupation Lane
ALBERT VILLAGE
THE TOWN PLANNING CONSULTANTS LTD
1:10,000
1 NOV 2015

MASTERPLAN



The planning has been prepared for illustrative purposes. Whilst showing the broad concept between the subject site and the existing urban form, it does not constitute a detailed masterplan. It is intended to provide a general overview of the proposed development and to illustrate the general form and layout of the development. It is not intended to be used as a basis for detailed design or construction. All rights reserved. © 2015 Ravensbourn Construction Limited.

- KEY**
-  PROPOSED RESIDENTIAL USE
 -  PROPOSED ASSEMBLY AND ENTERTAINMENT
 -  EXISTING IMPROVEMENT USE
 -  EXISTING IMPROVEMENT USE
 -  PROPOSED GREEN / RECREATION / PUBLIC OPEN SPACE



THE TOWN OF ALBERT VILLAGE PART 1, LTD.
 Albert Village Development Project
 Main Street / Occupation Lane
ALBERT VILLAGE
 Ravensbourn
 Construction Limited
 14th Floor
 100, Abchurch Lane
 London EC4N 3DF
 14th Floor
 100, Abchurch Lane
 London EC4N 3DF

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.

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

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No, I do not wish to participate at the oral examination.

Yes, I wish to participate at the oral examination

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Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:



Date:

15-8-2016

REPRESENTOR 46

46/9/EC2/0



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 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	<input type="text"/>	Mrs	<input type="text"/>
First Name	R	Janet	<input type="text"/>
Last Name	Meredith	Hodson	<input type="text"/>
Job Title <i>(Where relevant)</i>	Operations Manager	Principal	<input type="text"/>
Organisation <i>(Where relevant)</i>	Ravensbourn Container Systems Ltd	JVH Town Planning Consultants Ltd	<input type="text"/>

Address Line 1

Line 2

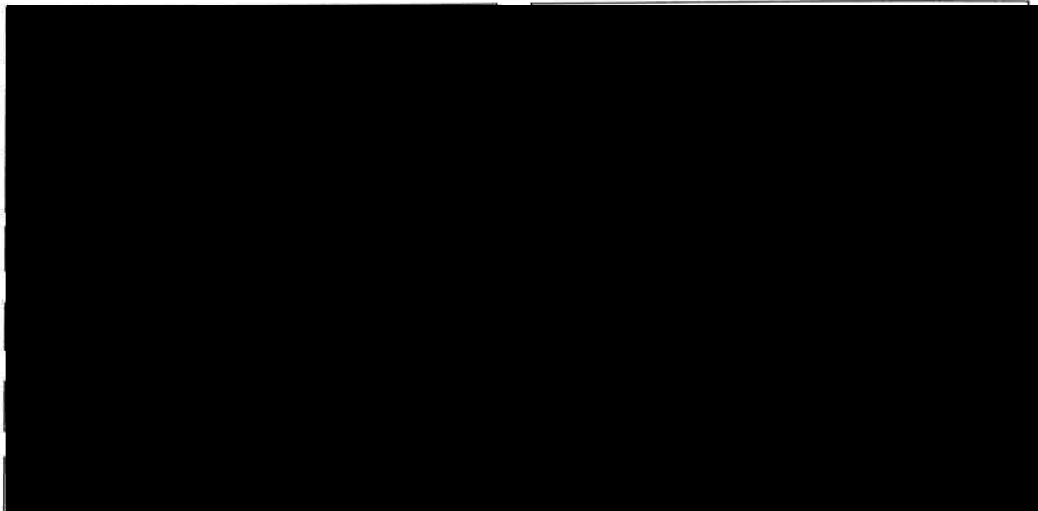
Line 3

Line 4

Post Code

Telephone Number

Email Address
(Where relevant)



Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	Chapter 2 context 1.16 Chapter 7 Housing	Policy	S1, S2, S3, H1, H2, H3, EC2	Policies Map	Proposals Map Insert 1 Albert Village
--------------	--	--------	--------------------------------------	--------------	---

4. Do you Consider the Local Plan is:
(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Chapter 2
Context
The Plan makes no mention of the presence of the urban area of Swadlincote/Woodville and the relevant geography. Clearly there is a close geographical relationship as shown on the Plan at Page 13. The Pan fails to recognise this.

Policy S1

We object to the policy as drafted.

The plan makes provision for 10,400 new dwellings over the Plan period. However the policy says that the long term level of housing needs remains to be established as part of the Leicestershire Housing and Economic Development Needs Assessment. It is unclear therefore why the level of 10,400 is proposed to be set in the plan until the overall level of need for the wider area is ascertained and properly planned for in the development plan. It is not clear how and where this Plan would provide any flexibility necessary, if the housing and employment requirements are not known. The Policy as proposed is therefore unsound. Para 1.16 of the Plan notes that the new HMA figures will be available in September 2016 so any delay is short lived.

Policy S2

We object to the settlement hierarchy as proposed in S2

We object to the settlement hierarchy as defined in the plan on the basis that it fails to take into account the relationship of land adjacent to Swadlincote and Woodville. Cleary land adjacent to Swadlincote and Woodville is in a sustainable location in close proximity to those centres where there are a full range of social and employment facilities. The proposal of South Derbyshire to locate new employment immediately north of the District Boundary supports this view, and which does not follow through into this local plan. The designation of Albert Village as a fourth tier settlement belies its position in close proximity to the urban area of Swadlincote and Woodville to which it is functionally related. To treat this area as a free standing village settlement does not deal with the reality of the situation in geographical terms. On this basis the settlement hierarchy needs to be amended to reflect the position of the land adjacent to Albert Village and the sustainability of the location. The text to the Policy makes no mention of the existence of Swadlincote and Woodville and the presence of this large urban area on the western extremity of the district. On this basis the sustainability of various locations has been artificially skewed by the presence of a boundary line which belies the geography of the area.

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Chapter 7 Housing

Table 2

The figures in table 2 should not be relied upon. The purported completions figures, And the sites with planning permission are considered to be an overestimate of the position.

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Policy H1

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Policy H2

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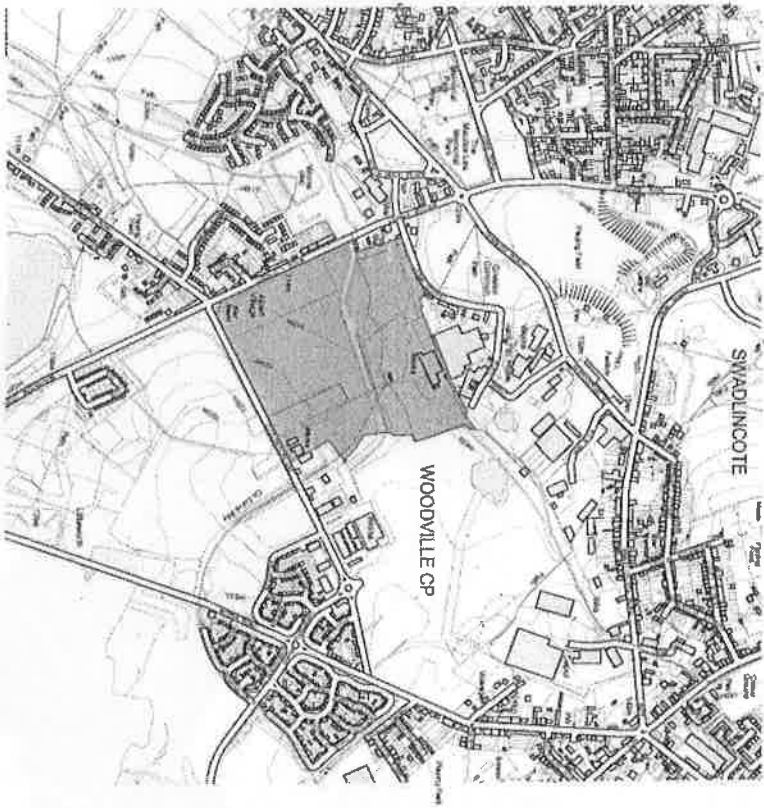
Attached

Masterplan of the land north of Occupation lane

Context Plan.

Proposed Changes that are specifically sought

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CONTEXT PLAN

Residential Development Proposal of
Main Street/Occupation Lane
ALBERT VILLAGE
TOWN PLANNING CONSULTANTS LTD
1:10,000
1/9/2015








MASTERPLAN



The planning has been prepared for illustrative purposes only. It does not constitute a contract. The Council reserves the right to amend the plan at any time without notice. The plan is subject to the approval of the Council. The plan is not intended to be used as a basis for any legal proceedings. The plan is subject to the approval of the Council. The plan is not intended to be used as a basis for any legal proceedings.

KEY

-  PROPOSED RESIDENTIAL USE
-  PROPOSED ALBERT VILLAGE AND SURROUNDING LANDS
-  EXISTING INFRASTRUCTURE USE
-  PROPOSED OPEN SPACE AND SPORTS/LEISURE
-  PROPOSED COMMERCIAL/INDUSTRIAL/RECREATION LAND

THE TOWN PLANNING CONSULTANTS LTD.
 Albert Village Development Proposal
 Main Street/Development Lane
ALBERT VILLAGE
 Ravensbourn
 Council
 1/2020

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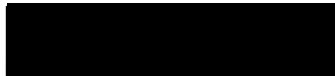
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9. Signature:



Date:

15-8-2016

REPRESENTOR 46

46/10/Policies Map 10



LOCAL PLAN

Ref:

(For official use only)

Publication Stage Representation Form

North West Leicestershire Local Plan Proposed Submission

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1. Personal Details

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**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		Mrs
First Name	R	Janet
Last Name	Meredith	Hodson
Job Title <i>(Where relevant)</i>	Operations Manager	Principal
Organisation <i>(Where relevant)</i>	Ravensbourn Container Systems Ltd	JVH Town Planning Consultants Ltd

Address Line 1

Line 2

Line 3

Line 4

Post Code

Telephone Number

Email Address
(Where relevant)



Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

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--------------	--	--------	--------------------------------------	--------------	---

4. Do you Consider the Local Plan is:
(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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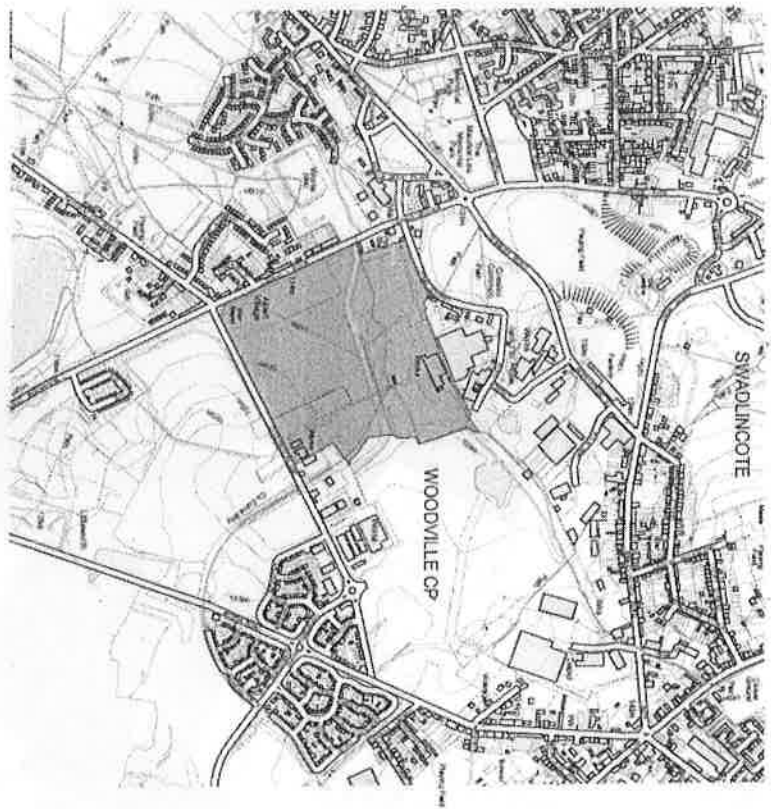
Masterplan of the land north of Occupation lane

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CONTEXT PLAN



0m 200m 400m 600m
1:10,000 on A3






Residential Development Proposal
of
Main Street/Occupation Lane
ALBERT VILLAGE

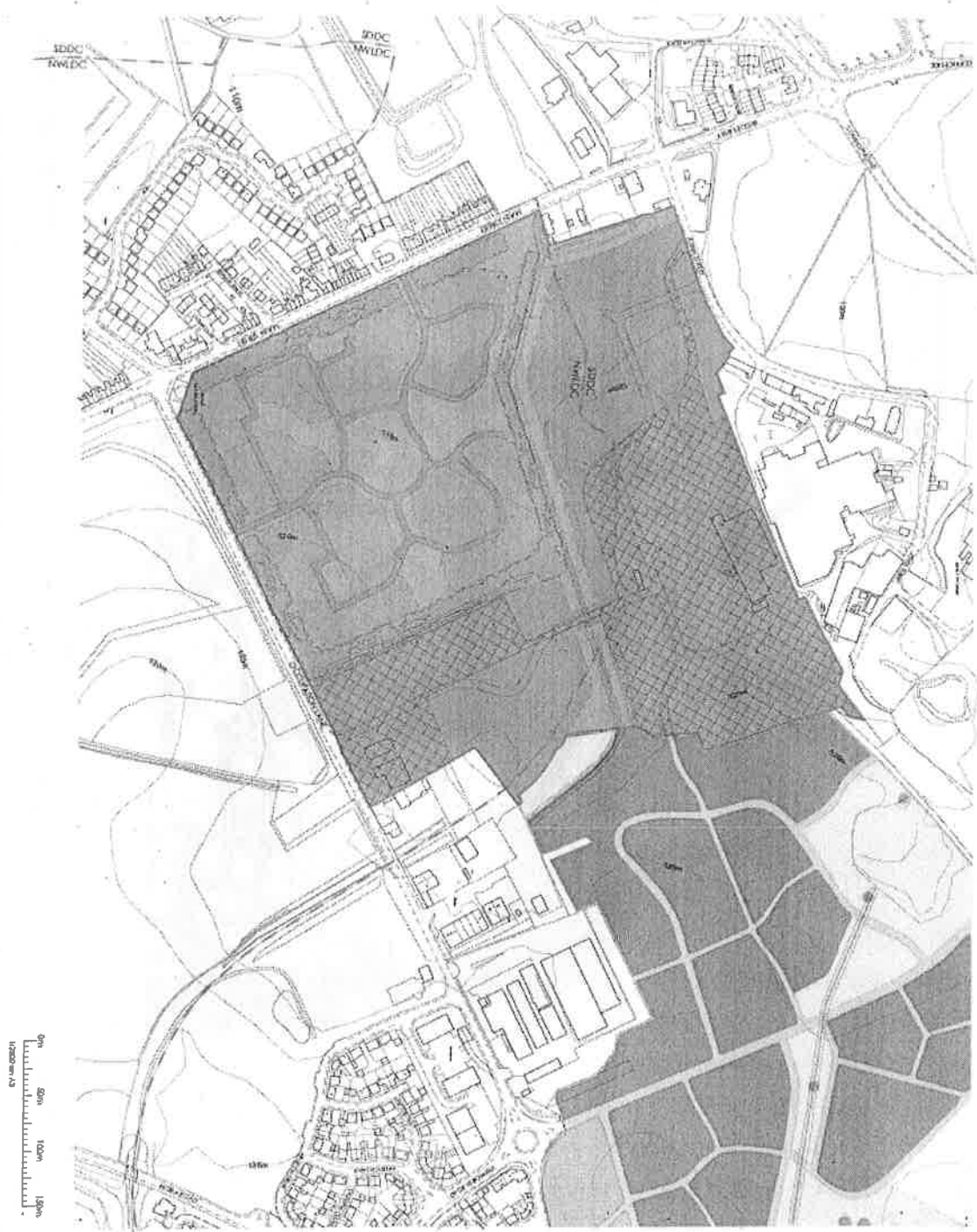
THE TOWN PLANNING CONSULTANTS LTD
1.10.2000 16th 2015

MASTERPLAN



The drawing has been prepared by the architect for the client and is not to be used for any other purpose without the written consent of the architect. It is not to be used for any other purpose without the written consent of the architect. It is not to be used for any other purpose without the written consent of the architect.

- KEY**
-  PROPOSED RESIDENTIAL USE
 -  PROPOSED LIGHT RAIL AND EXISTING PLANNING
 -  EXISTING DEVELOPMENT USE
 -  PROPOSED PARKING AND LAND
 -  PROPOSED GREEN SPACES AND LAND



THE CONSULTING ARCHITECTS ASSOCIATION
 100, MARKET STREET, LONDON, EC1A 3BB
 TEL: 020 7493 8800
 WWW.CAA.CO.UK

Ravensbourne
 Higher Education
 100, MARKET STREET, LONDON, EC1A 3BB
 TEL: 020 7493 8800
 WWW.RAVENSBOROUGH.CO.UK

1/2020

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.

Proposed Changes that are specifically sought

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

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Please note the inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

9. Signature:



Date:

15-8-2016

REPRESENTOR 46

46/11/Inset Map 1/0



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 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	<input type="text"/>	<input type="text" value="Mrs"/>
First Name	<input type="text" value="R"/>	<input type="text" value="Janet"/>
Last Name	<input type="text" value="Meredith"/>	<input type="text" value="Hodson"/>
Job Title <i>(Where relevant)</i>	<input type="text" value="Operations Manager"/>	<input type="text" value="Principal"/>
Organisation <i>(Where relevant)</i>	<input type="text" value="Ravensbourn Container Systems Ltd"/>	<input type="text" value="JVH Town Planning Consultants Ltd"/>
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
Email Address <i>(Where relevant)</i>		

Part B - Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph(s)	Chapter 2 context 1.16 Chapter 7 Housing	Policy	S1, S2, S3, H1, H2, H3, EC2	Policies Map	Proposals Map Insert 1 Albert Village
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4. Do you Consider the Local Plan is:
(Please tick as appropriate)

i) Legally Compliant	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
ii) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
iii) Complies with the Duty to co-operate	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>

5. Please give details of why you consider the Local Plan not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Chapter 2
Context

The Plan makes no mention of the presence of the urban area of Swadlincote/Woodville and the relevant geography. Clearly there is a close geographical relationship as shown on the Plan at Page 13. The Pan fails to recognise this.

Policy S1

We object to the policy as drafted.

The plan makes provision for 10,400 new dwellings over the Plan period. However the policy says that the long term level of housing needs remains to be established as part of the Leicestershire Housing and Economic Development Needs Assessment. It is unclear therefore why the level of 10,400 is proposed to be set in the plan until the overall level of need for the wider area is ascertained and properly planned for in the development plan. It is not clear how and where this Plan would provide any flexibility necessary, if the housing and employment requirements are not known. The Policy as proposed is therefore unsound. Para 1.16 of the Plan notes that the new HMA figures will be available in September 2016 so any delay is short lived.

Policy S2

We object to the settlement hierarchy as proposed in S2

We object to the settlement hierarchy as defined in the plan on the basis that it fails to take into account the relationship of land adjacent to Swadlincote and Woodville. Cleary land adjacent to Swadlincote and Woodville is in a sustainable location in close proximity to those centres where there are a full range of social and employment facilities. The proposal of South Derbyshire to locate new employment immediately north of the District Boundary supports this view, and which does not follow through into this local plan. The designation of Albert Village as a fourth tier settlement belies its position in close proximity to the urban area of Swadlincote and Woodville to which it is functionally related. To treat this area as a free standing village settlement does not deal with the reality of the situation in geographical terms. On this basis the settlement hierarchy needs to be amended to reflect the position of the land adjacent to Albert Village and the sustainability of the location. The text to the Policy makes no mention of the existence of Swadlincote and Woodville and the presence of this large urban area on the western extremity of the district. On this basis the sustainability of various locations has been artificially skewed by the presence of a boundary line which belies the geography of the area.

Policy S 3

We object to Policy S3

The area designated as countryside on the proposal map is objected to, with specific reference to the land north of Occupation Lane. This land as shown on the attached plans has been worked for minerals including coal and clay and is currently underused land. Given the close relationship between this land and the proposed employment development in South Derbyshire, this land should be excluded from the open countryside and a more logical edge to the urban area be made along Occupation Lane itself. There is no requirement for this land to be included within open countryside designation when it can play a valuable part in the delivery of regeneration in this locality providing both an employment and housing opportunity. Much of this land is already developed with existing employment uses and it would be logical therefore that it should be included within a development boundary and not remain part of open countryside

Chapter 7 Housing

Table 2

The figures in table 2 should not be relied upon. The purported completions figures, and the sites with planning permission are considered to be an overestimate of the position.

Sites with a resolution to grant permission are very significant number. However many of these sites have been available for a considerable time and show no sign of being brought forward. Although the Council indicate in para 7.8 that they accept that the figures are an overestimate of the supply, the resultant requirement for a further 800 dwellings to be allocated is in our opinion an underestimate of the situation.

Policy H1

We object to the allocations table in H1. The Policy indicates that all of these sites already have planning permission and that in the event that permissions lapse they will be renewed.

However if permissions lapse this will be because there is a problem with the delivery of the site and it should not be relied upon. It is not clear from the H1 list how many of these sites are completed or under construction.

Policy H2

The sites in H2 cannot be relied upon to deliver homes. Several of these sites have been subject to a resolution to grant for an extended period and have delivery issues. Some of the sites are directly affected by HS2, and the changes to HS2 proposed in July 2016 do not affect this part of the proposal. There is therefore significant doubt over the delivery of these sites and as a result they cannot be relied upon to deliver the housing numbers proposed in the Plan.

Policy H3 New allocations.

We object to the proposed new allocations on the basis that they fail to take into account the land that adjoins Woodville and Swadlincote at Occupation lane. The allocations rely on a settlement hierarchy that we fundamentally question as set out in our comments above.

We suggest that an allocation is made for 200 homes and open space on 9 hectares of land north of Occupation Lane making use of land in a sustainable location, that has been previously mined and remains underutilised. This should be a priority before resorting to greenfield lands in alternative locations which are in agricultural production and which may result in the loss of best and most versatile agricultural land.

Policy EC2

We object to EC2

There is a requirement to allocate land for employment to the order of 6 hectares. Policy EC1 proposes that this is allocated at Ashby at Money Hill. Again there is no acknowledgement of the Swadlincote Woodville urban area or the proposed strategic employment zone proposed by South Derbyshire south of Swadlincote in their allocation Ref E1C.

Additional consideration needs to be given to the allocation of additional employment land adjoining South Derbyshire as shown on the accompanying masterplans. These

proposals make sense of the existing and proposed land uses in this sustainable location. There are already existing business enterprises on part of this land north of Occupation Lane and this should be confirmed through additional allocations as shown on the plan. The existing employment areas comprise around 2 hectares and an additional 3 hectares should be allocated. [shown blue of the attached master plan]

Proposals Map

We object to the proposal map on the basis that it shows the Land North of Occupation lane as within the open countryside a designation which is inappropriate given the location of the land and relationship with the adjoining urban areas.

Insert Plan 1 Albert Village

We object to Inset Plan 1 for Albert Village, the Village development boundary should be extended to the east to include the land identified north of Occupation Lane for a mix of housing and employment purposes as defined on the accompanying masterplan.

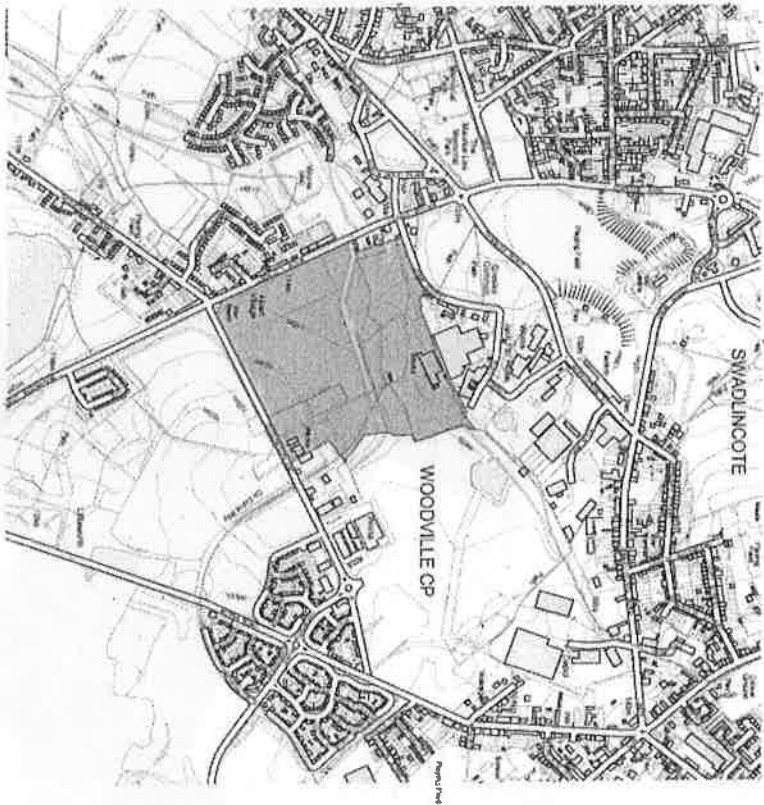
Attached

Masterplan of the land north of Occupation lane

Context Plan.

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CONTEXT PLAN

Residential Development Proposal
of
Main Street/Occupation Lane
ALBERT VILLAGE

JVA TOWN PLANNING CONSULTANTS LTD

11/02/00

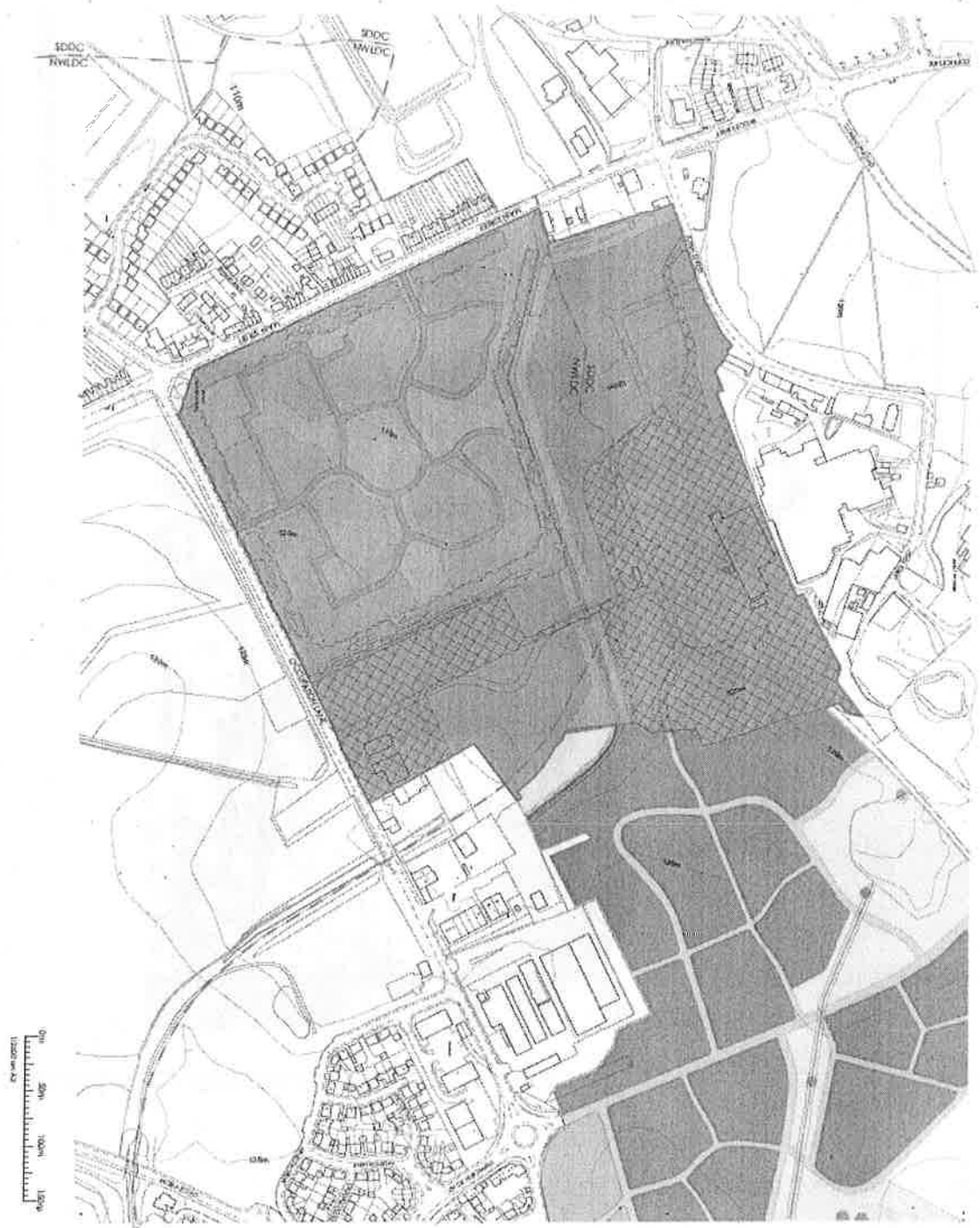
16/02/15

MASTERPLAN



The drawing has been prepared for illustrative purposes only. It does not constitute a contract. The client shall be responsible for the accuracy of the information provided. The client shall be responsible for the accuracy of the information provided. The client shall be responsible for the accuracy of the information provided.

- KEY**
- SIGNIFICANT EXISTING USE
 - HIGH QUALITY LANDSCAPE AND ENVIRONMENTAL FEATURES
 - ZONING BOUNDARIES
 - EXISTING AND PROPOSED INFRASTRUCTURE
 - PROPOSED CURRENTLY UNDEVELOPED LAND



FOR FURTHER INFORMATION CONTACT:
 NARRAGANSETT DEVELOPMENT PARTNERS
 1000 SHEPHERD ROAD
 ALBERT VILLAGE
 RAVENSBOROUGH
 1200
 10/2015

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