

Representor 50

50/1/4-6/0



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"/>
First Name	Helen	Guy
Last Name	Prangley	Longley
Job Title <i>(Where relevant)</i>	<input type="text"/>	<input type="text"/>
Organisation <i>(Where relevant)</i>	Western Range Limited	Pegasus Group
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number	<input type="text"/>	
Email Address <i>(Where relevant)</i>	<input type="text"/>	

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) Policy Policies Map

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

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

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Paragraph 4.6 sets out the objectives for the plan based on the vision set out at paragraph 4.5. Objective 2 aims to support the delivery of new homes balanced with economic growth to provide a stock of housing that meets the needs of the community.

The objective to deliver new housing to meet needs over the plan period is supported. However, it is important that, in making allocations, the plan provides sufficient flexibility to deal with potential changes that may result from work currently being undertaken by the Leicester and Leicestershire Housing Market Area (HMA) authorities on the updated Housing and Economic Development Needs Assessment (HEDNA). We make further representations on this issue in relation to policies S1 and D1.

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

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9. Signature:  Date:

15	/	8	/	16
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Representor 50

50/2/S2/0



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Policy S2 identifies a settlement hierarchy with the Coalville Urban Area identified as the most sustainable location for further growth in the district. This approach is supported.

The Coalville Urban Area is defined as comprising Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone and Whitwick as well as the Bardon employment area.

The definition of the Coalville Urban area should be amended to include the settlement of Ravenstone as part of the wider Coalville Urban area for policy purposes. The settlement is as well related in functional terms to Coalville and the main facilities available in the town centre as Thringstone and Whitwick. There is good public transport connectivity and the Sustrans cycle route 52 provides a safe largely off-road connection to the town centre. Recent consents for development in the settlement recognise the location's sustainability credentials. Inclusion of Ravenstone within the Coalville Urban Area would provide more robust and consistent definition of the main urban area.

The definition of Donisthorpe as a Sustainable Village is supported. The settlement provides for a range of services and facilities and good public transport and is a suitable location for some further housing growth.

Western Range Limited has interests in land at Ravenstone, Donisthorpe and Whitwick which provide sustainable opportunities for additional housing and should be included as allocations. Plans of these additional sites are included as part of these representations.

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

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Policy S2 should be amended to include Ravenstone within the definition of the Coalville Urban Area.

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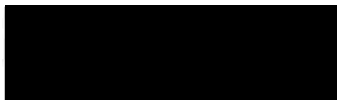
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As part of its representations on the Submission Plan, Western Range Limited is suggesting additional housing allocations and the provision for reserve sites to ensure that sufficient flexibility is built in to the plan. It is important that Western Range Limited is represented at the examination so that the merits of this approach can be explained and the suitability of the additional allocations outlined.

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Date:

15/8/16

Representor 50

50/3/51/0



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Policy S1 sets out a minimum housing requirement for the plan period of 10,400 dwellings and indicates a commitment to an early review of the plan if the HEDNA indicates an additional housing need in North West Leicestershire.

In our response to paragraphs 5.8-5.10, we have argued that the plan needs to take a more proactive approach to dealing with this soon to be available new evidence and, rather than committing to an inevitable early plan review, should build flexibility into the plan through additional allocations.

Increasing the overall requirement to some 12,000 dwellings would provide a flexibility allowance of some 15%.

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

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Policy S1 should be amended to provide sufficient flexibility to address the potential implications of the HEDNA, including the provision of reserve sites. It is suggested that the policy be amended as follows:

"Over the plan period to 2031 provision is made for a minimum of ~~10,400~~12,000 dwellings (520-600 dwellings each year), 96 hectares of land for employment purposes and 7,300 sq metres for shopping purposes....."

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

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Date:

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Representor 50

50/4/H3/0



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Part B - Please use a separate sheet for each representation

Name or Organisation:

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Policy H3 sets out proposed additional allocations at Ashby de la Zouch and Coalville to help meet future housing requirements, along with a reserve site at Measham in the event that the route of the HS2 prohibits development on land west of High Street.

As part of our representations on the plan, we have set out the need for greater flexibility to be built in to the strategy through a combination of additional housing provision and reserve sites to allow the potential implications of the HEDNA to be addressed effectively without the need for an early review of the plan.

Western Range Limited has interests in land at Ravenstone, Donisthorpe and Whitwick that offer suitable opportunities for additional allocation or reserve site provision to help provide this required additional flexibility.

Plans of these recommended additional allocations are included as part of these representations, and a brief summary of the sites is set out below.

Land at Ibstock Road, Ravenstone – This land provides for a logical extension of a residential site currently under construction, with the capacity to accommodate

a further 24 dwellings. The Local Plan Proposals Map shows the land as within the defined limits to development for Ravenstone.

Land at Chapel Street, Donisthorpe – This land lies to the west of Donisthorpe and there is potential for the development of around 100 dwellings on this site.

Land at Church Lane, Whitwick – Policy S2 identifies Whitwick as forming part of the Coalville Urban Area and the most sustainable location for further development in the district. The site is located to the south of Church Lane and south of Whitwick Cemetery. Although identified as part of wider Area of Local Separation proposed under Policy EN5, the site relates well to existing built development along Church Lane and further development in this location would not threaten the separate identities of Whitwick and Coalville.

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

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The Policy and the Proposals Map should be amended to include the additional sites identified above.

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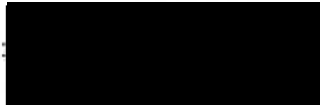
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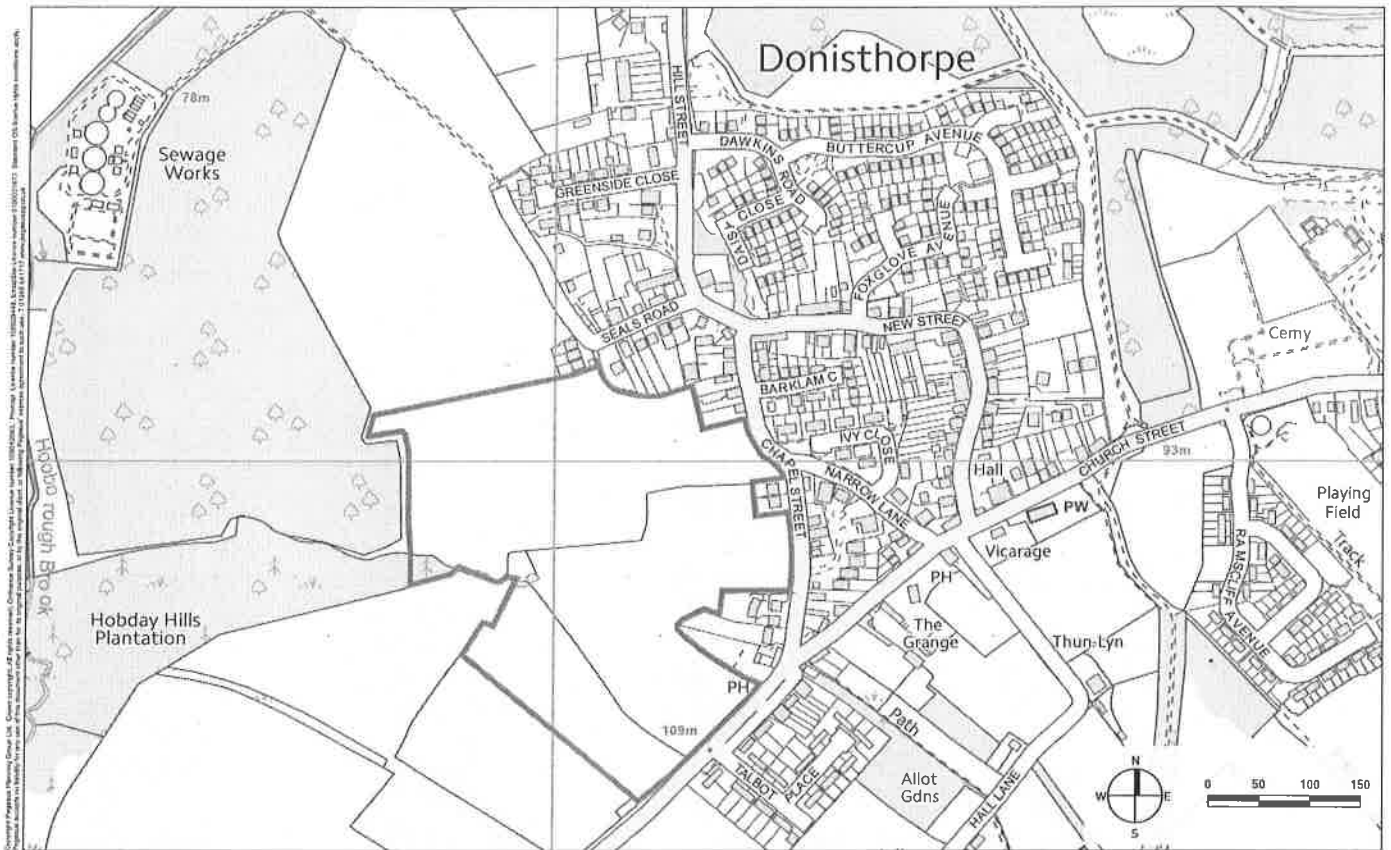
Date:

15/8/16



LAND OFF CHURCH LANE, WHITWICK - LOCATION PLAN

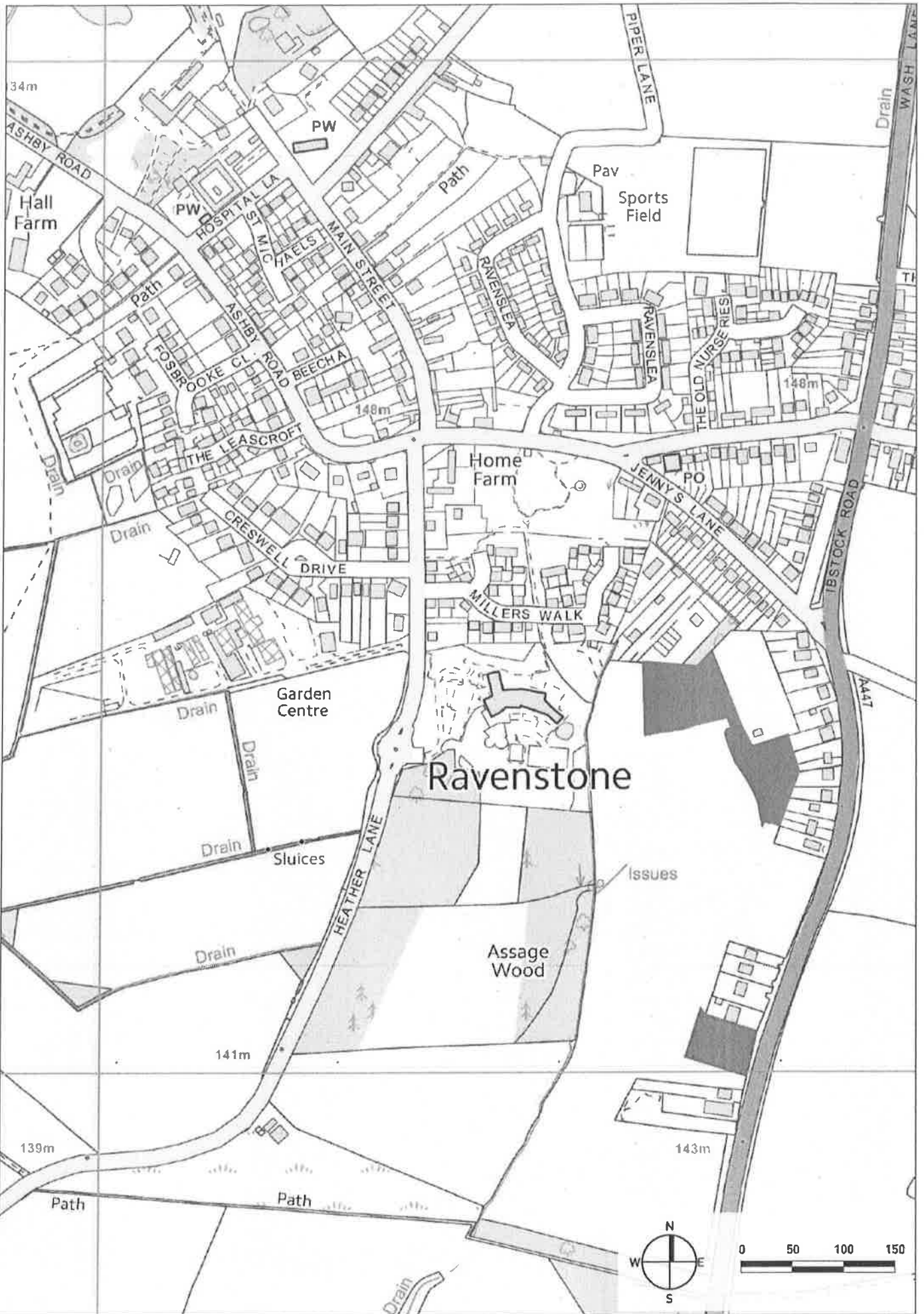
TEAM/DRAWN BY: JF | APPROVED BY: GL | DATE: 27/11/15 | SCALE: 1:5000 @ A4 | DRWG: EMS2774_001 SHEET NO: 1 REV: - | CLIENT: WESTERN RANGE



LAND OFF CHAPEL STREET, DONISTHORPE - LOCATION PLAN

| TEAM/DRAWN BY: JF | APPROVED BY: GL | DATE: 27/11/15 | SCALE: 1:5000 @ A4 | DRWG: EMS2774_003 SHEET NO: 1 REV: - | CLIENT: WESTERN RANGE |

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LAND OFF IBSTOCK ROAD, RAVENSTONE - LOCATION PLAN

Representor 50

50/5/En5/0



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As part of submissions in relation to Policy S3, we have argued that additional allocations are necessary to provide sufficient flexibility in the plan to deal with the potential implications of the HEDNA. Land south of Church Lane, Whitwick, in the control of Western Range Limited, is considered to represent a suitable site for additional allocation.

The submission plan shows the site as forming part of a larger Area of Local Separation between Coalville and Whitwick. However, the site lies on the northernmost edge of the defined Area of Separation, adjoining existing built development off Church Lane. Development on the site would not threaten the separate identity of Coalville and Whitwick or the integrity of the wider Area of Local Separation.

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The Proposals Map should be amended to remove land south of Church Lane from the Area of Local Separation and identify it as a housing allocation under Policy H3.

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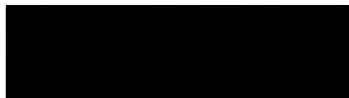
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Paragraphs 5.8 and 5.9 outline the proposal to provide a minimum of 10,400 dwellings over the plan period, and explains how the Council intends to take account of the findings of the Housing and Economic Development Needs Assessment (HEDNA). As paragraph 5.9 of the plan notes, results of this new study are likely to be available in September 2016 and a new Memorandum of Understanding (MOU) between the HMA authorities will follow.

Whilst the decision of the Council to proceed with the Local Plan is understood, given the timing of the likely availability of this new evidence, it is critical that the plan includes appropriately robust mechanisms to deal with this new evidence.

Paragraph 5.10 refers to Policy S1 and the intention to undertake an early review of the Local Plan in the event that the HEDNA or any subsequent MOU requires additional provision to be made.

It is considered that this approach is an insufficiently robust response to likely changes in circumstance in relation to housing and employment needs that will almost inevitably mean an early review of the plan.

A more appropriate response to this issue would be to build sufficient flexibility in the plan, through a combination of additional allocations and reserve sites, to allow the Council to respond to the findings of the HEDNA without necessarily requiring an early plan review. At its meeting on the 9th May 2016, Harborough's Executive approved an approach to its emerging Local Plan including a 15% allowance to address potential issues arising from HEDNA.

The Local Plan Expert Group report to Government dealt with the issue of flexibility and the need for plans not only to ensure a 5 year supply of housing land, but also to ensure a more effective supply of housing land for the medium to long term. The report recommends the provision additional flexibility over and above the identified objectively assessed housing need, along with provision for developable reserve sites equivalent to 20% of a council's housing requirement (para 11.4 and recommendation 41, Local Plans Expert Group Report).

It is recommended that the Council adopt this approach. In response to Policies S1 and H2 and H3, we have identified specific opportunities to provide this additional flexibility and provide for reserve sites, through the inclusion of additional sites. Western Range Limited has interests in land at Whitwick, Donisthorpe and Ravenstone where there is the opportunity for further release for housing. The sites were promoted through earlier stages of the plan and the recent SHLAA update. For completeness, details of the sites are included in our response to policies H2 and H3.

(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.

The plan needs to be amended to provide sufficient flexibility to deal with any implications arising from the HEDNA through the inclusion of additional site allocations and reserve site provision. Paragraph 5.10 should be amended to explain this approach to flexibility.

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

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.

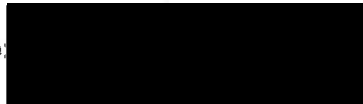
Yes, I wish to participate at the oral examination

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

As part of its representations on the Submission Plan, Western Range Limited is suggesting additional housing allocations to ensure that sufficient flexibility is built in to the plan. It is important that Western Range Limited is represented at the examination so that the merits of this approach can be explained and the suitability of the additional allocations outlined.

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:

15/8/16