



Ref:

(For official
use only)

NORTH WEST LEICESTERSHIRE LOCAL PLAN

Proposed Modifications Consultation - Representation Form

Following the Examination hearing sessions held in January and March 2017, Mr Brian Sims BSc CEng MICE MRTPI, the Independent Planning Inspector appointed on behalf of the Secretary of State, has requested that the Council now undertake consultation on a number of **Main Modifications** (MM) required to make the Plan sound in the light of new documentary evidence provided since the Plan was submitted for examination. This is without prejudice to the Inspector's ultimate conclusions and recommendations on the Plan and whether there will be any further hearings after the public consultation.

Details of what we are consulting on, and why, can be found on the Proposed Modifications Consultation page of the Council website at www.nwleics.gov.uk/localplanmysay.

You can participate in the consultation online via our [consultation website](#).

Alternatively, you can complete the following form. Please complete both Part A and Part B.

If your comments relate to more than one MM you will need to complete a separate Part B of this form for each representation.

For questions where there are multiple choice answers, please indicate your choice by placing a 'X' in the appropriate box(es).

PART A – Personal Details

If you are responding on behalf of yourself, or your own organisation, please fill in all the 'Personal Details' fields. If an agent is appointed, please complete only the Title, Name and Organisation boxes in the Personal Details column, but complete all the 'Agent's Details' fields.

| | Personal Details | Agent's Details (if applicable) |
|----------------------------------|-----------------------------------|---------------------------------|
| Title | Mr | |
| First Name | Richard | |
| Last Name | Bennett | |
| Job Title (where relevant) | Head of Planning and Regeneration | |
| Organisation (where relevant) | Charnwood Borough Council | |
| Address Line 1 | Southfields Road | |
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| Telephone | ██████████ | |
| Email address | ████████████████████ | |

| | | | | |
|--|----|-----|--|----|
| Did you comment at publication stage of the Local Plan? | ✓ | Yes | | No |
| If yes, what was your representor ID number? (You can find your Representor ID on our Examination webpages) | 54 | | | |

| Do you wish to be notified of subsequent stages of the Local Plan? | | | | |
|--|---|-----|--|----|
| Publication of Inspector's Report | ✓ | Yes | | No |
| Adoption of the Local Plan | ✓ | Yes | | No |

PART B – Your Representation

Please use a separate sheet for each representation

1. To which part of the consultation does this representation relate?

Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Publication Local Plan

| | |
|---|----------------------------------|
| ✓ | Main Modification |
| | Additional Modification |
| | Policies Maps |
| | Sustainability Appraisal Reports |
| | HEDNA |
| | Other new documents and evidence |

If you have chosen 'Sustainability Appraisal Reports,' 'HEDNA' or 'Other new documents and evidence' please identify the specific document:

2. Main or Additional Modification number to which your representation relates (or paragraph number if you are commenting on another document).

MM3
MM13 & MM29
MM8

3. Please provide comments below, being as precise as possible. Comments can support, as well as object to the MM concerned with reference to the new documentary evidence listed on our website – www.nwleics.gov.uk/localplanmysay. (Expand the box if needed)

Objectively Assessed Need (MM3)

Main Modification 3 sets out the Objectively Assessed Need (OAN) identified in HEDNA for the period 2011-31 of 481 dwellings per annum. The modifications do not however explain that this figure includes an upward adjustment of 56 dwellings a year (1,120 dwellings over the plan period) from the demographic led need of 425 dwellings per year to support economic growth within the District.

It is important this upward adjustment is referenced in the Local Plan. Any increase in the demographic need can only be supported by an alternative distribution of housing provision from elsewhere to be agreed through the duty to cooperate in order to avoid double counting. This duty to cooperate issue is explained in HEDNA [paragraphs 12.37 and 12.38] and was set out in the Borough Council's written and oral submissions to the examination.

Housing Provision (MM13 & MM29)

Main Modification 13 includes provision for 12,553 dwellings (20011-31), which is 30% higher than the OAN and housing requirement for the District of 9,620 dwellings (2011-31).

Main Modification 29 concludes that with new allocations (amounting to 2,555 homes to make up a shortfall identified taking account of large sites delivering beyond 2031 and uncertainties over the delivery of sites) total provision will ultimately amount to somewhere between 10,592 and 15,208 dwellings that are capable of being delivered over the plan period.

The total provision included in the plan is significantly higher than the OAN and the number of homes anticipated to be delivered once delivery constraints are considered is 972 more than are required to meet the OAN or housing requirement.

It is important that the anticipated and theoretical total over provision is explicitly recognised and accounted for at the Housing Market Area level. Taken together with the uplift in OAN to support economic growth needs, there are at least an additional 2,092 homes being planned for in North West Leicestershire (2011-31) that should be provided for by a distribution of housing in pursuit of the HMA strategy and/or to meet unmet need from other authorities.

It should be noted that the full provision before discounting for delivery concerns amounts to 15,208 homes in total (in essence, 4,516 of which are projected to be delivered beyond 2031). It is essential that this long term provision is taken into account as part of strategic planning processes for the HMA under the duty to cooperate. The Strategic Growth Plan will consider the need and distribution of homes up to 2036 and the provision within the North West Leicestershire District Local Plan 2031-36 needs to be understood within this context.

Employment Provision (MM8)

Main Modification 8 identifies the mismatch between the type of employment land identified as being needed in the HEDNA and the actual provision made by the plan. It states that the shortfall amounts to about 29 hectares when the provision is compared to the objectively assessed need for employment land identified in HEDNA.

It is important that this shortfall in employment land is considered within the context of a significant over provision of housing land within the plan. This is particularly important in the context of the upward adjustment to the housing OAN to support economic growth, which the plan does not make provision for. This raises concerns about whether the plan

as modified is robust and meets the tests of soundness in this regard.

The implication arising from a plan that delivers high housing but low jobs (rather than balancing them in accordance with evidence) is that the plan potentially results in a mismatch of commuting and migration patterns when compared to the evidence. This prevents the role of North West Leicestershire District from being understood in the context of the HMA when planning for homes and jobs. Furthermore, without reconciliation the shift in provision causes issues for the efficacy of HEDNA and its ability to be applied to the strategic plan making processes, including understanding the context for re-distribution.

The significant departure from the OAN for homes and jobs established by HEDNA and the mismatch which sees an increase in homes and a reduction in jobs requires explanation within the plan and reconciliation at the Housing Market Area level.

4. Please set out suggested revised wording if you consider further changes are necessary to make the Plan sound. (Expand the box if needed)

Main Modification 3 should be amended to explain that the OAN North West Leicestershire includes an upward adjustment to support economic growth. HEDNA is clear that this needs to be supported by an alternative distribution of housing provision to be agreed through the duty to cooperate in order to avoid double counting and this should be set out in new paragraph 5.6.

Main Modification 13 and 29 should highlight the total provision included in the plan is significantly higher than the OAN and the number of homes anticipated to be delivered is 972 more than are required to meet the OAN or housing requirement. This over provision should be recognised in the supporting text so that it can be accounted for at the Housing Market Area level. Taken together with the uplift in OAN to support economic growth needs, there are an additional 2,092 homes being planned for in North West Leicestershire (2011-31) that should be provided for by a distribution of housing in pursuit of the HMA strategy and/or to meet unmet need from other authorities.

Main Modification 13 and 29 should also note that the full provision includes homes projected to be delivered beyond 2031 and that this provision should be taken into account as part of strategic planning processes for the HMA under the duty to cooperate.

Main Modification 8 It is important that this shortfall in employment land is considered within the context of a significant over provision of housing land within the plan and the upward adjustment to the housing OAN to support economic growth, which the plan does not make provision for. The significant departure from the OAN for homes and jobs established by HEDNA and the mismatch which sees an increase in homes and a reduction in jobs requires explanation within the plan and reconciliation at the Housing Market Area level.

Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publically available and may be identifiable to my name / organisation.

I acknowledge that I have read and accept the information and terms specified under the Data Protection and Freedom of Information Statement.

Signed:



Date: 20 July 2017

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 1998. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004, save for requests of such information required by way of enactment. Your name, organisation and representations will be made publicly available when displaying and reporting the outcome of this statutory consultation stage, and cannot be treated as confidential. Other details, including your address and signature, will be treated as confidential.

You should not include any personal information in your comments that you would not wish to be made publicly available.

Your details will remain on our database and will be used to inform you of future planning policy matters and procedures. If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.

Please send completed forms to planning.policy@nwleicestershire.gov.uk or Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ (Please note that responses should be returned to the Planning Policy Team and not the Programme Officer).

The deadline for responses is Monday 24 July 2017