

████████████████████
21st July 2017

Planning Policy Team
North West Leicestershire District Council
Council Offices
Whitwick Road
Coalville
Leicestershire
LE67 3FJ

Dear Sir/Madam

North West Leicestershire Local Plan – Main Modifications Notification

Thank you for the opportunity to comment on the proposed Main Modifications to the Local Plan. These submissions are made on behalf of Davidsons Developments Limited who made representations on the Submission Draft Plan and responded to the Inspector's questions.

MM1, MM3 and MM6

These various modifications propose an amendment to the overall housing requirement reducing it from 10,400 dwellings to 9,620 dwellings. Through the examination various parties including the Home Builders Federation raised concerns that the Housing and Economic Development Needs Assessment (HEDNA) under estimates the objectively assessed housing need (OAHN) for North West Leicestershire. There remains a concern that the proposed modification provides a figure that will not meet the full OAHN for the district.

MM9

This proposed modification to Policy S1 sets out the lower figure for housing provision over the plan period and also sets out a process for the review of the plan. The modification indicates that a review involving a Regulation 18 consultation on the plan will take place by the end of January 2018 or within 3 months of the plan adoption, whichever is the later.

We have set out above the continuing concerns over the proposed OAHN for the district and these concerns apply to the proposed modifications to Policy S1. In terms of the proposed mechanism for review, given evidence presented to the examination by Leicester City Council, it is clear that the HMA authorities will need to deal with issues of unmet need and its redistribution across the HMA. In this context a commitment to an early review of the plan is critical. The proposed modification sets out a clear timetable for the review and submission of a revised plan for examination and is supported.

MM10, MM11 and MM12

These modifications amend Policies S2 and S3 to refer to the redevelopment of brownfield sites on the edge of the village. On behalf of Davidsons Developments we made representation on these proposed modifications during the examination.

At the Examination session on the 5th January 2017, the need for flexibility in housing provision to deal with changing circumstances was discussed. Following the Hearing sessions, the Inspector issued further guidance confirming actions and key dates agreed during the Hearing sessions (IN08).

Amongst other matters, the note requested the Council to provide ***'Proposed MM to Policies S2 and S3 to provide flexibility for proposals for the sustainable redevelopment of brownfield or other sites situated outside defined settlement limits'***.

The main modifications make no reference to the approach to other sites situated outside defined settlement limits as originally requested by the Inspector. It is considered that the modifications do not satisfactorily address the issue of flexibility as discussed at the Hearing session or the Inspector's request for a MM to Policy S2. Restricting the scope to consider sustainable development opportunities well related to settlements to previously developed land will provide very limited flexibility as there are likely to be few opportunities to develop previously developed sites adjoining settlements.

Policy S2 should be reworded to provide suitable flexibility for proposals for the sustainable redevelopment of brownfield or other sites outside but well related to defined settlement limits.

MM30 and MM31

These proposed modifications make amendments to Policy H4 on affordable housing and the supporting text. The table refers to minimum levels of affordable housing contribution. This does not reflect the latest viability evidence from the Council. This evidence shows that the greenfield targets for Castle Donington and Coalville are the maximum level of affordable provision that would be viable in these locations. The word minimum should therefore be replaced with 'up to'.

I hope that the above representations are helpful. Please let me know if you require any further information.

Yours faithfully



Guy Longley
Director