

Representor 69

69/1/51/0



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	Adam	<input type="text"/>
Last Name	Reddish	<input type="text"/>
Job Title <i>(Where relevant)</i>	Planning Policy Manager	<input type="text"/>
Organisation <i>(Where relevant)</i>	Frewash Borough Council	<input type="text"/>
Address Line 1	Long Eaton Town Hall	<input type="text"/>
Line 2	Derby Road	<input type="text"/>
Line 3	Long Eaton	<input type="text"/>
Line 4	Derbyshire	<input type="text"/>
Post Code	NG10 1HU	<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
Email Address <i>(Where relevant)</i>	<input type="text"/>	<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="checked" type="checkbox" value="x"/> | No | <input type="checkbox"/> |
| ii) Sound | Yes | <input checked="checked" type="checkbox" value="x"/> | No | <input type="checkbox"/> |
| iii) Complies with the
Duty to co-operate | Yes | <input checked="checked" type="checkbox" value="x"/> | No | <input 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.

Erewash Borough Council notes the proposed approach taken by North West Leicestershire District Council (NWLDC) through the Publication version of its Local Plan in delivering its objectively assessed growth needs.

As an adjoining local planning authority, Erewash Borough Council (EBC) wishes to continue its positive working relationship with NWLDC to ensure that elements of the Duty to Cooperate relating to cross-boundary spatial planning matters are able to be successfully discharged as Local Plan production progresses towards independent examination.

Of particular cross-boundary interest to Erewash are proposals for new strategic-scale employment generated by the East Midlands Gateway Rail Freight Interchange (EMGRFI), a now-approved facility located a short distance from the Borough Council's boundary with NWLDC.

EBC welcomes the approach undertaken by NWLDC in producing its draft plan which assesses the level of impact the presence of an employment facility of this scale will have on its future

housing needs which an emerging Local Plan should make suitable provision for.

Evidence published earlier this year by NWLDC within its **Review of Housing Requirements Study (2011-31)** revisits the suitability and robustness of the Council's objectively assessed housing need (OAHN). The OAHN was originally generated in 2014 through a SHMA undertaken jointly with all other Leicestershire Housing Market Area planning authorities, setting a range between 285-340 dwellings per annum (dpa). The Study has been carried out in light of the proposed EMGRFI and the impact this would have on the need to house those working at the EMGRFI, both for residents of NWLDC and those within commutable distances from nearby local authority areas. As a consequence of demographic analysis, there has been an increase in NWLDC's OAHN to 10,400 dwellings (520 dpa) over the draft plan period.

A key aspect of the Review of Housing Requirements Study is the conclusion reached on Page 83. Here, the Study outlines the forecasted impact of EMGRFI on housing needs in other areas. Erewash is named as one of four councils most impacted by the future facility, with a demographic modelling process identifying a need for the Borough to provide in excess of 10% of the 2,450 new homes required outside of the NWLDC area to support the EMGRFI workforce. In total, the Study suggests an estimated requirement of 263 homes would be necessary in Erewash, which would be in addition to the objectively assessed need of housing set through the production of the Borough Council's adopted Core Strategy (March 2014) of 6,250 homes between 2011 and 2028.

At current, Erewash Borough Council continues to work hard to deliver the scale of housing required by adopted Core Strategy policies. In a still-recovering housing market, this task remains challenging. Against this backdrop, the production of evidence supporting emerging Local Plans in adjacent local planning authorities which points towards a need to increase the Borough Council's OAHN as a result of economic factors - either in the short or longer term, will be extremely difficult to facilitate for a number of reasons – not least because of the relative stages of plan-making in our respective areas.

In response to the publication of evidence suggesting Erewash accommodates an additional number of homes, it may be prudent for the two councils under the banner of Duty-to-Cooperate to prepare a Statement of Common Ground (SoCG). This would help to clarify that Erewash Borough Council plan to continue meeting its current housing needs and North-West Leicestershire District Council will meet their OAHN through making local provision for appropriate sites solely within its area.

(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.

N/A – but the Borough Council would welcome the opportunity to clarify the likelihood of delivering any element of North-West Leicestershire District Council’s proposed housing provision in Erewash as a consequence of the EMGSFI, possibly through a Statement of Common Ground (or suitable equivalent).

(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?

n/a

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

n/a

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:

n/a

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.



12 August 2016

9. Signature:

Date: