

**TABLE E – POLICY S2 AND POLICY H7**

**Policy S2 – Future housing and economic development needs**

Do you agree with the amount of housing development we propose to make provision for? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Although not sure what basis the calculations on - whilst there may be lots of new jobs created at East Midlands Gateway a lot of people outside of the district will be getting these jobs (because of the lack of transport options for people across the district who don't have/can't afford a car) and therefore not sure that this expansion requires the significant new number of dwellings planned.	Noted and the Council is undertaking further work on this matter.		Lisa Marron	Resident
I strongly question the evidence that 10,700 houses are actually required	Noted and the Council is undertaking further work on this matter.		Mr s Whitehouse	Personal
It is important that housing provision continues to take account of factors outside the district, as indicated in the SHMA. For example ingress of workers at proposed employment sites around East Midlands airport from the Derby and Nottingham areas.	Noted and the Council is undertaking further work on this matter.		Nigel Garnham	Packington Nook Residents Association
<p>The provision sum appears to have been largely informed by totalling:</p> <ul style="list-style-type: none"> <li>- completions,</li> <li>- under construction,</li> <li>- planning permission,</li> <li>- resolution to grant</li> </ul> <p>This does not constitute an objectively assessed housing need nor does it reflect the duty to cooperate with neighbouring districts..</p> <p>NWLDC state that a study was undertaken to establish the likely delivery of homes.</p> <p>The result of this work identified need for a further 1600 homes to account for delivery shortfalls arising from delays associated with the Large SUE sites in Coalville that to date have failed to deliver a single unit since 1990.</p> <p>NWLDC elect to allocate these additional 1600 homes to a second SUE proposed at Money Hill in Ashby de la Zouch (13/00335/OUTM) which</p>	Noted and the Council is undertaking further work on this matter.		George Breed	Persimmon Homes NMID

<p>NWLDC refused 13 May</p> <p>2014. Since the consortium lodged its appeal NWLDC has reviewed its position;</p> <p>agreeing a revised scheme for 1750 homes.</p> <p>Having identified a need for an additional 1600 homes arising because of the inherent</p> <p>delays SUE sites incur; why allocate the entirety of this contingency to a second SUE</p> <p>that will be subject to the same delay?</p> <p>I would suggest at least half the contingency be used toward smaller to medium sized</p> <p>allocations spread more evenly across the district to reduce the risk of supply further</p> <p>shortfalls.</p>				
Yes	Noted and the Council is undertaking further work on this matter.		Stephen Saxby	None
Less housing, down to 6000 houses. With much of the development in the north of the district, extra housing can be catered for in adjoining authorities.	Noted and the Council is undertaking further work on this matter.		Mark Chadbourn	Emerald Eye Ltd
Yes	Noted and the Council is undertaking further work on this matter.		Alison Wright	Heather Parish Council
<p>Item 5.9</p> <p>Does not follow as most housing provision will be unsuitable. Already over 10,000 people travel into the Castle Donington area, most of these from Derby and Nottingham.</p> <p>Unless the housing provision is close to the where the increases are needed then the numbers could be unnecessary. It's no good building these in areas of little growth. Unless the developments are in the correct areas then the numbers may be too optimistic.</p>	Noted and the Council is undertaking further work on this matter.		Steve Palmer	NA
<p>HOUSING IN IBSTOCK AND SURROUNDING AREAS.</p> <p>NOT ALLOW THE OVER DEVELOPMENT OF THE AREA</p>	Noted and the Council is undertaking further work on this matter.		Mr Justin Wills-Wilson	NA
Yes	Noted and the Council is undertaking further work on this matter.		Mr Robert Harlow	Harlow Bros Ltd

<p>Making provision for an additional 10,700 dwellings in the District in the Plan period is excessive. 1,350 new dwellings are already approved for Ashby and little or no more should be added, as the existing and proposed infrastructure is inadequate for any more housing development. The Draft Ashby Neighbourhood Plan target of 1,434 dwellings is supported. Such a high level and concentration of development in the Ashby area will ultimately put under threat 'high value' open countryside in the Heart of the National Forest.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Frank Bedford, MBE</p>	<p>Willesley Environment Protection Association</p>
<p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p> <p>I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Moneyhill) is needed in the District.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Julia Fraser &amp; Henry Sharples</p>	<p>NA</p>
<p>I object to the Local Plan on the following grounds:</p> <ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</li> <li>• I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Moneyhill) is needed in the District.</li> </ul>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Jane Harris</p>	<p>NA</p>
<p>We object to the Local Plan on the following grounds:</p> <p>- We do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Anne Davis Glynis Gardner</p>	<p>NA</p>
<p>Housing development should be regularly reviewed in the light of population growth.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>F J ALLGOOD</p>	<p>Land Owner</p>
<p>No</p> <p>There is no evidence that the area needs this level of development, 10,700 is disproportionate.</p> <p>Communities grow naturally. This artificial creation will take the heart and soul out of the areas where large developments are earmarked such as MoneyHill and make them more akin to Milton-Keynes type area and not a character filled market town.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Olive kearins</p>	<p>Na</p>
<p>Develop Castle Donington, or some similar location in the north of the District, into a principle town rather than have most of the population in the Coalville/Ashby area.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>David Harris</p>	<p>Pyrotect Ltd</p>
<p>Too much housing. Should be more development of brownfield sites and not expansion of towns into green fields</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Simon Litchfield</p>	<p>Resident</p>

<ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time frame. This number should be greatly reduced.</li> <li>• I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Moneyhill) is needed in the District.</li> </ul>	Noted and the Council is undertaking further work on this matter.		Paul Riley	NA
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be significantly reduced; it's is disproportionate for our area. I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Money Hill) is needed in the District; there has already been a number of smaller developments completed or ongoing and this is already having a noticeable negative effect on our roads and facilities.	Noted and the Council is undertaking further work on this matter.		Nick Salt	NA
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be significantly reduced; it's is disproportionate for our area. I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Money Hill) is needed in the District; there has already been a number of smaller developments completed or ongoing and this is already having a noticeable negative effect on our roads and facilities.	Noted and the Council is undertaking further work on this matter.		Joanne Salt	NA
<p>I am contacting you to express my concern, shared by all members of my family, about the proposed developments in Ashby De La Zouch.</p> <p>I object to the Local Plan on the following grounds:</p> <ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced so that the character and ambience of Ashby and nearby settlements such as Blackfordby and Smisby are not irrevocably damaged. The need for new housing should be catered for by redeveloping brownfield sites in the major urban areas such as Leicester.</li> </ul>	Noted and the Council is undertaking further work on this matter.		Nigel Francis	NA
<p>I object to the local plan on the following grounds:</p> <p>- I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	Noted and the Council is undertaking further work on this matter.		Thomas Till	NA
<p>Muller Property Group support the Council's overall approach of setting a housing target that is above the objectively assessed need for the area in order to accord with the Council's economic approach, but object to the specific target set in the policy and we consider that it should be higher.</p> <p>On the specific housing target proposed we note Policy S2 states that over the plan period to 2031, provision will be made for a minimum of 10,700 dwelling and at 535 dwellings</p>	Noted and the Council is undertaking further work on this matter.		MATT WEDDERBURN	Muller Strategic Projects Limited

<p>each year, this suggested target is above the 285-350 dwellings per annum objectively assessed need figure set out in the June 2014 Leicestershire Strategic Housing Market Assessment (SHMA).</p> <p>Muller Property Group support of the approach of aligning employment and housing growth: we agree the plan strategy should be a positive approach to delivering jobs and homes. The North West Leicestershire area has excellent transport connections via road (M1 A42 A50), rail (good access to East Midlands Parkway station) and air (via East Midlands airport). It has good links to Nottingham, Derby, Leicester and Birmingham. The economic strategy will enable the area to capitalise on these advantages and gives the flexibility for the area to fully benefit from the potential future impact of HS2. We also recognise the importance of the proposed Strategic Rail Freight Interchange near to East Midlands Airport/junction 24 and we support the concept of an East Midlands Enterprise Gateway as a key part of the Council's strategy for future economic growth.</p> <p>If such an economic approach was not backed by an equivalently positive approach to provision of new housing the resulting under provision would lead to unsustainable in-commuting. We note that the SHMA figures provide a 'policy off' assessment of housing need. In translating this into a housing target for the development plan, the Council has correctly considered whether the level of housing provision should be adjusted in order to align with the evidence regarding local economic growth potential. We therefore consider that it is correct that the plan approach be one of seeking to attract new jobs and investment and further agree that this needs to be teamed with a planning approach that does not constrain the delivery of new housing. We therefore agree that uplift in the housing figure is entirely appropriate. We consider that it is critical to ensure this balance between employment and housing needs in order to integrate the social and economic dimensions of sustainable development.</p> <p>We also note that such an approach is entirely necessary to in order to accord with the National Planning Policy Framework:</p> <ul style="list-style-type: none"><li>• As a test of soundness, the plan should be 'positively prepared' (paragraph 182).</li><li>• The Government is committed to securing economic growth in order to create jobs and prosperity (paragraph 18).</li><li>• The planning system should do "everything it can to support and sustain economic growth". (Paragraph 19).</li></ul>				
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- The plan should operate to encourage and not act as an impediment to sustainable growth and significant weight should be placed on the need to support economic growth through the planning system (Paragraph 19).
- To help achieve economic growth Local Planning Authorities should plan proactively to meet development needs of businesses and supporting the economy for the 21st century (Paragraph 20).
- Planning policies should recognise and seek to address barriers to investment including lack of infrastructure, services or housing (Paragraph 21).
- Local Planning Authorities should set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth (Paragraph 21 – Bullet point 1).
- Policies and plans should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances (Paragraph 21 – Bullet point 4).

Whilst Muller Property Group consider policy S2 represents a positive approach to future housing and economic development needs we do nevertheless object to the specific housing target in policy S2 as we consider the housing target should be raised to correct historic under-provision locally, to avoid constraining the steady delivery of housing in the future and to help address the growing need for affordable homes.

Firstly Muller Property Group consider that a higher housing target is needed as a response to past under-provision in the North West Leicestershire area. Whilst the Regional Strategy no longer forms part of the development plan it does provide a measure for past performance. The housing requirement figure for North West Leicestershire in the revoked East Midlands Regional Plan was 510 dwellings per annum between 2006/7-2010/11. Significant under-provision occurred however, with a 1,207 homes shortfall for the period 2006/7-2010/11 when compared against the RS target.

This past North West Leicestershire shortfall accounted for nearly half of the overall under-delivery in Leicestershire as a whole and North West Leicestershire also had the highest percentage under-delivery at 58% of the RS target.

Whilst many LPAs saw a general decline in completions at that time owing to the recession and wider market circumstances, NW Leicestershire's downturn was pronounced and not

necessarily typical of the surrounding LPAs. It should be noted that both Harborough and Melton were ahead of their previous housing target as set by the East Midlands RSS for the five year period to 2010/11 for example.

This undersupply of housing in North West Leicestershire to 2011 will have suppressed new household formation in the area and has acted as a break on local demand going forward. Adopting a higher housing target for the 2011 – 2031 will therefore assist in achieving a desirable longer term correction in the local market.

The second point Muller Property Group wish to make in support of a higher target is that, having considered the Council's proposed trajectory for housing delivery we are concerned that housing delivery will be constrained in the future. Appendix B to the September 2015 Draft Plan provides a housing trajectory. This proposed trajectory is seen to drop away in the latter half of the plan period. Whilst projected completions of over 500 dwellings per annum are suggested between 2011–2020, thereafter completions are projected to steadily decline. Projected completions remain at c370 dwellings per annum for the last 5 years of the plan period. This is well below the current level: the Council's figures show 678 completions for 13/14 for example.

The Council's AMR and housing supply information shows that permissions granted have risen in recent years and the Council's current figures show 4,442 units on sites with planning permission and 4,178 dwellings on sites with a resolution to grant permission subject to a S106 agreement. The Council's trajectory correspondingly shows an emphasis on delivery over the middle years of the plan period from 2017/18.

We are concerned however that housing delivery will be constrained in the later years of the plan period with delivery returning to the lower levels of the recent past. A good supply of housing sites is needed in order to provide choice and competition in the market. The 678 completions figure achieved in 2013/14 shows that a higher figure going forward is deliverable.

Muller Property Group therefore consider that a higher housing target is necessary in order to "boost significantly the supply of housing" as required in para 47 of the NPPF and reduce the tailing off of completions shown in the Council's trajectory.

Finally, Muller Property Group also consider that a higher target is required in response to the rising need for affordable

homes and the constrained delivery of such housing. The need to meet affordable housing requirements is set out in para 47 and para 50 of The Framework. The Leicester and Leicestershire Strategic Housing Market Assessment, June 2014 shows a net figure of 209 dwellings need for affordable homes per annum in North West Leicestershire.

Considerable efforts need to be made by all involved in local housing markets to assist delivery and meet identified local needs for affordable homes. The Council's latest Annual Monitoring Report shows 57 affordable completions in 2011/12 and 82 affordable completions in 2012/13, well below the SHMA figure. The backlog need for affordable provision is clearly growing. A comprehensive strategy to address affordability concerns in the local market and reduce the worsening affordability gap is needed. If there is an insufficient amount of overall housing being proposed relative to housing need, then the affordability situation will continue to deteriorate.

The Practice Guidance states (at para ref 2a-029) 'the total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes'. One of the most effective sources of affordable housing provision through the plan period is likely to be provision of such housing as a component of private market developments on larger sites through legal agreements. Given recent changes in the sector and their impact on Registered Providers (such as reducing HCA funding, promoting affordable rent, and then more recently, starter homes and extending the Right to Buy to housing association properties) this is likely to become even more important source of new affordable supply going forward and will require a boosting of overall supply.

The site proposed by Muller Property Group at Ibstock (phase 1) for example will deliver around 25-30 affordable homes.

In conclusion, Muller Property Group consider policy S2 represents a positive approach to future housing and economic development but propose a housing target in the region of 12,000 dwellings (600 dwellings per annum as this would better address the impact of historic under delivery, avoid constraining the steady delivery of housing in the future and to help address the growing need for affordable homes.

<p>I object to the Local Plan on the following grounds:</p> <p>I do not agree that 10,700 new dwellings are needed in the district over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Judith K Bancroft</p>	<p>NA</p>
<p>We believe that housing need is overestimated by at least 3000 and the new housing allocation in policy H3 on greenfields at Money Hill Ashby should be withdrawn from the plan.</p> <p>For the reasons below we believe that the overall housing guestimate is unnecessarily high and at the extreme upper end of possible requirements. The estimated requirement is between 5300 and 6600 dwellings above the SHMA estimates in 1) below and makes no allowances for either the downward DCLG revision in 2) below or the miscellaneous sites likely to come forward in 4).</p> <p>1) The district-wide housing requirements used for NWLeicestershire for the plan period are well above the basic housing need of between 5700-7000 agreed in the Leicestershire Authorities Strategic Housing Market Assessment 2013 (SHMA). See DLPlan para 5.7.</p> <p>2) The plan also gives no justification for ignoring the latest Department for Communities and Local Government (DCLG) February 2015 household projections based on 2012 data. These suggest that in NWLeicestershire as at 2031 there would be just 44,000 households, 2000 less than the 46,000 used by the SHMA, see para 2.15 of the report to the NWLDC Local Plan Advisory Committee 10 June 2015</p> <p>3) The extremely large additional provision of 3700 dwellings to accommodate 50% of the 'possible new workers' at a Strategic Rail Freight Interchange on the northern boundary of the district is well in excess of the likely take-up at the distant Money Hill site in Ashby. See DLPlan paras 5.8-5.9. Will all these jobs arise, will this many workers wish to locate in the district and why should housing be provided to encourage additional environmentally unfriendly out-commuting from Ashby?</p> <p>4) The large addition of 1600 dwellings to the housing requirement to compensate for the possible deficiency in housing land take-up in Coalville is questionable and the reasons should be tackled at source rather than a replacement allocation transferred to distant greenfield sites at Ashby. DLPlan para 6.6-8.</p> <p>5) A realistic catch-all allowance should be included for the increasing number of smaller and self-build developments</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Robert Yates</p>	<p>Cliftonthorpe Residents Management Company</p>

together with land made available from as yet unidentified brownfield, small or reusable industrial sites which are bound to come forward over the plan period. DLPlan para6.9				
<p>The Town Council does not agree the 10,700 dwellings are necessary.</p> <p>Making provision for an additional 10,700 dwellings is excessive. In the Local Plan an additional 3,700 dwellings is deemed necessary because of the Strategic Rail Freight Interchange which will create 7,400 jobs.</p> <p>The location of the Rail Freight Interchange on the border of Derbyshire, Nottinghamshire and Leicestershire means the workforce will live in all three counties. If the additional dwellings were distributed between the three counties 2467 dwellings would be required in each county. There needs to be recognition that not all additional housing in Leicestershire will be required in North West Leicestershire.</p> <p>An allowance has already been made for some additional employment in the Strategic Housing Market Assessment (SHMA).</p> <p>The figure of 3,700 needs reducing to a maximum of 2,500, making a total of 9,500 additional dwellings, to reflect a more realistic distribution of housing associated with the new Rail Freight Interchange and additional dwellings already included in the SHMA.</p>	Noted and the Council is undertaking further work on this matter.		Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
<p>I object to the Local Plan on the following grounds:</p> <p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	Noted and the Council is undertaking further work on this matter.		Philip Bastow	NA
<ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced</li> </ul>	Noted and the Council is undertaking further work on this matter.		Terry Hill	NA
<ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</li> </ul>	Noted and the Council is undertaking further work on this matter.		D.Brearley	NA
<ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</li> </ul>	Noted and the Council is undertaking further work on this matter.		Sophia M	NA
<ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</li> </ul>	Noted and the Council is undertaking further work on this matter.		Mrs S Whitehouse	NA
<ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</li> </ul>	Noted and the Council is undertaking further work on this matter.		Mrs Lucy Clements	NA
<ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</li> </ul>	Noted and the Council is undertaking further work on this matter.		Mr D Spencer	NA

<p>The upper range of the OAN is supported.</p> <p>The inclusion of additional housing numbers as a result of the Strategic Rail Freight Interchange (SRFI) is supported. However the amount of additional housing numbers/jobs created is questioned.</p> <p>Background Paper 1 sets out that the PACEC study forecasts an increase in the number of jobs in the B8 Use Class (Storage or distribution) of 3,400. However, current proposals for the development of a Strategic Rail Freight Interchange (SRFI) west of Junction 24 of the M1 and north of East Midlands Airport (the East Midlands Gateway Rail Freight Interchange) envisage the creation of about 7,400 jobs, mostly in the B8 Use Class.</p> <p>#localplanmysay</p> <p>This is more than that forecast by PACEC. It is considered therefore, that whilst permission has not yet been granted for this development it would be prudent to consider a higher jobs growth figure in the B8 Use Class than that forecast by the PACEC study.</p> <p>In considering what a revised job growth figure should be it has to be appreciated that not all of the jobs created by the East Midlands Gateway Rail Freight Interchange would be over and above that forecast by PACEC.</p> <p>Some of the jobs would be included within the forecast of 3,400 jobs for the B8 Use Class but without knowing any precise proportion it cannot be sound to apply a proportion to the additional job growth.</p> <p>The Council have assumed that 5,000 of the projected job creation associated with the development (about 66%) would be additional to that forecast by PACEC. This would mean that the total revised number of jobs as at 2031 would be increased to 70,600 (i.e. 65,600 from PACEC study + 5,000). However it is considered more appropriate to calculate job growth on the full job creation figure in order to be prudent and robust (7,400 additional job creation). This would mean that the total revised number of jobs as at 2031 would be increased to 73,000 (i.e. 65,600 from PACEC study + 7,400).</p> <p>On the basis that it would be appropriate to seek to achieve a similar job density at the end of the plan period as that reported in 2011 (i.e. 0.92), a revised job total of 73,000 as outlined above would require the number of people of working age to be 67,160 (73,000 x 0.92). This is higher than the working age population projected by the OAN from the</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Angela Cornell</p>	<p>Fisher German</p>
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<p>SHMA (61,732).</p> <p>To convert this in to dwellings requirements the following calculation is undertaken:</p> <ul style="list-style-type: none"> <li>· Using data from the SHMA the number of people of working age as at 2031 (61,732) would equate to 57.18% of the total projected population as at 2031 (109,949)</li> <li>· Assume that the number of people of revised working age population (67,160) equates to 57.18% of all people in 2031 would mean that the total population would be 117,454 in 2031.</li> <li>· Based on a household size of 2.33 persons per household (from SHMA) this would equate to 50,409 household/dwellings as at 2031.</li> <li>· The SHMA identifies 38,189 households in 2011 and so the overall increase would be 12,220 (50,409 minus 38,189).</li> </ul> <p>On the basis of the above the housing requirement in the Local Plan would need to be 12,220 dwellings.</p>				
<p>I object to the Local Plan on the following grounds: I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Mr Stuart George Smith</p>	<p>N/a</p>
<p>I object to the Local Plan on the following grounds :</p> <p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>M.S. Bowyer</p>	<p>N/a</p>
<p>I object to the Local Plan on the following grounds :</p> <p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>M.M. Knight</p>	<p>N/a</p>
<p>I object to the Local Plan on the following grounds :</p> <p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Mr David Tweedale</p>	<p>N/a</p>
<p>I object to the Local Plan on the following grounds :</p> <p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Mrs Carrie Hamilton-Tweedale</p>	<p>N/a</p>
<p>I object to the Local Plan on the following grounds :</p> <p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Sarah Higgins</p>	<p>N/a</p>

Some development is always needed, but the scale in Ashby will potentially destroy much of the historic nature of the town. If you live in the conservation area then these changes will make the upkeep of the historic building more difficult as people will not want to live in areas with constant traffic jams and no parking.	Noted and the Council is undertaking further work on this matter.		Andrew Stone	NA
We need housing development in line with the needs of local people, near to job opportunities, and appropriate for our young people, not commuter housing for people who will be working outside the district in Leicester, Birmingham etc.  The amount of housing proposed round Hugglescote is completely out of proportion to the needs of the area.	Noted and the Council is undertaking further work on this matter.		Mary Lorimer	Not applicable
I object to the Local Plan on the following grounds :  I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		V Flemwell	N/a
I do not agree that 10,700 new dwellings are needed in the District over this time- frame.  The number should be reduced.  I do not agree that an additional allocation of 1,845 new dwellings ( including 1,750 on Moneyhill) is needed in the District.	Noted and the Council is undertaking further work on this matter.		Pamela Eastaugh	NA
I object to the Local Plan on the following grounds :  I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		J Hackett	N/a
I object to the Local Plan on the following grounds :  I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Mr J Martin	N/a
I object to the Local Plan on the following grounds :  I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Dr John Blythe	N/a
<ul style="list-style-type: none"> <li>• I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</li> <li>• I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Money Hill) is needed in the District.</li> </ul>	Noted and the Council is undertaking further work on this matter.		Mrs J.S Chapple	NA

* I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.  * I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Money Hill) is needed in the District.	Noted and the Council is undertaking further work on this matter.		Lesley Thom, Iain Thom, Graham Thom	NA
Totally idiotic spread of allocation, would completely destroy the town of Ashby as a traditional market town, growth is out of all proportion to current size	Noted and the Council is undertaking further work on this matter.		Trevor Davis	None
Provision already in place as per table 2.	Noted and the Council is undertaking further work on this matter.		Measham Parish Council	Measham Parish Council
The jump from 5,700-7,000 dwellings to 10,700 dwellings due to the strategic rail interchange skewing the demand us somewhat fanciful. Having perused the relevant documents I fail to see how the 7,400 potential jobs in this area right on the edge of NW Leicestershire could possibly account for this large rise. As stated many of these jobs will go to people commuting in from neighbouring districts or further afield. Furthermore the very nature of the construction phase and the transport sector suggest just that !	Noted and the Council is undertaking further work on this matter.		Mr T J Marsh	Appleby Resident
Increase the level of housing in rural areas and regenerate local infrastructure to accommodate the new influx.	Noted and the Council is undertaking further work on this matter.		Edward Hines	N/A
I object to the Local Plan on the following grounds :  I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Mr & Mrs Varden	N/a
I object to the Local Plan on the following grounds :  I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		D & K Butler	N/a
I object to the Local Plan on the following grounds :  I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Pat Wilson	N/a
I object to the Local Plan on the following grounds :  I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		C Attenborough and Y Pilkington	N/a
I object to the Local Plan on the following grounds :  I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		B Mason	N/a
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Mrs Carole Waterfield	Not applicable

I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Mr Ralph Waterfield	N/A
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced	Noted and the Council is undertaking further work on this matter.		B M Latimer	n/a
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Caroline Brown	n/a
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Mrs Dawn Gardner	n/a
<p>I challenge the stated grounds for determining the additional housing requirement. Dubious logic has been applied across the plan apparently with a specific aim in mind – allocation of all of Money Hill for housing. This is a lazy choice based on developer pressure.</p> <p>The district-wide housing requirements used for NW Leicestershire for the plan period are well above the basic housing need of between 5700-7000 agreed in the Leicestershire Authorities Strategic Housing Market Assessment 2013 (SHMA).</p> <p>The plan also gives no justification for ignoring the latest Department for Communities and Local Government February 2015 household projections based on 2012 data. These suggest that in NW Leicestershire as at 2031 there would be just 44,000 households, 2000 less than the 46,000 used by the SHMA, see para 2.15 of the report to the NWLDC Local Plan Advisory Committee 10 June 2015.</p> <p>The idea of needing houses to satisfy possible future additional job vacancies is back to front. Jobs should be provided to satisfy local need.</p> <p>The new jobs at Roxhill will attract large numbers from closer, more affordable areas such as Long Eaton and Stapleford rather than the southern end of NW Leicestershire. The allocation of an additional 3700 homes to satisfy demand from Roxhill is excessive. A figure of 2500 should be the maximum.</p> <p>Use of a job density of 1.06 to calculate the housing need in NWL is not justified. Current job density is 1.05 so the forecast is that Roxhill will hardly increase the proportion of incoming commuters.</p> <p>The large addition of 1600 dwellings to the housing requirement to compensate for the possible deficiency in housing land take-up in Coalville is questionable and the reasons should be tackled at source rather than a replacement allocation transferred to distant greenfield sites at Ashby.</p> <p>A realistic catch-all allowance should be included for the increasing number of smaller and self-build developments</p>	Noted and the Council is undertaking further work on this matter.		David Bigby	Private individual

<p>together with land made available from as yet unidentified brownfield, small or reusable industrial sites which are bound to come forward over the plan period. DLPlan para6.9</p> <p>In conclusion the overall housing numbers are unnecessarily high and at the extreme upper end of possible requirements. The estimated total housing requirement is 5300 and 6600 dwellings above the higher and lower SHMA estimates and makes no allowances for either the downward DCLG revision mentioned above or the miscellaneous sites which will become available. Given the imminent granting of 675 new holes at Ashby Money Hill by the public inquiry, if only 1075 of these additions are not required the need for a further new greenfield allocation at Ashby becomes unnecessary.</p>				
I do not agree that 10,700 new dwellings are needed in the district over this time frame. the number should be reduced.	Noted and the Council is undertaking further work on this matter.		K.V Percival	NA
We think that 10700 new dwellings is much too great a number to be imposed on the District over this timescale, and should be reduced.	Noted and the Council is undertaking further work on this matter.		Andrew and Anne Heaton	NA
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Caroline Ferrier	n/a
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Bernard Noble	n/a
<p>Whilst 10,700 dwellings is above what the OAN concludes for the District, this majority of delivery is based on permissions already granted and is based on past years information.</p> <p>The period for the OAN assessment is also dated back to 2011 which by the time of EIP and Adoption will be in advance of 5 years ago at least. The plan should in effect run from 2015-2035 and an OAN Assessment should run over this period and assess the outstanding permission on this basis in terms of delivering units.</p> <p>Assuming the Plan is adopted next year will in reality only be just within the 15 year requirement for a plan under the NPPG.</p>	Noted and the Council is undertaking further work on this matter.		Nick Wilkins	NW
Only build on brown planning land, not where developers choose to build.	Noted and the Council is undertaking further work on this matter.		Mrs Melanie Warren	Mrs Melanie Warren
Use brown sites before destroying the countryside!	Noted and the Council is undertaking further work on this matter.		Mr Clive Jayne and Mrs Patricia Jayne	Retired
The increased housing provision is welcome, however, further evidence is required to justify the increase from 7,000 to 10,700 dwellings across the plan period. The additional demand created by the SFRI is accepted, however, there is little explanation as to how this will equate to a further 3,700 dwellings being needed.	Noted and the Council is undertaking further work on this matter.		Lance Wiggins	Landmark Planning

<p>Hundreds of houses have been built on former factory sites in Coalville, these have not boosted the town centre shops. more people travel from the town for work and shopping than come to it. the only site for potential employment is the industrial estate between Bardon and Ellistown. New houses should be concentrated in that area, people are more likely to use the new cycle ways for short distances, and the council would not have wasted all that money for nothing.. As a lot of residents commute from Coalville to places such as Birmingham, Derby, and Nottingham. the Hoo Ash Roundabout area would be another logical site for housing as it`s only a short drive to the A42.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Yvonne Willars</p>	<p>retired</p>
<p>Bloor Homes Limited (BHL) note the proposal to plan to meet the housing requirement for the period up to 2031. The Council will be mindful of paragraph 157 of the Framework and the need to ‘preferably plan for a 15-year time horizon, and take account of longer term requirements’. The failure to plan for the longer term requirements beyond 2031 will place the Plan at risk of being found ‘unsound’ on the grounds of not being positively prepared. This is particularly important given the housing needs beyond 2031 have already been assessed as part of the Council’s evidence base.</p> <p>BHL understand that each local planning authority within the Leicester and Leicestershire Housing Market Area has indicated its ability to meet housing requirements to 2028 (Leicester and Leicestershire HMA Memorandum of Understanding relating to Objectively Assessed Housing Need – July 2014), although this is the subject of some debate.</p> <p>There is no certainty at this stage that there will not be unmet needs within the Housing Market Area beyond 2028, and within the plan period to 2031 or 2036. Failure to meet the housing need in full will place the Plan at risk of being found ‘unsound’ on the grounds of not being positively prepared, and this issue must be resolved between the authorities prior to the Plan proceeding to submission.</p> <p>BHL note the proposal to make provision for 10,700 dwellings over the plan period. BHL request the Council ensure the Local Plan allocates sufficient land to ensure there is flexibility to deal with circumstances where any sites allocated or committed are not delivered during the plan period in accordance with paragraph 14 of the Framework. It may therefore be appropriate for the Council to allocate additional land as a contingency to satisfactorily address this matter.</p> <p>In addition, the Plan should include a mechanism for review, should the need arise. Such a mechanism or trigger is considered necessary to ensure the Plan is effective and</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Jennifer Towers</p>	<p>Bloor Homes Limited</p>

robust.				
Yes	Noted and the Council is undertaking further work on this matter.		Ruth Hamm	teacher
Ashby has already fulfilled its quota of housing development beyond the time frame for this local plan and its medieval road system cannot cope with any more traffic. The local schools are full. Developers tend to make provision for primary education disregarding provision at secondary level. In particular Ivanhoe College and Ashby School are full.	Noted and the Council is undertaking further work on this matter.		Mrs Margaret Murton	In Context
The OAN is in the range 5,700 to 7,000. There is then a statement which suggests an additional 3,700 to 5,000 homes are required, largely justified by the SRFI. There is considerable doubt about the timeframe, number of jobs and location of employees for the SRFI. The range of the OAN and the uncertainty over the SRFI suggests that a figure 1600 lower than 10700 could easily be justified. There is an insufficiently robust argument to suggest that additional housing allocations are required beyond those already approved.	Noted and the Council is undertaking further work on this matter.		Chris Smith	Resident
5,700 to 7,000 within the ONA, therefore to go way beyond this is unnecessary and potentially damage the district, particularly to propose a 61% increase in the size of Ashby with no coherent plan as for how the town centre / infrastructure / road system / schools etc. will cope with this speculative development.	Noted and the Council is undertaking further work on this matter.		Tim Gregory	Ashby Control Engineering Ltd.
No	Noted and the Council is undertaking further work on this matter.		Mr. j Lewis	1950
The c25% increase proposed in the number of dwellings in the District is far too high , as the majority of workers for economic growth in the EMA area will come from outside the District ie from Nottingham/Derby/Long Eaton . So the 10,700 should be reduced.	Noted and the Council is undertaking further work on this matter.		Michael Ball	Individual
Firstly;in 5.4 it says birth rates are increasing; in fact there was a slight decline in the year to mid 2014 according to the ONS. Therefore the amount of housing is somewhat arbitrary and seems based on uncertain predictions and on the equity release scheme for the south of England-otherwise known as HS2 being adopted. Though the HS2 station is not that close it would clearly have a knock on effect of local migration to cheaper districts such as the Coalville area. The infrastructure is creaking now and pollution from excess traffic is a known health risk. The assumption that houses will be needed for an increasing population is self fulfilling. People will tend to move to where there are empty houses if the transport links are good enough. People are also prone to commute if encouraged to do so-another environmentally damaging trend.	Noted and the Council is undertaking further work on this matter.		Steve Johnson	YYYY

<p>Any housing development is problematic especially for villages like Appleby Magna which already had a fair amount of housing provided for the size of the village. Taking into account the current facilities these will not be sufficient for the increase in housing.</p> <p>The sites with permission should include houses suitable for local people rather than saying we need yet more housing sites.</p>	Noted and the Council is undertaking further work on this matter.		Mrs Paula Ashfield	Paula Ashfield
Assuming that there is clear and evidenced need and demand for the numbers of new dwelling proposed, the rate of development is steady and managed, that local communities are consulted, and that development includes a sufficient number of genuinely affordable homes available to rent as well as buy.	Noted and the Council is undertaking further work on this matter.		Hugh James	n/a
<p>Having read the local plan consultation document, whilst not an expert and just a general member of the public, I'm struggling to accept that the suggested 10,700 houses is an appropriate forecast, as I'm certainly of the opinion that this forecast figure is too high.</p> <p>I struggle to accept that the forecasted job growth, mainly referenced to the possibility of the new East Midlands Gateway development, would result in so many new people deciding to live in the Coalville, North West Leicestershire district area. Should the East Midlands Gateway be approved, which is far from confirmed, then to assume that so many new people would decide to live in North West Leicestershire, and then travel approximately twenty miles to this new proposed location of work, is highly unlikely in my opinion.</p>	Noted and the Council is undertaking further work on this matter.		J Ball	N/A
Yes	Noted and the Council is undertaking further work on this matter.		Paul Varty	Resident of Appleby
Yes	Noted and the Council is undertaking further work on this matter.		John Edwards	XMOS Semiconductors Ltd
There is a significant increase from 3500 to 5,700-7,000 or to 535 per annum compared with only 350. This needs to be substantiated, not least because of the scale of impact on Ashby.	Noted and the Council is undertaking further work on this matter.		Tim Abbott	Householder
<p>Too high. EMG is given too much weight here.</p> <p>There is no Duty to Cooperate, no HMA review and too many assumptions made in the calculation.</p> <p>Commuting dynamics and the fact that some businesses at EMG will merely relocate from existing premises and employees are more likely to commute from their existing homes rather than move.</p>	Noted and the Council is undertaking further work on this matter.		Jane Tebbatt	Quarrying

Yes	Noted and the Council is undertaking further work on this matter.		Heather Parish Council	Heather Parish Council
No	Noted and the Council is undertaking further work on this matter.		JON WALTERS	LPT
In the context of the national housing shortage and affordability crisis, it would seem sensible to provide more houses, as the SHMA suggests, particularly given that the higher target previously set by the Regional Plan has led to years of under-delivery and the numbers of households on the Council's waiting list. The Authority must be realistic, pragmatic and proactive in securing sufficient homes to meet local needs across the District to ensure the housing shortage does not continue.	Noted and the Council is undertaking further work on this matter.		Tim Farley	Copesticks Ltd.
The plan proposes to provide for more homes than has been identified in the Strategic Housing Market Assessment (SHMA). Assuming that this adjusted figure has been informed by robustly testing the evidence available to the Council insofar as job creation is concerned, in principle Erewash is supportive of this approach.	Noted and the Council is undertaking further work on this matter.		Andrew Johnson	Erewash Borough Council
<p>The amount of housing required includes a consideration of the PACEC report figures (5,600 jobs) and EMEG (7,400 jobs) – should the amount of housing also give consideration to figures detailed in the Local Growth Plan? (15,000 jobs including EMEG).</p> <p>The Council detail that delivery in Coalville is now beginning with lots more housing starts in the last 12 months than previously. However, it is acknowledged that viability is often marginal in Ibstock and Coalville (DTZ), and it appears that some assumptions about the trajectory on committed sites, or sites with a resolution to approve, were not informed by discussions with developers or promoters.</p> <p>We therefore question the delivery of housing assumed, and, whether the Council has sufficient deliverable land to meet a 5 year supply. In addition, more realistic assumptions about the likely rate of delivery on some large sites in particular, might identify that the Council do not have a residual supply of housing which is contrary to the position that the Council have sufficient sites permitted or proposed for allocation.</p>	Noted and the Council is undertaking further work on this matter.		Steve Harley	Oxalis Planning on behalf of Cordovan Holdings Ltd

<p>The amount of housing required includes a consideration of the PACEC report figures (5,600 jobs) and EMEG (7,400 jobs) – should the amount of housing also give consideration to figures detailed in the Local Growth Plan? (15,000 jobs including EMEG).</p> <p>The Council detail that delivery in Coalville is now beginning with lots more housing starts in the last 12 months than previously. However, it is acknowledged that viability is often marginal in Ibstock and Coalville (DTZ), and it appears that some assumptions about the trajectory on committed sites, or sites with a resolution to approve, were not informed by discussions with developers or promoters.</p> <p>We therefore question the delivery of housing assumed, and whether the Council has sufficient deliverable land to meet a 5 year supply. In addition, more realistic assumptions about the likely rate of delivery on some large sites in particular, might identify that the Council do not have a residual supply of housing (contrary to the position that the Council have sufficient sites permitted or proposed for allocation).</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Steve Harley</p>	<p>Oxalis Planning on behalf of the Trustees if Curzon Coaker Settlement</p>
<p>The Strategic Housing Market Assessment (SHMA) identified that housing need in North West Leicestershire for the period 2011 to 2031 equates to a total of between 5,600 and 7,000 dwellings.</p> <p>However, I understand that the revised proposed total of 10,700 houses for the region to 2031 is already satisfied through existing construction and planning permissions and those where a resolution to grant planning permission has already been given.</p> <p>On this basis, it seems logical that Ashby does not need the additional 1,750 houses on the Money Hill site.</p> <p>Whilst appreciate that it is possible that not all of the proposed building will take place, in the absence of more information, we need to work on the assumption that it will, otherwise there is a very real danger that the town's infrastructure will be overwhelmed.</p> <p>Given that central Ashby is at risk of flooding (P15 Draft Local Plan, September 2015), we need to take care that any additional building does not add to surface water run-off and add to the risk.</p> <p>As such, I suggest that we avoid building on greenfield sites and instead allocate the brownfield site of the former Arla Dairies factory as the only additional site for housing development within Ashby.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Elaine Robinson</p>	<p>Not applicable</p>

<p>We agree with the use of the term "minimum", as this provides flexibility for the future and changes in circumstances. Development policies should reflect this and make the plan adaptable to changes in need/government advice.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Mrs Penny Bicknell</p>	<p>Les Stephan Planning Ltd</p>
<p>Minimise the amount of land given for housing by building only small and medium sized, affordable houses and never build on greenfield until the brownfield options have been exhausted.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Lesley Colley</p>	<p>None</p>
<p>The provision for 10700 dwellings is excessive. Even the high Objectively Assessed Need of 5700-7000 should not be reached.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>George F Stapley</p>	<p>NA</p>
<p>I object to the Local Plan on the following grounds: I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Ruth Lovett</p>	<p>N/a</p>
<p>10,700 new dwellings is far too many and this number should be reduced. The type of homes needed should be looked into over this period.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Alan James Griffin</p>	<p>N/a</p>
<p>The plan identifies the need for 10700 houses in the 20 year period to 2031. This is more than 50% higher than the OAN proposed in the Leicestershire SHMA of June 2014. That OAN took account of "normal" job creation and demographic changes. The justification for the much higher number is the housing needs, because of the location of the EMG, many potential employees will be located in neighbouring council districts. Further work should be done, in conjunction with neighbouring councils, to more accurately assess the impact on housing needs in NWLDC.</p> <p>An increase in the housing stock of 10,700 represents an increase of about 27% of the 2011 housing stock. The government is urging councils to grant permissions to build at the rate of C250,000 per annum. In the 20 years to 2031 this would add about 5 million houses to the housing stock, an increase of about 18%. It is not clear why NWLDC should be aiming for an increase of 27% (i.e. 50% higher than the governments aspirational target). The figure 10700 looks far too high.</p> <p>The fact that the council can already identify sites for 10700 houses, (and taking no account of windfall sites that will inevitably become available) indicates that housing land supply is sufficient for a significant period after 2031. This should enable the council to plan much more effectively for the impact of development on infrastructure -roads, schools, health facilities etc. rather than being forced into ad hoc decisions by aggressive and opportunistic developers</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Malcom Allsop</p>	<p>NA</p>

<p>We do not agree that 10,700 new dwellings are needed in the District over this time-frame, and the number suggested should be considerably reduced. At present the infrastructure in the town is under considerable strain even coping with the existing population. Our doctors are unable to offer appointments within an acceptable time and people have to resort to attending hospital A&amp;E departments, adding to their already strained services, or alternatively go to the walk in centre in Loughborough, which is dependent on their being able to drive, as the bus service is very limited. Our existing schools have to provide additional accommodation through the provision of port-a-cabins which we would argue is totally unsatisfactory.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Mr DG and Mrs MP Heath</p>	<p>N/a</p>
<p>I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Moneyhill) is needed in the district</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Name unclear</p>	<p>n/a</p>
<p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Lesley Anne Good</p>	<p>n/a</p>
<p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>T Anderson</p>	<p>n/a</p>
<p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Chris and Monika Ingamells</p>	<p>n/a</p>
<p>Making provision for an additional 10,700 dwellings in the district in the plan period is excessive.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>David Colclough</p>	<p>N/a</p>
<p>Can somebody please explain why so many new homes are 'needed' in this country or in this area? Astronomic numbers are quoted in the papers, on the news, by the politicians and treated as factual statements. Our country is not huge, i understand that we are already the most densely populated. Do we just blindly build until no space remains? People find it difficult to get on the housing ladder. Perhaps experience is the key word here? Abuse of the system by unscrupulous landlords? Many houses are built that are not even slightly affordable. Considering our local situation, Ashby is already spreading in every direction. Our roads are congested, out schools are full, our doctors (by their own admission) can no longer cope and yet more homes are proposed!!</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>D &amp; P Hamilton</p>	<p>N/a</p>
<p>The Local Plan addresses the development of shopping areas and business areas. The strategy identifies that development should not detrimentally effect services for residents of the area, so I argue that the Local Plan should include a section to address the development of required amenities, not just shopping and business but also amenities such as health care and education. If it is not stipulated here how can a development be shown to be feasible or sustainable for the residents?</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Alison Saxby</p>	<p>N/A</p>

<p>KPC find that the overall amount of housing proposed for the Parish is acceptable, but that the type of housing required needs to be appropriate for Kegworth. We note that the Development at Slack and Parr</p> <p>Is now approved for 188 houses and that the outline planning application for 150 houses off the A6 is to go to Committee on 1st December 2015.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Vicky Roe</p>	<p>Kegworth Parish Council</p>
<p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Christine Iddon</p>	<p>n/a</p>
<p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Anthony Iddon</p>	<p>n/a</p>
<p>The 2014 Strategic Housing Market Assessment which was undertaken across Leicester and Leicestershire identified an objectively assessed need of 350 new dwellings per annum in North West Leicestershire district. However, in having regard to other evidence, North West Leicestershire District Council does not believe that the Strategic Housing Market Assessment makes sufficient allowance for jobs in the storage and distribution sector in the district – in particular, a strategic rail freight interchange near to East Midlands Airport and Junction 24 of the M1 which could create 7,400 jobs. Therefore, North West Leicestershire District Council has concluded that additional housing needs to be provided to maintain the balance between jobs and homes. Consequently, the draft Local Plan makes provision for a housing requirement of 535 dwellings. This is 185 dwellings per year more than the objectively assessed need for the district identified in the Strategic Housing Market Assessment.</p> <p>To date, the objectively assessed need identified in the Strategic Housing Market Assessment has been taken as the housing requirement for each of the councils within the Housing Market Area. For example, the current Memorandum of Understanding between Leicester and Leicestershire councils is directly based on the objectively assessed need identified in the Strategic Housing Market Assessment.</p> <p>If the housing requirement in North West Leicestershire is to be set at a level higher than its objectively assessed need, it is important that the effect that this could have upon the objectively assessed need for other council areas within the Housing Market Area is considered and agreed under the duty to co-operate. This is because the Inspector is likely to pursue this issue as a line of enquiry at Examination. For example, it is unlikely that all of the 7,400 jobs will be filled by people who live outside of Leicester and Leicestershire and therefore it would be expected that some to the jobs will be filled from within the Housing Market Area. If this is the case, if the housing requirement is increased in North West Leicestershire</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Adrian Thorpe</p>	<p>Oadby and Wigstan Borough Council</p>

<p>district, then it might be expected that the housing requirement would fall in other district areas within the Housing Market Area. To date, no work along these lines has been undertaken although North West Leicestershire District Council has indicated that it may be able to undertake some work to explore this issue.</p> <p>Any future updates to the Housing Market Area wide housing and economic needs assessments would also provide an effective way to undertake such a piece of work. This would enable the issues that have led North West Leicestershire District Council to increase its housing requirement above its objectively assessed need to be considered in the context of the objectively assessed need for all of the council areas in the Housing Market Area.</p> <p>The Strategic Housing Market Assessment also identifies affordable housing need per annum. For North West Leicestershire, this equates to about 60% of its objectively assessed need of 350 dwellings per annum and about 40% of its housing requirement of 535 dwellings per annum that is identified in the draft plan.</p> <p>The draft plan does not consider the effect that a higher housing requirement would have on affordable housing need either within North West Leicestershire district or the wider Housing Market Area. Rather, paragraph 6.24 of the draft plan states:</p> <p>‘it is important to note that the affordable housing need figure identified in the Strategic Housing Market Assessment is not in any way related to or influenced by the overall housing need figure, but is simply an estimate of the need for affordable housing having regard to a range of factors including the number of emerging households, housing waiting list demand, house prices and income levels’.</p> <p>Affordable housing, insofar as the Strategic Housing Market Assessment is concerned, has come under particular scrutiny in the Borough of Oadby and Wigston during a planning appeal relating to land at Cottage Farm, Oadby (the decision of which is currently being challenged through the Court of Appeal). The affordable housing need per annum in the Borough, which equates to 163% of the objectively assessed need of 100 dwellings per annum, is significantly different to that of North West Leicestershire district. As such, the Borough Council would wish to be assured that the approach taken by North West Leicestershire District Council in setting a housing requirement that is higher than its objectively assessed need will not increase the affordable housing need per annum in the Borough. The statement at</p>				
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paragraph 6.24 of the draft plan could usefully be amended in order to provide this necessary level of assurance in relation to other district areas in the Housing Market Area.				
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced. Such an unsustainable number of proposed houses should be reduced.	Noted and the Council is undertaking further work on this matter.		Mr P S Dyer	n/a
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced. Such an unsustainable number of proposed houses should be reduced.	Noted and the Council is undertaking further work on this matter.		Mrs S Dyer	n/a
I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.	Noted and the Council is undertaking further work on this matter.		Lorna Titley	n/a
It is not clear from the plan how the relationship with South Derbyshire has been taken into account with regard to the calculation of the housing needs. Quite clearly the western part of the District in close proximity to Woodville and Swadlincote has strong links with those sustainable settlements and that there is a high degree of inter connection.	Noted and the Council is undertaking further work on this matter.		Tom Beavin	jvh planning
<p>The Labour Group are sanguine with a figure of 10,700 new homes (policy S2) over the Plan Period. However, we will point out:</p> <p>(a) Objections to jobs and homes are being planned at opposite ends of district. This is unsustainable to those who cannot afford or choose to have personal transport. The Sky bus is of no use to most areas of southern/western NWL. The jobs at the Airport Jobs are inaccessible to people who cannot drive due to disability or low income.</p> <p>(b) The number of Planning Permissions given over the last few years for new housing more or less equates to the number of homes required. Whitehall now require evidence that land identified for housing will be able to 'deliver' new housing within the Plan Period. The Labour Group are not convinced that many of the planning permissions given will be delivered within the Plan Period due to 'market conditions'.</p> <p>(c) More land will need to be identified to guarantee to Whitehall the deliverability of new homes within the Plan Period. No doubt this will be contentious with many communities and the need for community engagement will be urgent if the Council is to meet the 2017 deadline for approval of the Local Plan by the Secretary of State (SoS)</p> <p>(d) The Labour Group considers that any rush to identify additional land from the SHLAA to satisfy new guidance on 'deliverability' will mean more speculative bids from developers to put their land in the local plan. The Labour</p>	Noted and the Council is undertaking further work on this matter.		Sue McKendrick	Labour Group leader

<p>Group are sympathetic to objections from Ashby residents to 'additional land' being made available at Money Hill</p> <p>(e) We question why this council has not taken up the Government's position on building a new freestanding Garden Village? This option needs to be seriously considered. A site could be found that will not overwhelm existing larger settlements. A situation close to the trunk road network would be convenient for the commuters who appears to be this council's priority.</p> <p>(f) The former and abandoned Regional Spatial Strategy (RSS) identified new housing requirements for Leicestershire in 2005. NWLDC in 2006 opted for Option 2b – which considered that around 12,500 new homes were required. In 2015 we are not far off that original figure.</p> <p>Suggested Changes. Zone new housing and employment within easy walking distance of each other.</p>				
<p>My clients disagree with both the quantum of housing proposed within the Local Plan and its spatial distribution. The approach to spatial distribution is provided in a response to later questions.</p> <p>The issue of the amount of housing development proposed within the Local Plan is clearly a matter of great importance, particularly as the Government clearly signals its intention for Local Planning Authorities to “boost significantly the supply of housing”, and use their evidence base to meet the “full objectively assessed needs for market and affordable housing” (para 47 NPPF).</p> <p>Paragraphs 182 and 157 of the NPPF also engender the principles of planning “positively” to meet these “objectively assessed” needs for development along with ensuring that the Local Plans which deliver a response to such needs are “positively prepared”, “justified”, “effective” and “consistent with national policy”.</p> <p>Firstly, Chapter 5 of the Local Plan clarifies the role of Policy S2 “Future Housing and Economic Development Needs”. It clarifies that for housing, the draft Local Plan makes provision for a minimum of 10,700 new homes from 2011-2031. Expressed annually, this is requirement for a minimum of 535 new dwellings each year.</p> <p>It is important to note that the approach to the quantum of housing is currently being considered by a Planning Inspector engaged in a Section 78 Appeal within North</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Christopher Lindley</p>	<p>Development Planning and Design Services</p>

<p>WestLeicestershire. In November 2015, the Appellants; Gladman Developments Limited presented evidence relating to an appeal at "Land South of Greenhill Road, Coalville" (ref APP/G2435/W/15/3005052).</p> <p>The evidence presented to the Inquiry by both the Local Planning Authority and the Appellant was very detailed and it goes to the heart of the adequacy of the approach to the housing requirement set out in the draft Local Plan. It is of significant importance for both this consultation and the future preparation of the Local Plan.</p> <p>As such, in this instance my clients reserve the right to reconsider their position following the outcome of the Appeal Inspector's findings. It would be only sensible for the Council to do the same given the circumstances.</p> <p>Notwithstanding this, it is clear that there have been numerous issues raised by the Appellants in the Appeal that would suggest the evidence underpinning the housing requirement is flawed and does not follow the policies of the NPPF and the guidance contained within the Planning Practice Guidance (PPG). Whilst a number of issues were identified, in essence, the main issue that requires a robust response is the implications of responding to job creation arising from the East Midlands Gateway, a strategic employment development.</p> <p>The PPG suggests that Local Authorities should take appropriate account of economic forecasts when undertaking housing and economic development needs assessments. In this instance it is not apparent how NWLDC have made a robust adjustment to its calculation of its OAN to account for job creation from East Midlands Gateway, particularly as it is absent from the outputs of the SHMA. Tellingly it is acknowledged in the draft Local Plan (background paper 1 para 4.18) that the quantum of job creation and the role of the employment land study (PACEC) and therefore its impact upon the OAN "is clearly open to debate".</p> <p>In such circumstances and for the purposes of this consultation (and subject to the findings of the Planning Inspector) my clients consider it appropriate to adopt the approach to establishing OAN which has been advocated by Gladman and their consultant Barton Willmore in evidence presented to the appeal and consider that it would be more appropriate for the Council to adopt a housing target of 637 dwellings per annum (2011-2031). It is not considered necessary to carry out a step by step analysis of that evidence as the Council will be well aware of its content.</p>				
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<p>We agree that the amount of development identified should be viewed as a “minimum”. The reference to annual housing supply (535 dwellings each year) should acknowledge that this is an “average” figure throughout the plan period and that in practice, this annual amount is liable to change – especially if there is a need to recover shortfalls in delivery in previous years.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Andrew Thomas</p>	<p>Thomas Taylor Planning</p>
<p>The plan states that permission has been given already for 10,754 houses but then goes on to say that 1,900 of these will not be built by 2031. This already shows a serious weakness in NW Leicestershire planning that permissions have been given that will not be implemented for 15 years. If these permissions are taken into account there is no need for any further builds in the draft plan period.</p> <p>The requirement for an additional 10,700 houses is excessive and inappropriate at this stage. The reference to 3700 houses to cater for the proposed Strategic Rail Interchange is unrealistic and seems to be based on the false assumption that most of the workforce will live in NW Leicestershire whereas, in fact they are just if not more likely to live in Derby or Nottingham. The allocation based on this unjustified and unproven assumption needs accurate and more realistic calculation which would produce a significant reduction in need. In any event, the Rail Interchange is still not a foregone conclusion</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Robert Nettleton</p>	<p>NA</p>

<p>Reference is made to the 2014 Strategic Housing Market Assessment and the figure of 285-350 dwellings a year required to meet objectively assessed needs over the proposed plan period 2011-2031. It is understood that the proposed annual provision for the plan of 535 dwellings a year reflects the additional houses it is considered to be needed to maintain the balance between homes and jobs, taking account of the proposals for a Strategic Rail Freight Interchange near East Midlands Airport.</p> <p>The proposals to plan for an uplift of housing to reflect employment growth is supported and is consistent with guidance contained in the National Planning Practice Guidance.</p> <p>Before the Council finally establishes the level of housing provision for the purposes of the Local Plan, it is considered that an update of the Housing Market Assessment should be undertaken in conjunction with the other HMA authorities, using the most recent 2012 household projections and also taking account of both the employment growth issues relating to the Strategic Rail Freight development but also potential issues of unmet need arising from Leicester City.</p> <p>In addition the Council should extend the plan period to 2036, both to ensure that plan provides for a 15 year time period on adoption and also to align with other HMA authorities who are now looking to plan for the period to 2036.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Guy Longley,</p>	<p>Pegasus Group on behalf of Davidsons Developments Limited.</p>
<p>Para 5.9 states the identified need for the delivery of 10,700 dwellings between 2011 and the end of the plan period in 2031 at a measured rate of 535 dwellings per annum.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Martin Ladd</p>	<p>Housemartin Design</p>
<p>Para 5.0 states the identified need for the delivery of 10,700 dwellings between 2011 and the end of the Plan Period in 2031 at a measured rate of 535 dwellings per annum.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Martin Ladd</p>	<p>Housemartin Design</p>

<p>The draft plan proposes an annual figure of 535 dwellings a year over the plan period to 2031. This is above the figure outlines in the 2014 Leicester and Leicestershire Strategic Housing Market Assessment. The draft Plan explains that the higher figure takes account of the proposals for a Strategic Rail Freight Interchange at East Midlands Airport.</p> <p>Uplifting the housing figure to reflect employment growth is in accordance with advice set out in the National Planning Practice Guidance. It is however considered that a comprehensive review of the 2014 SHMA is required to reflect up to date evidence and take account of employment growth issues across the HMA.</p> <p>The plan proposes a plan period to 2031. Extending the period to 2036 would be more appropriate and would help to ensure the plan provides for at least 15 years on adoption.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Helen Prangley</p>	<p>Western Range</p>
<p>Having worked at East Midlands Airport there were very few staff from the Coalville area I believe this will be the same regarding The East Midlands Gateway development due to my comments above I feel that the 10700 is an over estimate</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Mr &amp; Mrs M Bennion</p>	<p>N/a</p>
<p>10700 houses is too high. The need for houses to support economic development in Castle Donington realistically will be shared with Derby and Nottingham, thus reducing need by 1000 houses.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>C Tandy</p>	<p>Ashby de la Zouch Civic Society</p>
<p>I would be grateful if you could kindly accept my below mentioned comments, with reference to the request for feedback re: North West Leicestershire District Councils (NWLDC) Draft Local Plan Consultation 2015.</p> <p>In summary:</p> <ul style="list-style-type: none"> <li>Having read the local plan consultation document, I cannot accept that the suggested 10,700 houses is an appropriate forecast, as I'm certainly of the opinion that this forecast figure is too high.</li> </ul>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Jonathan Bell</p>	<p>n</p>

<p>The National Planning Policy Framework (NPPF) makes clear that local authorities should ensure that their local plans are based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area. It goes on to say that local planning authorities should ensure that their assessments of, and strategies for housing, employment and other uses are integrated and that they take full account of relevant market and economic signals.</p> <p>The Council is proposing to adopt a housing requirement of 10,700 new dwellings for the period 2011-2031 (or 535 dwellings per annum). This compares with the 9,700 dwellings (388 dwellings per annum) requirement for the period 2006-2031 that the Council proposed in the Submission version of its Core Strategy DPD.</p> <p>The Council argues that a requirement of 10,700 is justified by reference to the Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) prepared for the Leicester and Leicestershire local planning authorities by GL Hearn in June 2014. This modelled a range of growth scenarios and, for North West Leicestershire District, generated a potential housing requirement ranging from 285 dwellings to 350 dwellings per annum.</p> <p>Following completion of the SHMA the Housing Market Area (HMA) authorities agreed a Memorandum of Understanding (MOU) which confirmed that each authority was able to accommodate the upper range of the new housing requirements contained in the SHMA for the period to 2028. The District Council proposed a requirement of 7,000 dwellings (350 dwellings per annum). Importantly the SHMA makes clear at page 13 that “the conclusions on housing need do not take account of land supply, development or infrastructure constraints” and goes on to say that “the local authorities will need to consider these issues in deriving a ‘policy on’ distribution of housing.”</p> <p>The Council’s justification for increasing its housing requirement from 7,000 dwellings (350 dwellings per annum) to 10,700 dwellings (535 dpa) is set out within Local Plan Background Paper 2 – Policy S2: Future Housing and Economic Development Needs. It explains that the working age population estimate in the assessment of future economic needs (prepared by PACEC) (64,952) is higher than the OAN working age population forecasts used in the SHMA (61,732). This, in turn, has a knock on effect for total population, household sizes and number of households within the District. Accordingly, the Council has decided to increase its housing requirement to 10,700 so as to help it meet its economic</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Tim Evans</p>	<p>Bilfinger GVA</p>
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<p>objectives.</p> <p>Fully Objectively Assessed Need (FOAN)</p> <p>The NPPF in paragraph 47 requires Local Planning Authorities to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing, as far as is consistent with policies set out the Framework.</p> <p>Guidance in paragraph 003 of the Planning Practice Guidance (PPG) requires Local Planning Authorities to identify the scale of housing supply necessary to meet the identified need. The definition of 'need' is:</p> <p>“Need for housing in the context of the guidance refers to the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet that demand.”</p> <p>This reflects the requirement in paragraph 159 of the Framework to address the need for all types of housing and cater for housing demand and the scale of housing supply necessary to meet this demand.</p> <p>In respect of affordable housing, paragraph 029 of the PPG states:</p> <p>“The total need for affordable housing should be converted into annual flows by calculating the total net need (subtract total available stock from total gross need) and converting total net need into an annual flow. The total affordable housing need should then be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should then be considered where it could help deliver the required number of affordable homes.”</p> <p>Taking all this into account, the FOAN must consider the scale of housing supply necessary to meet the demand for both market and affordable housing in the area, taking into account the fact that the majority of affordable housing will only be delivered as a proportion of market housing. This necessitates looking at the overall level of market housing that would be necessary to deliver the affordable needs in a 'policy off' world (in other words, before any adjustments are made to reflect constraints or other related factors arising out of the NPPF).</p>				
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<p>For the purposes of these representations we have assumed that the SHMA data is robust but may need to check and challenge this in due course.</p> <p>Table 45 of the SHMA confirms a net affordable need for the District of around 209 dwellings per annum (5,225 over 25 years). Table 47 confirms that as a percentage of demographically assessed need this would be 78%.</p> <p>Evidently in the real world this level of affordable housing could not viably be delivered as a proportion of market housing.</p> <p>The SHMA at Table 48 goes on to assess the total level of market housing provision that would be necessary for affordable housing needs to be delivered in full. For North West Leicestershire District it determines an overall requirement of 836 dwellings per annum based on the delivery of affordable housing at 25% of market housing. In reality this is likely to underestimate the actual total given that not all market housing schemes will deliver affordable units (some will be on small scale schemes which fall below the affordable housing threshold; some will be on sites in the Coalville urban area where the Council has accepted reduced affordable housing contributions in lieu of payment towards the highway improvements identified in the Coalville Transport Study; and, other will be as a result of viability issues). In this regard it should be noted that since 2006 affordable housing delivery in the District has been closer to 20% of market housing.</p> <p>In the light of the above, the data indicates that, in order to meet the full affordable needs of the District, provision would have to be made for the development of at least 836 dwellings per annum. However, the SHMA (Table 84) suggests that the OAN for North West Leicestershire District should be capped at 350 dwellings per annum (a requirement of only 7,000 dwellings over the Plan period). In effect this will constrain the delivery of affordable housing below that required to meet need. Even the housing requirement put forward by the Council of 535 per annum (10,700 over the Plan period) would not meet affordable housing need.</p> <p>In order to justify not meeting the affordable housing need in full or recommending increasing the overall supply further, the SHMA points to the role of the private rented sector in making up the gap. This is clearly a policy on decision. Moreover, the distribution of the SHMA figures to the Districts was also a 'policy on' exercise. In addition, the approach taken by GL Hearn is not consistent with the NPPF which requires (i) assessment of FOAN for both market and affordable housing;</p>				
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<p>and (ii) an assessment of the impact that such a scale of development would have, having regard to policies contained within the NPPF and then, if necessary, the setting of a requirement for the District which might be lower than the FOAN if satisfying the District's housing needs in full would give rise to unacceptable adverse impacts recognised by policy. GL Hearn's approach to establishing ranges is at odds with the NPPF and critically lacking in supporting evidence.</p> <p>It follows that the figures that the District Council has relied on are not the appropriate FOAN figures to be used for setting the requirement for the amount of housing development it will deliver in its Plan.</p> <p>In the light of the above it is clear that:</p> <p>a) the Local Plan has not been positively prepared – it is not based on a strategy to meet objectively assessed development requirements (the District's requirements have not been objectively assessed);</p> <p>b) the Local Plan does not comprise the most appropriate strategy, the most up to date evidence indicates that the Council should be adopting a significantly higher housing requirement and re-defining its strategy to achieve this;</p> <p>c) the Local Plan is not consistent with National Planning Policy.</p>				
<p>From the information contained in the draft plan regarding Housing numbers it would appear we do not need any more approvals before 2031?. How many of these are much needed affordable homes? The plan should be specific and define the actual numbers being proposed in development briefs. Local people must be able to afford to continue to live locally.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Simon Weaver</p>	<p>Hugglescote and Donington le Heath Parish Council</p>

<p>We believe that housing need is overestimated by at least 3000 and the new housing allocation in policy H3 on greenfields at Money Hill Ashby should be withdrawn from the plan.</p> <p>For the reasons below we believe that the overall housing guesstimate is unnecessarily high and at the extreme upper end of possible requirements. The estimated requirement is between 5300 and 6600 dwellings above the SHMA estimates in 1) below and makes no allowances for either the downward DCLG revision in 2) below or the miscellaneous sites likely to come forward in 4).</p> <p>1) The district-wide housing requirements used for NWLeicestershire for the plan period are well above the basic housing need of between 5700-7000 agreed in the Leicestershire Authorities Strategic Housing Market Assessment 2013 (SHMA). See DLPlan para 5.7.</p> <p>2) The plan also gives no justification for ignoring the latest Department for Communities and Local Government (DCLG) February 2015 household projections based on 2012 data. These suggest that in NWLeicestershire as at 2031 there would be just 44,000 households, 2000 less than the 46,000 used by the SHMA, see para 2.15 of the report to the NWLDC Local Plan Advisory Committee 10 June 2015</p> <p>3) The extremely large additional provision of 3700 dwellings to accommodate 50% of the 'possible new workers' at a Strategic Rail Freight Interchange on the northern boundary of the district is well in excess of the likely take-up at the distant Money Hill site in Ashby. See DLPlan paras 5.8-5.9. Will all these jobs arise, will this many workers wish to locate in the district and why should housing be provided to encourage additional environmentally unfriendly out-commuting from Ashby?</p> <p>4) The large addition of 1600 dwellings to the housing requirement to compensate for the possible deficiency in housing land take-up in Coalville is questionable and the reasons should be tackled at source rather than a replacement allocation transferred to distant greenfield sites at Ashby. DLPlan para 6.6-8.</p> <p>5) A realistic catch-all allowance should be included for the increasing number of smaller and self-build developments together with land made available from as yet unidentified brownfield, small or reusable industrial sites which are bound to come forward over the plan period. DLPlan para6.9</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>David Owen</p>	<p>Cliftonthorpe Management Company</p>
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<p>As part of this Duty North West Leicestershire District Council has identified the substantial shared working which was involved in establishing housing requirements for the Housing Market Area (HMA). This was undertaken through the joint 2014 Strategic Housing Market Assessment (SHMA) and completion of a Memorandum of Understanding (MOU), which was agreed and signed by all the HMA authorities. The MOU set out the Objectively Assessed Need (OAN) for additional housing in the HMA between 2011 and 2028.</p> <p>The MOU sets out an OAN for North West Leicestershire District Council of 4,845 to 5,950 dwellings, 2011 to 2028 (285 to 350 dwellings per annum (dpa)). Through the recent Examination of the Charnwood Core Strategy it was confirmed that the Full Objectively Assessed Need for the HMA authorities is the upper figure of the range: 350 dpa in the case of North West Leicestershire. Charnwood Borough Council is concerned to note that the figure included within the North West Leicestershire Local Plan is for 10,700 dwellings, 2011 to 2031 (535 dpa). This represents a significant increase in the figures previously agreed through the MOU and has been introduced without agreement across the HMA and may impact upon the delivery of development proposals across the wider HMA.</p> <p>Charnwood Borough Council has considered the Background Paper 1 (Policy S2 – Future housing and economic development needs) which itself examines the case for an increased figure. In doing so, we would respectfully suggest that the figures in the Paper be considered in light of the SHMA (Table 10 pg 82, Table 16 pg 90 and Fig C1 pg 237).</p> <p>Charnwood Borough Council also has concerns about the methodology used in Background Paper 1 to arrive at the housing requirement. These relate to the variety of data sources used and their cross referencing, as well as the approach which has been employed to arrive at the figure.</p> <p>Charnwood Borough Council considers the format and nature of Background Paper 1 to be similar to the Charnwood Housing Requirements Study 2013. North West Leicestershire District Council may wish to consider the findings of Planning Inspector Kevin Ward, set out in his letter following the initial hearing sessions in March 2014 for the Charnwood Core Strategy Examination (Examination Library, Ref C4). The Inspector raised concerns with the use of the Charnwood Housing Requirements Study to determine the OAN as it did not provide an assessment of the housing needs of the HMA as a whole or the role of Charnwood in accommodating them. There was also significant discussion during the further hearing sessions over the relationship between housing and</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>David Pendle</p>	<p>Charnwood Borough Council</p>
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employment growth and again the Inspector looked at this at the HMA level (Planning Inspector's Final Report). In short, he did not consider it appropriate to prepare evidence or plan for housing growth without the direct involvement of HMA partners in the methodology and processing of that evidence towards an agreement.

Whilst it is recognised that the Plan shows housing provision at 1st April 2015 amounting to 10,754 units (from planning permissions and resolutions to grant planning permission) it is felt that determining an OAN for the HMA and North West Leicestershire and arriving at Housing Requirements that flow from it should happen with the agreement of the HMA authorities.

In doing so, Charnwood Borough Council will wish to explore the impact that an increased housing requirement for North West Leicestershire (above that set out in the SHMA and MOU) will have on the delivery of strategic development sites in Charnwood in the context of the housing market and maintaining supply.

Charnwood Borough Council would welcome further discussions with North West Leicestershire District Council and HMA partners on this issue to resolve our concerns and identify a suitable way forward on the matter.

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<p>In paragraph 5.7 the Council refers to an OAHN of 285 - 350 dwellings per annum for the period 2011 – 2031 as set out in the Leicester &amp; Leicestershire SHMA Final Report prepared by G L Hearn dated June 2014. As the Council is aware from the Charnwood Local Plan Core Strategy Examination Hearing Sessions the HBF and other parties were critical of the assumptions used in this calculation of OAHN. It is believed that this assessment under-estimates OAHN by failing to take full account of :-</p> <ul style="list-style-type: none"> <li>· longer term migration trends by using 5 year migration trend ;</li> <li>· unattributable population change by its exclusion ;</li> <li>· household formation rates by using a mid-point from a partial return to trend model ;</li> <li>· worsening trends in market signals ;</li> <li>· affordable housing needs ;</li> <li>· no alignment of employment and economic growth trends with the Leicestershire LEP SEP.</li> </ul> <p>Moreover the assessment pre-dates the publication of 2012 Sub National Household Projections (SNHP). The NPPG sets out that household projections produced by DCLG are the starting point for OAHN (ID 2a-015-20140306). The NPPG confirms that the 2012 SNHP are the most up to date estimate of household growth. Therefore the Council was correct in undertaking further work to consider the balancing of homes and jobs as set out in summary in paragraph 5.8 and in more detail in the Background Paper on Policy S2. Accordingly Policy S2 proposes a minimum housing requirement of 10,700 dwellings (535 dwellings per annum) for the plan period of 2011 – 2031.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Susan E Green</p>	<p>HBF</p>
<p>Having read the local plan consultation document, I cannot accept that the suggested 10,700 houses is an appropriate forecast, as I'm certainly of the opinion that this forecast figure is too high. I struggle to accept that the forecasted job growth, mainly referenced to the possibility of the new East Midlands Gateway development, would result in so many new people deciding to live in the Coalville, North West Leicestershire district area. Should the East Midlands Gateway even be approved, which is far from confirmed, then to assume that so many new people would decide to live in North West Leicestershire, and then travel approximately twenty miles to this new proposed location of work, is highly unlikely in my opinion.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Mrs Trena Elizabeth Ball</p>	<p>NA</p>

<p>Economic Growth</p> <p>Support is given to the proposed scale and location of growth for housing and employment which focuses on the Coalville Growth Corridor (which includes Ashby as well as Coalville) and the East Midlands Enterprise Gateway growth area. These are two of the five growth areas identified in the Strategic Economic Plan (SGP). The proposal to provide an increase in the number of dwellings to maintain the balance between jobs and homes is supported. As is the intent to provide appropriate levels of affordable housing, which will provide the opportunity for local families to remain in the area and access new and existing jobs.</p> <p>The approach to the assessment of OAN is welcomed as it takes full account of the most recent SHMA (2014) in that it both recognises the baseline position but has due regard to the additional economic growth that is likely to be generated through the delivery of the SEP proposals in relation to the Coalville Growth Corridor and Enterprise Gateway Project.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Sharon Wiggins</p>	<p>Leicestershire County Council</p>
<p>It is acknowledged that whilst the housing need in North West Leicestershire, based on the Objectively Assessed Need (OAN), equates to a total between 5,700 and 7,000 dwellings, NWLDC has proposed to make a provision for a minimum of 10,700 dwellings during the Plan period. This substantial increase in housing provision is related to the projected number of jobs which will become available as part of the Strategic Rail Freight Interchange (SRFI) at East Midlands Gateway where 7,400 are expected to be created. Based on the preferred option for housing distribution, Highways England notes that towns of Coalville, Ashby, and Castle Donington and the village of Kegworth have been identified for growth. All these locations are in close proximity to sections of the strategic road network, specifically the M1 and A42.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Emma Luckman</p>	<p>AECOM on behalf of Highways England</p>
<p>I do not agree that we need 10,700 new dwellings in the District over this period, the number should be far lower - where are all the people that need houses currently housed? They are surely not on the streets? If they are renting what will happen when they all vacate their rented accommodation? The answer is that the buy to let market will crash and there will be a housing surplus.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Mr M D Ensor</p>	<p>N/a</p>

<p>The draft Local Plan at paragraph 5.7 makes reference to the 2014 Leicester and Leicestershire Strategic Housing Market Assessment (SHMA), which for North West Leicestershire District Council (NWLDC) identified an objectively assessed need of 285 – 350 dwellings per annum required over the plan period 2011 to 2031. This equates to between 5,700 and 7,000 dwellings over the plan period.</p> <p>The draft Local Plan at policy S2 sets out a requirement of 10,700 dwellings (535 per annum), which is significantly higher than the SHMA requirement range of 285 – 350 dwellings per annum. It is understood that this is proposed to ensure a balance between likely jobs growth and population growth – particularly with regards to the proposal for a Strategic Rail Freight Interchange near to East Midlands Airport/Junction 24 of the M1. The proposal to plan for additional housing to reflect employment growth is supported and is consistent with guidance contained in the National Planning Practice Guidance (PPG).</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Pegasus Group on behalf of Stuart Andrews</p>	<p>Pegasus Group</p>
<p>Reference is made to the 2014 Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) and the range of 285 – 350 dwelling per annum required over the plan period to meet objectively assessed housing needs. The draft Local Plan at policy S2 sets out a requirement of 10,700 dwellings (535 per annum), for the plan period 2011-2031; this is significantly higher than the SHMA requirements (range of 285 – 350 dwellings per annum). It is understood that this is proposed to ensure a balance between likely jobs growth and population growth – particularly with regards to the proposal for a Strategic Rail Freight Interchange near to East Midlands Airport. The proposal to plan for an uplift in housing to reflect employment growth is supported and is consistent with guidance contained in the National Planning Practice Guidance (PPG).</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Pegasus Group on behalf of Miller Homes</p>	<p>Pegasus Group</p>
<p>Do not agree that 10,700 new dwellings are needed in the district. It is disproportionate.</p> <p>Do not agree that an additional allocation of 1845 new dwellings is needed. Existing developments already have a negative impact on roads and facilities.</p> <p>Do not agree that 3,100 new dwellings should be built in Ashby as there is not enough capacity.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Andrew Chapman</p>	<p>n/a</p>

<p>The Local Plan addresses the development of shopping areas and business areas. The strategy identifies that development should not detrimentally effect services for residents of the area, so I argue that the Local Plan should include a section to address the development of required amenities, not just shopping and business but also amenities such as health care and education. If it is not stipulated here how can a development be shown to be feasible or sustainable for the residents?</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Mrs. A Saxby</p>	<p>n/a</p>
<p>The Plan does not set a housing requirement that reflects the Full OAN for housing.</p> <p>GL Hearn prepared a Strategic Housing Market Assessment (SHMA) for the Leicester and Leicestershire HMA in June 2014 which recommended an OAN of 350 units per annum for North West Leicestershire. Since this date, North West Leicestershire has sought to set a figure aside and through an update to the Local Plan evidence base, has set out that in order to deliver up to 15,000 new jobs across the plan period sufficient to support the growth identified in the Employment Land Study as well as East Midlands Gateway (EMG) proposal, the OAN should be 535 dwellings per annum.</p> <p>Many of the Leicestershire authorities have raised issues with changes to the housing requirement that has been included in the North West Leicestershire and indeed, Oadby and Wigston Borough Council have suggested that the only way to understand the impact of such a change on the whole HMA is through a full review of the Leicester and Leicestershire SHMA. Gladman support this view and suggest that an update to the SHMA is undertaken to inform all of the forthcoming local plans within the HMA.</p> <p>BW consider that it is highly unlikely that 10,700 new dwellings (535 dwellings per annum) will support the generation of 15,000 new jobs across the plan period.</p> <p>Gladman commissioned Development Economics to undertake an assessment of future employment trends in the district which suggests that based on the Councils Employment Land Study and delivery of the EMG a total of 16,040 jobs will be created.</p> <p>BW have therefore undertaken a fully NPPF and PPG compliant OAN exercise for North west Leicestershire, using the forecast derived from the Development economics Work (16,040 jobs) to assess the full need for housing in the district up to 2031.</p> <p>It is also considered by BW that the 2014 SHMA prepared by GL Hearn is flawed for a number of reasons. The net-migration</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Phil Bamford</p>	<p>Gladman on behalf of Wilton Balmore.</p>

trends assumed in the SHMA require adjustment to reflect the long term net migration trends. In addition, the household formation rates used in the 2014 SHMA have not been adjusted to take account of suppression in household formation throughout the recession, particularly for 25-35 and 35-44 year olds.

The 2014 SHMA also acknowledges the presence of adverse Market Signals and although adjustment is made to the OAN to account for this, it is highly likely to be insufficient to make a significant contribution to addressing affordability.

As a result, it is concluded that the 2014 Leicester and Leicestershire SHMA does not reflect the full level of housing need within the HMA, a conclusion that is uncontroversial given the fact that the Council are not using it as the basis of their housing requirement for the emerging Local Plan.

BW's own assessment of housing need which is fully compliant with the NPPF and PPG, concludes that the OAN for North West Leicestershire lies in the range of 534 to 739 dwellings per annum.

The 2012- based Sub-national Population Projections (SNPPs) are widely recognised as being based on suppressed household formation. From analysis undertaken by BW, it is clear that the 2012 based SNPPs need to be adjusted to take account of suppressed household formation of 25-34 and 35-44 year olds such that they return to a long term trend 2008 based household formation rates.

BW have also made an adjustment to the demographic starting point to take account of long term annual average migration flows which take account of migration trends that were depressed through the severe economic downturn.

As stated previously the BW OAN has based the economic uplift OAN on the work undertaken by Development Economics which suggests an increase of 16,040 new jobs across the plan period . Adjustments are also made to take account of a gradual reduction in unemployment to average pre-recession levels and to economic activity rates to account for increasing economic participation and the changes to State Pension Age. Commuting ratios have remained constant throughout the projection period and endorsed by the PAS Technical Guidance on OANs.

Finally there is evidence of the presence of adverse market signals within North West Leicestershire which would warrant, under the guidance contained in the PPG, an uplift to the OAN based purely on demographic needs.

<p>Taking all of the above into account, it is Barton Willmores conclusion that the OAN for North West Leicestershire should be in the range of 534 to 739 dwellings per annum. It is considered that in order to ensure that the OAN is both aspirational but realistic in line with para 154 of the framework, mid -point of the range , 637 dwellings per annum should be taken as the OAN for North West Leicestershire.</p> <p>Gladman have provided as part of their response the calculation of housing numbers.</p>				
<p>Having read the local plan consultation document, I cannot accept that the suggested 10,700 houses is an appropriate forecast, as I'm certainly of the opinion that this forecast figure is too high.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Jonathan Ball</p>	<p>n/a</p>
<p>Question 4 - research carried out by DLP in September 2014 (copy attached) indicates that the housing need should reflect a range of employment led forecasts which suggest a level of between 510 and 651 dwellings per annum. Although the proposed figure of 535 dpa falls within this range, Government policy is that, in order to boost significantly the supply of housing, figures at the upper end of the range should be selected. The housing provision figure should therefore be 13,020 over the Plan period (651 dwellings per annum). This is also required because in the past household formation rates have been suppressed by under-supply in the District and affordability of housing has worsened. The assessment will therefore have to reflect the consequences of past under-delivery of housing (PPG ID 2a – 015). The latest 2014 ONS household projections should also be used and the SHMA needs up-dating to reflect this.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Sigma Plan</p>	<p>Sigma Plan on behalf of Hallam Land Management</p>
<p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number should be reduced.</p> <p>I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Moneyhill) is needed in the District.</p> <p>I do not agree that 3,100 new dwellings should be built in Ashby.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Ian Retson</p>	<p>n/a</p>
<p>10700 dwellings is considered to be at the high end of the total number of dwellings required to 2031 therefore it is not envisaged that any significant developments outside the plan should be approved</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Fiona Palmer, Clerk to the Parish Council</p>	<p>Castle Donington Parish Council</p>

<p>I do not agree that 10,700 new dwellings are needed in the District over this time-frame. The number is not justified by local need and should be reduced.</p> <p>I do not agree that an additional allocation of 1,845 new dwellings (including 1,750 on Money Hill) is needed in the District .</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Cliftonthorpe Residents c/o Robert Yates</p>	<p>n/a</p>
<p>A central tenet of the NPPF is the provision of sufficient housing to meet the needs of present and future generations, and in doing so to widen the choice of housing (para 7 &amp; 9). To achieve that it requires (para 14) that “local planning authorities should positively seek opportunities to meet the development need of their area”; and that Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change”, and set out a “clear strategy for allocating sufficient land” (para 17). More specifically, in order to “significantly boost the supply of housing” it requires (para 47) that local planning authorities use their evidence base to ensure that their Local Plan “meets the full objectively assessed needs for market and affordable housing in the market housing area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period.”</p> <p>In that regard the proposed uplift in the housing requirement set out in Policy S2 to provide a minimum of 10,700 dwellings to reflect the predicted economic growth in the District over the plan period to 2031 is supported.</p> <p>The provision of 535 dwellings per annum (dpa) is greater than the level of identified need in the Leicester and Leicestershire Strategic Housing Market Assessment (June 2014). The SHMA does, however, state (para 9.19) that “local authorities will need to consider how there [sic] emerging evidence base for housing and employment align and may need to adjust the level of housing provision which is planned for to support economic growth”. That is clearly an exercise that needs to be undertaken in the preparation of the Local Plan, and the evidence with the Background Paper presents a clear case for increasing the housing supply in the District to ensure there is a sufficient labour supply to support the predicted employment growth. That approach accords with the NPPG (2a-018-20140306) that requires the plan maker to consider making an uplift when identifying the housing need in order to avoid unsustainable commuting patterns and harming the resilience of local businesses.</p> <p>Affordable Housing</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Kirstie Clifton</p>	<p>Rossconn Group Ltd</p>

<p>However, the SHMA also states (paras 9.14) that the affordable housing evidence suggests that a higher provision of housing would be justified in the District. Tables 84 &amp; 85 in the SHMA identify an annual affordable housing need of 211 dpa for 2011-2031 and 209 dpa for 2011-2036. Clearly that is a substantial proportion of the demographic need figures given (75/78%), and in that context the PPG (2a-029-20140306) requires that “an increase in the total housing figures included in the Local Plan should be considered where it could help deliver the required number of affordable homes”.</p> <p>However, the Draft Local Plan and Background Paper make no reference to addressing affordable housing needs. This matter needs to be considered to determine whether a further uplift in provision is required, and potentially in specific locations within the District to meet identified needs. That approach would accord with provisions of the NPPF (para 54): “In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs”.</p> <p>Plan Period</p> <p>It is currently anticipated that the new Local Plan will be adopted in late 2017. That programme is ambitious given the progress made thus far, but even if that is achieved there will not be a 15-year time horizon to the end of the plan period (2031). This does not accord with the NPPF, which states that local plans should “be drawn up over an appropriate time scale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date” (NPPF, paragraph 157, point 2).</p> <p>Consequently it is suggested that the plan period should be extended to 2036 to ensure that The Local Plan has a time horizon in excess of 15 years, and longer term requirements, including an adequate level of future housing and the infrastructure required to support that, can be provided for. That period would also reflect other Housing Market Area (HMA) partners, a number of which are preparing their own local plans for the period to 2036.</p> <p>That said, the extension of the plan period must be on the basis that the Local Plan will reflect the evolving strategic</p>				
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<p>context that will emerge through the preparation of the Leicester and Leicestershire Strategic Growth Plan, be subject to review as and when necessary to ensure that it remains up-to-date, and that the identified development needs in the Borough and across the Housing Market Area (HMA) are met.</p> <p>The extension of the plan period will necessitate the allocation of additional housing sites, but as set out below those additional allocations can be used to reinforce the proposed settlement hierarchy, notably in the Sustainable Villages where the proposed provision is clearly inadequate to meet the needs of those settlements (refer to response to Question 7).</p> <p>Housing Market Area (HMA)</p> <p>In light of this requirement, the NPPF continues to refer (para 54) to the duty to cooperate with neighbouring authorities introduced by the Localism Act 2011. It later states (para 179) that “joint working should enable local authorities to work together to meet development requirements which cannot be wholly met within their own areas”. It requires (para 181) that authorities will be expected to “demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts”. Following the publication of the NPPF, the DCLG’s Chief Planner recently stated that the duty to cooperate puts a legal requirement on councils to ensure a “positive outcome” to their strategic planning discussions, and “they have got to show that they have addressed the issues and the outcome is a positive plan that meets objectively assessed needs”.</p> <p>Given the projected household growth in Leicester predicted by the Leicester and Leicestershire Strategic Housing Market Assessment (June 2014), Rosconn Group have a real concern whether the city can meet its Objectively Assessed Housing Need. Leicester City’s records demonstrate that housing delivery in the city is substantially behind their requirement, and there are clearly significant difficulties to address given their reliance on strategic regeneration sites and a large urban extension that have been substantially delayed. The Charnwood Local Plan Examination Report (para 47) highlights the lack of capacity in the city beyond 2031 to meet its own needs, and closer scrutiny of the City’s evidence base suggests that the shortfall in capacity is much more significant than that.</p> <p>Therefore, in order to ensure that the full OAN for the HMA is met, and for the District Council to fulfil its Duty to Cooperate, a proportion Leicester’s shortfall dwellings may ultimately need to be provided for in the Local Plan over and above the</p>				
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<p> dwellings required to meet the District’s own housing requirement.</p> <p>It is apparent that the needs across the HMA have not yet been addressed in the housing needs assumptions and associated annual housing requirement set out under Policy S2. The potential need to address this matter should at the very least be recognised within the policy.</p> <p>Supply</p> <p>The Local Plan Consultation does not seek views in respect of the proposed supply of housing sites (beyond the new allocations proposed) to meet the identified requirements set out in Policy S2. However, to accord with the NPPF (as set out above), it is absolutely critical that the Local Plan ensures sufficient land comes forward to meet those identified needs within the plan period and ensure that everyone has the opportunity of a decent home, through the identification and allocation of deliverable development sites. Moreover, a 5 year supply of housing land will need to be demonstrated at the point of adoption of the Local Plan.</p> <p>The difficulties of delivering substantial development sites in the District, and particularly in and around Coalville should not be under estimated. A review of the progress of large development sites in the District has highlighted that of the five sites in excess of 100 dwellings allocated in the 2002 North West Leicestershire Local Plan, development has only commenced on one site (East of Leicester Road, Ashby De La Zouch). In respect of that site planning permission was not secured until over 9 years after its allocation, and the first completions were delivered approximately 2.5 years after that. The other site allocations have not been delivered some 13 years since the Local Plan was adopted.</p> <p>Looking more widely, there are obviously delivery issues within the current land supply when construction has begun on only 16 of 49 sites included in the Housing Trajectory (and only 1 in Coalville), and when such a large part of the suggested supply is contained within sites that are just subject to a resolution to approve planning permission, notably around Coalville.</p> <p>Whilst the overall strategy to focus future housing growth within Coalville Urban Area is accepted, Rosconn Group questions whether the scale of development proposed at the town can / will be delivered within the anticipated timescale. The current housing trajectory suggests that over 300 dpa will be provided at Coalville in the first part of the plan period. However, as Background Paper 4 recognises (para 5.7) land</p>				
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values in Coalville are lower and market demand weaker than other parts of the District. That has created viability issues in relation to a number of sites, but there is also ultimately a finite amount of housing that can be sustained in Coalville. This is confirmed in the attached advice on the housing market to Rosconn Group (refer to letter dated 27th November 2015 from Martin Sansom, RICS Regulated Valuer), which highlights that a predicted delivery of 300 dpa is considered to be overly optimistic for Coalville and “the comparative low housing values in the area will be exacerbated by the over supply of housing, making viability of other sites questionable, particularly any sites with high infrastructure costs”. As a result, if completions on larger sites reduce due to lower sales volumes, this will put pressure on other areas of the District to deliver, which is “evident from developers that there is a healthy demand for smaller scale sites within sustainable locations throughout North West Leicestershire”.

Moreover, it is a very real concern that substantial elements of the suggested housing land supply are at risk. The current housing trajectory provision relies heavily on the timely delivery of a number of very large developments, most notably at South-East Coalville, which is currently anticipated to provide 1,935 of a total of a total 3,500 dwellings within the plan period (substantially more than the 905 dwellings in the same period suggested by the build out rates for included sites within the 2014 SHLAA). There are known to be significant infrastructure and viability constraints that may well prevent or at least further delay the delivery of this site. The reliance on it to meet identified housing needs at least in the short to medium term should be treated with great caution, and its contribution to the overall supply in the plan period needs to be very carefully considered (both in terms of quantum and timing). Clear evidence of the deliverability of the development is required if it is to be relied on to meet identified needs in the Local Plan.

It is accepted that predicting the timing, phasing and delivery rates of developments of the scale and complexity proposed at Coalville is inherently difficult. However, it is apparent that the number of dwellings that can be delivered within the plan period in that will be ultimately limited given the infrastructure burden and lead in times required, and the recognised market constraints, and the Local Plan must still demonstrate a deliverable supply of housing land for the first 5 years following its adoption.

The housing requirement is recognised to be a ‘minimum’ requirement, and given the clear and inherent uncertainty embedded within the District’s Housing Trajectory,

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contingency plans should be embedded in the Local Plan to address any shortfall in housing arising from a delay in the strategic sites coming forward, by allocating additional development sites in other sustainable locations and seeking to bring them forward at the earliest opportunity.

The response to Question 7 highlights the concerns Rosconn Group have in respect of the development strategy and the mismatch between the proposed settlement hierarchy in Policy S3 and the actual delivery that will result from the sites identified in Policies H1, H2 and H3 that arises from the existing commitments rather than a planned strategy of delivery. Specifically the concentration of recent past delivery and proposed delivery of housing at Coalville in particular, and also the Key Service Centres, at the expense of the Sustainable Villages, such as Heather, which have sufficient facilities to support further housing development, but no future provision is proposed.

The overall strategy of urban concentration should not be undermined, but it is apparent that a number and variety of appropriate and sustainable development sites away from the main urban area, notably in the identified Sustainable Villages, are required to come forward notably in the early part of the plan period, to accelerate the supply of housing and meet identified needs through to 2036. Those developments will also have the added benefit of meeting local development needs, supporting the services and facilities that exist in those locations, and ensuring the continued sustainability of those settlements in the long term.

Conclusion

In summary:

- The Local Plan should identify and address affordable housing needs in the District;
- The plan period should be extended to 2036;
- The potential under delivery within Leicester needs to be addressed;
- A sufficient deliverable and developable supply of housing land needs to be identified;
- That should take account of the constraints to delivery in Coalville in particular;
- Notwithstanding that contingency arrangements should be put in place to address the potential shortfall arising from

<p>elements of the suggested supply not being realised; and</p> <ul style="list-style-type: none"> <li>• The development needs of Sustainable Villages should be addressed thorough the identification of additional allocation sites.</li> </ul> <p>These matters need to be addressed in the preparation of the Local Plan in order for it to comply with the NPPF, and be considered sound.</p>				
<p>The draft Plan uses the evidence within the Leicester and Leicestershire Strategic Housing Market Assessment 2014 as a starting point to set a housing target for the district up to 2031. The City Council fully supports the use of the SHMA, and recognises the significant and constructive ongoing cross boundary co-operation across the Leicester and Leicestershire area.</p> <p>The objectively assessed housing need figure for the district set out in the SHMA has been considered alongside future employment creation evidence (from the PACEC study). As a result the draft plan states that 'additional housing needs to be provided to maintain the balance between jobs and homes'.</p> <p>As you are aware it is intended that the SHMA will be updated and replaced by a housing market area wide Housing and Economic Development Needs Assessment (HEDNA), which will provide greater clarity on the interplay between housing need and economic growth.</p> <p>It is recognised that the HEDNA will not be completed until late summer 2016. The City council considers the approach to housing set out in the draft plan reasonable and pragmatic in advance of the HEDNA.</p>	<p>Noted and the Council is undertaking further work on this matter.</p>		<p>Grant Butterworth</p>	<p>Leicester City Council</p>

**Policy H7 – Provision for Gypsies and Travellers and Travelling Showpeople**

Question 16 Do you agree with our suggested approach to the issue of making provision for gypsies and travellers? If not what changes do you suggest? - Please provide further comments;	NWL Response	Any change required?	Name	Business or organisation name;
Yes	Noted.		Lisa Marron	Resident
Yes	Noted.		Mr s Whitehouse	Personal
Yes	Noted.		Sue Colledge	colledge's florists
Yes	Noted.		Nigel Garnham	Packington Nook Residents Association
Do not agree that site provision should be made for gypsies and travellers, and travelling showpeople.	The Local Authority has a duty to meet the housing needs for all of its community, including Gypsies and travellers and Travelling Showpeople. An accommodation assessment has identified there to be a need for such provision within the district In addition, all Gypsies and travellers and travelling showpeople, living on a local authority site or a private authorised site, will be required to pay council tax, rent, gas, electric and all other charges measured in the same way as houses.		Stephen Saxby	None
Sites should not be village-based as these often change the character of a village and become communities within a community e.g. Moira where high fences and high gates have created a separate 'gated community'. Sites should be established near to major transport hubs e.g. the M1/A50/A453 interchange as even fixed sites generate a large amount of traffic.	It is the intention that sites will be identified through the Gypsy and Traveller Development Plan Document. Public consultation will be undertaken on this document. Sites should be sustainable economically, socially and environmentally. When assessing the suitability of potential sites consideration will be given to a range of issues, including traffic implications and accessibility to the road network, as well its relationship and scale with adjacent/nearby villages or settlements, as set out in Policy H7.		Mark Chadbourn	Emerald Eye Ltd
Support the provision of suitable sites, in the form of sustainable development which means that schools are suitably funded and there is adequate community resilience	Noted.		Alison Wright	
Sites should not be located in areas of open countryside of the highest value in terms of environmental value and tranquillity, prized for their recreational and amenity value and meeting the needs of local people and visitors, in terms of their enjoyment, health and wellbeing.	Sites should be sustainable economically, socially and environmentally. They should be located in or near an existing settlement which has access to a range of services. In addition, as detailed in the 'Planning policy for traveller sites', local authorities should very strictly limit new traveller site development in open countryside that is away from existing settlements, when considering planning applications for such development.		Frank Bedford, MBE	Willesley Environment Protection Association
Yes	Noted.		F J ALLGOOD	Land Owner

Nothing for them.	The Local Authority has a duty to meet the housing needs for all of its community, including Gypsies and travellers and Travelling Showpeople. An accommodation assessment has identified there to be a need for such provision within the district		None	none
Gypsies and travellers do not contribute to community well being. Do not agree that site provision should be made for gypsies and travellers, and travelling showpeople.	The Local Authority has a duty to meet the housing needs for all of its community, including Gypsies and travellers and Travelling Showpeople. An accommodation assessment has identified there to be a need for such provision within the district.		David Harris	Pyroprotect Ltd
Unable to comment due to absence of any site allocations for gypsy and traveller sites.	There will be further opportunity to comment during the preparation of the Gypsy and Traveller Site Allocation Development Plan Document. It is the intention for this document to identify and allocate sites.		Karen Edwards, Deputy Town Clerk	Ashby de la Zouch Town Council
About time you provide better facilities	Noted		Andrew Stone	NA
Gypsy and Travellers should be treated equally to the settled population	The Local Authority has a duty to meet the housing needs for all of its community, including Gypsies and travellers and Travelling Showpeople.  An accommodation assessment has identified there to be a need for such provision within the district.		Trevor Davis	None
Yes	Noted.		Measham Parish Council	Measham Parish Council
Yes	Noted.		Edward Hines	N/A
Travellers should be encouraged to purchase/rent their own sites, within the planning system. The council should not be involved with or subsidise their sites.	There will be further opportunity to comment during the preparation of the Gypsy and Traveller Site Allocation Development Plan Document. It is the intention for this document to identify and allocate sites. Regard will also be had to the possible mechanisms through which sites can be provided e.g. privately owned, privately rented, social rented.		Mr Richard Hine	Resident of Appleby Magna
We do not have knowledge of this area and therefore we feel that we are unable to comment to this response.	Noted.		Helen Stockdale	Lovell Partnerships
Proposed sites may not be respected by their intended users	The Local Authority has a duty to meet the housing needs for all of its community, including Gypsies and travellers and Travelling Showpeople.  An accommodation assessment has identified there to be a need for such provision within the district.		Lynn Bradbury	Retailmap Ltd
Yes	Noted.		David Bigby	Private individual

Object to the proposed designation of land a No 1 Fair Oak, Burton Road, Oakthorpe as Countryside given the site's current usage being for commercial purposes. It is a commercial site for Showman's accommodation and storage facilities. The historical use of the site is as a drift mine facility.	The site in question has previously had planning permission for use as a Showmens site and has been used as such. The lawful use for the land remains as a Showmens site notwithstanding the fact that it is shown as being subject to the Countryside policies. There are other instances where there is an established use (with or without buildings) which are shown as Countryside. For example, industrial buildings individual or small groups of dwellings. Policy S4 identifies that sites for Gypsies and Travellers and Travelling Showpeople as a possible exception to the Countryside policy.		Mary Smith	n/a
If they are built, rent and council tax should be paid by people who use the sites	The Local Authority has a duty to meet the housing needs for all of its community, including Gypsies and travellers and Travelling Showpeople.  An accommodation assessment has identified there to be a need for such provision within the district. Council tax is payable for those who rent accommodation on a Local Authority run site.		Mrs Melanie Warren	Mrs Melanie Warren
Yes	Noted.		Lance Wiggins	Landmark Planning
Yes	Noted.		Mr. & Mrs Loveless	Retired
Yes	Noted		Mr. j Lewis	1950
This is an ever more controversial and difficult issue. I'm sure the future outcomes will improve as the settled and travelling communities sort out their differences but there has to be give and take on both sides.	The Local Authority has a duty to meet the housing needs for all of its community, including Gypsies and travellers and Travelling Showpeople.  An accommodation assessment has identified there to be a need for such provision within the district.  National policy aims, amongst others, to reduce tensions between settled and traveller communities in plan-making and planning decisions promote peaceful and integrated co-existence between the site and the local community and reduce the number of unauthorised developments and encampments.		Steve Johnson	YYYY
Yes	Noted.		Mrs Paula Ashfield	Paula Ashfield
Yes	Noted.		Hugh James	n/a
Yes	Noted.		Tim Abbott	Householder
Yes	Noted.		Jane Tebbatt	Quarrying
Yes	Noted.		Heather Parish Council	Heather Parish Council
No	Noted.		JON WALTERS	LPT
Yes	Noted.		Lesley Colley	None

I think this section also needs to address that any new allocations of this nature should not result in breaching other clauses such as the areas of separation or detrimentally effect the capacity of local amenities, even though they do not result in physical homes being erected on the site they do use the local services and remove open space between current settlements, which needs to be considered carefully.	Noted. All the policies in the Local Plan have to be read together when reaching a decision and Policy H7 will not operate in isolation.		Alison Saxby	N/A
We oppose criteria 4a. This is too prescriptive and should be revised to say "Be located with reasonable access to a range of services, such as shops, schools, welfare facilities and/or public transport"  We oppose criteria 4e. This should be revised to say "Be capable of being provided with adequate services, including ...." In its present form it unreasonably requires these services to already exist.	There is overall support for these suggested changes. However under criteria 4a, public transport need not be preceded by 'or'. It is not considered necessary as this part of the policy just provides a list of the types of services and facilities. The other suggested changes are supported.	Criteria 4a to be amended to read "Be located with reasonable access to a range of services, such as shops, schools, welfare facilities or public transport. Criteria 4e to be amended to read "Be capable of being provided with adequate services, including ...."	A. R. Yarwood	National Federation of Gypsy Liaison Groups
Yes	Noted		Sonia Liff	Chair Appleby Environment
We cannot provide an answer to this question until we have had time to scrutinise reports and recommendations from the December meeting of the Local Pan Advisory Committee.	Noted.		Sue McKendrick	Labour Group leader
Actual site allocations should be in the plan.	It is the intention that site allocations will be contained within the Gypsy and Traveller Development Plan Document. Public consultation will be undertaken during the preparation of this document.		C Tandy	Ashby de la Zouch Civic Society
To Policy H7, part (4) (f) we request the following addition:  “(f) Be compatible with landscape, heritage, environment and biodiversity as well the physical and visual character of the area,”	Noted. It is suggested that 'heritage' is added in part 4(f). A comma should also be inserted between 'drainage' and 'sewage disposal' in part 4 (e)	Amend 4 (f) to read " Be compatible with landscape, environment, heritage and biodiversity as well as the physical and visual character of the area." Amend 4(e) to read "Be capable of being provided with adequate services, including water supply, power, drainage, sewage disposal and waste disposal facilities."	Kim Miller	National Trust
We do not require a further traveller's site. We are close to the South Derbyshire boundary. South Derbyshire has several sites in the vicinity.	The Local Authority has a duty to meet the housing needs for all of its community, including Gypsies and travellers and Travelling Showpeople.  An accommodation assessment has identified there to be a need for such provision within our district. A separate need has ben identified for site provision within South Derbyshire.		Andrea Robinson	Ashby Woulds Town Council

<p>I think this section also needs to address that any new allocations of this nature should not result in breaching other clauses such as the areas of separation or detrimentally effect the capacity of local amenities, even though they do not result in physical homes being erected on the site they do use the local services and remove open space between current settlements, which needs to be considered carefully.</p>	<p>Noted. All the policies in the Local Plan have to be read together when reaching a decision and Policy H7 will not operate in isolation. Whilst the previous Areas of Separation have not been included in the Draft Local Plan the Countryside Policy (S4) seeks to prevent development (either individually or cumulatively) that would undermine the physical or perceived separation and open undeveloped character between nearby settlements.</p> <p>In terms of allocating new sites the National Planning Policy for traveller sites (2012) does not place a restriction on the location of such sites on the grounds of a specific designation, apart from the Green Belt designation (of which there is none of in the district). With respect to amenity, the policy does allow for allocated sites to be proportionate to the scale of nearest settlements and the local services and infrastructure, as well as compatible with neighbouring properties and land use.</p> <p>With respect to windfall applications for gypsy and traveller sites, national guidance states within the section on 'Determining planning applications for traveller sites', we should "very strictly limit new traveller site development in open countryside that is away from existing settlements or outside areas allocated in the development plan." It is suggested that the draft Local Plan policy be amended to reflect this.</p>		Mrs. A Saxby	n/a
Yes	Noted		Fiona Palmer, Clerk to the Parish Council	Castle Donington Parish Council
<p>The City Council supports the inclusion in the policy of the full identified Gypsy and Traveller accommodation needs in the district as identified in the latest available evidence (Leicester and Leicestershire Gypsy and Traveller Accommodation Needs Assessment 2013). We understand that the required provision will be identified through a separate Gypsy and Traveller Site Allocations DPD rather than through the Local Plan. It will therefore be important that this DPD identifies enough site provision to meet the need identified in the latest evidence base.</p>	<p>Noted. Consultation has recently commenced on the Gypsy and Traveller Site Allocation Document as well as a Call for Sites which will run from 1 February 2016 and 4 April 2016. Both of which will feed into the production of a Gypsy and Traveller Site Allocation Development Plan Document. Both the text within the draft Local Plan and the consultation documents recognise that we should provide a five year supply of deliverable sites against locally set targets as well as a supply of developable sites or broad locations for years 6 to 10 and where possible years 11-15. The most recently available GTAA will provide the evidence base for the identified need.</p>		Grant Butterworth	Leicester City Council