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MR NEIL HOULT,



To whom it may concern

I am writing my letter to object to the application to build houses on land off Thornborough Rd, Church Lane and behind Brookas Lane, this is known as the "Green Wedge" of land between Whitwick Swannington & Coalville, which was agreed in last application in 2017 and will lead to much loss of green space between these towns and villages, and will lead to one big urban sprall. Is that what we need! we need to bring our children and grandchildren up in these green spaces. This development is not needed in this area!

P.T.O

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Roads, schools, doctors etc cannot cope with this any more!

Pockets of few houses here and there can be allowed.

North West Leicestershire must not be allowed to be a dumping area for Leicester City Council any more!

Leicester has been awarded millions of pounds from the cancelled link of HS2 to the East Midlands and

what does Leicester Council do with it? Cycle Lanes, Bus Lane, Traffic calming plans!! these will do

Nothing at all to stop congestion

when it could use some of this money to open the Leicester to Burton railway line!

So this mad sad scheme should be rejected out of hand as it is not needed or wanted has it just greedy builders who want to make money and then clear off and leave us with an urban sprawl So NO NO NO

Thank you

FRI MARCH 15th

Dear Planning Team,

I'm writing to object to all the houses going up around Coalville. 600 extra cars coming onto Thornborough Rd and Spring Lane is going to make our roads gridlocked in the morning and evening.

Broomleys Farm development will make the roads around there a no go area most of the time.

We have Prince of Wales, the Land on High Street and the old Bakehouse sites to name just 3 that should be considered before any other sites.

All the other lands are areas of separation

P. 20

and should stay as such
Have you informed the
people living around here
that you have promised
7,000 houses to be
taken from Leicester County
Council?

We are fed-up with
being a dumping ground
and it must stop.

Yours Faithfully


From: [REDACTED]
To: [PLANNING POLICY](#)
Cc: [REDACTED]
Subject: EXTERNAL: NWLDC Draft Local Plan Consultation - Representations by Define Planning and Design on behalf of Rosconn Strategic Land - Land at Curzon Street, Ibstock and Land adjacent to Sparkenhoe Estate, Heather
Date: 15 March 2024 16:01:40
Attachments: [NWLDC Draft Local Plan Consultation - Define Planning and Design on behalf of Rosconn Strategic Land.pdf](#)
[DE205b_001 Development Framework.pdf](#)
[Development Framework Plan - Land at Curzon St Ibstock.pdf](#)

Good Afternoon,

I write in relation to the Council's Draft Local Plan consultation, and submit representations by Rosconn Strategic Land (RSL) in light of their land interests at 'Land at Curzon Street, Ibstock' and 'Land adjacent to Sparkenhoe Estate, Heather' (part of which is included as a proposed allocation under reference H3).

RSL's written representations are set out in the attached Response Form. This contains comments in relation to Policies S1, S2, H1, H2, H3, AP4, AP9, H4, H7, H10, H11, INF1, INF4, INF5, and Proposed Allocation Policy H3; as marked on the Response Form.

I also attach Development Framework Plans in relation to both of RSL's land interests; which are referred to in their comments. The plans demonstrate the ability of the sites to deliver high-quality residential development, and the capacity to deliver c. 115 dwellings within RSL's land ownership at Heather, and c. 135 dwellings within RSL's land ownership at Ibstock.

I would be grateful for confirmation of the receipt of this email and the three attachments via return email. We would also welcome any opportunities to discuss the emerging Local Plan and the potential of their sites at Heather and Ibstock following the conclusion of this consultation. In the meantime, please do not hesitate to contact me if you have any queries in relation to this submission or the sites.

Kind regards
Sam

Sam Perkins
Senior Planner

Define. | Unit 6 | 133-137 Newhall Street | Birmingham | B3 1SF

[REDACTED]

Our new website is now live, take a look at www.wearedefine.com

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Draft North West Leicestershire Local Plan (2020 – 2040) Consultation - Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/localplanmysay. You can also participate in the consultation online.

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Sam
Last Name		Perkins
Job Title (where relevant)		Senior Planner
Organisation (where relevant)	Rosconn Strategic Land (c/o Define Planning and Design Ltd)	Define Planning and Design Ltd
House/Property Number or Name	████████████████████	████
Street	████████████████████	████████████████████
Town/Village	████████	████████
Postcode	████	████
Telephone	██████████	██████████
Email address	████████████████	████████████████

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?	✓	Proposed policies
		Proposed housing and employment allocations
		Proposed Limits to Development Review

2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

POLICY S1 – FUTURE HOUSING AND ECONOMIC DEVELOPMENT NEEDS:

Rosconn Strategic Land (RSL) welcomes the preparation of North West Leicestershire District Council's (NWLDC) emerging Local Plan (eLP), and the Council's intention to positively plan for development in the forthcoming plan period. That aligns with the Government's priority to ensure that all local authorities maintain up-to-date local plans, which the Secretary of State for Levelling Up, Housing and Communities considers is critical in delivering for communities and "*getting more homes built in the right places*" (Written Ministerial Statement, 19th December 2023).

In that regard, and whilst RSL support the approach that has been taken in relation to some aspects of the eLP (namely the approach to providing a proportionate amount of growth at sustainable villages such as Heather), they have some concerns as to the overall balance of the spatial strategy and consider that additional allocations should be identified. RSL's concerns are underpinned by two fundamental matters. Firstly, RSL consider that the actual level of growth that will be delivered through the plan period will fall significantly short of the housing requirement, as set out in response to Policies H2 and H3. Secondly, RSL have significant concerns as to the nature of the spatial strategy, which currently will fail to direct an appropriate level of growth to the Local Service Centres and, in the case of Ibstock, will fail to maximise its potential as a sustainable settlement and support its ongoing vitality. That is set out in response to Policy H1.

National Context:

The current acute national housing supply crisis is recognised by all of the main political parties, as is the importance of the housing industry to the nation's economy. Remedying this has been a critical policy imperative for successive Governments, with the February 2017 White Paper 'Fixing Our Broken Housing Market' presenting startling facts and figures highlighting that on average only 160,000 new homes had been delivered each year in England since the 1970s.

The White Paper highlighted that the years of under supply on a national scale have led to rising average house prices compared to earnings, declining home ownership in the under 35s, and

escalating rental costs. That is a particularly pertinent point in North West Leicestershire, as discussed further below.

The Government's White Paper also acknowledged that the under-delivery of housing has had a severe negative impact on the economy in terms of labour mobility, the construction industry, economic spend, and increasing housing benefit costs. Therefore, it is clear that those socio-economic impacts will only worsen within the area if the eLP does not begin to remedy the existing affordability issues and, in that regard, the White Paper recognised that a significant uplift in the delivery of homes is needed to address such issues where they arise.

A subsequent statement from the Ministry of Housing, Communities and Local Government (October 2018) sought to quantify the level of delivery that should be achieved on a national scale, and confirmed the Government's commitment to delivering 300,000 homes a year by the mid 2020s to address those matters; a level that has not been achieved since 1969. Recent statements by the Secretary of State for Levelling Up, Housing and Communities have reiterated the Government's commitment in this regard, including the press release relating to the publication of the latest version of the NPPF in December 2023.

Therefore, the Government's commitment to housebuilding permeates through the NPPF, which focuses (at paragraph 60) on "significantly boosting" housing delivery to address identified housing needs. The NPPF also now explicitly recognises that an area's actual housing need may exceed the base LHN that is derived from the standard method. In that context, the NPPF highlights the importance of ensuring that a sufficient amount and variety of land comes forward where it is needed, so that the housing needs of specific groups are addressed and that land is developed without unnecessary delay. It also highlights the importance of delivering a sufficient quantum of housing in rural areas to support their ongoing vitality (paragraphs 78 - 79).

The eLP should, therefore, be advanced in line with the clear importance that the Government attributes to increasing the supply of housing both to respond to the national housing crisis (which is manifesting itself in the District) and to realise the socio-economic benefits that are related to the delivery of a sufficient quantum of development.

Plan Period:

The NPPF requires local plans to "*look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities*". It also states that they should "*set a vision that looks further ahead*" to a period of at least 30 years "*where larger scale developments such as new settlements or significant extensions to existing villages and towns forms part of the strategy for the area*"; which is the case in NWLDC.

The DLP suggests a plan period of 2020 to 2040, with strategic policies prepared on that basis. To meet the requirements of NPPF paragraph 22, that would require the plan to be adopted by the end of 2025; in less than two years' time. Even based on the timescales that are set out in the DLP, that would not be achievable given that the DLP suggests that the plan would be examined in October 2025 and provides no dates for the examination process, main modifications stage or the plan's eventual adoption.

In reality, however, the timescales for the plan's adoption are likely to be much longer than that. Indeed, NWLDC will be aware that the adopted Local Plan took two-and-a-half years from Regulation 18 stage (i.e. the current stage) to adoption. This plan, however, will be prepared in a much more complex national and regional planning policy context, and therefore it is not

unreasonable to expect that the preparation of the plan will take longer still. In that regard, each period of the plan's preparation has potential for delay, and therefore each of the suggested timescales are particularly optimistic.

The DLP suggests that the publication eLP will be published for consultation within 10 months of the end of this consultation. That is a particularly short period given that, in RSL's view, NWLDC will need to entirely revisit its spatial strategy in order to fully meet the housing requirement and provide for a more balanced spatial strategy. Therefore, between the Regulation 18 and Regulation 19 consultations, NWLDC will need to process and take account of the comments that will be received through the Regulation 18 process, update the evidence base (which will require updates in relation to the spatial strategy, housing needs, the SA, viability, etc.), make the required amendments to the plan to address the matters raised by consultees, and publish the Regulation 19 plan (which itself will require political engagement and approval through NWLDC's committee process). That will clearly take significantly longer than 10 months, particularly if NWLDC is required to undertake an additional Regulation 18 consultation; which the DLP document recognises could be required.

Following on from that, the timetable set out in the DLP provides for only 3 months between the end of the Regulation 19 consultation and the submission of the plan for examination. Again, that is clearly a very optimistic assumption, given that the Council will need to replicate many of the above processes in terms of processing and considering responses, making any required amendments, and preparing the plan for submission; which will need to be approved through the Council's internal committees.

The DLP does not provide any timescales from the examination of the plan to its adoption, but that can also be a lengthy process. Firstly in terms of the commencement of the examination process, it is noted that the plan will be examined against the 2023 version of the National Planning Policy Framework (NPPF) as it will not reach the Regulation 19 stage before March 2024. Although further detail is to be provided in due course, it appears that the Government intends to 'batch' examinations of New Local Plans based on the age of the extant plan. Given that NWLDC's extant plan was adopted in November 2017 (and thus is more recently adopted than some other authorities), it is entirely likely that the eLP will not be in the first batch of plans that are examined under the new NPPF, and that its examination could be subject to delays before it begins. Likewise, the examination process itself is likely to be lengthy given the complex nature of the plan and the matters that are considered.

Therefore, in taking account of the above, it is reasonable to suggest that the eLP will be adopted in 2026 or 2027 at the earliest. As such, it is proposed that the end date of the local plan is extended to 2043 to meet the requirements of NPPF paragraph 22. That must be done at this early stage, where Sustainability Appraisal and Site Selection work can comprehensively consider the overall housing requirement, the spatial strategy, and site allocations; rather than during the examination of the plan if the Inspector was to request that NWLDC identify additional allocations to account for an extension to the plan period as a result of delays to the adoption of the plan.

Housing Requirement:

RSL welcomes the recognition within the DLP that the standard method (SM) derived local housing need (LHN) is the minimum starting point in calculating an authority's housing requirement and that, *"to arrive at a housing requirement figure for the Plan, it is necessary to*

consider a range of other factors.”

Indeed, paragraph 61 of the NPPF now explicitly highlights that there may be circumstances *“which justify an alternative approach to assessing housing need; in which case the alternative approach should also reflect current and future demographic trends and market signals.”*

The ‘Housing and Economic Development Needs Assessment’ Planning Practice Guidance (PPG) sets out further guidance in that regard. It re-affirms the Government’s commitment to ensuring that more homes are built, and their support for *“ambitious authorities who want to plan for growth”*. The PPG states that circumstances where an authority may identify a housing requirement that exceeds the SM-derived LHN include, but are not limited to, situations where increases in housing need are likely to exceed past trends because of:

- Growth strategies for the area that are likely to be deliverable, for example where there is funding in place to promote and facilitate additional growth;
- Strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or
- an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

That was accounted for in the Leicester and Leicestershire Housing and Economic Needs Assessment (LLHENA). The LLHENA, whilst noting that the District has a limited functional relationship with Leicester City, took account of the future employment growth that is anticipated to occur and made adjustments to the housing delivery figures to seek to achieve a better balance between jobs and homes. As the DLP recognises, *“in view of the existing and projected strength of the economy of the district, this resulted in a significant increase in the need for housing to 686 dwellings each year.”*

In that regard, RSL welcome the recognition that there is a need for 686 dwellings per annum (dpa) that is arising due to projected economic growth. Indeed, the LLHENA is clearly robust in its assessment of that matter, reflected by the fact that the Statement of Common Ground (SoCG) that has been prepared on the basis of the LLHENA’s findings has now been signed by all authorities as of January 2024.

With regard to affordable housing, however, the LLHENA found that there was not a basis to specifically uplift the overall housing need of the Leicestershire area on that basis, but did explicitly note that *“it is a consideration in setting a housing requirement.”* That is, therefore, a point to be considered by each local authority, and is a key issue for the eLP given that the LLHENA establishes that there is a significant annual affordable housing need of 382 dwellings per annum (dpa). That exceeds the SM-derived LHN of 372dpa, and equates to 55.7% of the re-distributed housing need of 686dpa.

Clearly, a requirement for some 55% of all housing to be affordable (compared to a requirement ranging between 5% and 30% in the extant plan) would not be viable, and there is therefore compelling evidence to increase the overall level of housing need further still to deliver as much affordable housing as possible. That would reduce the entrenchment of housing unaffordability and limit the socio-economic impacts associated with persistent affordability issues; including escalating house prices, declining ownership, increasing housing benefits costs, and limited economic growth, labour mobility, and local economic spend.

In that regard, whilst RSL welcome the DLP's use of 686dpa as a starting point to positively respond to expected economic growth, it would be prudent for NWLDC to prepare additional evidence to consider what level of additional uplift is required to begin to address the significant affordable housing need. It is not possible, however, for RSL to undertake that analysis. However, by extending the plan period to 2043, it is clear that the **housing requirement should be at least 15,778 dwellings**, rather than 13,720 dwellings as Draft Policy S1 suggests. That figure is, however, likely to be significantly higher still once an additional uplift for affordable housing provision has been applied.

Housing Supply:

The purported supply from completions, commitments and new allocations totals 14,635 dwellings, which falls short of the uplifted housing requirement as set out above. Therefore, additional housing allocations should be identified to respond to that.

However, RSL is concerned that the level of supply that will actually be realised in the plan period both from existing commitments and new allocations will be less than NWLDC expect. That is set out in their response to Policy H3, which highlights that the actual supply will fall short of the housing requirement by some 3,200 dwellings (but higher still once the housing requirement has been increased and the appropriate buffer has been incorporated). Therefore, the eLP must identify a significant number of additional sites, and RSL's response to Policy H1 sets out the merits of their site at 'Land at Curzon Street, Ibstock' and its capacity to deliver c. 135 dwellings. Likewise, the response also identifies the suitability of 'Land Adjacent to Sparkenhoe Estate, Heather' as reflected through its proposed allocation (Site Ref. H3), and highlights that the allocation should be extended to reflect the full and logical extents of the site and its capacity to deliver c. 115 dwellings.

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?	✓	Proposed policies
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2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

POLICY S2 – SETTLEMENT HIERARCHY:

Settlement Hierarchy:

RSL supports the DLP’s settlement hierarchy, which is based on the 2022 Settlement Study that is itself underpinned by an entirely appropriate methodology that takes account of the services and facilities that are present within each settlement.

lbstock:

As a result of that, the DLP recognises lbstock as one of six villages that offers the most comprehensive range of services and facilities, and also plays a key role in serving nearby settlements to ensure their ongoing functionality (see DLP paragraph 4.22). It is, therefore, identified as a Local Service Centre; which are defined as *“settlements which provide some services and facilities primarily of a local nature meeting day-to-day needs and where a reasonable amount of new development will take place.”*

Within lbstock, that includes two convenience stores, some smaller shops, a post office / parcel drop off and pick up point, two GP surgeries, two pharmacies / chemists, a nursery school, two primary schools, a community college, a library, and numerous places of worship. In addition, lbstock benefits from a good recreational offer, including a leisure centre with several pitches, a second smaller sports club, a gym, a cricket club, a bowling club, the Sence Valley Forest Park, numerous play spaces (one of which includes a skate park), and other public open spaces. It also contains numerous bars, pubs, restaurants, cafes and takeaways. The settlement also benefits from existing employment areas at Leicester Road, the Spring Road Industrial Estate and the lbstock Brick compound.

In addition to that, the settlement is well connected to nearby settlements, meaning that its residents are able to benefit from the services and facilities that are available therein. In particular, the 15 and 159 bus routes provide services between lbstock and nearby ‘sustainable villages’ and ‘local housing need villages’, as well as the higher order settlements of Coalville / Ravenstone and Hinckley. The settlement is, therefore, a key part in the functioning of the District

as a whole.

Whilst the settlement hierarchy classification of Ibstock is appropriate, RSL's response to Policy H1 highlights that the spatial strategy and site allocations fail to direct sufficient growth to the settlement to meet its housing needs and fully maximise its potential as a sustainable settlement. That is despite the DLP recognising that the six most sustainable villages (including Ibstock) should "*form the central part of our settlement hierarchy*" and "*accommodate the vast majority of new development.*"

RSL's response sets out that the DLP must facilitate further development within Ibstock in reflection of its sustainability as a settlement, to ensure that it fully responds to the localised housing needs, and to support the services and facilities that serve both the residents of Ibstock and those living in less sustainable villages in the surrounding area. That would ensure that the spatial strategy is more balanced and focuses growth to sustainable locations, which is a fundamental principle of good plan making (see NPPF paragraph 109).

Conversely, a failure to do so will result in less sustainable patterns of growth by failing to meet localised housing needs, and potentially undermine the long-term viability of key services and facilities. Therefore, it would give rise to significant adverse effects from a socio-economic and environmental perspective.

In that regard, RSL's response to Policy H1 highlights the suitability of their site at 'Land at Curzon Street, Ibstock' and its capacity to deliver c. 135 new dwellings. The site should be identified as an allocation site in the next iteration of the plan to address RSL's concerns in relation to the spatial strategy.

Heather:

The Settlement Study also correctly recognises that Heather has some services and facilities that make it an appropriate location for some growth. That includes a convenience retail store, a primary school, a community venue, a church, a football club, a recreation ground with Multi-Use Games Area, pitches and a LEAP, allotments, and a public house / restaurant. There is also a reasonable employment offer within and near to the settlement, including from Caetano and Quarry Plant and Industry Ltd. Heather is also well-connected to Ibstock, which is within a short cycling distance. As above, Ibstock has a wide range of services and facilities that are therefore accessible to residents of Heather.

Therefore, the DLP correctly recognises that some growth should be directed to Heather to reflect the services and facilities that are available within the settlement and its connectivity to Ibstock. That is in accordance with NPPF paragraph 83, which states that, "*to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities*" and that planning policies should "*identify opportunities for villages to grow and thrive, especially where this will support local services.*"

Therefore, RSL support the identification of 'Land Adjacent to Sparkenhoe Estate, Heather' (Allocation Ref. H3) as a residential allocation, and in that regard their response to Policy H1 highlights its suitability. It also highlights that, given the need for NWLDC to significantly bolster the supply of housing in the plan period to fully meet the housing requirement, the remainder of the land under RSL's control (to the north of proposed allocation site H3) should also be allocated for development, and the capacity amended to c. 115 dwellings accordingly.

PART B – Your Representation

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POLICY H1 – HOUSING STRATEGY:

RSL’s response to Policy S1 sets out that the overall housing requirement should be increased in order to incorporate an additional uplift above the 686dpa housing need to address the significant affordability issues within the District and allow for a 23 year plan period. RSL’s response to Policies H2 and H3 also highlights that the actual supply that will be realised from existing commitments and new allocations will fall short of the housing requirement (whether that is retained at the level that the DLP proposes, or is increased as suggested).

Notwithstanding those points, and whilst the spatial strategy appropriately focuses some growth to the sustainable villages (including Heather), RSL considers that the approach taken to the Service Centres must be revised to ensure that the spatial strategy realises sustainable patterns of growth by focusing growth to *“locations which are or can be made sustainable”* (NPPF paragraph 109); which is key to the soundness of the spatial strategy and the plan more widely. Currently, the proposed spatial strategy focuses insufficient growth to Local Service Centres including Ibstock, despite their sustainability and role in serving less sustainable settlements, and the inherent need for housing arising from them. In the case of Ibstock, whilst an allocation site has been identified, that site alone will not fully meet the housing needs of the settlement.

Therefore, to address RSL’s concerns, an additional allocation site must be identified in Ibstock, as set out below. Furthermore, to meet the housing requirement in full, NWLDC should allocate Site H3 (‘Land Adjacent to Sparkenhoe Estate, Heather’) to its full and logical extents.

Ibstock:

RSL has significant concerns with regard to the spatial strategy for growth at Ibstock. Notably, despite the sustainable credentials of Ibstock and its role in providing critical services and facilities to support its own population and that of nearby villages and hamlets, the DLP identifies just one allocation sites in the settlement.

Whilst it is recognised that the allocation and the existing commitments in the settlement will

deliver 592 dwellings in the plan period, that will fall significantly short of the actual need for housing in the village. Indeed, the Local Housing Needs Assessment Report 2 (LHNAR2) sets out the housing need for each settlement linked to the working housing requirement of 480dpa at that point (June 2020), and therefore the need based on a housing requirement of at least 686dpa can be extrapolated. The LHNAR2 identified a need of 634 dwellings linked a 480dpa requirement over a 19 year plan period. Applying that figure across a 23 year plan period as proposed, with an annual housing requirement of at least 686dpa would suggest that a minimum of c. 1,100 dwellings should be accommodated within Ibstock to respond to the need arising in the settlement and achieve a balanced spatial strategy. As currently drafted, the DLP falls well short of achieving that.

Likewise, the proposed approach does not align with the preferred spatial strategy as tested through the SA process. Indeed, the preferred option (Option 7b) included the delivery of 765 dwellings in the Service Centres over and above existing commitments, whereas the proposed allocations only amount to 450 additional dwellings. The SA had, however, identified significant benefits associated with the preferred option, some of which were specific to the scale of growth proposed in the Service Centres. Notably, it attributed a significant positive effect to Objective SA6 (enhancing the vitality and viability of existing town and village centres), noting that the level of growth would *“help to maintain and enhance current existing urban areas, supporting existing services, and encourage the development of new ones.”*

Conversely, it is clear that a failure to facilitate a sufficient level of growth would not only fail to realise that significant benefit, but could result in negative effects in that regard. Failing to meet the specific demand for housing in Ibstock (in the order of c. 1,100 dwellings as above) could potentially result either in the re-location of some of Ibstock’s residents to more distant settlements or out-migration from the District altogether due to a lack of housing stock in what is a desirable Service Centre. For those who continue to work within Ibstock (for example in the existing employment areas), that could potentially result in less sustainable travel to work patterns, which itself could give rise to significant environmental impacts.

Likewise, failing to provide for sufficient growth in Ibstock will undermine the vitality of the services and facilities that are located within the settlement (see NPPF paragraph 83). Given the reasonably rural nature of parts of the District and the manner in which residents depend on the services and facilities within larger villages such as Ibstock, such an outcome would have very significant negative effects. Socially, that could result in the isolation of rural communities, economically it would likely be a barrier to investment in Ibstock, and from an environmental perspective it could potentially promote private car use due to rural communities needing to drive further to access services and facilities. Given the high-level approach that the SA takes in attributing a level of growth across the Service Centres, that will not have been fully been taken into consideration in assessing options through the SA.

The spatial strategy, therefore, fails to maximise the potential of Ibstock as a sustainable local service centre and one of the six settlements that should *“form the central part of our settlement hierarchy”* and *“accommodate the vast majority of new development”* (see DLP paragraph 4.23). It can only be seen, therefore, that additional growth should be located to Ibstock to reflect its sustainable credentials, achieve a more balanced spatial strategy and ensure that a sufficient quantum of growth comes forward to meet the housing requirement. That would also ensure that a five year supply of housing can be established and maintained in the short and medium term.

The above is sufficient justification to identify allocation site(s) within Ibstock in itself. However, RSL has wider concerns that provide further justification for such an approach, as set out below.

Growth in Coalville:

Whilst it is recognised that Coalville is the District's primary settlement, and it is appropriate in-principle for the extant and emerging local plans to have directed significant growth to it, there is ultimately a limit to the level of growth that (i) is actually required based on the evidence of need, (ii) is appropriate given the infrastructure constraints present in the area, and (iii) is achievable in the plan period.

The Site Allocations Consultation Document (SACD) states that just short of 3,500 dwellings have been / will be delivered from the South East Coalville site in the plan period, and that a further 705 dwellings are expected to be delivered from other committed sites within the Coalville Urban Area. In addition to that, the DLP proposes to allocate a further 1,666 dwellings within the area. That is, the DLP purports that almost 6,000 new dwellings will be delivered in the forthcoming plan period.

As a point of principle, RSL has concerns as to whether there is actually a need for growth at this scale. The LHNAR2 sets out the housing need for each settlement linked to the working housing requirement of 480dpa at that point. For the Coalville Urban Area, the LHNAR2 suggests a need of 3,272 dwellings. In scaling that up to the base housing requirement of 686dpa, that suggests a need of c. 4,600 dwellings.

That highlights an over-provision of c. 1,400 dwellings within the DLP and, therefore, an imbalance in the spatial strategy in that regard. That approach appears to be particularly inappropriate given the existing infrastructure constraints within Coalville. Indeed, the 2022 Infrastructure Delivery Plan (IDP) that has been published as part of the evidence base identifies (at page 55) that the development of 1,785 homes in Coalville over and above existing commitments, which is a similar figure to the 1,666 dwellings that are proposed, would result in a "significant level of increase" to congestion "across the whole settlement as a whole and on key nearby junctions" without proper mitigation.

Clearly, therefore, whilst the settlement is undoubtedly the primary settlement, there is a tipping point in terms of the existing infrastructure, and the proposed spatial strategy will likely overstep that point. RSL is concerned that the proposed spatial strategy has simply sought to maximise growth at Coalville with little considerations of those practical implications.

The suitability of some proposed allocations is also questionable. In particular, the Broad Location for Growth at West Whitwick that is proposed to be allocated for the delivery of c. 500 dwellings (Refs. C47, C77, C78, C86 and C81) will clearly diminish the separate identity of Swannington from the Coalville Urban Area (including Whitwick). Whilst it is recognised that the two settlements are closely related, the DLP specifically recognises Swannington as a settlement in its own right, and the delivery of the proposed allocation would reduce the gap between the settlements from c. 520m at its closest point to c. 280m. That is particularly surprising given that NWLDC clearly recognise the sensitivity of this part of the District in terms of settlement identity / coalescence; having identified two Areas of Separation between Whitwick, Coalville and New Swannington.

Notwithstanding those in-principle concerns, RSL's response to Policy H1 also highlights concerns

as to the level of growth that will actually be delivered within the existing commitment at South East Coalville. Whilst it is recognised that there was a high level of annual deliveries in the first three years of the plan period, that level of delivery is not likely to be sustainable in the long-term, and indeed it is noted that delivery levels from the 2023-24 period have not yet been registered and may have slowed in light of the ongoing economic recession.

Moreover, the 'Letwin Review of Build Out' sets out that deliveries can vary greatly throughout the build-out process. The report highlights that a key driver in that is the market absorption rate, stating that *"the homogeneity of the types and tenures of the homes on offer on these sites, and the limits on the rate at which the market will absorb such homogenous products, are the fundamental drivers of the slow rate of build out"*. Given that some 6,000 dwellings are proposed to be delivered within the Coalville area in the forthcoming plan period, this will be a determinative factor in the actual level of deliveries that will be realised.

That factor further suggests that the DLP makes provision for a disproportionately high level of growth in the Coalville urban area in the forthcoming plan period. Therefore, further allocations should be identified within other sustainable settlements to provide flexibility in that regard, whether or not that results in a reduction in the level of growth proposed in Coalville. That provides further justification to identify sites for residential development within Ibstock.

New Settlement at Isley Woodhouse:

RSL recognises the role that East Midlands Airport (EMA) plays in generating housing needs, particularly following its identification as a Freeport in March 2021. In that regard, RSL has no in-principle objection to the delivery of a new settlement near to the EMA, but notes that it is entirely unlikely that a strategic development of this scale would deliver 1,900 dwellings within this plan period as suggested in the DLP.

RSL's response to Policy H3 discusses that in further detail, and highlights that it is more likely to expect that a maximum of c. 300 dwellings will be delivered in the plan period given the complexity associated with delivering a new settlement of such a scale.

Again, that provides further justification for the identification of additional allocation sites, which should facilitate significant additional growth at Ibstock given the concerns as set out above.

Land at Curzon Street, Ibstock:

It is clear that further allocation sites should be identified within Ibstock to address the above concerns.

In that regard, RSL's site at Land at Curzon Street, Ibstock (as shown on the Development Framework Plan that has been submitted alongside these representations) is an entirely suitable site that is located in a sustainable location for growth. It is located at the east of Ibstock, in close proximity the High Street and the key services and facilities that are located along it; including, but not limited to, a primary school, a secondary school / community college, retail shops, a library, a chemist and a doctors surgery.

In addition to the site's sustainable location, it is an entirely suitable development site that does not have any insurmountable technical or environmental constraints.

Vehicular, pedestrian and cycle access can be provided from Curzon Street, which links to the

High Street that runs through the settlement; and therefore can promote a high level of connectivity. Pedestrian links to the public right of ways that run adjacent to the eastern boundary and through the site' southern area can also be provided to maximise safe, convenient and attractive connections to the existing built form and the wider countryside.

It is recognised that some parts of the site are at higher risk of flooding, and that is accounted for in the emerging Development Framework in the form of a development offset. That provides an opportunity to create high-quality public open spaces, as well as new wetland and other habitats to support a Biodiversity Net Gain as required. Likewise, a waterside path is proposed in those areas to the west of the site to travel through the green / blue corridor.

The site is not subject to any ecological designations. It is ecologically unremarkable and any areas of ecological interest are likely to be limited to the site's margins, which would be enhanced through the landscape strategy. The watercourse will likely be of some biodiversity interest and would also be retained and enhanced as part of the proposals.

Likewise, the site is not subject to any landscape designations. It is relatively flat, and visibility is limited to nearby views. That includes from Curzon Street, where new development would be seen in the context of the existing built form. With that said, the Development Framework incorporates a green offset from Curzon Street to provide an attractive entrance to the development and frame the existing public right of way. It also seeks to retain and enhance existing field boundaries. New structural planting can be accommodated into the proposals, if that considered to be necessary by NWLDC.

The site is, therefore, clearly a suitable location for growth. The submitted Development Framework Plan identifies a net developable area of c. 3.80ha; which suggests a capacity of approximately 135 dwellings at 35 dwellings per hectare. Given the suitability of the site and the need to identify additional allocation sites to meet the housing requirement and achieve a more balanced spatial strategy, this site should be allocated in the next iteration of the eLP.

Land to the north of the Sparkenhoe Estate, Heather (Allocation Ref. H3):

RSL supports the recognition that growth is required in sustainable villages. Indeed, as set out in NPPF paragraph 83, residential development plays a key role in promoting sustainable development in rural areas, in that it can "*enhance or maintain the vitality of rural communities*" and "*support local services.*"

In that regard, RSL welcomes the DLP's identification of 'Land Adjacent to Sparkenhoe Estate, Heather' (Allocation Ref. H3) as a residential allocation, which reflects the suitability of the site for development and the absence of any insurmountable constraints to development. It is, however, noted that RSL is promoting additional land to the north, as identified on the submitted Development Framework (Drawing Ref. DE205b_001 RevB), and RSL therefore consider that the whole of their land ownership should be included within the allocation to reflect the full and logical extents of the site and maximise the potential to deliver a high-quality and comprehensive development.

Vehicular access to the site would be delivered from Sweepstone Road via the recently constructed residential development to the south of the site (i.e. via Gadsby Road). That is considered to be suitable in highways terms and achievable, given the presence of an existing turning head close to the southern boundary of the promoted site. In addition to that, it is

anticipated that pedestrian and cyclist access will also be provided via the same point of access, and that connections can be made to the footpath within the recent residential development. That would provide access to the services and facilities that are located in the settlement, within walking distance from the site.

The site is located in flood zone 1 and is not subject to any surface water flood risk. The site slopes gently in the south-westerly direction, and therefore is not constrained by its topography. The site has also not been subject to any previous land uses that would suggest that contamination / ground stability is likely to be a constraint to development.

In relation to ecology, there are no national designations within or immediately adjacent to the site, nor does the site have any particular, or immediately obvious, ecological merit or interest; and as such it is not considered that ecology would be a constraint to development. Similarly in relation to arboriculture, the site's development could be accommodated with limited tree or hedgerow loss, with any loss able to be offset through tree provision elsewhere in the site.

Similarly, heritage impact is not a constraint to development, as there are no known heritage assets within or immediately adjacent to the site. Moreover, the Council's Landscape Sensitivity Study (July 2019) found that the site's southern parcel is located in an area of medium landscape sensitivity and medium visual sensitivity to residential development, whilst the site's northern parcels are located in an area of medium-low landscape sensitivity and medium-low visual sensitivity to residential development. As such, it is not considered that there will be a significant adverse landscape and visual impact and that impact certainly will not be any higher if the remainder of RSL's land were to be included as part of the proposed allocation.

Given the site's suitability for development and the need for NWLDC to significantly bolster the supply of housing in the plan period to fully meet the housing requirement, the remainder of the land under RSL's control (to the north of proposed allocation site H3) should also be allocated for development. In that regard, the submitted Development Framework Plan identifies the capacity of the entire land ownership to deliver c. 115 new homes at 35 dwellings per hectare, with associated open space, drainage and infrastructure. This site should, therefore, also be identified as an allocation site in the next iteration of the eLP.

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?		Proposed policies
	✓	Proposed housing and employment allocations
		Proposed Limits to Development Review

2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

POLICY H2 – HOUSING COMMITMENT:

RSL's comments in response to Policy S1 highlight the need to incorporate an uplift above the LHN of 686dpa to account for existing affordability issues in the District, and that this should be applied across a plan period of 23 years to derive the plan's housing requirement. On that basis, the housing requirement will be at least 15,778 dwellings, but likely higher to respond to the existing affordability issues.

NWLDC is correct in including previous completions in the plan period and existing commitments when calculating the residual housing target. The SACD sets out that 2,396 dwellings have been completed in the plan period and, given that they have already been delivered, RSL does not dispute that figure.

However, the SACD suggests that 6,068 dwellings will be delivered in the remaining plan period from the existing commitments within the District. Whilst the principle of including those sites is accepted, there will inevitably be some sites that are not delivered, or are subject to slower delivery rates.

That is particularly the case for the strategic commitment at South East Coalville, where NWLDC suggests that just short of 3,500 dwellings have been / will be delivered in the plan period. Whilst it is recognised that there was a high level of annual deliveries in the first three years of the plan period, that level of delivery is not likely to be sustainable in the long-term, and indeed it is noted that delivery levels from the 2023-24 period have not yet been registered and may have slowed in light of the ongoing economic recession.

Moreover, the 'Letwin Review of Build Out' sets out that deliveries can vary greatly throughout the build-out process. The report highlights that a key driver in that is the market absorption rate, stating that "*the homogeneity of the types and tenures of the homes on offer on these sites, and the limits on the rate at which the market will absorb such homogenous products, are the fundamental drivers of the slow rate of build out*". Given that some 6,000 dwellings are proposed to be delivered within the Coalville area in the forthcoming plan period, this will be a

determinative factor in the actual level of deliveries that will be realised.

In light of that, there is a strong likelihood that the quantum of housing deliveries from the site in the plan period will fall short of the c. 3,500 dwellings that the DLP suggests. To account for that, and the inevitable non-implementation of some of the other commitments, a 10% deduction should be applied to existing commitments for non-implementation or slow implementation. That would reduce the supply from the existing commitments to 5,461 dwellings.

When removing this figure and previous completions from the housing requirement, the residual housing target to be met by new allocations would be at least 7,921 dwellings (but likely higher once the additional uplift to respond to existing affordability issues has been accounted for). The current purported supply from new allocations totals 5,476 dwellings and therefore falls significantly below that figure. However, as set out in response to Policy H3, the actual level of deliveries from the proposed allocation sites will also be less than is anticipated, and the shortfall between the actual supply and the residual housing target is more likely to be in the order of c. 3,200 dwellings.

Therefore, and as highlighted in more detail in response to Policy H1, the next iteration of the eLP must identify a significant number of additional housing allocations. It is critical that this includes residential allocation(s) at Ibstock, and as set out in response to Policy H1, RSL's site at Land at Curzon Street can deliver c. 135 dwellings both in order to bolster the housing supply and provide a balanced spatial strategy that appropriately responds to the sustainable credentials of the settlement. Furthermore, that response highlights that the proposed allocation site at 'Land Adjacent to Sparkenhoe Estate, Heather' (Allocation Ref. H3) should be extended to reflect the full and logical extents of the site and maximise its capacity to deliver c. 115 dwellings (at 35dph).

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?		Proposed policies
	✓	Proposed housing and employment allocations
		Proposed Limits to Development Review

2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

POLICY H3 – HOUSING PROVISION – NEW ALLOCATIONS:

RSL's comments in response to Policy S1 highlight the need to incorporate an uplift above the LHN of 686dpa to account for existing affordability issues in the District, and that this should be applied across a plan period of 23 years to derive the plan's housing requirement. On that basis, the housing requirement will be at least 15,778 dwellings, but likely higher to respond to the existing affordability issues.

Following on from that, RSL's comments in response to Policy H2 highlight that, whilst NWLDC is correct in taking account of previous completions and existing commitments, a 10% deduction should be applied to the commitments to take account of non-implementation or slow-implementation. Those comments concluded that, on that basis, the residual housing target would be at least 7,921 dwellings (but likely higher once the additional uplift to respond to existing affordability issues has been accounted for), but that the purported supply from new allocations totals 5,476 dwellings and therefore falls significantly below that figure.

There is, therefore, a requirement for NWLDC to identify additional allocation sites, and RSL's response to Policy H1 highlights that this must include additional residential allocations at Ibstock both to bolster the housing supply and provide a balanced spatial strategy that appropriately responds to the sustainable credentials of the settlement. The response also highlights that the proposed allocation site at 'Land Adjacent to Sparkenhoe Estate, Heather' (Allocation Ref. H3) should be extended to reflect the full and logical extents of the site and maximise its capacity to deliver c. 115 dwellings.

With that said, however, RSL considers that the actual supply of housing that will be delivered from the currently proposed allocation sites will fall significantly short of the purported figure as set out in the SACD (5,476 dwellings) for the following reasons.

Firstly, as RSL's response to Policy H1 highlights, there will be a very significant level of growth focused to the Coalville Urban Area in the forthcoming plan period when accounting for new allocations and existing commitments (totalling c. 6,000 dwellings). Whilst there are some in-

principle concerns as to whether there is actual a need for such significant growth in this area, whether the existing infrastructure could accommodate such a level of development, and whether some of the sites (the Broad Location for Growth at West Whitwick in particular) are suitable, RSL also has significant concerns as to the whether the scale of growth anticipated could be delivered in the plan period in any case. Notably, in light of the findings of the Letwin Review of Build Out, it appears that there is significant risk that the market will not be able to absorb the level of housing delivered given the concentrated nature of the allocations and the homogeneity of the products; which could cause some sites to deliver more slowly in response to the market context at that time.

Setting that to one side, it is also entirely unlikely that the New Settlement at Isley Woodhouse will deliver 1,900 dwellings in the plan period as expected. New settlements are complex by their nature and will inevitably have long lead-in times before housing completions are realised, if indeed they are viable and deliverable in the first case. It is, therefore, important that NWLDC take a realistic approach to assessing the number of dwellings that can be completed in the plan period (in line with NPPF paragraph 74d), and the Council must provide clearly evidenced timescales for delivery on that basis.

In the absence of that evidence, Lichfields' 'Start to Finish: What Factors Affect the Build-Out Rates of Large Scale Housing Sites?' report provides a useful proxy to estimate the actual level of deliveries, and has been used previously in Local Plan Examinations. It states that, for sites of 2,000+ dwellings, the period from the submission of the first planning application to delivery of the first dwelling on-site averages 8.4 years. RSL's response to Policy S1 sets out that the plan is likely to be adopted in 2027 and, assuming that an application was submitted immediately on the adoption of the plan (which it may not be), that would suggest that the earliest deliveries would be in mid-2035. That would allow for just 7.5 years of delivery, even when accounting for the proposed extension of the plan period to 2043. The report also states that the average annual build-out rate for a site of 2,000+ homes is 160dpa, which would suggest that a maximum of 1,200 dwellings will be delivered in the plan period. However, even then that would ultimately be dependent on the timely submission and determination of an application, the ability to deliver the required infrastructure without significant delays (which the Letwin Report highlights is often responsible for delays in site deliveries, and will be particularly complex given that this is a new settlement), and consistent annual deliveries.

In that light, 700 dwellings should be removed from the supply to account for the likely level of delivery from the new settlement. That would mean that the supply from the proposed new allocations would total c. 4,700 dwellings, rather than 5,476 dwellings as the SACD states. When set against the residual housing target of at least 7,921 dwellings (accounting for RSL's comments in relation to Policy H2), the shortfall would be in the order of 3,200 dwellings; but would be higher still once the increase to the housing requirement on affordability grounds is accounted for. Moreover, in line with the Local Plan Expert Group's recommendations, a healthy buffer should be provided above the residual supply target to provide for flexibility and ensure that a five year supply of housing can be provided and maintained throughout the plan period. That buffer would also account for RSL's concerns regarding the allocations within the Coalville Urban Area as above.

In that regard, and to respond to RSL's wider concerns as to the spatial strategy, it is imperative that the next iteration of the plan identifies additional allocations, and that should include residential allocation(s) at Ibstock. As set out in response to Policy H1, RSL's site at Land at

Curzon Street, Ibstock can deliver c. 135 dwellings in that context and, as an entirely suitable site located in a sustainable location, it should be allocated without delay. Likewise, the proposed allocation site at 'Land Adjacent to Sparkenhoe Estate, Heather' (Allocation Ref. H3) should be extended to reflect the full and logical extents of the site and maximise its capacity to deliver c. 115 dwellings.

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?		Proposed policies
	✓	Proposed housing and employment allocations
		Proposed Limits to Development Review

2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

ALLOCATION POLICY H3 – LAND ADJACENT TO SPARKENHOE ESTATE, HEATHER:

As set out in response to Policies S1 and H1, H2 and H3, RSL welcome the Council’s identification of ‘Land adjacent to Sparkenhoe Estate, Heather’ as a proposed residential allocation (Ref. H3), but consider that the allocation should be extended to include the land being promoted to the north in order to reflect the full and logical extents of the site and realise the potential to deliver c. 115 dwellings.

RSL also welcome the opportunity to comment on the proposed allocation requirements. It is noted that the allocation policy seeks the provision of self-build and custom-build (SCB) plots in accordance with Policy H7. However, RSL’s response to that policy highlights their concerns as to the practical implications of delivering SCB housing plots on market schemes; which are particularly significant for smaller sites such as this. Therefore, RSL are of the view that the requirement should therefore be deleted in favour of identifying specific sites for SCB delivery. The allocation policy would also need to be updated accordingly to remove that requirement.

The intention of the requirement to retain all existing hedgerows with a 5m buffer zone is recognised. It is RSL’s intention to retain all hedgerows, but it is noted that some minor areas of loss will be required to facilitate vehicular, pedestrian and cycle access into the site and between parcels of development. Moreover, whilst the Development Framework (as attached alongside these representations) seeks to incorporate buffers to the existing hedgerows, there may be circumstances during the detailed design stage where a smaller offset is more appropriate. Therefore, to provide flexibility the requirement should be updated to read as follows: *“Retention of existing hedgerows (where possible) with the provision of a 5m buffer zone alongside to be retained as open space where appropriate”.*

The proposed allocation policy also requires the provision of a *“high-quality landscaping scheme to the northern and western boundaries to help mitigate the visual impacts of development.”* However, and as established in the appeal decision in relation to the development to the immediate south, the existing landscape framework to the north and west is very robust, meaning that the site is very well contained and has a limited visual envelope. That means that

development within the site (including the additional land to the north) can be accommodated with very limited landscape and visual impact. Therefore, there is not a need for additional robust planting to the north and west of the site and the landscape scheme should instead be focused more so on ensuring good place-making through the positive integration of SuDS and public open space with the built form. The submitted Development Framework demonstrates how this can be achieved through the high-quality development of the entirety of RSL's land ownership. This policy requirement should, therefore, be deleted.

PART B – Your Representation

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1. To which consultation document does this representation relate?	✓	Proposed policies
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POLICY AP4 – REDUCING CARBON EMISSIONS:

RSL supports NWLDC’s ambitions to achieve Net Carbon Zero (NCZ) development by 2050, and agrees with the conclusions of the DLP that the recent alterations to the Building Regulations, and the provisions of the forthcoming Future Homes Standard (FHS) “*will deliver significant and meaningful contributions to achieving a zero carbon future for the district.*” Indeed, that is the Government’s intention by introducing national standards that will contribute incrementally towards their goal to achieve NCZ by 2050.

It is, therefore, entirely sensible for NWLDC not to seek to go above the Building Regulations. Likewise, the proposed policy tests, in terms of seeking evidence that proposals have sought to minimise energy consumption and maximise renewable energy generation, are appropriate.

With that said, it is noted that NWLDC seeks financial contributions towards its carbon offset fund where a proposal is unable to match the total energy consumption of the development through use of on-site renewables due to technical feasibility or viability. In the case of the latter, if a development would not be able to viably deliver the required infrastructure on-site, then it follows that contributions towards an offsetting scheme would also be unviable. Therefore, Policy AP4 should provide additional flexibility that would require developments to meet the requirements as far as possible in the confines of a viable development; requiring viability assessments to demonstrate that if the Council sees fit.

In addition, given that the Council are seeking contributions towards their own offsetting schemes, they should be sure that this can be in place in short order and that NWLDC’s scheme has sufficient capacity to support the scale of growth that is required in the plan period (see RSL’s response in relation to Policy S1). Moreover, NWLDC should also ensure that the offsetting scheme is specific and measurable and that it supports a tariff / credit-based approach in a CIL compliant manner.

PART B – Your Representation

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POLICY AP9 – WATER EFFICIENCY:

RSL supports the Council’s intention to strive for higher water efficiency standards given that the area is classified as one under serious water stress, and note that the development industry already works to high standards in this regard, including the newly introduced Environmental Improvement Plan.

In that regard, the requirement for new residential developments to meet the optional water efficiency standard of 110 l/p/d is justified. The Council is also correct to consider alternative approaches for non-residential development given the absence of a similar regulation for them. However, it is considered that the proposed requirement to achieve BREEAM Excellent for the Water O1 (WATO1) credit should only be applied over a specific threshold, to ensure that it does not apply for smaller outbuildings and alike that would not be able to achieve such a standard.

PART B – Your Representation

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1. To which consultation document does this representation relate?	✓	Proposed policies
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2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

POLICY H4 – HOUSING TYPES AND MIX:

RSL supports the manner in which NWLDC have sought to develop a housing mix policy that provides clarity with an appropriate degree of flexibility, and agrees with the approach of allowing applicants to seek to justify more significant departures from the HENA’s proposed housing mix by referring to the site context and local character, the local stock profile and the nature of the scheme, as well as the Housing Register, up-to-date local housing needs information and the Registered Provider’s requirements for affordable housing.

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?	✓	Proposed policies
		Proposed housing and employment allocations
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2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

POLICY H7 – SELF-BUILD AND CUSTOM HOUSEBUILDING:

Draft Policy H7 effectively requires new allocations and windfall sites of 30 or more dwellings to deliver 5% of new plots as self-build and custom build (SCB) dwellings. However, RSL has significant concerns as to the actual demand for SCB plots on wider market schemes and the practical implications of doing so.

Registrations on SCB registers often relate to a desire for SCB in a specific location, rather than in market housing developments. That would suggest that, if there truly is a need / demand for SCB plots in the coming plan period, it would be most appropriate for the Council to identify specific sites for the delivery of solely SCB development.

That would also avoid the practical challenges of delivering SCB housing within market housing schemes. For example, the delivery of SCB houses is often dependent on the ability of sites to provide independent construction access and infrastructure, and deal with difficult health and safety issues; notably relating to the provision of alternative build routes and the uncertainty surrounding deliveries, etc. That will be particularly difficult for smaller sites such as the proposed allocation site at Heather, and those factors add uncertainty to what is already a complex planning and construction process, and are therefore not conducive to the timely delivery of much-needed housing. Moreover, SCB housing has the potential to undermine the realisation of consistent design principles across a scheme, and can also negatively impact on delivery timescales.

Therefore, taking the above into account, NWLDC should prepare additional evidence to consider the actual demand for SCB from those who have the capabilities to deliver a SCB dwelling. On that basis, it should identify specific allocations for SCB delivery, rather than seeking SCB delivery on market schemes, so as to respond to the nature of the limited demand.

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

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POLICY H10 – SPACE STANDARDS:

RSL recognises NWLDC’s intention to impose the optional Nationally Described Space Standards (NDSS) in relation to internal floor areas. It is noted, however, that adherence to the NDSS inevitably impacts on development density and therefore the capacity of developments. That should be accounted for in the comprehensive Viability Assessment, which should consider the cumulative impacts of the proposed policy requirements as set out in the plan.

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?	✓	Proposed policies
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POLICY H11 – ACCESSIBLE, ADAPTABLE AND WHEELCHAIR USER HOUSING:

RSL recognise the importance of responding to the housing needs of different groups in the community, in line with NPPF paragraph 63.

In that regard, it is noted that the proposed requirements for all new dwellings to meet Part M4(2) of the Building Regulations, for 9% of market homes to meet Part M4(3)(2)(a) and for 23% of affordable homes to meet Part M3(3)(2)(b) has been informed by the 2022 HENA. As yet, however, a Viability Assessment has not been prepared to consider whether the cumulative policy requirements are deliverable without rendering developments unviable. If it is the case that the Viability Assessment finds that the proposed level of provision would render development schemes unviable, then the level of provision should be capped at a level that would allow for viable schemes to be delivered.

With that said, the flexibility that is suggested in the policy is welcomed. Indeed, it is entirely appropriate to allow for exceptions from these requirements where applicants have *“demonstrated that the provision of safe, step-free access is not viable.”* To align with the approach set out in the supporting text, it is also suggested that reference is made to circumstances where those standards cannot be achieved due to site-specific characteristics such as topography and drainage.

In those circumstances, it would be appropriate to accept a scheme that maximises the delivery of such units within the confines of a viable and deliverable scheme; and the policy could perhaps also include a statement to confirm that.

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?	✓	Proposed policies
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POLICY INF1 – DEVELOPMENT AND INFRASTRUCTURE:

The proposed approach of requiring development to be supported by, and make contributions towards, the provision of new physical, social and green infrastructure to mitigate its impacts is appropriate. In that regard, RSL note the importance of identifying the infrastructure delivery requirements that are associated with specific allocations and the plan more generally as early as possible, and considering how infrastructure delivery should be funded. That should then be taken account of in a comprehensive Viability Assessment that considers the cumulative costs of the plan’s policy requirements.

RSL also note that the Government intends to introduce a new Infrastructure Levy (as referred to in the Levelling Up and Regeneration Act) that may offer an opportunity to deliver the infrastructure required to support new development in a more efficient manner.

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?	✓	Proposed policies
		Proposed housing and employment allocations
		Proposed Limits to Development Review

2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

POLICY INF4 – OPEN SPACE, SPORT AND RECREATION FACILITIES:

RSL support the plan’s requirement for new development to be supported by the on-site provision of public open space (POS), but note that the plan does not include specific standards for POS delivery. NWLDC should, therefore, instruct updated evidence in that regard to understand what POS standards would be appropriate, and should also take account of it in a whole plan Viability Assessment that takes account of the cumulative costs of the plan’s policy requirements.

In updating Policy INF4 to reflect the outcome of the further evidence gathering, some flexibility should be provided to allow POS delivery to also reflect settlement-specific evidence of existing provision and the resultant demand for specific typologies, as well as site-specific considerations.

PART B – Your Representation

Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.

1. To which consultation document does this representation relate?	✓	Proposed policies
		Proposed housing and employment allocations
		Proposed Limits to Development Review

2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

POLICY INF5 – TRANSPORT INFRASTRUCTURE AND NEW DEVELOPMENT:

As set out in response to Policy INF1, RSL recognise the importance of ensuring that new development is supported by the required infrastructure, and note that it is critical that NWLDC identify infrastructure requirements associated with specific allocations and the plan more generally as early as possible, and consider how infrastructure delivery should be funded.

Declaration

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

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

Signed: S. Perkins

Date: 15/03/2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

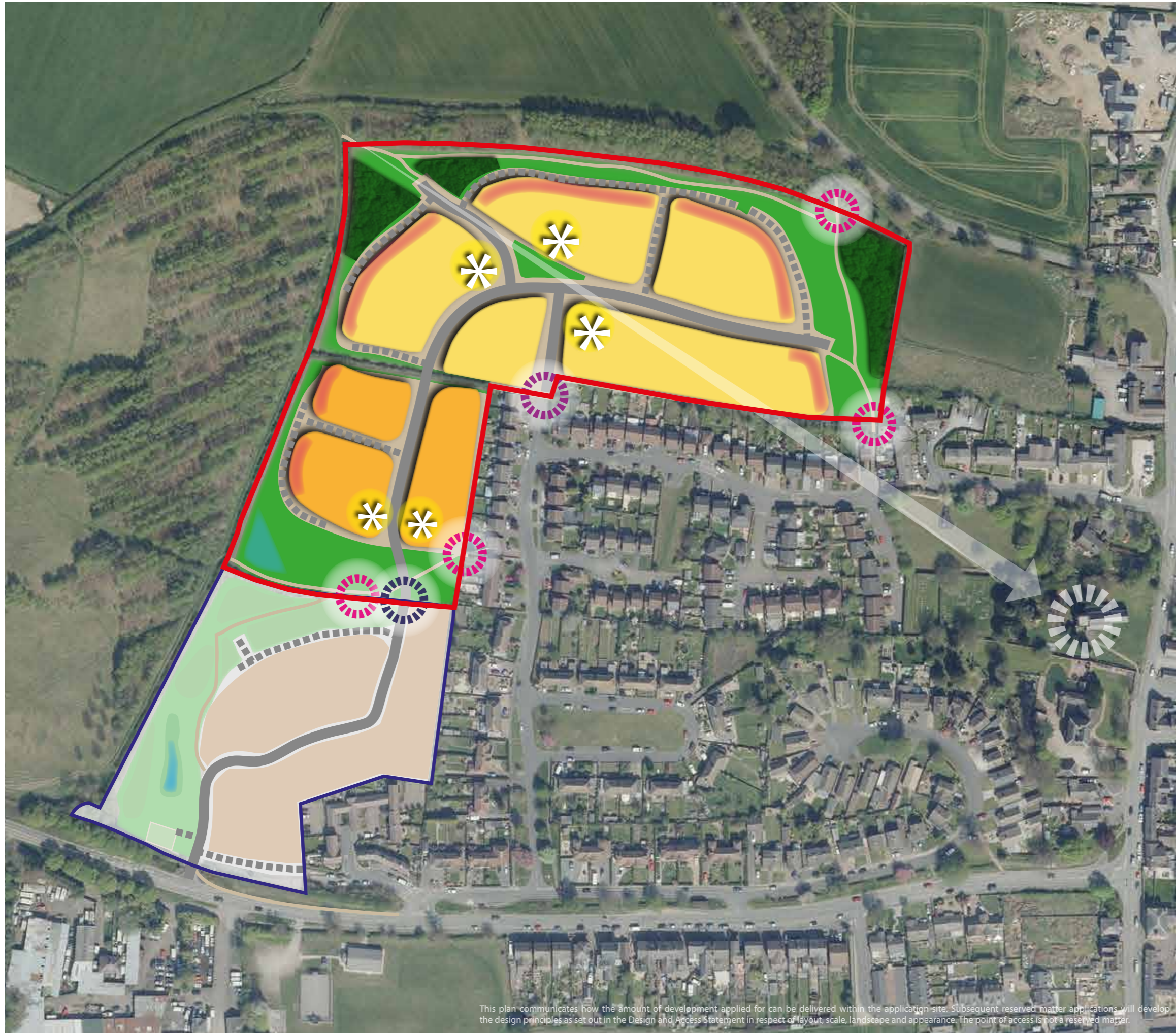
The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004, save for requests of such information required by way of enactment. Your name, organisation and representations will be made publicly available when displaying and reporting the outcome of this statutory consultation stage and cannot be treated as confidential. Other details, including your address and signature, will not be publicly available.

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

















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

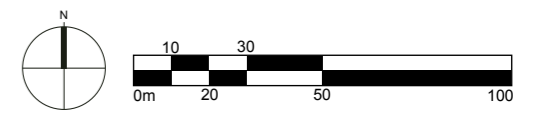
**Please send completed forms to planning.policy@nwleicestershire.gov.uk or
Planning Policy Team, NWLDC, PO Box 11051, Coalville LE67 0FW**

The deadline for responses is the end of Sunday (11.59pm) 17 March 2024



LEGEND

-  Site Boundary
-  Recently Completed Development Site (including Indicative Layout)
-  Recently Completed Residential Development Blocks (Indicative)
-  Indicative Development Blocks (Phase 1)
-  Indicative Development Blocks (Phase 2)
-  Indicative Public Open Space
-  Indicative Woodland / Copse Planting
-  Indicative SuDS / Drainage Areas
-  Primary Road
-  Shared Surface Lane / Private Drive
-  Footpath Links
-  Focal Buildings
-  Lower Density Edge
-  Vehicular & Pedestrian Entrance
-  Emergency Vehicular & Pedestrian Entrance
-  Pedestrian Entrance







This plan communicates how the amount of development applied for can be delivered within the application site. Subsequent reserved matter applications will develop the design principles as set out in the Design and Access Statement in respect of layout, scale, landscape and appearance. The point of access is not a reserved matter.







-	Rev
DE205B_001	Drg No
Rosconn	Client
Land West of Heather	Project
Development Framework	Title
1:2,000 @ A3	Scale



KEY

-  Site Boundary 6.85 Ha
-  Residential Development 3.80 Ha
-  Indicative Vehicular Route
-  Vehicular Access

Green Infrastructure

-  Existing Public Right Of Way
-  Indicative Pedestrian / Cycle Routes
-  Potential Equipped Play
-  Potential Location for Attenuation Ponds
-  Existing Woodlands, Trees and Hedgerows
-  Existing Watercourse
-  Structure Planting

NOTES

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