

Local Plan Review. Consultation Response

Name Mr. Joshua Rodrigues
[REDACTED]

Dear Sirs/Madams,

In addition to the objections below, I would like to express my own concerns and objections for the planned development of the surrounding countryside. Having spent over a decade in the Royal Marines, serving around the globe and moving every two years to different bases, I recently left the MOD to get married and settle in rural Leicestershire, the county in which I grew up.

It was my intention to settle in a quiet village and start a family. Both my wife and I have worked hard to realise this ambition. To continue with the planned, development of cherished countryside would undo our sacrifices to achieve this dream. It would, more importantly compromise the surrounding rural countryside for future generations to come. I implore you to take head of the extensive objections to this proposed 'development'.

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much

needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *“immediate need for additional employment land”*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *“detrimental to ...nearby residential properties”*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary

planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

Joshua Rodrigues

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name: Jonathan Lee



Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90]. My objections are based on the following:-

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3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster. This will have a major impact on the ability of households, existing and future, to obtain adequate insurance cover

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

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11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an “*immediate need for additional employment land*”. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being “*detrimental to ...nearby residential properties*”. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had

the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent years we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and more local traffic and rat running than can be tolerated. We will also have the proposed HS2 route which is planned to terminate at East Midlands Parkway. If the timelines are to be believed there is likely to be overlap with these proposed developments and the HS2 construction phase. On completion of HS2 there is almost certainly going to be an increase in commuter traffic along the A453, which coupled with the expected traffic from both the developments looks like a recipe for repeated gridlock scenarios along the A453 and around junction 24 on the M1. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both: ill conceived schemes, in the wrong place, on an unprecedented scale and have absolutely of no benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner(s) and an exploitative developer(s) who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of the development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle. They ignore the principle objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

A large black rectangular redaction box covering the signature area of the letter.



North West Leicestershire District Council,
Council Offices,
Whitwick Road,
Coalville
LE67 3FJ

Southfield Road, Loughborough,
Leicestershire. LE11 2TX



Dear Sir/Madam

North West Leicestershire Local Plan Review: Development Strategy and Policy Options Consultation – Charnwood Borough Council Response

Charnwood Borough Council welcomes the opportunity to comment on the North West Leicestershire Local Plan Review consultation document which sets out potential options for a number of key issues that the Local Plan Review must address, including development strategy options for both housing and employment, as well as more specific policy topics. We recognise that a further consultation on potential site allocations is proposed for spring 2022 with consultation on the publication Local Plan (Regulation 19) in summer 2023.

Charnwood Borough Council is pleased to note that North West Leicestershire District Council identifies the on-going joint work across Leicester and Leicestershire, taking place under the Duty to Cooperate, to address the issue of unmet housing and employment need from Leicester City. This recognises the updated Housing and Economic Needs Assessment (HENA) which is in preparation, and which will help inform decisions regarding the amount of housing and employment development that needs to be provided for as part of the North West Leicestershire Local Plan Review.

Charnwood Borough Council recognises the work undertaken to identify a proposed settlement hierarchy and considers this an appropriate approach upon which to base the development strategy in the Plan. In terms of the overall amount of new housing development which should be provided for by the Plan, we are pleased to see the consideration which has been given to the various factors that can influence the adoption of a local housing need figure higher than that derived through the standard method for assessing local housing need, detailed in the national Planning Practice Guidance. It is noted Northwest Leicestershire District Council considers options around scenarios high 1 and high 2 (512 -712 homes per year) as the most suitable requirement until such time as the issue of the redistribution of unmet housing need from Leicester City has been agreed. Charnwood Borough Council welcomes this approach.

The fifteen separate spatial options identified for the distribution of this development, distinguished by amount and location of development, and these options along with the sustainability appraisal work undertaken are considered to provide a suitable basis for

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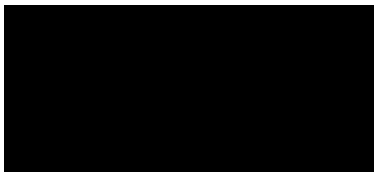


determining the development strategy which should be pursued in the Plan.

Charnwood Borough Council recognise the employment land evidence base which has been produced in support of the need for employment land and the on-going work to inform these matters, with the policy options identified representing reasonable alternatives. We note a preferred option has yet to be determined and given the uncertainty in the economy following the Covid pandemic and withdrawal from the European Union, along with sufficient supply until towards the end of the plan period, a 'do nothing for now' approach appears appropriate, subject to the upcoming further evidence identifying employment land requirements in the HENA and discussions on Leicester's unmet employment need.

In terms of strategic warehousing, the recognition of the Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change (April 2021) study and the joint working with other Leicester and Leicestershire authorities to assess how best the outstanding requirements identified can be met in a way which maintains an appropriate supply in terms of geography and trajectory, as recommended in the study, is supported. The consultation document highlights the development pressure for strategic warehousing in North West Leicestershire and takes a proactive in suggesting a substantial 50% of the outstanding road-served requirement for strategic warehousing be met in the district, whilst identifying that the option at this stage is preliminary and does not signal the Council's commitment or agreement to take a particular share of the remaining Leicester and Leicestershire need; this approach is welcomed.

Yours faithfully,



Richard Bennett
Head of Planning and Regeneration

Local Plan Review. Consultation Response

Name: Thomas Miller

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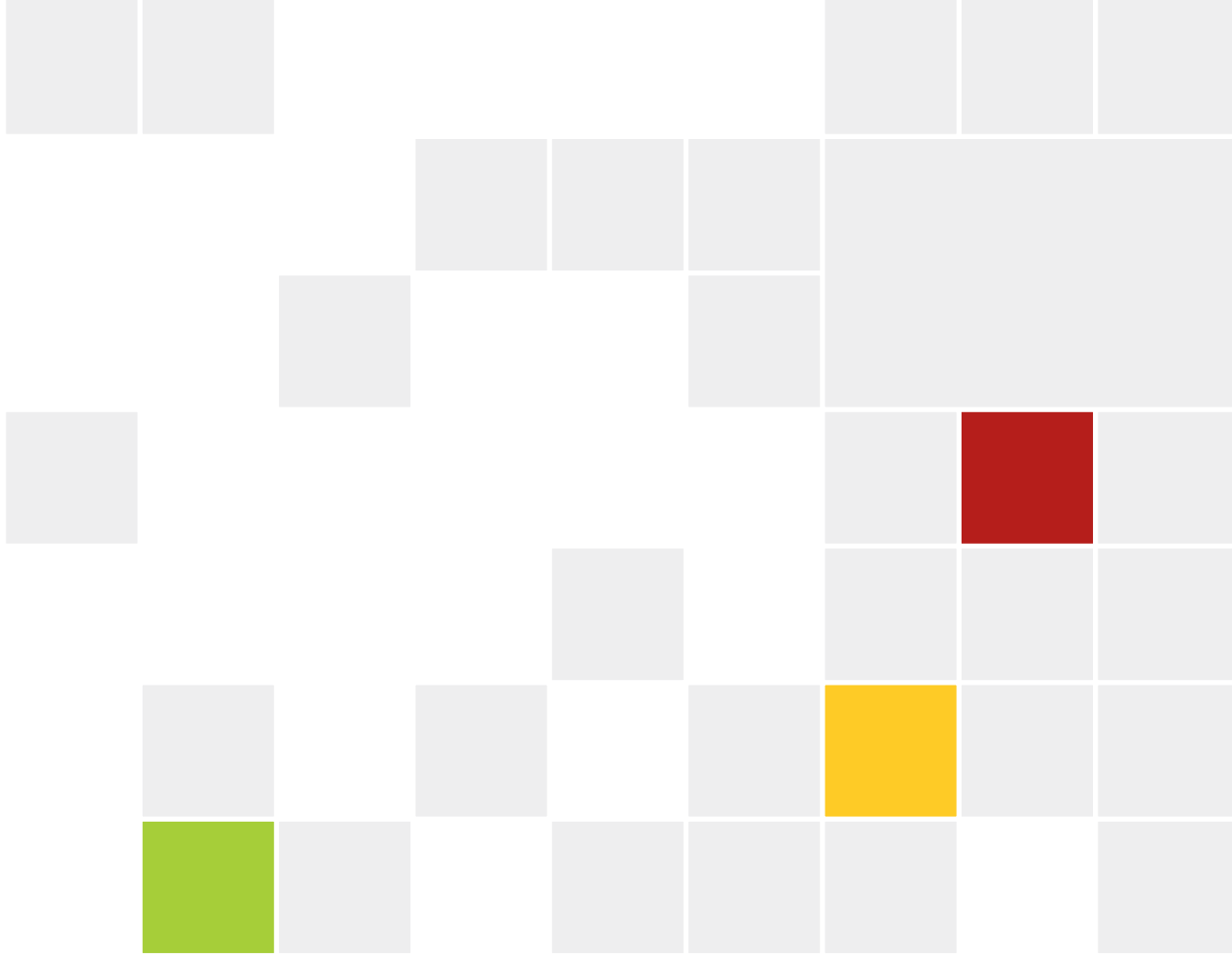
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Yours Faithfully,

Signed,

Thomas Miller



North West Leicestershire Local Plan Review Development Strategy Options
(Regulation 18 Consultation)



Boyer

Report Control

Project:	North West Leicestershire Local Plan Review – Regulation 18 Consultation
Client:	Hawke Living
Reference:	22.3006
File Origin:	
Primary Author	Raj Bains
Checked By:	Simon Atha

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	02/03/2022	Draft	Simon Atha

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1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Hawke Living in response to the North West Leicestershire District Council (NWLDC) Local Plan Review Development Strategy Options and Policy Options Regulation 18 Consultation.
- 1.2 The Local Plan Review takes into account changes that have occurred since adoption of the Local Plan (2017), notably the publication of the revised National Planning Policy Framework (2021), changes in the Use Class Order and taking into account the significant unmet housing need from Leicester City, which is yet to be determined. These are changing circumstances to which NWLDC have committed to update and review their adopted Local Plan (as required by paragraph 33 of the National Planning Policy Framework), and to ensure the identified housing and employment needs are sufficient and deliverable over the plan period.
- 1.3 The following sections of these representations respond to relevant questions around the scale and distribution of housing as set out in the Development Strategy and Policy Options consultation document. These representations also review the two growth options, which the Council are taking forward and are seeking views from the public. The two growth options present a low growth scenario (High 1 - 1,000 dwellings) and high growth scenario (High 2 - 5,100 dwellings) over the plan period and both include a different approach towards the distribution of housing across the District.
- 1.4 The consultation document identifies Woodville as a new settlement to the Local Plan and also as a Sustainable Village, given the range of services and facilities available to meet the day to day needs of the local community.
- 1.5 Hawke Living are promoting land north of Hepworth Road, Woodville as a sustainable location to provide approximately 55 new dwellings. This site which benefits from existing access of Hepworth Road, would form an extension to the existing settlement boundary from South Road and further contribute and support the higher growth strategy (High 2 scenario Option 7a) in the provision of new housing within the Sustainable Villages.

2. CONSULTATION QUESTIONS

Q2 Do you agree with the proposed settlement hierarchy?

- 2.1 The proposed settlement hierarchy is effectively a continuation of the adopted Local Plan strategy with the addition of part of Woodville, as a Sustainable Village. The settlement hierarchy has been informed by a recent Settlement Study (2021). This study considers the range of services and facilities available to meet local needs without having to travel elsewhere or when travelling elsewhere, such travel can be undertaken by using means other than a car.
- 2.2 The proposed settlement hierarchy with the inclusion of Woodville as a Sustainable Village is strongly supported. Whilst the majority of Woodville, including a range of local services and facilities fall within South Derbyshire District, a significant recent expansion of Woodville has occurred within North West Leicestershire district and forms a cohesive expansion of the existing settlement, rather than a standalone new settlement.
- 2.3 Woodville is a sustainable village which comprises of a local convenience store, two primary schools and access to public transport. The area also includes a library, a GP surgery, a post office, a Methodist Church, three public houses, two recreational grounds, three local play and equipped areas and employment sites which are accessible within 2km of the village. There are close linkages to facilities further afield within Swadlincote, South Derbyshire's largest town. Woodville is a suitable location that could facilitate additional housing growth over the plan period.

Q4 – Do you agree with the proposed approach to the amount of housing growth at this time?

- 2.5 The Council has considered and applied a wide range of evidence including the Strategic Growth Plan (2018)¹, NWLDC Interim Sustainability Appraisal Report of the Spatial Options (2021), NPPF (2021) and the Housing and Economic Development Needs Assessment (2017) and the Planning Practice Guidance to inform the amount of housing required over the plan period.
- 2.6 This evidence has informed a number of growth options, which take into account demographic trends, the spread of development across the district, past and sustainable delivery rates, choice of housing in the market, deliverability of sites particularly on large-scale developments and new settlements. Given there is significant doubt in build out rates in Coalville as set out in the consultation document, the options have also considered whether the market can achieve the average build out rates.
- 2.7 Another key factor that is fundamental to considering the proposed housing requirement is the unmet housing need from Leicester City Council, which is being discussed through the strategic planning process between the Leicester and Leicestershire Planning Authorities as part of the Statement of Common Ground. As such, the level of unmet need to be allocated to NWLDC is yet to be determined.
- 2.8 The consultation document explains how four different scenarios have been developed, which all result in a different annual housing requirements. Each of these scenarios have been informed by different methods of information, as shown below.
- 368 dwellings per annum – This is based on the standard method, which identifies the minimum and annual housing need. This is referred to as the Low scenario.
 - 448 dwellings per annum – This is based on assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment (2017), referred to as the Medium scenario.
 - 512 dwellings per annum – This is based on the SGP (2018) and referred to as the High 1 scenario.

¹ The SGP is a joint and non-statutory growth plan, between 10 partners and estimates the scale of growth (housing and employment land needs) between 2011-2050.

- 720 dwellings per annum – This is based on the 2018 household projections with an allowance for vacancy rates in dwellings, referred to as the High 2 scenario.
- 2.9 Given that a number of scenarios based on credible evidence have been considered, the proposed approach towards the amount of housing growth required is justified and therefore supported.
- 2.10 The housing trajectory shows a significant amount of new housing is committed already, which has the benefit of planning permission or is an allocation of the adopted Local Plan. Taking into account the number of dwellings to be completed from 2020 and those projected to be completed after the end of the current plan period (2031), approximately 8,784 dwellings would be built by 2039.
- 2.11 Based on the 2018 household projections, this indicates that from the period of 2020-2039, 13,870 new homes would be required. Given that 8,784 dwellings are committed, the Council are required to provide a total of 5,086 new homes over the period 2020-2039. As a result for the purposes of the Local Plan review, the Council have considered four growth scenarios.
- 2.12 The Low growth scenario provides for 368 dwellings per annum, which is based on the standard method and does not allow for any unmet need from Leicester City Council. The Medium growth scenario, which is based on HEDNA (2017), provides for 448 dwellings per annum and considers a buffer of 80 dwellings compared to the standard method. Over the plan period, this represents about 1,500 dwellings of the unmet need. Given that LCCs unmet need equates to 18,000 dwellings, 1,500 dwellings would not be sufficient and could present a risk later where more dwellings are likely to be required.
- 2.13 When taking into account the projected level of commitments from 2020, which are likely to be built by 2039, the fundamental point about the proposed number of dwellings for both Low and Medium growth scenarios is that this level of housing provision is capable of being met through the existing commitments (planning permission and allocations). Therefore, this would not require any additional land to be allocated for growth. Both these approaches fail to plan for future growth and would conflict with the principles of the NPPF and raise significant issues with respect to the Duty to Co-operate.
- 2.14 In contrast and as set out below, the High 1 growth scenario results in a residual requirement of about 1,000 dwellings to be allocated and the High 2 growth scenario, results in a residual requirement of about 5,100 dwellings to be allocated. Both options would require the allocation of additional land for housing development. In comparison to all four scenarios, the two preferred options taken forward by the Council, which are being consulted on, are:

- High 1 scenario – 512 dwellings each year, for which there is a residual requirement of about 1,000 dwellings.
- High 2 scenario – 730 dwellings each year, for which there is a residual requirement of about 5,100 dwellings.

2.15 We consider the High 1 scenario (based on the SGP), to present a significantly low growth housing strategy throughout the plan period. When assessed against demographic trends, build rates, unmet need and deliverable growth strategy, the consultation document (paragraph 4.19) concludes, this scenario is more balanced in terms of these factors than either the Low or Medium scenarios. Whilst this provides a degree of buffer for accommodating unmet need from Leicester City, it is well below the demographic trends and build out rates.

2.16 Whilst NWLDC consider this to present a potentially suitable scenario, in our view High 1 scenario would fail to meet the District's overall housing need (5,086 dwellings) throughout the plan period. This option would not only fail to accord with the principles of the NPPF including (Section 5: Delivering a sufficient supply of homes), it would also not meet the tests of soundness (positively prepared to meet the areas objectively assessed needs, or justified and consistent with the NPPF) and would therefore potentially result in the Local Plan Review being found unsound.

2.17 The High 2 growth scenario, which is based on 2018 household projections, presents a higher and more appropriate growth housing strategy over the proposed plan period 2020-2039 and for this reason we strongly advise that this approach is supported by the Council.

2.18 Taking into account a committed level of new housing provision (8,784 dwellings) until the period of up to 2039, we consider the High 2 growth scenario of 5,100 dwellings to provide a reasonable level of new housing, equating to 13,870 dwellings. This scenario also takes into account a buffer of 362 dwellings per annum compared to 144 dwellings per annum considered for High 1 scenario. Although the amount and distribution of Leicester's unmet need is yet to be determined and agreed, we consider this option provides a degree of flexibility and more certainty in delivery than the Low, Medium and High 1 growth scenarios. As such the High 2 growth scenario is supported.

- 2.19 The Council are advised to proceed with caution in advancing the Local Plan Review without the unmet need position from Leicester City being first established. Charnwood Borough Council have submitted their Local Plan for Examination in December 2021. The Inspector's Preliminary Matters Letter to the Council (February 2022) have specifically asked for evidence of what meetings and liaison have taken place between the signatories to the SoCG since the announcement of the revisions to the standard method on 16 December 2021. Together with an indication of the working arrangements that are in hand to pursue the apportionment of the unmet need for both housing and employment across the county.
- 2.20 There is an expectation that the apportionment of the unmet need will have been informed by the Housing and Economic Needs Assessment, Strategic Growth Options and Constraints Mapping, Strategic Transport Assessment and Sustainability Appraisal. All of which will be examined by the Inspectors to establish whether or not the Duty to Co-operate requirements have been met.
- 2.21 The Council should therefore ensure robust evidence is in place to support and justify the proposed buffer of 363 dwellings per annum and to consider whether this figure is appropriate in light of the most up-to-date SoCG between the Leicestershire authorities.
- 2.22 In addition, whilst the High 2 growth scenario is supported, it is critical that the Council's development strategy focus on growth that meets local housing need in the short, medium and long term of the proposed plan period. In the event that some committed sites may not come forward during the plan period, the Council should make arrangements so that alternative sites can be supported during the plan period to ensure an adequate supply of housing is available without prejudice to the development strategy or proposed Local Plan.

Q5 – Do you agree with the proposed approach to the distribution of housing growth at this time?

- 2.23 The Council have tested a number of spatial options and reasonable alternatives for the distribution of housing growth against the sustainability objectives set out in the SA (2021). The Strategic Housing and Economic Land Availability Assessment (2019) identified two potential sites located south of the East Midlands Airport and adjoining each other, which has been considered as a potential new settlement (site IW1 in the 2021 SHELAA).
- 2.24 The approach to the distribution of housing is developed through the adopted settlement hierarchy, where the roles and function of each settlement is identified. The role and function of each settlements are determined by the availability of the facilities and services in that area.
- 2.25 The distribution of the two preferred growth scenarios in which the Council are taking forward are:
- High 1 scenario (1,000 dwellings) Option 3a Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings).
 - High 2 scenario (5,100 dwellings) Option 7b Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings).
- 2.26 For the reasons set out in Q2 of these representations, we do not support the proposed approach towards the distribution of housing. It is suggested that more housing should be allocated within the Sustainable Villages such as Woodville.
- 2.1 The High 1 scenario Option 3a primarily focuses on new housing within the principal town. Whilst growth is largely concentrated in the principle town (500 dwellings), this is not adequate for the District as a whole, as it fails to address new housing need across the entire District.
- 2.2 This option proposes a requirement of 512 dwellings per annum, where 50% of the residual requirement is proposed in the principal town. Given that past housing build out rates have been low in the principal town, High 1 scenario presents a risk in overestimating housing delivery in this area, of which may not be deliverable and could prejudice the overall housing strategy.
- 2.3 Paragraph 4.41 of the consultation document note that the housing market in the principal town (Coalville area) has been weaker than other parts of the district. For the period 2011-21 the average build rate in the Coalville Urban Area was 180 dwellings per annum. This increased to 267 dwellings for the period 2016-21. Therefore, there are significant doubts if the market can deliver the 512 dwellings per annum.

- 2.4 The High 1 scenario Option 3a allocates a proportion of new dwellings in the KSCs and LSCs, yet fails to provide new housing in the Sustainable Villages of the settlement hierarchy, including; Albert Village, Appleby Magna, Belton, Blackfordby, Breedon on the Hill, Coleorton (the Lower Moor Road area only), Diseworth, Donisthorpe, Ellistown, Heather, Long Whatton, Moira (including Norris Hill), Oakthorpe, Packington, Ravenstone, Swannington, Woodville (part) and Worthington.
- 2.5 In these villages, it would be detrimental for existing local services and facilities to survive, which rely on regular customers, without limited options for development growth. In our view, all sustainable settlements of the settlement hierarchy need opportunities to grow and new housing provision can help facilitate this. As such, High 1 Option 3a would not accord with paragraph 79 of the NPPF, which essentially promotes sustainable development in the rural areas and where housing should be provided to enhance or maintain the vitality of rural communities.
- 2.6 In contrast, the High 2 scenario Option 7b proposes a spread of housing distribution across the District. Option 7b would need to deliver 5,100 new dwellings in the District over and above existing commitments. Option 7b assumes that 35% (1785 dwellings) of growth would go to both the principal town and the new settlement options, 15% (765 dwellings) to the Key Service Centres, 10% (510 dwellings) to the Local Service Centres and 5% (255 dwellings) to Sustainable Villages.
- 2.7 Whilst the proposed High 2 scenario would provide good quality homes to meet local need, as development would be spread amongst the principal town, KSVs, LSCs, Sustainable Villages, and a new settlement, it is not considered that 5% of housing in the Sustainable Villages is sufficient. We consider that more housing should be allocated in the Sustainable Villages that is proportionate towards supporting future economic growth, particularly growth anticipated around the northern area of the District.
- 2.8 The SGP introduces the Leicestershire International Gateway, which is an area focused around the northern parts of the A42 and M1, as an area of economic growth where there are major employment opportunities notably from East Midlands Airport and East Midlands Gateway (strategic rail freight interchange). The SGP estimates that the Leicestershire International Gateway has the potential to accommodate around 11,000 new homes up to 2050, with improvements to the A42 and M1, railway lines and services, which also form part of the Midlands Connect Strategy. However, discussions to confirm the quantum of long term growth and its distribution are yet to be finalised.

- 2.9 With a significant amount of economic growth anticipated from the Leicestershire International Gateway, a sufficient level of new homes would be required between now and 2050. With the East Midlands Gateway ahead of completion by 5 years due to strong uptake in the market, the site is almost constructed with completion expected in autumn this year. Overall this site alone is expected to support over 9,000 jobs in total². This level of employment growth needs to be accessible by local communities without having a detrimental effect on the environment.
- 2.10 With this anticipated economic growth, and the proposed plan period up to 2039, we consider the proposed scale of distribution in the Sustainable Villages (255 dwellings) is significantly low, given that there are 18 villages to consider. Whilst all the Sustainable Villages can facilitate some level of housing growth, some larger villages close to urban areas, such as Woodville, could sustain higher levels of housing growth without putting pressure on existing services and facilitate future socio economic growth. As such we strongly suggest that more housing is allocated to the Sustainable Villages.
- 2.11 This approach to the distribution of housing in NWLDC would provide multiple benefits including; the provision of market and affordable homes to meet local needs, new housing spread across the District rather than in a limited number of locations, enhance the vitality and viability of existing settlements and villages, by increasing and supporting local services. Given the anticipated levels of employment growth, this would also provide opportunities to enable people to remain in their local community whilst moving onto or up the housing ladder.
- 2.12 Woodville is supported with a range of services and facilities that meet the day to day needs of local people, with access to frequent bus services and employment sites. Woodville has more local services and facilities than most of the other sustainable villages and could therefore accommodate additional levels of housing growth. The village is well related to the local and strategic highway network via the A511, A42 (eastwards) with links to Ashby-de-la-Zouch, Nottingham and Birmingham, and the A38 (westwards) with links to Burton upon Trent and Derby.

Land north of Hepworth Road, is a site located in the south west corner of Woodville. The site comprises of two land parcels that are adjoined and in total could accommodate approximately 55 new dwellings. We consider land north of Hepworth Road is a suitable site located in a sustainable location, which should be allocated in the Local Plan to provide local housing need in Woodville and the District as a whole and support the higher growth strategy (High 2 scenario).

² <https://www.slp-emg.com/>

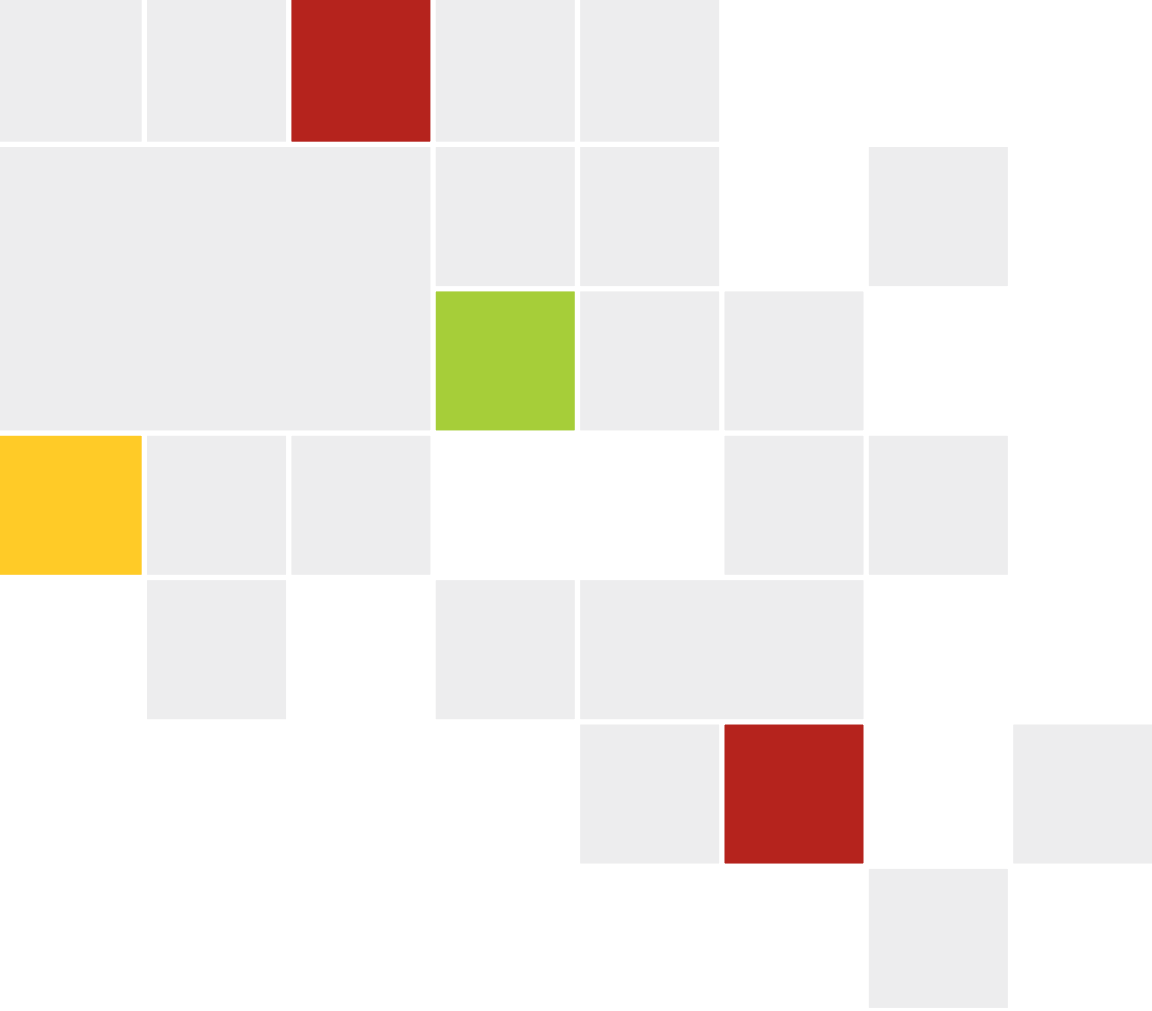
3. LAND NORTH OF HEPWORTH ROAD, WOODVILLE

- 3.1 Land north of Hepworth Road is a suitable site that is being promoted by Hawke Living as a proposed site allocation to the Local Plan for the development of approximately 55 new dwellings. A call for sites form has been completed and submitted to NWLDC to support the proposed allocation of the site.
- 3.2 Land north of Hepworth Road extends approximately 1.83 ha is relatively flat and vacant. It comprises of two adjoining land parcels. The northern parcel of land is a mix of grazing land and brownfield land, which abut on to South Street, with the north eastern corner bound by dwellings, mature trees and hedgerows. The adjoining southern parcel is previously developed brownfield land that abuts on to Hepworth Road, which is bound to the east by a deciduous woodland. Land to the west is to form a new housing development (planning reference 21/01380/RESM). A public footpath runs along the western boundary of the site and there is an existing access point off Hepworth Road.
- 3.3 The southern parcel which has been formally assessed and included in the Strategic Housing Land Availability Assessment 2016 (reference Wd2), is considered as land potentially suitable for housing development. The site's suitability from a highways perspective was considered achievable with no fundamental reasons for this site to be excluded from the Local Plan.
- 3.4 Land north of Hepworth Road would make a suitable and sustainable location to provide 55 new dwellings, which would form a logical extension to the existing settlement. With new housing development proposed west of the site, the proposed site would support the higher growth strategy (High 2 scenario) and contribute towards meeting local housing needs in Woodville and the District as a whole.
- 3.5 Furthermore, the proposal would deliver a policy compliant level of affordable housing on the site that would provide significant benefits to the local community and meet the social objective set out of the NPPF (2021). The development of the site would complete the southern eastern corner of Woodville and overall support the socio economic growth of the village.
- 3.6 The site is located within close proximity to local services with a convenience store, a nursery, Woodville Infant and Junior school, a play park and local a bus stop all located within 12 minutes of walking distance north of the site. The site is well related to the A511 connecting to the A38 (Derby) and A42 (East Midlands Gateway) and the nearest bus stop located 430m north of the site.

- 3.7 Land north of Hepworth Road is located in Flood Zone 1 and is not constrained by any ecological designations or constraints. The site has no known ownership issues and development of this site can be achieved within 5 years, ensuring delivery promptly on adoption of the plan.
- 3.8 The development of site would make a positive contribution towards the higher growth strategy (High 2 scenario) and equally support the growth of Sustainable Villages. The development of the site would support the Government's objective in significantly boosting the supply of homes as set out in Section 5 of the NPPF (2021) and support housing where it will enhance or maintain the vitality of rural communities. As such we strongly suggest this site is allocated within the proposed Local Plan to support the delivery of housing need across the District.

4. CONCLUSION

- 4.1 These representations to the NWLDC - Local Plan Review - Development Strategy and Policy Options (Regulation 18 consultation) have been prepared on behalf of Hawke Living and present considerations in relation to the proposed scale and distribution of housing of the Development Strategy which we consider that the Council should review.
- 4.2 Hawke Living are promoting land north of Hepworth Road as a proposed housing allocation to the Local Plan 2039, to help meet local housing needs in Woodville and the District as a whole.
- 4.3 These representations support that the broad distribution of housing development aligns with the settlement hierarchy, which although is a continuation of the adopted Local Plan, it continues to direct growth towards the most sustainable settlements which are the principal town, KSCs, LSCs and Sustainable Villages.
- 4.4 In relation to the proposed scale and distribution of housing set out in the consultation documents, whilst we support the higher growth scenario (High 2, scenario 5,100 dwellings scenario), over the plan period, we do not support the approach to the distribution of housing.
- 4.5 The proposed High 2 scenario Option 7b, would provide good quality homes to meet local need, as development would be spread amongst the principal town, KSVs, LSCs, Sustainable Villages, and a new settlement. However given that there are 18 Sustainable Villages, and some of these comprise of more services and access to employment sites than other villages, it is not considered that 5% of housing in the Sustainable Villages is sufficient and that further levels of housing should be allocated to the Sustainable Villages, such as Woodville.
- 4.6 This approach would provide multiple benefits including; supporting the role, function and growth of Sustainable Villages over the plan period and promote sustainable development in the rural areas, where housing should be provided to enhance or maintain the vitality of rural communities (paragraph 79 of the NPPF). This approach would support future employment growth by providing new market and affordable homes in sustainable locations that contribute to achieving the spatial objectives of the plan.



Boyer



Dear Sir/madam

Thank you for consulting Sport England on the above,

Q1 – Sport England supports the local plan review objectives in so far as the matters which Sport England is concerned.

Q16 - we agree with the principle of the health and wellbeing policy clearly we would like to see references to active design and other similar guidance which covers the same principles.

Our new Strategy 'Uniting The Movement' is a 10-year vision to transform lives and communities through sport and physical activity. We believe and will advocated sport and physical activity has a big role to play in improving the physical and mental health of the nation, supporting the economy, reconnecting communities and rebuilding a stronger society for all. We will be a catalyst for change and join forces on 5 issues which includes connecting communities, connecting with Health and Wellbeing and Active Environments.

The new strategy can be downloaded from our website [here](#) The strategy seeks to;

Connect Communities

We want more communities to enjoy the benefits of what sport and physical activity can do, both for individuals and the place where they live and work. Those benefits will come from a more bottom-up approach, working with – not doing things to – communities, and helping those affected to play a role in what happens in their neighbourhood and how it gets done.

Active communities can be such a powerful tool in building great places to live.

Connect with Health and Wellbeing.

We know that there are many organisations working to improve health and wellbeing, from the NHS to those in the voluntary and community sector, local authorities, employers and the commercial health and wellbeing sector.

The strategy creates a potential to improve existing connections and explore new areas to help strengthen people's health and wellbeing, from childhood right through to older age.

Therefore Q17 and Q18 are supported

Active Environments

Sport England considers that the planning system plays a vital role in shaping our built environment and that can play a big part in the movement of people and getting people active. Modern-day life can make us inactive, and about a third of adults in England don't do the recommended amount of weekly exercise, but the design of where we live and work can play a vital role in keeping us active.

We want to make the choice to be active easier and more appealing for everyone, whether that's how we choose to move around our local neighbourhood or a dedicated facility for a sport or activity.

As part of Sport England's drive to create an active environment, we promote Active Design through all planning activity. Active Design is Sport England's contribution to the wider debate on developing healthy communities. Active Design is rooted in Sport England's aims and objectives to promote the role of sport and physical activity in creating healthy and sustainable communities. Active Design wraps together the planning and considerations that

should be made when designing the places and spaces we live in. It's about designing and adapting where we live to encourage activity in our everyday lives, making the active choice the easy choice. Sport England has produced design guidance on 'Active Design' that can be downloaded from the website [here](#).

Regards Steve

Steve Beard
Planning Manager

Local Plan Review. Consultation

Nick and Sue Hollick



We moved to Diseworth over 40 years ago, primarily to enjoy a conservation village in a rural area. During this period development has been on a massive scale right up to the parish boundary, two working farms including associated farmland (Finger Farm and Gimbro Farm) are now under concrete, three working farms within the village are now housing developments and the consequence of this raging development is that the village is no longer the quiet rural community we moved into. With HS2 plans passed for the line to skirt the village and the ever present threat of a second runway surely Diseworth has had more than its fair share of massive scale development. Whilst the following statement is another person's point of view we wholly agree with the content and support these views

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth.

I also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.
2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.
3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.
4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.
5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.
6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an "immediate need for additional employment land". Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being "detrimental to ...nearby residential properties". Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

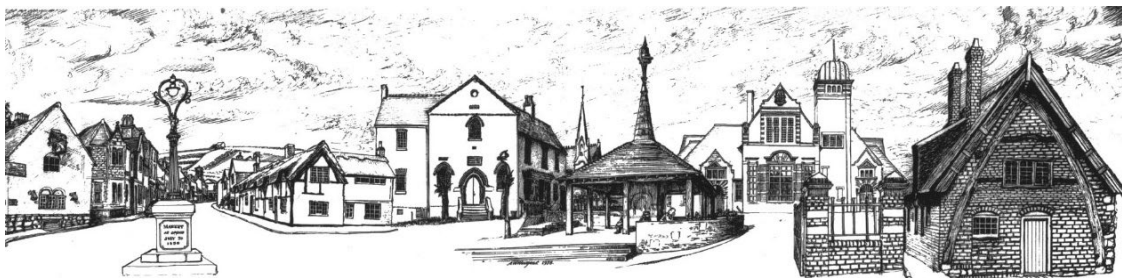
15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by

the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

.....A.N. Other



President: Lord Ralph Kerr DL

www.melbournecivicsociety.org.uk

North West Leicestershire Local Plan Review Development Strategy and Policy Options Public Consultation January 2022

Response from Melbourne Civic Society

Introduction

Melbourne Civic Society is based in Melbourne, Derbyshire and we do not normally become involved in Leicestershire planning issues. However, we do have members in North West Leicestershire, and the Isley Walton New Town proposed in this review is so close to Melbourne that on this occasion we feel it necessary to make comment.

Our comments predominantly relate to Section 4 of the consultation document 'Development strategy options for housing' and to Question 4 and 5. We have not attempted to assess and analyse any other aspects of the consultation nor answer any other questions. We note the Objectives 1-15 set out in North West Leicestershire Local Plan, March 2021, and will refer to these objectives as required.

Consultation question 4

Q4 - Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

We disagree.

The 'proposed approach' referred to in the question, actually includes two quite different scenarios for potential housing with significantly different growth figures. The question makes no distinction between these different scenarios. In our view, this is a meaningless question, consultees have no idea what they are asked to agree to, nor which scenario will be considered.

Consultation question 5

'Q5 - Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.'

We disagree.

The 'proposed approach' referred to in the question, actually includes two quite different scenarios for the distribution of housing with significantly different implications. The question makes no distinction between these different scenarios. In our view, this is a meaningless question, consultees have no idea which scenario they are asked to agree.

We will concentrate our comments on the High 2 scenario.

Assessment of options

The consultation document identifies, for each scenario, a series of options for the potential distribution of housing. Each option is judged on a series of up to 12 'sustainability effects', which are assessed as positive or negative, some as significantly so.

There is no explanation of what these 'sustainability effects' mean nor how they are assessed, though it is suggested they are a summary from the 'Sustainability Appraisal'. There are two documents called Sustainability Appraisals, one of 121 pages and a second Spatial Sustainability Appraisal of 41 pages. A consultee cannot be expected to read and assess these to verify the assigned sustainability effects.

We consider that the consultation does not make clear the grounds for assessing the options.

New Settlement – General Comments

A recent report in the Guardian¹ newspaper referred to the undesirability of new developments in rural environments. The Guardian referred to a research report - Building Car Dependency by Transport for new Homes². This research analysed a number of new settlements and found that those on greenfield sites out of major towns, were designed and built assuming car dependency. The report strongly recommends new developments in locations with readily available and extendable sustainable transport. At this time of increased climate change and fuel price volatility, we consider that new settlements in the countryside are to be avoided.

High 2 Scenario Option 7b - Isley Walton New Town

The proposed approach (High 2 scenario - Option 7b) includes a proposed New Settlement of 1,785 houses. The location of the new settlement is not made clear in the question, though is suggested 10 pages previously. It is then necessary to search a separate 561 page document (the SHELAA) to find mention and map of a potential Isley Walton New Town.

The scale of the proposed new town is unclear and confusing:

- The consultation document says 1,785 houses
- SHELAA suggest a mix of housing and employment with 2,370 - 4,740 houses
- A public meeting in Diseworth held on 14th February was told that the whole site would be for housing – i.e. 4,740 houses.

It is very unclear what is actually proposed. Respondents are asked to agree a new settlement of 1,785 houses, when in fact NWLDC planning officers propose a settlement of 4,740 houses. In our view, this discrepancy may make the Question 5 and the consultation invalid.

From the consultation report, we can see from the no clear reason for choosing this site, except that the report suggests the land owners are willing to sell. Some residents of NW Leicestershire have also suggested another reason - that the site is safely distant from Coalville.

The High 2 scenario apparently makes some provision to meet an unmet need from Leicester City. There does seem to be a fundamental flaw in this plan which seeks to allocate housing provision for Leicester in the remotest corner of the county, furthest away from the city of Leicester.

¹ <https://www.theguardian.com/society/2022/feb/07/new-greenfield-housing-forcing-people-to-use-cars-report-finds>

² [Building-Car-Dependency-2022.pdf \(transportfornewhomes.org.uk\)](#)

We believe there are many reasons not to develop the Isley Walton site.

Traffic.

When there are events at Donington Park, the A453 through Isley Walton and the roads to Melbourne and Castle Donington are highly congested to the point of gridlock.

The Council's own Sustainability Appraisal forecasts traffic growth in the area due to increased car usage and growth of East Midlands Airport (EMA).

It does not seem sensible to plan to create over 4,500 new houses with 10,000 additional cars in this already congested area. This new settlement would cause inevitable overcrowding of the rural road system. Drivers will take rat runs through local villages. On Donington Park event days, the existing roads may become so overcrowded, that drivers will seek rat runs through the new settlement.

We are particularly concerned about the potential impact on roads into and through south Derbyshire. An additional 10,000 cars resident so close to the county border will inevitably lead to greatly increased traffic and damage on the rural routes to Wilson and Melbourne. There would be potential traffic overcrowding in Melbourne and on Swarkestone Bridge. These are all impacts felt and borne by Derbyshire ratepayers.

Noise

The site is subject to significant noise issues. The east of the site is affected by significant noise from the A42. The west of the site will be impacted by noise from Donington Park, practice and events, and by aircraft take-off noise. The northern edge of the site adjacent to A453 will be impacted by ground and air noise from EMA.

We would draw attention to UK Government policy to reduce the number of people affected by aircraft noise, based on the International Civil Aviation Authority (ICAO) 'balanced approach'. The main elements of the 'balanced approach' are 'Reduction of noise at Source' i.e. the use of quieter aircraft, which is not a local authority responsibility, and Land Use Planning – which is very much a Local Authority responsibility. The main elements of the 'balanced approach' were incorporated into UK law as part of Statutory Instrument 2003 No. 1742, the Aerodrome (Noise Restrictions) (Rules and Procedures) Regulations 2003. Within this context, 'land use planning' clearly means the separation of residential and sensitive properties from the proximity of aircraft noise. While the meaning of 'land use planning' is not further defined, the environmental objective is clear – 'limiting or reducing the number of people significantly affected by aircraft noise' – restated in the Statutory Instrument.' We would argue that actually planning to locate up to 15,000 people immediately adjacent to the airport runway is in direct contradiction of Government policy and of the existing UK legislation.

We believe that Objective 1 of the Local Plan - "*Promote the health and wellbeing of the district's population*" would not be met on grounds Noise.

Air Pollution

The Sustainability Appraisal identifies five air quality management areas in NWL, three of which are in this area – Castle Donington, Kegworth and M1(J23A-24). There will also be increased air pollution from growth in air traffic and associated road traffic. It does not seem sensible to add more houses, cars and residents into an already congested and polluted area.

We believe that Objective 1 of the Local Plan - "*Promote the health and wellbeing of the district's population*" would not be met on grounds of air pollution.

Protection of Countryside

The northern section of NW Leicestershire around Castle Donington and Kegworth is already over developed. The area suggested for the Isley Walton New Town represents invaluable open countryside, providing great visual relief south of the airport. We feel that rather than being developed, the area south of the airport should be protected as open ground as set out in Objectives 11 and 12 of the NWL local plan.

We believe that Objective 11 (*Protect and enhance the natural environment...*) and Objective 12 (*Conserve and enhance the quality of the district's landscape character*) would not be met.

For the reasons stated above we are strongly opposed to the proposed development of a new settlement at Isley Walton.

Mr Neil Wright
Chairman
Melbourne Civic Society

9th March 2022

For whom it may concern

Will there ever be an end to covering our green and pleasant land in concrete? The so called developers should hang their heads in shame to want to build near Isley Walton and Diseworth. What's happened to 'rewilding'? We are told to put our dwindling wildlife at the top of our priority list but, yet again, they are at the bottom. They cannot make protests themselves apart from disappearing. Then there is an outcry about it. That's far too late as the wild life will never come back as it won't have anywhere to go. Stop this vicious cycle by rejecting the plan.

To finish, the proposed development is on a sharp hill running down towards Diseworth and Long Whatton. This will inevitably cause more flooding.

A very sad Mrs. Margaret Green.

9th March 2022

By email planning.policy@nwleicestershire.gov.uk

Local Plan Review - Consultation Response

Dear Sirs

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth. I also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

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- 4. Objective 9.** Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.
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- 8. Sustainability.** The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.
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15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours faithfully



Mr T Lane

9th March 2022

By email planning.policy@nwleicestershire.gov.uk

Local Plan Review - Consultation Response

Dear Sirs

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth. I also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

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Yours faithfully

██████████

Mrs K Lane

9th March 2022

By email planning.policy@nwleicestershire.gov.uk

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Yours faithfully

██████████

Mr N Lane

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name: Gail Lee
[REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential industrial development of land south of the A453, which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

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1. Objective 1. Health and well-being. The proposal fails this test.

2. Objective 3. High-quality housing stock and reflection of local context. The proposal fails this test. It will not reflect local context.

3. Objective 9. Effective flood prevention. The proposal fails this test. Water management west of Diseworth has been mismanaged for many years. The creation of 100 hectares of concrete on EMP90, on a down slope to Diseworth, will create major problems with run-off and add to the repeated flooding in the area. This will also have a major impact on householders' ability to obtain adequate insurance cover.

4. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self-evident that the proposal for an industrial zone fails this test. The Diseworth natural heritage is open [designated] countryside and farmland.

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6. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Proposal EMP90 falls short of this requirement and will destroy open countryside and beautiful views.

7. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as highlighted in the Local Plan [5.17]. EMP90 fails this test. It will generate pollution

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9. Traffic. The development of an industrial zone EMP90 will increase the volume of HGVs and cars using our local roads. These roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth (and Long Whatton), already suffering from through traffic, will become a major rat run avenue for this new proposal.

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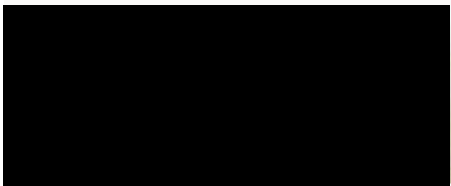
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13. Summary. This proposal is an ill-conceived scheme, in the wrong place and on an unprecedented scale. It is detrimental to the local environment and is of no benefit to the area. The proposal gives no regard to the consequences of the development on either the local communities or on the environment. Furthermore, the proposal endeavours to ride roughshod over pretty much every relevant NPPF planning principle. It ignores the principle objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain.

14. Conclusion and Planning Integrity. In order for this proposal to progress, it will be necessary for NWLDC to compromise, ignore or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

North West Leicestershire
Local Plan Review:
Development Strategy and
Policy Options
Land at Main Street /
Tonge Lane,
Breedon on the Hill

Prepared by Fisher German LLP on behalf of
Barwood Homes

Project Title:

Land at Main Street/Tonge Lane, Breedon on the Hill

Author:

James Beverley MRTPI

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

01 Introduction

- 1.1 These representations have been prepared on behalf of Barwood Homes in respect of their land interests at Land at Main Street/Tonge Lane, Breedon on the Hill, as illustrated on Figure 1 below. Barwood Homes are a respected midlands-based housebuilder who deliver high quality new residential development and who have a strong track record of delivery in the region.



Figure 1: Site Location Plan

- 1.2 For ease of reference these representations follow the order of the questions in the Regulation 18 Consultation Document. Where we have not commented we have no specific comments at this stage.

02 Representations

Q1 - Do you agree with these Local Plan Review Objectives? If not, why not?

- 2.1 Barwood Homes broadly agree with the Local Plan Review Objectives. It is however considered that the scope of Objective 2, which relates to the delivery of new homes, should be extended to reflect the need for authorities within the Leicester and Leicestershire Housing Market Area (HMA) to assist Leicester City in meeting its unmet needs in full. Given Leicester City's functional relationship with Leicestershire, which predominantly forms the Leicester travel to work area, it is entirely likely that Leicester City's unmet needs will naturally need to be met in the wider county.
- 2.2 Failure to deliver the housing needs of the HMA as a whole will result in further increases in house prices due to the increases in demand. This will have significant economic and social impacts. It is therefore essential that the sufficient housing is provided so that the needs of the HMA are delivered, thus ensuring supply keeps up with demand, that the Plan does not fail, and that speculative applications are not increased as a result of any such failings. It is considered that the wording of Objective 2 should be amended to state:

*Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type. **Ensure the needs of the Housing Market Area can be met in full through the delivery of additional housing, above local demographic needs, to meet unmet needs from Leicester City.***

Q 2 – Do you agree with the proposed settlement hierarchy? If not, why not?

- 2.3 The Settlement Hierarchy is generally supported however, it is considered that it should be amended to better reflect proposals within the Leicester and Leicestershire Strategic Growth Plan 2018 (SGP) and in particular the role of the Leicestershire International Gateway (LIG). Breedon on the Hill falls within the LIG (Figure 2 overleaf), and is in close proximity of extensive employment opportunities. It is considered that sustainable settlements such as Breedon on the Hill should play a role in the LIG and should be considered more positively for development.

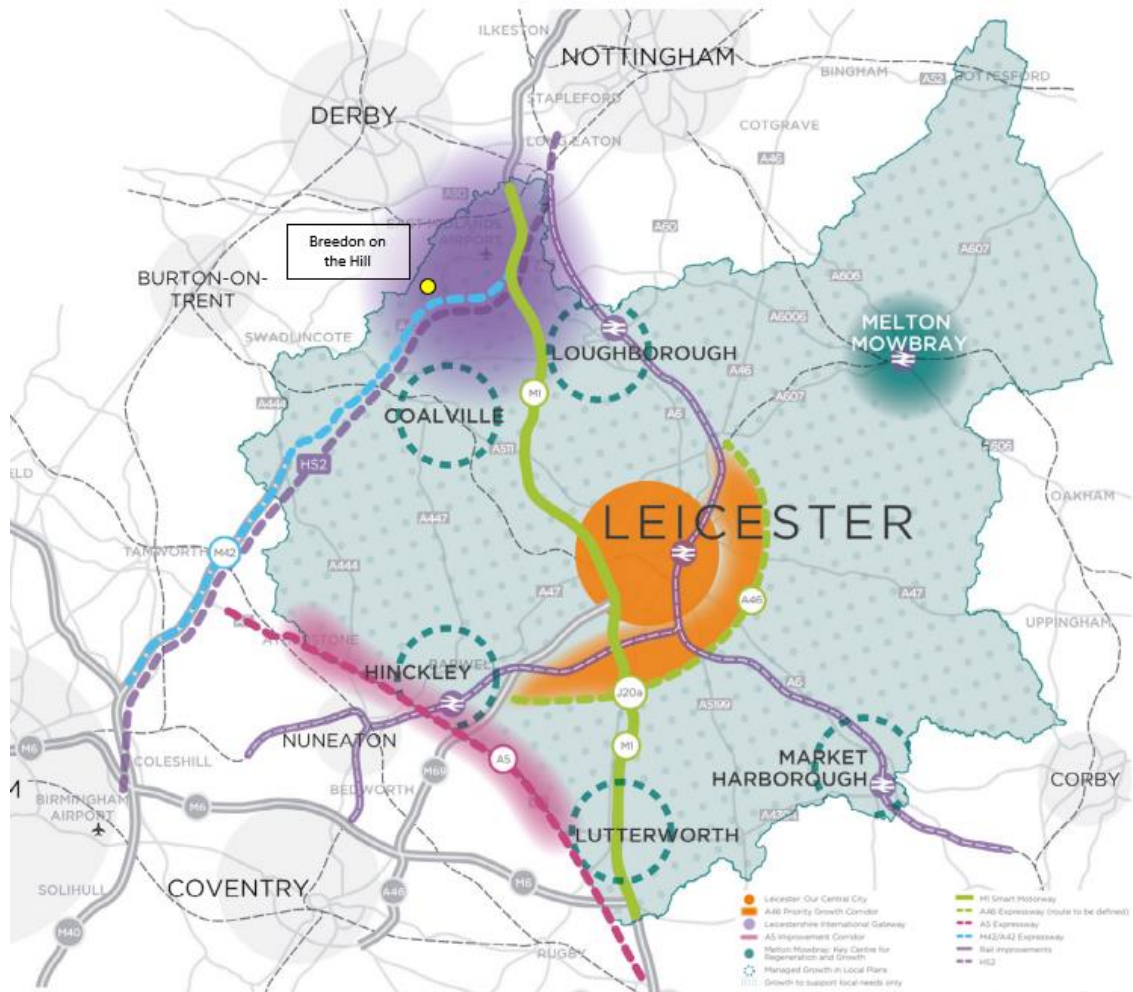


Figure 2: SGP Figure 6 (showing Breedon on the Hill. Purple Highlighting illustrates the LIG)

- 2.4 Breedon on the Hill is identified in the proposed settlement hierarchy as a ‘Sustainable Village’, the fourth tier of settlements on the Spatial Hierarchy. This position however does not reflect its location within the LIG. Breedon on the Hill lies within 3 miles of East Midlands Airport and the East Midlands Gateway. New homes at Breedon on the Hill would support the services and facilities of the settlement itself as well as ensuring new homes are located within close proximity of jobs easily accessed by sustainable travel opportunities. The delivery of homes in settlements within the ‘Sustainable Villages’, over and above that currently outlined, particularly in settlements recognised within the Strategic Growth Plan, would also ensure market choice in the delivery of homes across the authority.
- 2.5 The above becomes particularly relevant when considered against the likelihood of an increased housing requirement as a result of the future distribution of Leicester City’s unmet need. Small developments in sustainable locations such as Breedon on the Hill will not only contribute to the LIG strategy, but will also contribute positively to meeting the District’s housing requirements in the initial years of the Plan period.

- 2.6 Having regard to the proximity of Breedon on the Hill to the LIG, and the services and facilities which already exist within the settlement, it is considered that the settlement should be elevated within the Spatial Hierarchy. Alternatively, its unique location within the LIG and the role it can play in delivering a greater number of homes than other Sustainable Villages should be recognised. It is noted that there is already significant committed development in Coalville in particular (and Loughborough in Charnwood) which fall just outside of the LIG: appropriate allocations in settlements such as Breedon on the Hill would reduce the development pressures on these towns and ensure the LIG is supported by and benefits from a range of settlements, not just the larger urban areas.
- 2.7 New homes in Breedon on the Hill would likely serve a different market to new housing delivery in larger urban centres like Coalville, thus ensuring a range of housing is provided for the differing markets that will continue to arise from the development of the LIG. Owing to its proximity to the LIG, Breedon on the Hill will be attractive to those moving into the area to fill jobs provided at the LIG, and also those who already reside in North West Leicestershire and may want to move closer to their jobs.
- 2.8 Without sufficient housing growth, the existing residents of Breedon on the Hill may find themselves priced out of the local housing market due to increasing house prices and rent arising from increased demand to live close to the LIG. House prices in Breedon on the Hill have increased by 10% since the last peak in 2017 (Zoopla). It is noted that Breedon has one of the lowest levels of social rent accommodation in North West Leicestershire, with only 6.7% of properties being for social rent. This is approximately half the District average (circa 15%). There is overprovision of private rent within Breedon on the Hill, with 19% of properties being for private rent versus a District average of only circa 11%. Increased demand will thus place pressure on those in rental accommodation as many landlords will seek to increase rental costs in line with local demand.
- 2.9 North West Leicestershire's Local Housing Needs Assessment - Report 3 (June 2020) confirms that Breedon on the Hill has an annual net affordable need of 2 dwellings per annum. This equates to a net need up to 2039 of 38 dwellings. Notwithstanding the potential for an exception site, this will require allocations or sites delivering circa 120 dwellings, assuming 30% affordable housing.
- 2.10 North West Leicestershire's Local Housing Needs Assessment - Report 2 (June 2020) sets out that the housing need for Breedon on the Hill, based on demographic, policy-off need, is likely to be in the region of 78-95 dwellings up to 2039, which would require further allocations and permissions to satisfy in its own right. When regard is had for policy-on interventions, such as the LIG and the impacts of migration associated with significant employment growth in the locality, demand in Breedon on the Hill is likely to

be far in excess of that. It is considered vital therefore that the Council ensure that Breedon on the Hill and other settlements in the LIG respond positively to increased housing needs and this should be reflected either within the Spatial Hierarchy or distribution of housing, preferably both for effectiveness and clarity.

- 2.11 As demonstrated by the Council's Settlement Study (2021) Breedon on the Hill contains a range of services and facilities and is thus considered to be a sustainable settlement entirely capable of serving an increase in population. Access to the LIG however is not however considered within the evidence document or within the proposed spatial hierarchy as a factor, this approach therefore requires further refinement to ensure sustainable settlements located within an area of strategic regional importance are not unnecessarily restricted when they can make vitally important contributions to meeting housing needs and ensuring new jobs have the requisite local population, without relying on longer distance commuting. It is noted that North West Leicestershire is a net importer of labour, and without sufficient housing growth in settlements close to core job opportunities, this is a trend that is likely to continue and potentially worsen.

Q4 - Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 2.12 North West Leicestershire District Council's recognition that an increase from base Local Housing Need is required is supported. It is recognised that it can be politically sensitive to pursue growth agendas and higher levels of growth. To deliver the lowest level of housing possible would be socially and economically damaging. It must be remembered that those who most require housing growth, including younger people and those on lower incomes, are less likely to engage in the development of a new Local Plan and thus Officer's have a duty to ensure that these individuals needs are recognised and supported through the Plan preparation. Moreover, as demonstrated through the consultation document and supporting evidence, the arguments for an increase in housing requirement from Local Housing Need are significant.
- 2.13 The Local Housing Need for North West Leicestershire, derived using the Standard Method equates to 368 dwellings per annum - a Local Housing Need of 6,992 dwellings over the 2020-2039 Plan period (noting that Table 2 of the Reg.18 consultation shows a standard method of 359 and 17 years, rather than the 19-year plan-period).

- 2.14 The PPG is clear that when establishing a housing requirement *"the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates."* [our underlining] (Paragraph: 010 Reference ID: 2a-010-20201216)
- 2.15 Examples of scenarios which may justify an increase of housing requirement include growth strategies, the delivery strategic infrastructure improvements or the requirement of an authority to take on unmet need from a neighbouring authority. It is important to note that the PPG sets out that the consideration of whether uplifts to the housing requirement from local housing need are necessary should be undertaken prior to and independently from any consideration of the ability of an area to meet that need.
- 2.16 The Council set out the different reasons why it considers an uplift to be appropriate at page 13 of the Consultation Document. The reasons given include;
- **Demographic Trends** – These set out a range between 370 and 752 dwellings per annum.
 - **Build Rates (Market Signals)** – Show an annual delivery of 619 dwellings per annum since the adoption of the extant Local Plan, with recent years averaging 770 dwellings per annum.
 - **Unmet Needs** - Set out Leicester City's unmet needs of circa 18,000 dwellings which it is reasonable to assume will be met in part in North West Leicestershire.
 - **Deliverable Growth Strategy** – Refers to the SGP for Leicestershire which identifies a housing figure for North West Leicestershire of 512 dwellings per annum.
- 2.17 In addition to the above, it is considered that regard to the need for additional affordable housing should be had when reviewing whether any uplift to Local Housing Need is delivered. North West Leicestershire's Local Housing Needs Assessment - Report 3 (June 2020) sets out an annual affordable housing need of 195 dwellings per annum net, equating 3,605 over the proposed Plan period to 2039. Notwithstanding the delivery of exception sites, to meet this need would require an annual delivery of 650 dwellings per annum, assuming 30% affordable housing delivery on all sites. Given it is considerably more likely that sites will on average deliver less than this (particularly given delivery in Coalville presently only needs to provide 20%) and that these losses will likely not be remedied by additional supply through exception sites, to meet affordable housing need will require growth in excess of 650 dwellings per annum.
- 2.18 The consultation document provides four growth scenarios which have been tested against various scenarios. These include how they perform against the four uplift reasons provided above; i.e. demographic trends, build rates (market signals), unmet needs and deliverable growth strategy.

- **Low** - 368 dwellings (standard method)
- **Medium** - 448 dwellings (Housing and Economic Development Needs Assessment 2017 (HEDNA))
- **High 1** - 512 dwellings (Leicester and Leicestershire Strategic Growth Plan)
- **High 2** - 730 dwellings (2018 household projections with an allowance for vacancy rates in dwellings)

2.19 Two of the scenarios have already been ruled out by the Council, that being **low** and **medium**. The **low** option was considered to perform poorly against all factors and thus is "*not be an appropriate basis on which to continue planning for future provision*".

2.20 The same conclusion was reached in respect of the **medium** scenario, as the 1,500 additional dwellings to the LHN would not be appropriate in respect of seeking to meet the 18,000 dwelling unmet need from Leicester. The additional dwellings above the LHN would provide for only 8% of the overall level of unmet need and leave no flexibility to meeting NWLDC's own needs. It is agreed that this contribution would be too low, having regard for the spatial relationship between Leicester and North West Leicestershire, particularly including the implications of the LIG, which further requires higher levels of growth in the north of the County, beyond simple demographic needs.

2.21 The **High 1** option is acknowledged to perform better than **low** and **medium**, albeit there is still some concern in that the exact quantum of unmet need from Leicester City distributed to North West Leicestershire remains unknown and thus the provision may remain insufficient and require further review. In addition, the level of growth proposed through the High1 option is less than some of the demographic-led scenarios and current build rates within the District. If the higher demographic trends are realised, the level of housing that would functionally serve to respond to Leicester City's unmet need will be reduced, as local demographic need will eat into this provision. The same is true if there are higher levels of migration due to strategic scale employment provision associated with the LIG and wider district. The proposed High 1 scenario would also not provide sufficient housing to ensure affordable needs are met in full. For these reasons, it is not considered that scenario **High 1** is a realistic baseline for forming the additional growth strategy.

2.22 The remaining option is **High 2**. This is acknowledged by the Council to perform best when considered against all factors. As a net importer of labour, with significant economic proposals in place, it is absolutely vital that sufficient housing growth is provided in accordance with and to deliver planned economic growth strategies. Whilst affordable housing need was not considered in uplifting housing

figures, it is notable that **High 2** is the only growth option which would have the potential to meet the affordable housing needs of North West Leicestershire in full. We would contend that the ability to meet the Districts affordable housing need is a central factor in determining which scenario to use. High 2 would assist in making a substantial contribution to meeting identified unmet needs, whilst providing new housing for the labour market who may come from outside the HMA. **High 2** has substantial economic benefits to North West Leicestershire ensuring a suitable local labour force to meet the significant growth potential of the District, including that delivered through the LIG. It is also the only option that seeks to meet a realistically robust and commensurate level of unmet need from the City (circa 25%). Of the options proposed, **High 2** is considered to be the most justified approach and should be adopted as the minimum housing requirement. Having regard for the range of demographic scenarios, there is considerable justification for increases beyond **High 2**, as if a higher demographic trend is followed, or there are higher levels of inward migration in accordance with job growth, this will reduce the amount of housing which will cater for overspill from the city.

- 2.23 Whilst **High 2** should be adopted as a minimum requirement, an additional buffer should be applied to ensure that sufficient housing is brought forward and the local housing requirement can be met in full, without risks of losing the planned approach through the lack of an ability to demonstrate a 5-year housing land supply.

Q5 Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 2.24 The consultation document provides a range of options for the distribution of the housing requirement. Of the options proposed it is considered that a strategy reflecting something similar to Options 7 or 9 should be adopted.
- 2.25 Option 1 would deliver insufficient levels of growth, as acknowledged within the consultation document, and is thus clearly inappropriate and not suitable for further consideration.
- 2.26 Options 2 to 6 would unnecessarily restrict development in the sustainable settlements lower in settlement hierarchy. All settlements above the 'Local Housing Needs Villages' tier can make a valuable contribution towards the overall housing requirement, ensuring choice and competition in the market and supporting the vitality and viability of the existing services and facilities in the settlements.

- 2.27 In respect of Breedon on the Hill, a planning strategy which delivers no new positive allocations would not be justified or effective. It would not meet the established demographic need for Breedon, nor would it deliver the necessary level of affordable housing. Moreover, it would fail to take advantage of Breedon on the Hill's spatial location within the LIG.
- 2.28 Option 8 is considered inappropriate as it is not possible for the entire needs of the district to be delivered in one new settlement, within the Plan period. New settlements have significant lead in times to delivery. Experience in the area, and the evidence through Letwin Review, suggests it will take some time for such sites to come on stream. The financial implications of establishing appropriate levels of infrastructure to serve a new settlement often result with a reduction in the level of affordable housing provided, which would be in a clear conflict with the significant affordable housing need identified.
- 2.29 Very little preparatory work has been undertaken for the proposed New Settlement and as such it is considered unlikely that the site would be able to deliver the District's housing need within the Plan period. To rely on a single site where failure of the site to deliver, or deliver as expected, would leave significant issues in housing land supply and delivery. Moreover, this approach would not provide a choice and competition in the land and would essentially monopolise the remaining land supply to a small number of landowners/developers. The lack of a range of housing options would further not provide the choice and competition in the eventual for sale housing stock, which may encourage people to look elsewhere to find a property that meets their particular needs and ambitions. This approach would restrict sensible growth to a range of settlements, exacerbating the aging profile of some settlements and impacting vitality of services, facilities and public transport routes.
- 2.30 Options 7 and 9 are broadly supported in that they seek to provide homes through the settlement hierarchy including to Sustainable Villages, as per the extant Local Plan spatial strategy. These options could be improved as discussed below, to enable sensible growth, commensurate to the scale of the settlements. This approach will ensure there is a wide choice of housing in the market which will help to facilitate a more consistent delivery, alongside greater variety in the type of homes constructed. It will also ensure that sustainable settlements will deliver much needed new housing over the next 19-year period.
- 2.31 In respect of the detailed High 2 growth options explored, it is considered that there are issues with all options assessed. Options 7b and 9b are considered to be the most reasonable of the options explored, in that they are the only two which afford any growth throughout the hierarchy of sustainable settlements and offer the greatest prospects of being delivered, however as discussed below they are still considered

inappropriate in that insufficient growth is proposed in sustainable settlements. They are the only options which enable a range of sites to be brought forward as allocations and, as a consequence, a range of housebuilders who would then be able to build concurrently serving different parts of the market; a position acknowledged at paragraph 4.57 of the Reg.18 consultation.

- 2.32 Options 7b and 9b are further considered preferable within the consultation document (page 24) as *“both Options 7b and 9b would benefit local communities as they would provide opportunities for people to remain in their local community whilst moving on to or up the housing ladder”*. The level of growth directed to such settlements in options 7b and 9b however is insufficient to achieve this goal.
- 2.33 Option 7b is considered in the consultation document to be a continuation of the current strategy, with the inclusion of a new settlement, but meeting an updated housing need. This is acknowledged to be a strategy which has a current track record of deliverability (excluding the new settlement). Option 9b is acknowledged by the consultation document to provide sites which could benefit small and medium developers, of which the NPPF requires plans to support.
- 2.34 Through the consultation document the Council acknowledge the increases in demographic and affordable housing needs across the sustainable settlements (including the smaller sustainable settlements), and recognise that the lack of delivery of suitable housing will have significant social and economic implications. All settlements grow and it is an outdated planning notion to seek to attempt to contain settlement existing limits without proper justification. Modern practices of home working are likely to enable many working professionals to move further out of cities as they seek more rural surroundings, a trend expected to continue after the pandemic.
- 2.35 The consultation concludes that **Option 7b** is the preferred option if the **High 2** growth scenario is taken forward. We broadly support this in so far as it seeks to deliver across the spatial hierarchy, but object to the current proposed distribution offered by Option 7b, due to the level of housing directed towards sustainable settlements such as Breedon on the Hill, amounting to a dwelling per annum in each settlement (as set out below). Moreover, as set out throughout these representations the growth options do not factor in affordable and demographic housing need which will be far in excess of that proposed by this option, nor proximity to strategic employment sites such as the LIG, which logically must be considered spatially in the distribution of dwellings geographically.
- 2.36 Option 9b delivers more housing to settlements such as Breedon on the Hill, despite provision also being proposed in the lowest tier. It does this by reducing the level of housing in the Principal Town. We consider that the 1,020 dwellings directed towards Coalville in Option 9 is likely to be more than sufficient,

requiring an annual delivery of over 50 dwellings per annum consistently throughout the Plan period. This will ensure the localised market is not saturated and ensure a constant stream of housing to meet growing demographic needs. Coalville is less likely however to have some of the pressures of other settlements in that house prices are already at a more reasonable level and there is a far larger existing stock of social housing.

- 2.37 Whilst we have no specific objections to the principal of the allocation of a new settlement, we reserve comment until full details of the site are identified to ensure a detailed discussion as to the merits or constraints of such an allocation. It is however the case that the allocation of a new settlement is likely to have significantly greater adverse effects, when compared to other strategy options. New settlements are an option but should be considered after development in existing settlements have been fully reviewed and all reasonable alternatives exhausted.
- 2.38 Furthermore, the Council should not however place an over reliance on a new settlement in terms of overall housing delivery. If a new settlement is allocated, significant lead in time must be afforded and sensible build out rates adopted. An allocation should not presume to begin delivery until 10-15 years into the Plan period. This approach will enable a critical view to be undertaken at the 5 year review of the Plan to assess the progress of the site and revise delivery timescales if required. For these reasons we consider the allocation of the new settlement should be provided in part as a buffer to the overall housing requirement and should not be relied on to deliver the overall housing requirement, to minimise risks of non-delivery as there will be sufficient, wider sites to cater for any shortfalls in delivery of the new settlement. If a new settlement is allocated and relied upon as part of the overall housing delivery, then reserve sites should be designated with release criteria relating to key milestones of the Reserve Site. i.e., reserve sites will be released if outline planning permission for the new settlement isn't achieved by a certain date, reserved matters consents and then a trajectory of delivery, to ensure the plan is responsive to a lack of delivery.
- 2.39 The risks associated with overreliance on strategic site deliver are well documented. Your attention is draw to authorities such as neighbouring Rushcliffe, Nottinghamshire, wherein a failure of 5 out of 6 allocated strategic sites allocated in the Core Strategy to deliver as anticipated has caused a requirement to introduce a Part 2 Local Plan which allocates around 2,500 additional dwellings to compensate for the shortfall.
- 2.40 Moreover, we do not consider that the Plan has explored sufficient reasonable alternatives without a new settlement. Of the Council's 9 spatial distribution options, only three do not include a new settlement,

including the adopted Local Plan option. No options have been explored which distribute growth to Sustainable Villages without a new settlement, except Option 1 which has only been assessed against the Low scenario.

2.41 As per the above, we have no specific objection to a new settlement subject to the caveats set out, but at the very minimum we would expect the Council to explore more comprehensively the benefits or weaknesses of an approach which simply sought to distribute additional growth (High 2) through the existing spatial hierarchy. This approach taken has pre-determined that a new settlement is needed to meet the Council's growth aspirations. This is not true, there is significant latent capacity within settlements that the Council has confirmed as sustainable. Looking specifically at Sustainable Villages, the Council intends to designate 18 settlements within the spatial tier. Having regard for the 255 dwellings to be delivered through the 7b growth option, this would result in only 14 dwellings per settlement. Over the 19-year Plan period, this would result in the construction of less than a dwelling per annum. As set out above, this would not meet demographic or affordable needs for settlements such as Breedon on the Hill. The result of this strategy would be significant house price growth in these settlements, squeezing people out of their communities. This is entirely inappropriate and demonstrates the need for exploring further options. This should include an amended option 1 or 7 which delivers additional growth further down the spatial hierarchy.

2.42 We consider it is logical that Option 1 should be explored within the High 2 scenario (e.g. Option 1b) which is effectively a continuation of the adopted Local Plan distribution strategy, excluding delivery of a new settlement. This would look similar to Option 9b, without the new settlement, and re-distribution of the associated 1,785 dwellings across the spatial hierarchy (i.e. 595 dwellings apportioned to the KSC, LSC and Sustainable Villages tiers). We consider an Option 1b or 9c with the following growth distribution to be more appropriate than the options put forward:

Option 1b or 9c - Principal Town (1,020 dwellings), KSC (1,054 dwellings), LSC (850 dwellings), Sustainable Villages (1,972 dwellings) and Small Villages (204 dwellings)

2.43 This would be significantly less risky, as the Plan would not need to demonstrate the delivery of a highly complex new settlement. It would be eminently deliverable, as proved by the most recent local plan which adopted such an approach and has thus far been delivered. It would result in the greatest social benefit as it would support existing communities and ensure suitable housing exists to enable people to buy a home, upsize or downsize within their own settlement, without being forced to move due to rising house prices and lack of options. It would ensure balanced vibrant communities, with affordable housing and

new homes for first time buyers. It should not be a pre-requisite that this Plan will have to deliver a new settlement and suitable reasonable options excluding one should be fully explored before the Council weds itself to this approach.

- 2.44 We would object to any approach which would mean demographic and affordable housing needs for settlements such as Breedon on the Hill were unlikely to be met in full, when there are available suitable sites and willing housebuilders to deliver those homes which the evidence suggest is needed. We urge the Council therefore to fully and correctly explore the options of locating suitable and commensurate growth in sustainable settlements to ensure the housing needs of the District are met in a suitable manner having regard for where people are likely to want to live and not forcing people to leave the settlements in which they grew up.

Q6 Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?

- 2.45 Barwood Homes maintain their objection on the proposed self-build and custom housebuilding policy which seeks to enforce the delivery of self/custom build housing as part of new residential developments. It is well established that such criteria add unnecessary difficulty on modern housing developments and do not serve to provide additional units. In reality, such requirements may impede development unnecessarily, adding to developer burden without even delivering additional housing units. It is not our understanding or experience that many, if any, self-builders wish to buy a serviced plot within or adjacent to a modern housing estate. Our experience is for the most part that they are instead looking for more bespoke opportunities. While some housebuilders provide a custom build option as part of their product, this cannot be expected across all sites and the entire sector. Such requirements could therefore dissuade housebuilders from operating within the District and delay development while policy requirements are negotiated. It is a further fallacy to consider that because there is demand for 44 self-build plots on the register that they would all build their own property, even if suitable land was available. The reality is the difficulty and lack of needed skills and finances will mean only a small percentage of those on the register will ever develop a self-build property.
- 2.46 The suggested policy fails to identify the quantum of self/custom builds required on sites, and puts the onus on the applicant to evidence the need for self-build plots as part of the application, deferring to the local register. If a significant local need is evidenced through the register, what proportion of this should be delivered on development sites? Could sites be required to deliver all of such need or a percent? The policy is unnecessarily confusing and will serve to hinder affordable housing and other infrastructure

works. The interrelationship with affordable housing is also unclear. It would be unfair if the affordable housing requirement was taken as a percentage of units in total delivered on a site, including self-build plots. These plots will not deliver the same profits or certainties as market housing. If such a policy is advanced, affordable housing must therefore be reduced as a percentage of dwellings delivered, not inclusive of self-build plots. This will reduce the level of affordable housing available.

- 2.47 It is our continued view that the Local Plan, in line with the revised NPPF, should enable the delivery of appropriate self-build plots without overly prescriptive policies. We do not believe that the delivery of larger schemes should include the requirement to deliver a proportion of self or custom build units. Such an approach does not deliver any additional dwellings, but places risk upon the delivery of such schemes and increases their complications. There is no evidence that potential self-builders wish to be included in a modern housing development. Furthermore, there is no legal or national policy requirement that states the delivery of self-build plots is more important than the delivery of market housing, so it seems incongruous that the Council would look to structure a requirement in such a way so that less market housing would be delivered, to the detriment of much needed housing delivery.

Q26 What additional comments do you have about the Local Plan Review not covered by the preceding questions?

- 2.48 Having regard to the Council's preferred approach in respect of Option 7b, if the **High 2** growth figure is correctly adopted for the purposes of the Plan, additional allocations will need to be made in sustainable settlements. The Council's attention is therefore drawn to our client's land interests at Main Street/Tonge Lane, Breedon on the Hill.
- 2.49 The site is located to the north of the village (Figure 1) and is in an optimal location to deliver new housing. It relates well to existing services and facilities within Breedon on the Hill. The site has a good physical relationship with the existing settlement of Breedon on the Hill, with residential development to the east and south, with the quarry to the west. The site is further contained by existing mature vegetation both on the site's boundary and on neighbouring parcels of land, particularly to the west. The result of which is the site as promoted is very well contained and will not be widely visible from the surrounding area. Where it can be seen it will generally be seen in the context of the existing built form of the settlement or Berry Avenue to the east. On this basis it is considered to be an entirely logical location for sensible residential growth and forms a suitable, well defined development parcel.
- 2.50 It is noted that the Councils adopted Landscape evidence (Landscape Sensitivity Study Part 2) assess the site as part of a far larger parcel of land to the east and south of the village (11BRE-B). The

assessment concludes that there is no landscape, historic or ecological designation within the parcel, albeit it does adjoin Breedon on the Hill's Conservation Area adjacent to Worthington Lane, however this is located away from the promoted site to the south of the settlement. The development of the promoted site is not considered to have an impact on the Conservation Area. The landscape document concludes that the parcel is of medium landscape sensitivity for residential development and medium visual sensitivity for residential development.

- 2.51 In addition to the above, the promoted land has been assessed as part of the most recent SHELAA, under reference Br5 with some crossover into former Br6. In respect of Br5, the site is acknowledged to be outside the current defined limits to development as set out on the adopted Local Plan's policies map. The land is within a minerals consultation area for the potential presence of limestone resources. In respect of highways, on the basis of an initial assessment it is confirmed that there are no known reasons to preclude further consideration of the site on highways grounds, albeit more detailed assessments will be required in the future. With regards to ecology, whilst the site has some potential for protected species, subject to further assessment and mitigation the site is considered acceptable.
- 2.52 In conclusion the SHELAA assessment considers the site as potentially suitable, subject to a redrawing of the limits to development and evidence on matters such as flooding and minerals. The site is acknowledged to be available, being promoted by a housebuilder. There are no known viability issues and thus the site is considered potentially achievable. The capacity of the site is considered to be circa 84 dwellings.
- 2.53 SHELAA site Br6 has been deleted and was not formally assessed.
- 2.54 We again confirm that the site is being actively promoted by a respected housebuilder who consider the site to be available and achievable. Site specific technical evidence is currently being prepared and will be shared with the Council as it becomes available. On the basis of work undertaken to date, there are no issues which would preclude the development of the site.
- 2.55 An initial framework plan has been prepared and is provided below. It sets out an early indication as to how the site may be developed. The proposals will continue to be developed, informed by the site specific evidence. The masterplan shows the retention of TPOs, used to define an area of recreational space, landscape buffering to the Old Vicarage and new pedestrian connections. Access is proposed to be taken from Main Street. The quantum of development would assist in fully meeting the demographic needs of Breedon on the Hill, and with committed development in the village, make a reasonable and

commensurate contribution to District needs. Development here is spatially preferably located to serve the nearby LIG and other economic development in and around East Midlands Airport.



Figure 3: Emerging Illustrative Masterplan

2.56 This site should be considered favourably as an allocation as part of the emerging North West Leicestershire Local Plan. Barwood Homes would welcome working collaboratively with the Council to ensure the prompt delivery of the Local Plan and immediate delivery thereafter of a high-quality development at Main Street/Tonge Lane, Bredon on the Hill.

Miss C L Springthrope

10th March 2022

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

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90]. My objections are based on the following:-

1. LP. 5.25. Policy S3. The NPPF states that planning needs to "take account of the different roles and character of different areas," and that planning should recognise "the intrinsic character and beauty of the countryside". Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that "There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)". The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to "focus significant development in locations which are or can be made sustainable". At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local

lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable "The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy". The only way to achieve sustainability would be at the

expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - "Promote the health and wellbeing of the district's population" Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - "Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances". Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

6. LP. 4.6. Objective 4 - "Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care". The IW1 development is non-compliant. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion, will generate sufficient demand to justify 4.7k homes. This new village will therefore become primarily a dormitory town, increasing, rather than reducing, travel. Shopping will be at local supermarkets [Ashby, Loughborough, etc.] as will recreation and entertainment. ~10miles away. The principal transport used will be the car as no viable public transport system exists.

7. LP. 4.6. Objective 9 - "New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)." In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or it's partners undertake to achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining

land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

8. LP. 4.6. Objective 10 - "Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets". Again, neither proposal is compliant. The distinctive elements of the district's character between the MOTO MSA and Ashby de la Zouch [south of the A453] are rolling countryside and farmland. Both these developments will totally destroy all aspects of local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. L.P. 4.6. Objective 11 - "Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance". Neither development can possibly protect any of the natural environment – nor the associated wildlife, plant life, etc. at present supported by this open countryside. In respect of IW1, even the SHELAA recognises this fact [SHELAA pages 362-3] and lists several exposed species, etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character since its entry in the Doomsday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that "In view of its scale, it is more likely that a change to policy/strategy would be required". So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states "In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended". This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

10. LP Page 18. [Pollution]. This states that:- "...new development is not itself detrimentally affected by noise.". Anyone purchasing a property on the IW1 site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect of the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechnicons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

11. Traffic. The major access to/from both sites will be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, airport customer traffic and

EMA freight lorries. The LW1 site, housing a further 4.7k houses will produce circa 16k car movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even more problematic than already, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in transport movements. In respect of EMP90, this site has no viable access from the south or west [which would be through the village of Diseworth. The only access available is from the A453. As SHELAA concedes [Appendix 2. Page 170], this is not compatible with the Leicestershire Highways Design Guidance [Policy INS3] - unless the LHA can be persuaded to change their mind. Again, change the rules to fit the proposal, not change the proposal to fit the rules.

12. Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- "What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations." As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating - and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

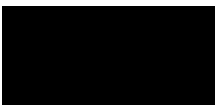
16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as "...Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development. Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies "...an immediate need for additional employment land". It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly "...detrimental to the amenities of...nearby residential properties and the wider environment" – vis. Diseworth.

18. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove it's own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully

A solid black rectangular box used to redact the signature of the sender.

Miss C L Springthorpe

The Template Letter:-

Local Plan Review. Consultation Response

Name MR & MRS. C. BROWN.....

Address 

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton and which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. My objections are based on the following:-

1. **LP. 5.25. The NPPF Policy S3** states that planning needs to *"take account of the different roles and character of different areas,"* and that planning should recognise *"the intrinsic character and beauty of the countryside"*. This proposal complies with neither of these criteria. The roles and character of the proposed site consist solely and only of open countryside and farmland. The site is also outside the Limits of Development and is in designated countryside so is again at variance with the National Planning Policy Framework [Policy S3].
1. **L.P. 5.24.** In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *"There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)"*. This proposed development is not compliant with that requirement - see LP 25 comment above.
1. **LP. 5.17.** A core principle of the NPPF is to *"focus significant development in locations which are or can be made sustainable"*. At present this proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan.
1. **LP. 4.6. Objective 1** - *"Promote the health and wellbeing of the district's population"* The proposal falls woefully short on this objective. It is immediately adjacent to the rural environment of Diseworth. Most residents have moved here because of the rural setting and access to open and unspoiled countryside, without any fear that this countryside would be despoiled, not

- with all that this implies. To have their local environment so significantly undermined cannot be good for their health and wellbeing. If it's Isley Walton today and it was the Rail/Freight interchange last week, Aldi and Amazon last year - what comes next? Where lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development.

1. **LP. 4.6. Objective 3** - *"Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances"*. The proposal fails to meet these criteria. The proposal is that the site accommodates 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and some employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective.

1. **LP. 4.6. Objective 4** – *Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care*. The development is non-compliant with this objective. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion will generate demand to fill 4.7k homes. This new village will therefore become primally a dormitory town, thus increasing, rather than reducing, travel. Domestic shopping will be at the prime supermarkets [ASHBY. Loughborough. etc. as

mode of transport will be the car as local as no viable public transport system exists.

1. **LP. 4.6. Objective 9** - *"New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)."* I am sceptical that there will be effective management of flood risk - whatever effort NWLDC and/or it's partners make to do so. The proposed site will substitute a vast amount of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse additionally now also accommodates much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse.
1. **LP. 4.6. Objective 10** - *"Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets"*. Again, non compliant. The distinctive elements of the district's character between East Midlands Airport and Ashby de la Zouch are rolling countryside and farmland. This development will destroy that aspect of the area.
1. **L.P. 4.6. Objective 11** - *"Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance"*. This development cannot possibly protect any of the natural environment - or associated wildlife, plant life, etc. Even the SHELAA recognises this [SHELAA pages 362-3] and lists several exposed species, etc.. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character from it's Doomsday entry.
1. **Noise**. In the context of noise, anyone purchasing a property on the site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy through tourism. It is also a centre of high noise production. A new village on it's doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East

path are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as noise and pollution. You can double glaze and insulate your house but that doesn't work when you have an open window in the bedroom or elsewhere in summer - and you can't double glaze your garden. Further, Breeden quarry lies close to the western edge of the proposed site and residents will be subjected to the sounding of regular [loud] warning sirens - shortly followed by the loud explosion of quarry blasting [maybe even with slight earth tremors.

1. **Traffic.** In the context of road traffic and infrastructure generally, the major access to/from the site will obviously be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, as well as airport customer traffic and EMA freight lorries. A further 4.7k houses will produce circa 16k car movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even more problematical than now, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in car movements.
1. **Cumulative Development.** There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or over development in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see above]. Certainly in the case of development around Diseworth, historically a farm based village, there have been very substantial tracks of agricultural land that have been given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to NPPF Policy 3 and must be recognised along with provision to curtail this erosion.

1. **Summary.** This proposal is an ill thought out scheme, in the wrong place, is on an unprecedented scale, would not significantly reduce the demand for housing in Leicester, is promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. It exists only because no regard is given to the consequence of the development on either the local communities or on the environment. Further, it endeavours to ride roughshod over pretty much every relevant NPPF planning principle and the primary objectives and planning criteria presently put in place by NWLDC in the present Local Plan.

1. **Conclusion and Planning Integrity.** In order for this proposal to progress it will be necessary for NWLDC to compromise, or ignore, it's own guidance and primary objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless.

North West Leicestershire
Local Plan Review:
Development Strategy and
Policy Options
Land off Moira Road,
Ashby-de-la-Zouch

Prepared by Fisher German LLP on behalf of
Mr R Botham

Project Title:

Land off Moira Road, Ashby-de-la-Zouch

Author:

James Beverley MRTPI

Contact Details:

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

01 Introduction

- 1.1 These representations have been prepared on behalf of Mr R Botham in respect of their land interests at Land off Moira Road, Ashby-de-la-Zouch, as illustrated on Figure 1 below. This includes 2 parcels of land, referred to as land north of Moira Road and land south of Moira Road through these representations for clarity.



Figure 1: Site Location Plan

- 1.2 For ease of reference these representations follow the order of the questions in the Regulation 18 Consultation Document. Where we have not commented we have no specific comments at this stage. Detailed consideration of the land parcels are included in response to Question 26.

02 Representations

Q1 - Do you agree with these Local Plan Review Objectives? If not, why not?

- 2.1 Our client broadly agree with the Local Plan Review Objectives. It is however considered that the scope of Objective 2, which relates to the delivery of new homes, should be extended to reflect the need for authorities within the Leicester and Leicestershire Housing Market Area (HMA) to assist Leicester City in meeting its unmet needs in full. Given Leicester City's functional relationship with Leicestershire, which predominantly forms the Leicester travel to work area, it is entirely likely that Leicester City's unmet needs will naturally need to be met in the wider county.
- 2.2 Failure to deliver the housing needs of the HMA as a whole will result in further increases in house prices due to the increases in demand. This will have significant economic and social impacts. It is therefore essential that the sufficient housing is delivered so that the needs of the HMA are delivered, thus ensuring supply keeps up with demand. It is considered that the wording of Objective 2 should be amended to state:

*Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type. **Ensure the needs of the Housing Market Area can be met in full through the delivery of additional housing, above local demographic needs, to meet unmet needs from Leicester City.***

Q 2 – Do you agree with the proposed settlement hierarchy? If not, why not?

- 2.3 The Settlement Hierarchy is generally supported however, in particular in relation to recognition and categorisation of Ashby de la Zouch as a Key Service Centre in the second tier of the Spatial Hierarchy. Ashby, with Castle Donnington, are demonstrably some of the most sustainable settlements within North West Leicestershire, behind only the Principal Town of Coalville, as acknowledged in adopted evidence and as such this should be reflected within the spatial hierarchy and subsequent distribution of housing and employment.
- 2.4 The Council's adopted evidence document *North West Leicestershire Settlement Study 2021* sets out that of the two Key Service Centres, Ashby is the more sustainable and the most sustainable settlement behind Coalville.

- 2.5 Ashby benefits from a wide range of services and facilities that would enable a low reliance on a private car. This includes primary schools, convenience shops, a doctors surgery, a pharmacy, community facilities and places of worship. Ashby also benefits from good levels of existing public transport, providing regular access to larger centres such as Leicester and Derby. Ashby further benefits from a strong existing employment base and strategic location on the A42, within easy access of larger centres and key employment sites, including both the Leicestershire International Gateway and Mercia Park. It is a demonstrably sustainable and suitable location to deliver further growth.

Q4 - Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 2.6 North West Leicestershire District Council's recognition that an increase from base Local Housing Need is required is supported. It is recognised that it can be politically sensitive to pursue growth agendas and higher levels of growth. To deliver the lowest level of housing possible would be socially and economically damaging. It must be remembered that those who most require housing growth, including younger people and those on lower incomes, are likely to be less likely to engage in the development of a new Local Plan and thus Officers have a duty to ensure that these individuals needs are recognised and supported through the Plan preparation. Moreover, as demonstrated through the consultation document and supporting evidence, the arguments for an increase in housing requirement from Local Housing Need are significant.
- 2.7 The Local Housing Need for North West Leicestershire, derived using the Standard Method equates to 368 dwellings per annum. A Local Housing Need of 6,992 dwellings over the 2020-2039 Plan period (noting that Table 2 of the Reg.18 consultation shows a standard method of 359 and 17 years, rather than the 19-year plan-period).
- 2.8 The PPG is clear that when establishing a housing requirement "*the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates.*" [our emphasis] (Paragraph: 010 Reference ID: 2a-010-20201216)
- 2.9 Examples of scenarios which may justify an increase of housing requirement include growth strategies, the delivery strategic infrastructure improvements or the requirement of an authority to take on unmet need from a neighbouring authority. It is important to note that the PPG sets out that the consideration

of whether uplifts to the housing requirement from local housing need are necessary should be undertaken prior to and independently from any consideration of the ability of an area to meet that need.

2.10 The Council set out the different reasons why it considers an uplift to be appropriate at page 13 of the Consultation Document. The reasons given include;

- **Demographic Trends** – These set out a range between 370 and 752 dwellings per annum.
- **Build Rates (Market Signals)** – Show an annual delivery of 619 dwellings per annum since the adoption of the extant Local Plan, with recent years averaging 770 dwellings per annum.
- **Unmet Needs** - Set out Leicester City's unmet needs of circa 18,000 dwellings which it is reasonable to assume will be met in part in North West Leicestershire.
- **Deliverable Growth Strategy** – Refers to the SGP for Leicestershire which identifies a housing figure for North West Leicestershire of 512 dwellings per annum.

2.11 In addition to the above, it is considered that regard to the need for additional affordable housing should be had when reviewing whether any uplift to Local Housing Need is delivered. North West Leicestershire's Local Housing Needs Assessment - Report 3 (June 2020) sets out an annual affordable housing need of 195 dwellings per annum net, equating 3,605 over the proposed Plan period to 2039. Notwithstanding the delivery of exception sites, to meet this need would require an annual delivery of 650 dwellings per annum, assuming 30% affordable housing delivery on all sites. Given it is considerably more likely that sites will on average deliver less than this (particularly given delivery in Coalville presently only needs to deliver 20%) and that these losses will likely not be remedied by additional supply through exception sites, to meet affordable housing need will require growth in excess of 650 dwellings per annum.

2.12 The consultation document provides four growth scenarios which have been tested against various scenarios. These include how they perform against the four uplift reasons provided above; i.e. demographic trends, build rates (market signals), unmet needs and deliverable growth strategy.

- **Low** - 368 dwellings (standard method)
- **Medium** - 448 dwellings (Housing and Economic Development Needs Assessment 2017 (HEDNA))
- **High 1** - 512 dwellings (Leicester and Leicestershire Strategic Growth Plan)
- **High 2** - 730 dwellings (2018 household projections with an allowance for vacancy rates in dwellings)

- 2.13 Two of the scenarios have already been ruled out by the Council, that being **low** and **medium**. The **low** option was considered to perform poorly against all factors and thus is *“not be an appropriate basis on which to continue planning for future provision”*.
- 2.14 The same conclusion was reached in respect of the **medium** scenario, as the 1,500 additional dwellings to the LHN would not be appropriate in respect of seeking to meet the 18,000 dwelling unmet need from Leicester. The additional dwellings above the LHN would provide for only 8% of the overall level of unmet need and leave no flexibility to meeting NWLDC’s own needs. It is agreed that this contribution would be too low, having regard for the spatial relationship between Leicester and North West Leicestershire, particularly when regard is had for the implications of economic growth aspirations within North west Leicestershire, which further requires higher levels of growth, beyond simple demographic needs. This will ensure development such as Mercia Park and the Leicestershire International Gateway have ready access to sufficient labour force to be truly successfully.
- 2.15 The **High 1** option is acknowledged to perform better than **low** and **medium**, albeit there is still some concern in that the exact quantum of unmet need from Leicester City distributed to North West Leicestershire remains unknown and thus the provision may remain insufficient and require further review. In addition, the level of growth proposed through the **High 1** option is less than some of the demographic-led scenarios and current build rates within the District. If the higher demographic trends are realised, the level of housing that would functionally serve to respond to Leicester City’s unmet need will be reduced, as local demographic need will eat into this provision. The same is true if there are higher levels of migration due to strategic scale employment provision associated with growth associated with the Leicestershire International Gateways and wider district developments such as Mercia Park. The proposed **High 1** scenario would also not provide sufficient housing to ensure affordable needs are met in full.
- 2.16 The remaining option is **High 2**. This is acknowledged by the Council to perform best when considered against all factors. As a net importer of labour, with significant economic proposals in place, it is absolutely vital that sufficient house growth is provided in accordance with and to deliver planned economic growth strategies. Whilst affordable housing need was not considered in uplifting housing figures, it is notable that **High 2** is the only growth option which would have the potential to meet the affordable housing needs of North West Leicestershire in full. **High 2** would enable a substantial contribution to meeting identified unmet needs, whilst providing new housing for the labour market who may come from outside the HMA. **High 2** has substantial economic benefits to North West Leicestershire ensuring a suitable local labour force to meet the significant growth potential of the District, including

that delivered through extant economic strategies. It is also the only option that seeks to meet a realistically robust and commensurate level of unmet need from the City (circa 25%). Of the options proposed, **High 2** is considered to be the most justified approach and should be adopted as the minimum housing requirement. Having regard for the range of demographic scenarios, there is considerable justification for increases beyond High 2, as if a higher demographic trend is followed, or there are higher levels of inward migration in accordance with job growth, this will reduce the amount of housing which will cater for overspill from the city.

- 2.17 Whilst **High 2** should be adopted as a minimum requirement, an additional buffer should be applied to ensure that sufficient housing is brought forward and the local housing requirement can be met in full, without risks of losing the planned approach through the lack of an ability to demonstrate a 5-year housing land supply.

Q5 Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 2.18 The consultation document provides a range of options for the distribution of the housing requirement, ranging from options 1 to 9, as set out at Table 5 within the consultation document.
- 2.19 Option 1 would deliver insufficient levels of growth, as acknowledged within the consultation document, and is thus clearly inappropriate and not suitable for further consideration.
- 2.20 Options 2 to 6 would unnecessarily restrict development in the sustainable settlements lower in settlement hierarchy. All settlements above the 'Local Housing Needs Villages' tier can make a valuable contribution towards the overall housing requirement, particularly the Service Centres, ensuring choice and competition in the market and supporting the vitality and viability of the existing services and facilities in the settlements.
- 2.21 Option 8 is considered inappropriate as it is not possible for the entire needs of the district to be delivered in one new settlement, within the Plan period. New settlements have significant lead in times to delivery. Experience in the area, and the evidence through Letwin Review, suggests it will take some time for such sites to come on stream. Very little preparatory work has been undertaken for the proposed New Settlement and as such it is considered very unlikely that the site would be able to deliver the District's housing need within the Plan period. To rely on a single site where failure of the site to deliver, or deliver

as expected, would leave significant issues in housing land supply and delivery. Moreover, this approach would not provide a choice and competition in the land and would essentially monopolise the remaining land supply to a small number of landowners/developers. The lack of a range of housing options would further not provide the choice and competition in the eventual for sale housing stock, which may encourage people to look elsewhere to find a property that meets their particular needs and ambitions. This approach would further restrict sensible growth to a range of settlements, exacerbating the aging profile of some settlements and impacting vitality of services, facilities and public transport routes.

- 2.22 In respect of Ashby, a planning strategy which delivers no new positive allocations and only relies on existing commitments would not be justified or effective, having regard for the increase in housing requirement and increase in the Plan period.
- 2.23 North West Leicestershire's Local Housing Needs Assessment - Report 2 (June 2020) sets out that Ashby has a quickly aging population, with one of the largest increases in over 65 year olds within the population, with a 31.4% growth in that cohort between 2011 and 2018. The Housing Needs Assessment Report 2 states that the housing need for Ashby de la Zouch (rest), based on demographic, policy-off need, is likely to be in the region of 1,049-1,385 dwellings up to 2039, broadly comparable to that required to meet its affordable housing needs. However, these are based on demographic needs only. When regard is had for policy-on interventions, such as ensuring the working population is suitably located having regard for strategic employment growth and the impacts of migration associated with significant employment growth in the locality, demand in Ashby is likely to be far in excess of that. Particularly when having regard for its proximity to strategic employment sites and its general attractiveness to new buyers. It is considered vital therefore that the Council ensure that Ashby should respond positively to increased housing needs and this should be reflected within the spatial distribution of housing.
- 2.24 North West Leicestershire's Local Housing Needs Assessment - Report 3 (June 2020) confirms that Ashby has an annual net affordable need of 23 dwellings per annum. This equates to a net need up to 2039 of 423 dwellings. Notwithstanding the potential for an exception site, this will require allocations or sites delivering circa 1,400 dwellings, assuming 30% affordable housing.
- 2.25 Whilst we have no specific objections to the principal of the allocation of a new settlement, we reserve comment until full details of the site are identified to ensure a detailed discussion as to the merits or constraints of such an allocation. The Council should not however place an over reliance on a new settlement in terms of overall housing delivery. If a new settlement is allocated, significant lead in time must be afforded and sensible build out rates adopted. An allocation should not presume to begin

delivery until 10-15 years into the Plan period. This approach will enable a critical view to be undertaken at the 5 year review of the Plan to assess the progress of the site and revise delivery timescales if required. For these reasons we consider the allocation of the new settlement should be provided in part as a buffer to the overall housing requirement and should not be relied on to deliver the overall housing requirement, to minimise risks of non-delivery as there will be sufficient, wider sites to cater for any shortfalls in delivery of the new settlement. If a new settlement is allocated and relied upon as part of the overall housing delivery, then reserve sites should be designated with release criteria relating to key milestones of the Reserve Site. i.e., reserve sites will be released if outline planning permission for the new settlement isn't achieved by a certain date, reserved matters consents and then a trajectory of delivery, to ensure the plan is responsive to a lack of delivery.

- 2.26 The risks associated with overreliance on strategic site deliver are well documented. Your attention is draw to authorities such as neighbouring Rushcliffe, Nottinghamshire, wherein a failure of 5 out of 6 allocated strategic sites allocated in the Core Strategy to deliver as anticipated has caused a requirement to introduce a Part 2 Local Plan which allocates around 2,500 additional dwellings to compensate for the shortfall.
- 2.27 As per the above, we have no specific objection to a new settlement subject to the caveats set out, but at the very minimum we would expect the Council to explore more comprehensively the benefits or weaknesses of an approach which simply sought to distribute additional growth (**High 2**) through the existing spatial hierarchy. This approach taken has pre-determined that a new settlement is needed to meet the Council's growth aspirations. This is not true, there is significant latent capacity within settlements that the Council has confirmed as sustainable, particularly including Ashby-de-la-Zouch.
- 2.28 We would object to any approach which would mean demographic and affordable housing needs for settlements such as Ashby were unlikely to be met in full, when there are available suitable sites and willing housebuilders to deliver those homes which the evidence suggest are needed, in lieu of delivery at an isolated new settlement. We urge the Council therefore to fully and correctly explore the options of locating suitable and commensurate growth in sustainable settlements to ensure the housing needs of the District are met in a suitable manner having regard for where people are likely to want to live and not forcing people to leave the settlements in which they grew up.

Q6 Do you agree with the proposed self-build and custom housebuilding policy?

If not, why not?

- 2.29 Our client objects the proposed self-build and custom housebuilding policy which seeks to enforce the delivery of self/custom build housing as part of new residential developments. It is well established that such criteria add unnecessary difficulty on modern housing developments and do not serve to provide additional units. In reality, such requirements may impede development unnecessarily, adding to developer burden without even delivering additional housing units. It is not our understanding or experience that many, if any, self-builders wish to buy a serviced plot within or adjacent to a modern housing estate. Our experience is for the most part that they are instead looking for more bespoke opportunities. While some housebuilders provide a custom build option as part of their product, this cannot be expected across all sites and the entire sector as it simply not within the business model of many housebuilders. Such requirements could therefore dissuade housebuilders from operating within the District and delay development while policy requirements are negotiated. It is a further fallacy to consider that because there is demand for 44 self-build plots on the register that they would all build their own property, even if suitable land was available. People may be registered on multiple registers, creating an artificial need. The reality is the difficulty and lack of needed skills and finances will mean only a small percentage of those on the register will ever develop a self-build property.
- 2.30 The suggested policy is further unclear as the evidence to support the need for self-build plots is required to be provided as part of the application, whereas the requirement to deliver said plots and the quantum of plots required will presumably come from the Council. The policy is unnecessary confusing and will serve to hinder affordable housing. The interrelationship with affordable housing is also unclear. It would be unfair if the affordable housing requirement was taken as a percentage of units in total delivered on a site, including self-build plots. These plots will not deliver the same profits or certainties as market housing. If such a policy is advanced, affordable housing must therefore be reduced as a percentage of dwellings delivered, not inclusive off self-build plots. This will reduce the level of affordable housing available and will create confusing situations if the self-build plots are not sold.
- 2.31 It is our continued view that the Local Plan, in line with the revised NPPF, should enable the delivery of appropriate self-build plots without overly prescriptive policies. We do not believe that the delivery of larger schemes should include the requirement to deliver a proportion of self or custom build units. Such an approach does not deliver any additional dwellings, but places risk upon the delivery of such schemes and increases their complications. There is no evidence that potential self-builders wish to be included in a modern housing development. Furthermore, there is no legal or national policy requirement that

states the delivery of self-build plots is more important than the delivery of market housing, so it seems incongruous that the Council would look to structure a requirement in such a way so that less market housing would be delivered, to the detriment of those who simply wish to own an ordinary home.

Q7 Do you agree with the proposed policy on Space Standards? If not, why not?

- 2.32 Our client object the imposition of Space Standards. This approach would result in more expensive, larger housing and limit the more affordable market housing options. Not everyone will want or be able to afford a larger house so such provisions, whilst well intended, could result in significant impacts relating to people's ability to purchase enforced larger houses. It is not fair or reasonable to expect housebuilders to deliver larger houses without a subsequent increase in the price for such dwellings, particularly having regard for an already difficult materials and labour market. Housebuilders generally provide a mix of housing, including larger dwellings, and thus individuals are able to chose a dwelling which meets both their needs and budget. Larger houses can also be more inefficient, harder to clean and more expensive to heat or cool.

Q8 - Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?

- 2.33 Our client objects to this policy which enforces all dwellings to be built to M4(2) standards. Again, there are costs associated with this policy which would increase the cost of housing, where in most of the cases there will be no functional need for dwellings to be built to this standard. This again will have impacts on the ability of people to afford a new build, as it has been built to a specification which does not benefit them, but with associated increased costs. People will purchase a dwelling based on their personal needs.
- 2.34 The Council has provided no robust justification or evidence why this policy is required. If such standards were required for all dwellings, they would be mandatory within building regulations. Instead, they have been used as a tool for authorities to use commensurately where required, but the approach adopted by the Council is not justified or effective, and is otherwise considered unreasonable and should be removed.

Q26 What additional comments do you have about the Local Plan Review not covered by the preceding questions?

- 2.35 Having regard for the spatial sustainability and role of Ashby-de-la-Zouch and its connectivity to strategic employment development, we consider there is significant merit in delivering additional housing allocations in Ashby-de-la-Zouch. In this regard, our client's land off Moira Road, Ashby is considered to be optimally located to provide new housing.
- 2.36 The Councils adopted Landscape evidence (Landscape Sensitivity Study Part 1) assess the site as part of a larger parcel of land to west and north of Ashby (02ASH-D). The assessment sets out that the landscape of the parcel is associated with areas of National Forest woodland planting and well-maintained arable fields with hedgerow boundaries south of Moira Road, and directly west of Burton Road. The overall landscape sensitivity for residential development across the parcel is assessed to be Medium-Low. In terms of visual sensitivity, there are acknowledged to be some scenic views associated with Prestop Park Woodland in the southern half of the parcel. Views are influenced by mixed commercial use at the settlement edge of Ashby-De-La-Zouch, solar farms, and busy roads crossing the parcel. There is no evidence that views are valued more than at a local level. Due to these factors, the overall visual sensitivity to residential development is considered to be medium-low. Whilst this confirms that the parcel as a whole is not overly sensitive to new residential development, the promoted parcels themselves are considered to be on the lower end of this sensitivity, particularly the northern parcel which has strong level of containment between existing residential development and mature woodland.
- 2.37 The promoted land has been assessed as part of the most recent SHELAA (2021), under reference A25 and A26 (Phase1-3). The SHELAA assessment for the parcels set out that the parcels are outside the current defined limits to development as set out on the adopted Local Plan's policies map. The land is formed of Grade 3 agricultural land quality (natural England regional records). The site is also acknowledged to be located within the River Mease catchment area. In respect of highways, on the basis of an initial assessment it is confirmed that there are no known reason to preclude further consideration of the site on highways grounds, albeit more detailed assessments will be required in the future. With regards to ecology, whilst the site has some potential for protected species, but is generally considered to be acceptable subject to further detailed studies and any necessary mitigation. Buffers should be provided in Parcels 26, with a 5m buffer from hedges and the stream and a 10m buffer from the important wildlife corridor along the railway line to the south.

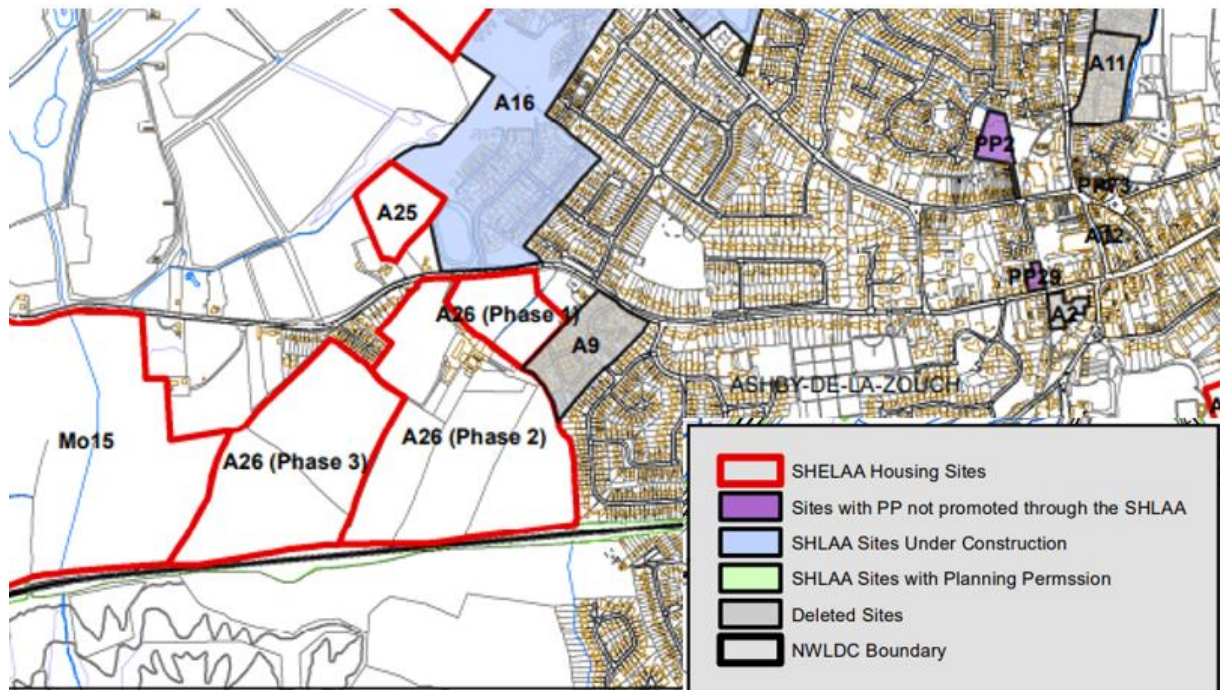


Figure 2: North West Leicestershire SHELAA Extract

- 2.38 In conclusion the SHELAA assessment considers the sites as potentially suitable, subject to a redrawing of the limits to development and constraints relating to the River Mease Catchment Area. The sites are acknowledged to be available. There are no known viability issues and thus the site is considered potentially achievable. The capacity of the site is considered to be circa 46 dwellings for Parcel 25, 47 for Parcel 26 (Phase 1), 255 for Parcel 26 (Phase 2) and 191 for Parcel 26 (Phase 3).
- 2.39 We again confirm that the site is being actively promoted and consider the sites to be available and achievable. The phasing proposed in relation to Parcel 26 is to help demonstrate that the site can be brought forward in parts, albeit has been provided on an indicative basis. The whole parcel can be allocated, or the sit can be delivered in part. This could follow the proposed phasing plan or could otherwise be split to provide an area of land to deliver a capacity of dwellings to suit the Council's requirements.
- 2.40 The site is not at significant flood risk and development can be made acceptable through usual on-site mitigation measures such as SuDS, which will provide wider amenity and ecological benefits. The site can proceed without being subject to significant flood risk in accordance with the NPPF. Moreover, the development will not result in flood risks to the wider area subject to the usual management of surface water run off discharging from the site.

- 2.41 The site is well located adjacent to Ashby, with a good proximity and synergy with recent strategic developments to the west of the town. The town centre is a circa 1.2km east of the site. There are bus stops located adjacent to the sites on Moira Road, served by the regular 29 and 29a service to Swadlincote, Ashby and Coalville. Services run from early in the morning (6am) to the evening (7.40pm), providing an attractive option for commuting and a range of other journeys to Ashby's key services and facilities and larger centres.
- 2.42 The development proposed will generate modest level of vehicular trips and thus is unlikely to result in a material impact on the local highway network. Whilst further work will be undertaken, it is evident on the basis of the work to date that safe and suitable access can be provided, as confirmed by the comments of the County Council.
- 2.43 Whilst there are currently issues relating to capacity within the existing Developer Contribution Scheme (DCS2) in relation to the River Mease SAC, it is our understanding that work is currently being undertaken on a new DCS3 which should provide new capacity for new development in the area, with further capacity being generated in the future through works which will pump waste outside of the River Mease SAC catchment. As such, this should not preclude new allocations with site specific criteria ensuring development that comes forward will be appropriate and not cause undue harms.
- 2.44 For the reasons set out in these representations, these sites should be considered favourably for allocation as part of the emerging North West Leicestershire Local Plan. The sites are spatially optimally located adjacent to the second most sustainable settlement in North West Leicestershire. The sites are not unduly constrained and will be brought forward to reflect their opportunities and constraints, to deliver high-quality new residential development and a new gateway when entering Ashby on Moira Road. As set out previously, the parcels can be tailored in size and scope to release the level of growth to suit the Council's requirements for Ashby and we are happy to work with the Council to best subdivide the land to the south of Moira Road if required to deliver an allocation which meets the emerging needs of North West Leicestershire. We hope to work collaboratively with the Council to ensure the speedy development of the Local Plan and that a high-quality development can be brought forward in accordance with the above.

The Short Template Letter:-

Local Plan Review. Consultation Response

Name MR D + MRS E. WAMT
Address

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth.

I also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *"immediate need for additional employment land"*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *"detrimental to ...nearby residential properties"*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

.....A.N. Other

From: Nick Hollick [REDACTED]
Sent: 08 March 2022 08:37
To: Customer Services <Customer.Services@NWLeicestershire.gov.uk>
Subject: EXTERNAL: Local Plan Review

Further to our previous email objecting to major development around Diseworth We've now had the opportunity to look at the freeport proposals in more detail particularly with regards to horses

We've been riding horses in Diseworth for over thirty years, our children and grandchildren still ride our horses around the village. There's only three safe routes to exercise horses in Diseworth, Long Mere Lane is now crossed by the A42 and requires nerves of steel to ride across the narrow bridge, this route will be totally out of bounds when high speed trains pass in parallel to the A42 on the HS2 line, this leaves Hyams Lane and Long Holden, both of these will now have industrial development right up to their boundaries if the freeport plans are carried forward, they will certainly not be suitable for exercising horses. Diseworth is a rural village with many horse owning families who need to exercise their horses around the village. This need must be factored into an proposed development and quite exercise routes must be maintained during any development and / or alternative routes created before existing routes are compromised. Failure to recognise this need will have a major impact on horse welfare or worse lead to accidents due to horses being frightened.

The freeport development will lead to a massive increase in traffic, traffic through Diseworth has increased massively over the last 4 decades once again making riding horses around the village increasingly hazardous. Our village must be protected against further traffic volume particularly heavy vehicles and significant traffic calming should be installed to deter light traffic from using the village as a rat run as well as properly managed control of HGVs

As well as additional restrictions through the village closing the road to Long Whatton except for buses, (bus drivers are always considerate to horses/ riders) cyclists, horses and pedestrians as was done on Ashby Road in Kegworth when the bypass was built, this would solve both issues and restore an element of tranquility to our village whilst being surrounded by industrial development and Long Whatton would no longer be a rat run and would be opened up for quite riding, cycling and walking as well as Diseworth

The route to Loughborough is now almost as quick using the Kegworth bypass and avoids Long Whatton, the route to Shepshed is only marginally longer through Belton

Nick and Sue Hollick
[REDACTED]

Dear Sir/Madam

Local Plan Review – Consultation Response

I wish to object to all new development in and around Diseworth in the local plan review. I would like for you to stop trying to build on our beautiful countryside.

My reasons for this are as follows:

- It does not recognise the intrinsic character and beauty of the countryside (NPPF Policy S3)
- Diseworth is a designated conservation village so any plans submitted for additional building surrounding the village must be rejected to protect this.
- The health and wellbeing of local residents living in the rural villages will be severely negatively affected. Years of heavy traffic, construction noise, large amounts of dust are just the obvious issues in the short term. Long term damage would be even more significant.
- There is no appetite for additional housing or industry in our area. A whole load of new houses are being built in the vicinity already (with some already completed). We now have the EM Gateway and all of the industrial units that came with that. We do not require any more. There are still advertising boards for the industrial units at the Gateway. If they can't fill that, this shows there is no need for more. There are also further industrial units being constructed at the northern end of new Castle Donington bypass. If further industrial units. Freeport are required I would suggest looking at the vast amounts of land backing onto the A50 which have no surrounding housing and are not, I believe, green belt land.
- This area of open countryside is an established home for many species of wildlife. Please stop destroying their habitat.
- Adding traffic to the A453 would be a disaster. It is already difficult to exit the side roads at busy times with large trucks and airport traffic, adding more to this would cause huge problems and would be incredible dangerous.
- Anything downhill from the EMA is liable to heavy flooding. Adding more concrete to the situation is reckless. Soon the houses in the local villages will be uninsurable. Are you going to pay to repair damage from the floods caused by your irresponsible building on open fields?

To be clear, I object to any building of any further housing or industrial units to both the East and the West of Diseworth along with new housing plans within the village of Diseworth. This includes but is not limited to the Freeport plan, the planned 'new town' at Isley Walton and the mooted development on Grimes Gate in Diseworth. This wholesale throwing up of buildings in rural areas has to stop. Our children and their children will soon have to see our beautiful wildlife in zoos.

Yours faithfully

Joanne Hunt

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: NWLDC Local Plan. Developments around Diseworth - consultation response
Date: 10 March 2022 12:06:11

Local Plan Review. Consultation Response

Name Richard Ardley

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90]. My objections are based on the following:-

1. LP. 5.25. Policy S3. The NPPF states that planning needs to *"take account of the different roles and character of different areas,"* and that planning should recognise *"the intrinsic character and beauty of the countryside"*. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *"There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)"*. The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to *"focus significant development in locations which are or can be made sustainable"*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local

lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *"The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy"*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - "Promote the health and wellbeing of the district's population"
Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because

of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - "*Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances*". Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

6. LP. 4.6. Objective 4 – "*Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care*". The IW1 development is non-compliant. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion, will generate sufficient demand to justify 4.7k homes. This new village will therefore become primarily a dormitory town, increasing, rather than reducing, travel. Shopping will be at local supermarkets [Ashby, Loughborough, etc.] as will recreation and entertainment. ~10miles away. The principal transport used will be the car as no viable public transport system exists.

7. LP. 4.6. Objective 9 - "*New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)*." In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or it's partners undertake to achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface

water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

8. LP. 4.6. Objective 10 - "*Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets*". Again, neither proposal is compliant. The distinctive elements of the district's character between the MOTO MSA and Ashby de la Zouch [south of the a453] are rolling countryside and farmland. Both these developments will totally destroy all aspects of local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. L.P. 4.6. Objective 11 - "*Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance*". Neither development can possibly protect any of the natural environment – nor the associated wildlife, plant life, etc. at present supported by this open countryside. In respect of IW1, even the SHELAA recognises this fact [SHELAA pages 362-3] and lists several exposed species, etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character since its entry in the Domesday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that "*In view of its scale, it is more likely that a change to policy/strategy would be required*". So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states "*In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended*". This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

10. LP Page 18. [Pollution]. This tates that:- "*..new development is not itself detrimentally affected by noise*". Anyone purchasing a property on the IW1 site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect if the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechinons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

11. Traffic. The major access to/from both sites will be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, airport customer traffic and EMA freight lorries. The LW1 site, housing a further 4.7k houses will produce circa 16k car movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even more problematic than already, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in transport movements. In respect of EMP90, this site has no viable access from the south or west [which would be through the village of Diseworth]. The only access available is from the A453. As SHELAA concedes [Appendix 2. Page 170], this is not compatible with the Leicestershire Highways Design Guidance [Policy INS3] - unless the LHA can be persuaded to change their mind. Again, change the rules to fit the proposal, not change the proposal to fit the rules.

12. Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- *"What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations."* As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle

Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as *"...Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development.* Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies *"...an immediate need for additional employment land"*. It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly *"...detrimental to the amenities of...nearby residential properties and the wider environment"* – vis. Diseworth.

18. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove it's own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully

Richard Ardley





**DEVELOPMENT STRATEGY
OPTIONS & POLICY OPTIONS**
January 2022

Consultation Response Form

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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, 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	Mrs
First Name	R	P
Last Name	Gray	Kreuser
[Job Title]		
[Organisation]	J F & B M Gray	CT Planning
Address Line 1	c/o CT Planning	██████████
Address Line 2		██████████
Address Line 3		██████
Address Line 4		
Postcode		██████████
Telephone		██████████
Email address		██████████████████

PART B – Your Representation

Please use a separate sheet for each question you wish to respond to.

Please state which consultation question your response relates...

Q 2

Please use this box to set out your answer to the question.

This representation is made on behalf of JF & B M Gray with respect to Land off Talbot Place, Donisthorpe as shown marked red on the attached plan (drawing no. 4450.99B).

Support the inclusion of Donisthorpe as a “Sustainable Village” as set out in the proposed settlement hierarchy at paragraph 3.11. Donisthorpe supports a primary school, convenience store and post office, public houses, church and formal and informal play facilities.

(Continue on a separate sheet /expand box if necessary)

If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes

✓

No

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 understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

Signed

[Redacted Signature]

Date

10 March 2022

Please send completed forms to planning.policy@nwleicestershire.gov.uk or
Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

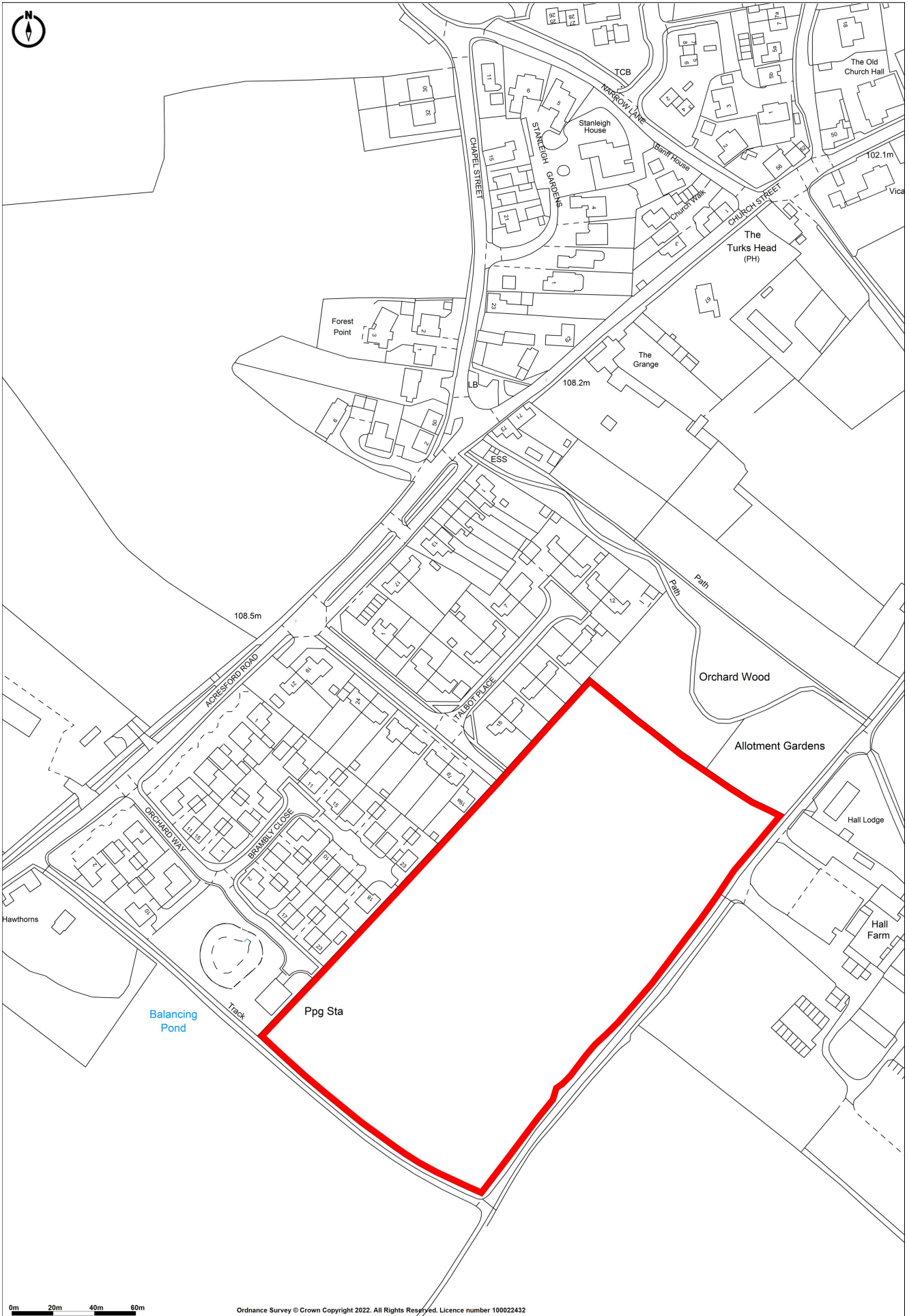
The deadline for responses is the end of Monday 28 February 2022

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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First Name	R	P
Last Name	Gray	Kreuser
[Job Title]		
[Organisation]	J F & B M Gray	CT Planning
Address Line 1	c/o CT Planning	██████████
Address Line 2		██████████
Address Line 3		██████
Address Line 4		
Postcode		██████████
Telephone		██████████
Email address		██████████████████

PART B – Your Representation

Please use a separate sheet for each question you wish to respond to.

Please state which consultation question your response relates...

Q 4

Please use this box to set out your answer to the question.

This representation is made on behalf of JF & B M Gray with respect to Land off Talbot Place, Donisthorpe as shown marked red on the attached plan (drawing no. 4450.99B).

Support North West Leicestershire Council's preferred High 2 Scenario to deliver some 730 dwellings per year over the plan period 2020-2039. This level of growth provides the Authority with a sufficient housing supply and a degree of flexibility to deliver the housing needs requirement for the District and to accommodate any further additional unmet need that may arise from Leicester City through its Duty to Co-operate. The additional supply provides for some 5,100 new homes to be found in the District over the plan period and allows for this new growth to be distributed across the District including allocating sustainable housing growth to the smaller settlements such as "Sustainable Villages".

(Continue on a separate sheet /expand box if necessary)

If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes

No

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.

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Signed



Date

10 March 2022

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Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

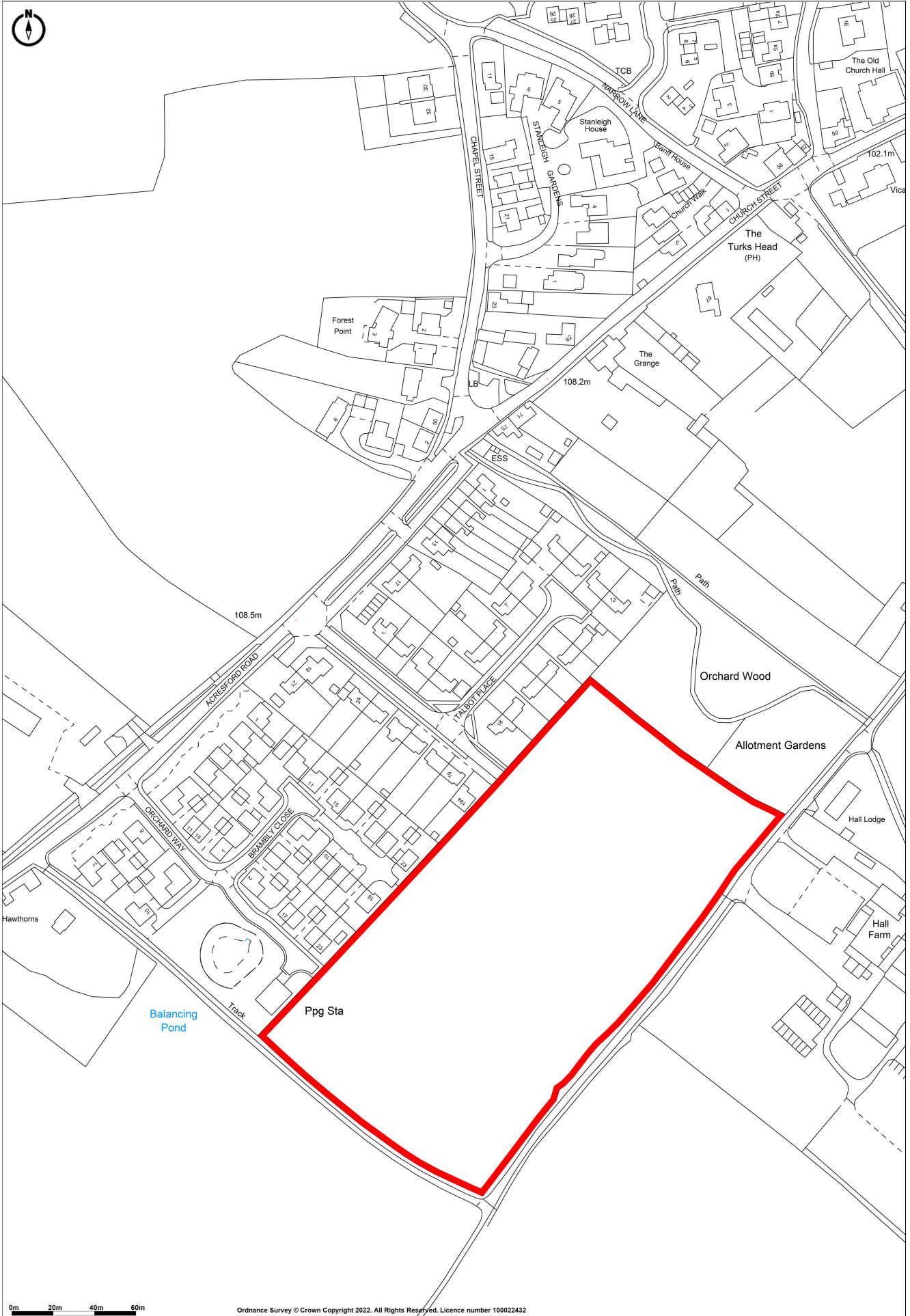
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Address Line 3		██████
Address Line 4		
Postcode		██████████
Telephone		██████████
Email address		██████████████████

PART B – Your Representation

Please use a separate sheet for each question you wish to respond to.

Please state which consultation question your response relates...

Q 5

Please use this box to set out your answer to the question.

This representation is made on behalf of JF & B M Gray with respect to Land off Talbot Place, Donisthorpe as shown marked red on the attached plan (drawing no. 4450.99B).

Support North West Leicestershire Council's preferred option 7b. Preferred option 7b proposes to distribute the housing growth related to the High 2 Scenario across the District rather than limiting development to a small number of locations/settlements. This strategy will therefore support local housing needs in a greater number of settlements, and specifically allows for new housing allocations in those settlements falling within the category of "Sustainable Village", as set out in the proposed settlement hierarchy, such as Donisthorpe. Preferred option 7b will allow for a variety of housing types and tenures to be delivered in smaller settlements which can meet the needs of the local population, enhance the vitality of a community and support the viability of the local services.

The preferred option 7b is also supported by paragraph 79 of the NPPF which requires Planning Authorities to prepare policies that identify opportunities for villages to grow and thrive, especially where this will support local services. However the number of houses proposed to be allocated to the Sustainable Villages should be increased beyond the 250 dwellings proposed. To meaningfully support growth in the local villages as advised in national policy, the number of dwellings should be increased to a minimum of 350 dwellings in order to maximise growth opportunities in the Sustainable Villages of the District.

Continued.....

Preferred option 7b should seek to identify small to medium sized housing allocations in the Sustainable Villages. Such sites can assist in delivering homes more quickly than large strategic allocations and certainly New Settlements. In seeking to allocate new housing sites, the Plan should review the existing Limits to Development of the Sustainable Villages and maximise the use of land readily available which abuts the Limits to Development. One such site is Land off Talbot Place, Donisthorpe.

Land off Talbot Place, Acresford Road, Donisthorpe DE12 7PU (shown marked red on the attached plan drawing no. 4450.99B) is located immediately adjacent to the Limits to Development at Donisthorpe. Donisthorpe supports a number of community facilities including a convenience store, post office, and a primary school.

Land off Talbot Place comprises some 2.95ha and is well related in size and scale to the settlement. Residential development lies immediately to the north-west of the site, fronting Acresford Road. The site could accommodate some 75 dwellings and provide affordable housing compliant with local plan policy. The site can deliver 20% National Forest planting, public open space and provide for on-site biodiversity offsetting. Acresford Road serves as a public transport route providing bus services to Ashby, Burton and Swadlincote. Sustainable travel opportunities are therefore available for journeys to be made other than by the private car. The site is located in a highly sustainable location.

The allocation of the Land off Talbot Place, in whole or in part, for future residential development could deliver an attractive, green sustainable extension to Donisthorpe. The site can provide additional homes to address local housing needs and to help maintain and enhance the community facilities in Donisthorpe. Development of Land off Talbot Place for housing with its ensuing community benefits represents exactly the type and nature of development sought by paragraph 79 of the NPPF to promote sustainable development in rural areas.

If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes

No


Declaration

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I understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

Signed



Date

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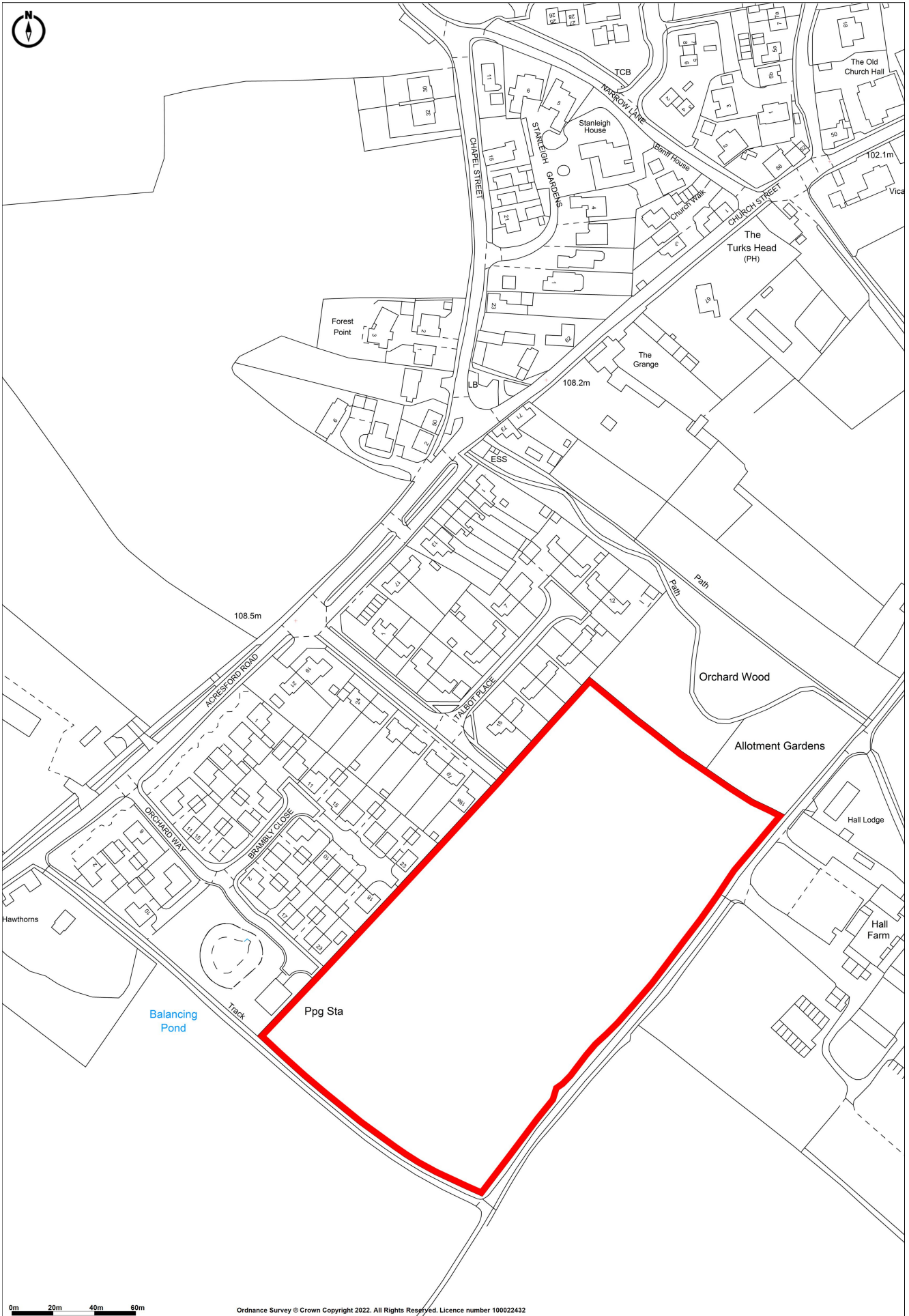
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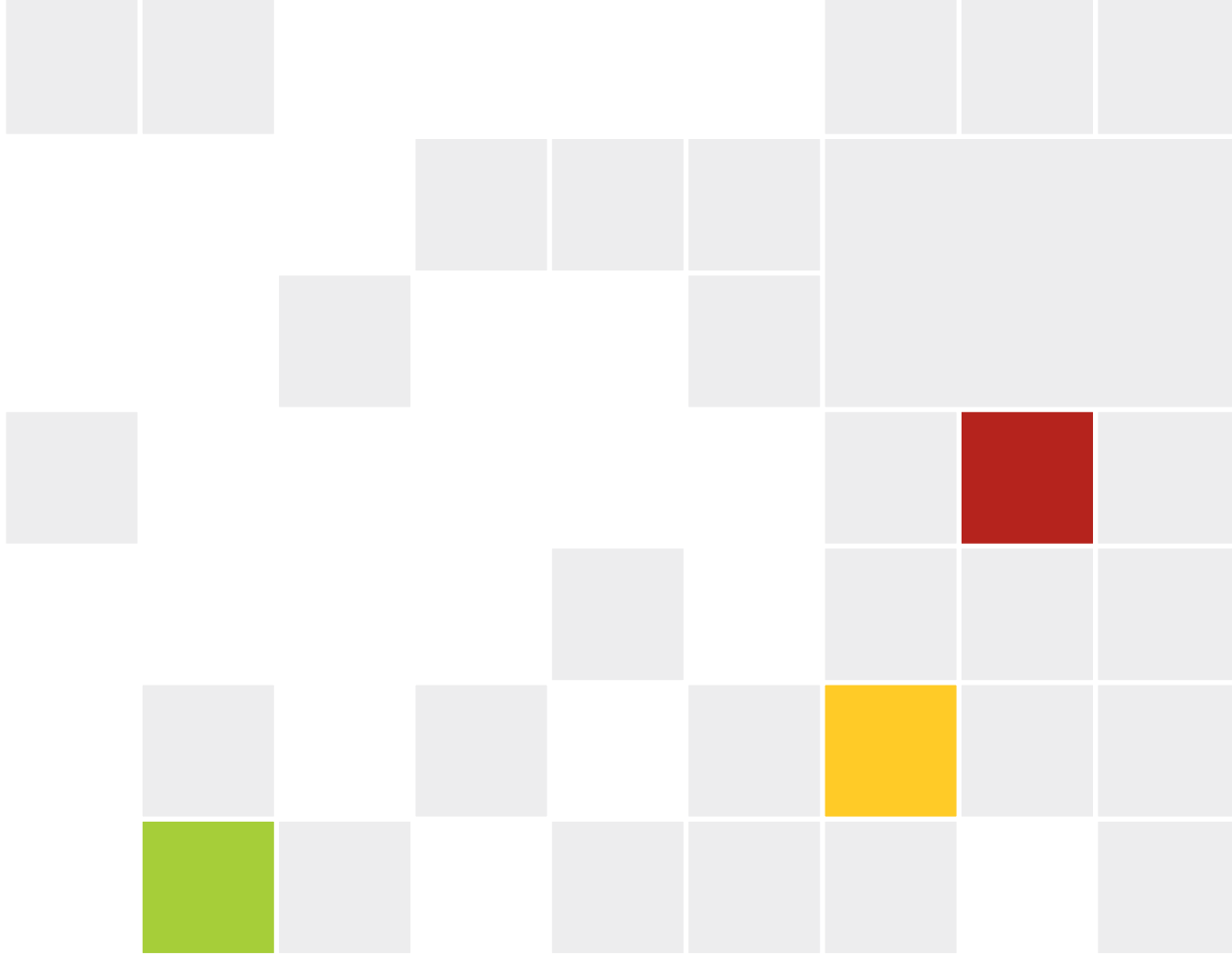
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From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Possible development of land at Isley Walton & Diseworth
Date: 10 March 2022 13:58:15

I object to these possible developments on the following grounds:

- 1) Destruction of countryside, farmland and wildlife habitats. As the UK's population increases and the environmental cost of imports also increase, the country should be making sustained efforts to be more self-reliant by making more use of agricultural land rather than building on it. This is emphasised by current events in Europe which are likely to result in increased prices and product shortages, at least in the short-term. Continued destruction of wildlife habitats results in reducing animal and bird populations as they lose feeding and breeding areas. It is generally accepted that access to country areas can be beneficial to our health.
- 2) Covering the suggested areas with roads and buildings is likely to create flooding in Diseworth and Long Whatton, as rainwater drains southward into Diseworth Brook, then flows through Long Whatton. Both villages are already subject to frequent flooding. The same could also apply to sewage.
- 3) The additional traffic generated by the potential occupants of nearly 5,000 houses, together with delivery vehicles, will swamp the local road network. It is likely that much of this traffic would use the A453, which is subject to traffic jams, particularly during events at Donington Park. There would also be the associated massive increase in air pollution and noise. The prevailing wind is from the west, meaning that pollution from development at Isley Walton would be blown over Diseworth, and pollution from EMP90 would be blown over Kegworth.
- 4) There would seem to be no need for additional industrial development near the airport when there is already surplus spare capacity in the area (SEGRO/ Castle Donington)
- 5) Any housing development at Isley Walton would suffer greatly from noise from both the airport and racing/concerts at Donington Park.
- 6) Before any development takes place on what is currently open countryside or agricultural land, any existing brown-field sites should be used.

Alan Green
[REDACTED]



Representations to North West Leicestershire

Local Plan Review Development Strategy Options

(Regulation 18 Consultation)



Boyer

Report Control

Project:	North West Leicestershire Local Plan Review – Regulation 18 Consultation
Client:	Caddick Land
Reference:	22.3003
File Origin:	
Primary Author	Raj Bains
Checked By:	Simon Atha

<i>Issue</i>	<i>Date</i>	<i>Status</i>	<i>Checked By</i>
1	21/2/2022	Draft	Simon Atha
2	04/03/2022	Draft	Simon Atha

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1. INTRODUCTION

- 1.1 These representations have been prepared by Boyer on behalf of Caddick Land in response to the North West Leicestershire District Council (NWLDC) Local Plan Review Development Strategy Options and Policy Options Regulation 18 Consultation.
- 1.2 The Local Plan Review takes into account changes that have occurred since adoption of the Local Plan (2017), notably the publication of the revised National Planning Policy Framework (2021), changes in the Use Class Order and taking into account the significant unmet housing need from Leicester City, which is yet to be determined. These are changing circumstances to which NWLDC have committed to update and review their adopted Local Plan (as required by paragraph 33 of the NPPF), and to ensure the identified housing and employment needs are sufficient and deliverable over the plan period.
- 1.3 The following sections of these representations respond to relevant questions around the scale and distribution of housing as set out in the Development Strategy and Policy Options consultation document. These representations also review the two growth options, which the Council are considering taking forward and are seeking views on. The two growth options present a low growth scenario (High 1 - 1,000 dwellings) and high growth scenario (High 2 - 5,100 dwellings) over the plan period and both include a different approach towards the distribution of housing across the District.
- 1.4 The consultation document identifies Kegworth's continued role as a Local Service Centre. It is considered that Kegworth is well placed to receive additional housing growth due to the anticipated level of employment growth over the plan period and beyond close by at the East Midlands Gateway, part of the wider East Midlands Freeport. Allocating additional housing growth to Kegworth as part of the Local Plan Review would ensure that there is an adequate supply of housing to support employment growth in the District during the plan period.
- 1.5 Caddick Land are the promoters of land South of Ashby Road, Kegworth, which is a site allocation stipulated in Policy H3d of the adopted Local Plan (2017) for 110 - 140 dwellings.
- 1.6 Policy H3d of the adopted Local Plan also allocates two sites with permission at Kegworth for 260 dwellings (north of Ashby Road, Kegworth and south of A6, Derby Road, Kegworth). These sites are both affected by the route of HS2. The adopted Local Plan raised doubt as to whether those sites could be delivered in the plan period. Land South of Ashby Road was proposed as an alternative in the event that the final route of HS2 prohibits their development.

- 1.7 In light of the publication of the Government's Integrated Rail Plan for the North and the Midlands in November 2021, the route of HS2 is proposed to be terminated at East Midlands Parkway to the north of Kegworth. The Government is committed to deliver the HS2 link from the West Midlands to the East Midlands using the original safeguarded route that was put forward at the time of the Local Plan adoption in 2017.
- 1.8 It is considered that as a result of this the two allocated and permitted sites north of Ashby Road and south of A6 are undeliverable and should be removed as allocated housing sites as part of the Local Plan Review.
- 1.9 It is suggested land South of Ashby Road should be put forward as a full housing allocation that is capable of meeting some of the shortfall from the other two sites and could be delivered without constraint immediately.

2. CONSULTATION QUESTIONS

Q2 Do you agree with the proposed settlement hierarchy?

- 2.1 Although the proposed settlement hierarchy is effectively a continuation of the adopted Local Plan strategy with the addition of part of Woodville, as a Sustainable Village, it has been informed by a recent Settlement Study (2021). This study considers the range of services and facilities available to meet local needs without having to travel elsewhere or when travelling elsewhere, the provision of public transport.
- 2.2 The study concludes that after the Coalville Urban Area, the most sustainable settlements are Ashby de la Zouch and Castle Donington followed by Ibstock, Measham and Kegworth.
- 2.3 We support the Council's approach to the proposed settlement hierarchy and Kegworth's designation as a Local Service Centre. The Settlement Hierarchy 2021 outlines that Kegworth has a good range of existing services and facilities available in the village to meet day-to-day needs. Furthermore, the settlement scores positively in relation to its proximity to employment opportunities within the village and close by at East Midlands Airport and East Midlands Gateway.
- 2.4 We consider that Kegworth has an important role as a Local Service Centre within the District as it is especially well related to the M1, A42, A50 and A453 that are key strategic highway connections. Alongside Castle Donington, it is the closest settlement within the District to the East Midlands Freeport and specifically the East Midlands Gateway and M1 where future economic growth is proposed to be directed. The Leicester and Leicestershire Local Enterprise Partnership Growth Strategy 2021 – 2030 forecasts that the East Midlands Airport and Gateway Industrial Cluster (EMAGIC) in North West Leicestershire District is expected to contribute £600 million in GVA annually and provide 5,300 jobs on-site.
- 2.5 The NWLDC Interim Sustainability Appraisal Report of the Spatial Options (2021) (SA) assesses reasonable alternatives for the spatial distribution of housing. It does not detail or assess options for economic growth. The Strategic Growth Plan (2018) (SGP) identified economic growth opportunities within the District. The SGP is a joint and non-statutory growth plan, between 10 partners¹ and estimates the scale of growth (housing and employment land needs) between 2011-2050.

¹ Blaby District Council, Charnwood Borough Council, District of Harborough, Hinckley & Bosworth Borough Council, Leicester City Council, Leicestershire County Council, Melton Borough Council, North West Leicestershire District Council, Oadby & Wigston Borough Council and Leicester & Leicestershire Enterprise Partnership.

- 2.6 The SGP introduces the Leicestershire International Gateway, which is an area focussed around the northern parts of the A42 and M1, as an area of economic growth where there are major employment opportunities notably from East Midlands Airport and East Midlands Gateway (strategic rail freight interchange).
- 2.7 Since the publication of the SGP and the designation of the Leicestershire International Gateway, the Government has announced the designation of the East Midlands Freeport in March 2021. The Freeport features three main sites: the East Midlands Airport and Gateway Industrial Cluster (EMAGIC) in North West Leicestershire, the Ratcliffe-on-Soar Power Station site in Rushcliffe in Nottinghamshire and the East Midlands Intermodal Park (EMIP) in South Derbyshire.
- 2.8 Kegworth is in a prime location at the heart of the Freeport, close to East Midlands Airport and Gateway and close to future economic development opportunities at Ratcliffe-on-Soar Power Station to the north of the village. Kegworth's role as a Local Service Centre will become more important from an economic perspective as the Freeport develops. The East Midlands Gateway is already occupied by a number of logistics operators and a strategic rail freight interchange. The Gateway is ahead of completion by 5 years due to strong uptake in the market. As a result the site is close to being fully occupied and a large proportion of the projected 5,300 jobs on-site have already been created from the local labour force.
- 2.9 Kegworth is within a walkable and cyclable distance from the Gateway and it is likely a number of workers from the site reside in the village or would be looking to relocate to Kegworth to be close to their place of work. This will benefit Kegworth's role as a Local Service Centre ensuring existing facilities and services are retained and grow on the back of the new economic activity taking place close to the village.
- 2.10 The new Kegworth bypass and bridge over the M1 are significant elements of highways infrastructure that were built in 2018. They form part of the wider infrastructure improvements which were made as part of the Gateway and feature integrated cycle paths and footways from the village to the employment site.
- 2.11 The bridge and bypass which connect the A6 and A452 at Ashby Road and over the M1 motorway was purposely built to facilitate the Gateway and reduce traffic and congestion by 60% and to assist in improving air quality in Kegworth.

2.12 We consider that with a significant amount of economic growth anticipated in the coming years from the newly designated Freeport and on the back of the success from the Gateway, a high level of housing growth is required to be delivered close to the Freeport to sustain and support the local labour force. Given the existing relationship between Kegworth and the Freeport, it is viewed that the village would provide a suitable and sustainable location to provide additional new housing over the plan period, commensurate with Kegworth's role in the settlement hierarchy as a Local Service Centre.

Q4 – Do you agree with our proposed approach to the amount of housing growth at this time?

- 2.13 The consultation document sets out a number of growth options which take into account demographic trends, the spread of development across the district, past and sustainable delivery rates, choice of housing in the market and the deliverability of sites.
- 2.14 We agree with the Council that the Low and Medium Housing Growth Scenarios of 6,103 dwellings (368 dwellings per annum) and 8,512 dwellings (448 dwellings per annum) between 2020 – 2038 should not be pursued. Both scenarios are below the Council's currently adopted housing requirement of 481 dwellings per annum and past average housing delivery rates in the District of 619 dwellings per annum (2011 – 2021). Both of the Low and Medium approaches fail to plan for future growth and would conflict with the requirements set out in paragraph 16 of the NPPF that plans should be prepared positively and be aspirational.
- 2.15 Furthermore, the Leicester & Leicestershire SGP envisages more growth needs to take place in North West Leicestershire and neither the Low or Medium scenarios would accommodate unmet housing needs from Leicester City. This would raise significant issues for the Council and potentially result in the plan being found unsound under the Duty to Co-operate requirement.
- 2.16 In our view, the two Higher Housing Growth Scenarios put forward by the Council of 9,728 dwellings (512 dwellings per annum) based on the SGP and 13,870 dwellings (730 dwellings per annum) represent more appropriate approaches to proposed amounts of housing growth.
- 2.17 These options are subject to agreement between the Leicester and Leicestershire Planning Authorities as part of a joint Statement of Common Ground on the redistribution of approximately 18,000 dwellings of unmet housing need from Leicester City across neighbouring Leicestershire authorities including NWLDC.
- 2.18 There is an expectation that the apportionment of the unmet need will have been informed by the agreed Statement of Common Ground, Housing and Economic Needs Assessment, Strategic Growth Options and Constraints Mapping, Strategic Transport Assessment and Sustainability Appraisal. All of which will be scrutinised at the Examination stage to establish whether or not the Duty to Co-operate requirements have been met.
- 2.19 The consultation paper acknowledges that whilst the High 1 scenario would provide a good buffer for accommodating unmet need from Leicestershire City, it is not clear at this time whether it would be sufficient, which the Council acknowledge is a risk.

- 2.20 Proceeding with the High 1 scenario would carry greater risk as the proposed level of growth would be well below both demographic trends and build out rates. If the Council were to proceed with this option and the plan was adopted, it may require another early plan review close after adoption which could potentially weaken the effectiveness of the plan to adequately plan ahead over a minimum of a 15 year period as paragraph 22 of the NPPF requires.
- 2.21 It is for the above reasons that we share the Council's view that the High Growth 2 scenario performs the best out of the two options as it builds flexibility into the plan, making it more resilient and is an approach that is likely to be found sound at examination. This approach would ensure that the unmet need is provided for and the Duty to Cooperate requirement is complied with.
- 2.22 NWLDC is a net importer of labour and that is acknowledged by the previous HEDNA 2017 and the Council in the consultation paper. On the back of the economic development that is taking place across the District, (discussed in our response to question 2 above) it is clear that out of the two options the High Growth 2 scenario would respond more positively to the future economic circumstances of the District and the spatial objectives of the plan.

Q5 – Do you agree with our proposed approach to the distribution of housing growth at this time?

- 2.23 The Council have tested a number of spatial options and reasonable alternatives for the distribution of housing growth against the sustainability objectives set out in the SA (2021). The Strategic Housing and Economic Land Availability Assessment (2019) identified two potential sites located south of the East Midlands Airport and adjoining each other, which have been considered as a potential new settlement (site IW1 in the 2021 SHELAA).
- 2.24 The approach to the distribution of housing is developed through the adopted settlement hierarchy, where the roles and function of each settlement is identified. The role and function of each settlements are determined by the availability of the facilities and services in that area.
- 2.25 The distribution of the two preferred growth scenarios in which the Council are proposing to take forward are:
- High Growth 1 scenario (1,000 dwellings) - Option 3a Principal Town (500 dwellings), KSCs (300 dwellings) and LSCs (200 dwellings).
 - High Growth 2 scenario (5,100 dwellings) - Option 7b Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSCs (765 dwellings), LSCs (510 dwellings) and Sustainable Villages (255 dwellings).
- 2.26 High Growth 1, Option 3a provides growth in the most sustainable settlements in the District, proportionate to their scale and sustainability. As set out above in the response to question 4, whilst we consider the High Growth 2 option should be taken forward, if the Council were to proceed with the High Growth 1 Scenario, we would support Option 3a as being the most appropriate approach to take with the allocation of 200 dwellings being provided for in LSCs as a minimum.
- 2.27 The approach under High Growth 2, Option 7b, with the exception of a new settlement, represents a continuation of the spatial strategy in the adopted Local Plan, which has a demonstrably strong delivery record. The variety of locations and sites will assist in optimising deliverability across the District. There would be a sufficient quantum of dwellings allocated to LSCs to reinforce their role and ensure their future housing requirements are met. We would support the Council's approach to Option 7b should the High Growth 2 scenario be taken forward.

- 2.28 We consider that the Council's proposed approach to the distribution of housing should ensure the availability of a sufficient supply of deliverable and developable land to deliver either the High 1 or 2 Housing Growth Scenarios. The Council's housing land supply should meet the housing requirement, ensure the on-going provision of a 5 Year Housing Land Supply and be capable of achieving the Housing Delivery Test performance measurements.
- 2.29 If the Council proceed with the High Growth 2 Option 7b and seek to allocate a new settlement, it will be essential to ensure smaller and medium scale sites are allocated close to existing settlement edges that are capable of delivering readily on adoption of the plan. Particularly as large strategic scale new settlements/SUEs have a lengthy lead in time due to the complexities of infrastructure, phasing and viability issues. Strategic sites can often take 7 years on average to start delivering units and as a result it is critical to ensure there is an adequate supply of housing available in the short term and medium particularly in the LSCs.

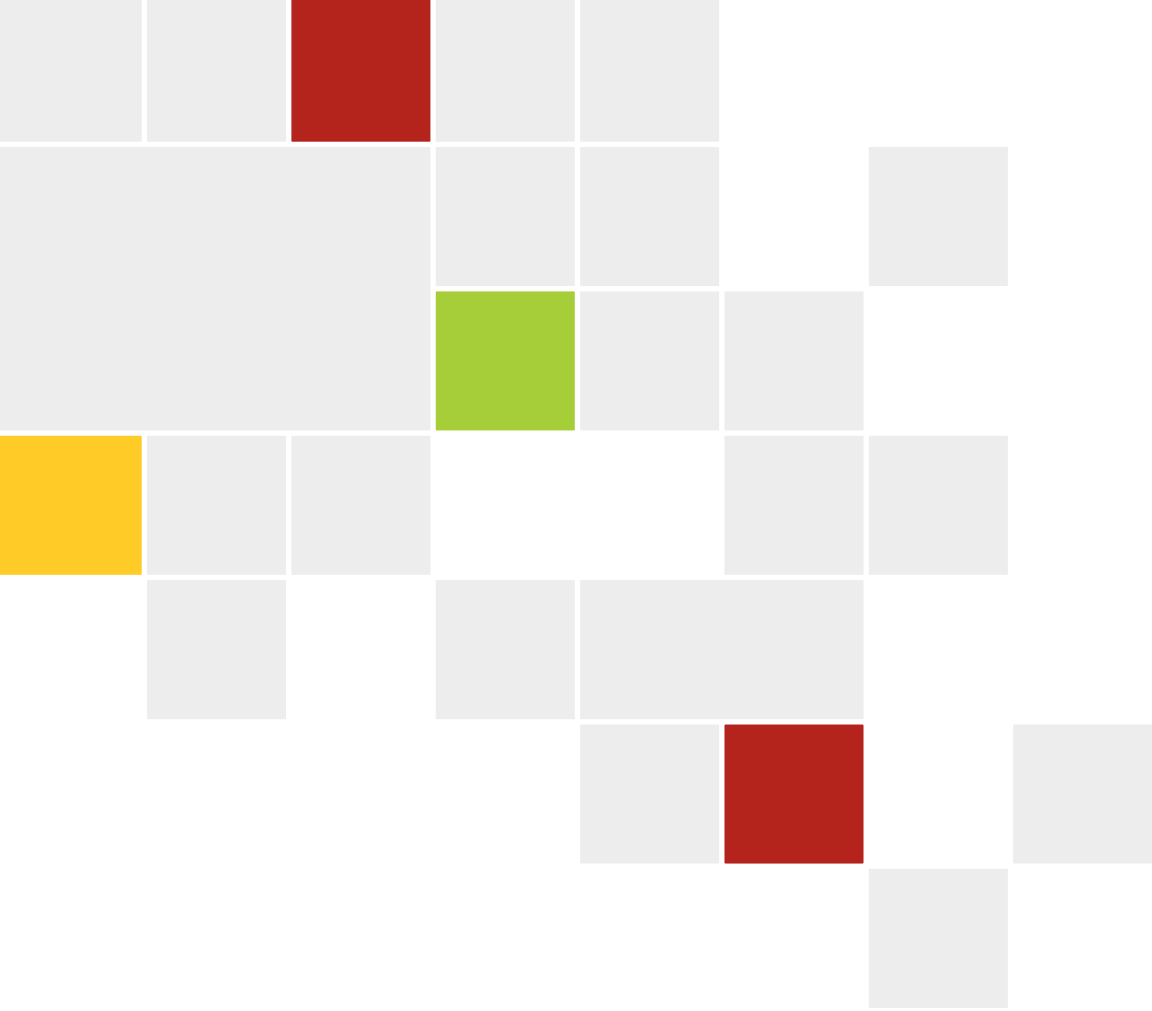
3. POLICY H3D - LAND SOUTH OF ASHBY ROAD, KEGWORTH

- 3.1 Policy H3d of the adopted Local Plan (2021) contains the potential development of two sites, which have planning permissions for 260 dwellings, (land at Ashby Road, Kegworth and land south of A6, Derby Road, Kegworth) identified as H1k and H1m in the Policies Map for Kegworth.
- 3.2 A third site is also identified in this policy as land South of Ashby Road for 110 dwellings (identified as H3d in the adopted Local Plan and Policies Map). The development of land South of Ashby Road is a suitable allocation that can be delivered immediately and free from the constraint of the safeguarded route of HS2.
- 3.3 The adopted policy recognises that the two existing allocated sites with planning permission fall within the safeguarded route of HS2. In light of the Integrated Rail Plan (2021) that was published in November 2021, plans for the HS2 Phase 2 eastern leg, where the route would continue from Birmingham to Leeds and stop via Toton (High Speed Hub Station), have now been scrapped.
- 3.4 A stretch of new high speed line will be built from the West Midlands to the East Midlands based on the existing safeguarded route, connecting to the existing railway line near East Midlands Parkway Station. These plans form part of the Integrated Rail Plan (2021) and will utilise an upgraded electrified Midland Main Line between London St Pancras, East Midlands Parkway, Nottingham and Sheffield.
- 3.5 As such, land at Ashby Road, and land south of A6, Derby Road, Kegworth, would be directly affected by this proposed route, to which land would be required to facilitate the HS2 line. The two sites, which currently benefit from planning permission for the development of 260 dwellings will no longer be deliverable and it is suggested that the Council remove these sites as housing commitments as part of the Local Plan Review process.
- 3.6 As the policy also includes land south of Ashby Road as an alternative allocation for the development of 110 dwellings, it is considered that this site should be made a separate housing allocation as part of the Local Plan Review, given that it can come forward immediately without constraint. Given the issues and impacts of the uncertainty of HS2 on the two existing allocations, this has limited the deliverability of housing in Kegworth since 2017.
- 3.7 Currently, adopted Policy H3d stipulates that development of land south of Ashby Road would be supported when the line of the HS2 and route is confirmed through the above two sites.

- 3.8 The allocation of land South of Ashby Road, Kegworth would support a number of policies contained within the adopted Local Plan including:
- Policy S1- Future Housing and Economic Development Needs
 - Policy S2 - Settlement Hierarchy
 - Policy H1 - Housing Provision: Planning Permissions
 - Policy H4 - Affordable Housing
 - Policy H6 - House Types and Mix.
- 3.9 Development of land south of Ashby Road, Kegworth would contribute a minimum of 110 – 140 dwellings to the overall housing requirement and would support either of the Council's proposed housing growth options – High 1 or High 2. Development of this site would seek to provide a mix of housing types that would contribute to providing a significant amount of affordable housing.
- 3.10 Land South of Ashby Road is a suitable and sustainable location located in close proximity to major economic and employment opportunities. The adjacent Kegworth bypass, which has facilitated the development of the East Midlands Gateway, will further assist in delivering the economic growth as per the SGP (2018) and provide access to more job opportunities for local people. Although Kegworth is well located to the local and strategic road network, the bypass contributes to increasing connectivity across the District.
- 3.11 Land south of Ashby Road is a suitable and deliverable site with one single owner. Caddick are a committed developer, with a strong track record of land promotion and development. Caddick have undertaken a range of technical assessments that support the deliverability of the site.
- 3.12 We strongly consider that the site, formally assessed as a potentially suitable site (reference K12 Land at Molehill Farm, Kegworth within the Strategic Housing Land Availability Assessment 2018 Part 1), would help provide both market and affordable housing in a sustainable location that could deliver early on adoption of the plan without constraint.

4. CONCLUSION

- 4.1 These representations to the NWLDC Local Plan Review Development Strategy and Policy Options (Regulation 18 consultation) have been prepared on behalf of Caddick Land.
- 4.2 Our representations are supportive of the Council's approach to the proposed settlement hierarchy and designation of Kegworth as a Local Service Centre.
- 4.3 We consider the Council should proceed with the High Growth 2 option for the scale of housing growth across the District. This approach would ensure that the Local Plan Review is found sound by meeting the requirements of the Duty to Cooperate in providing for NWLDC's share of Leicester City's unmet need.
- 4.4 Our comments in respect of the proposed distribution of housing growth are largely supportive and reflect a need and requirement to deliver a meaningful quantum of housing growth in Local Service Centres such as Kegworth, to meet the spatial objectives of the plan.
- 4.5 In relation to Policy H3d of the currently adopted Local Plan, we consider that in light of the two allocated and permitted sites north of Ashby Road and south of A6 being undeliverable due to the route of HS2, they should be removed as allocated housing sites through the Local Plan Review.
- 4.6 Caddick are promoting land South of Ashby Road that would be suitable to be put forward as a full housing allocation that is capable of being delivered without constraint immediately. We strongly consider that the Council should allocate this site for housing as part of the Local Plan Review.



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From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: NWLDC Local Plan. Developments around Diseworth - consultation response
Date: 10 March 2022 15:06:37

Local Plan Review. Consultation Response

Name Marilyn Ardley

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90]. My objections are based on the following:-

1. LP. 5.25. Policy S3. The NPPF states that planning needs to *“take account of the different roles and character of different areas,”* and that planning should recognise *“the intrinsic character and beauty of the countryside”*. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *“There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)”*. The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to *“focus significant development in locations which are or can be made sustainable”*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local

lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *“The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy”*. The only way to achieve sustainability would be

at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - "*Promote the health and wellbeing of the district's population*" Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - "*Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances*". Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

6. LP. 4.6. Objective 4 – "*Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care*". The IW1 development is non-compliant. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion, will generate sufficient demand to justify 4.7k homes. This new village will therefore become primarily a dormitory town, increasing, rather than reducing, travel. Shopping will be at local supermarkets [Ashby, Loughborough, etc.] as will recreation and entertainment. ~10 miles away. The principal transport used will be the car as no viable public transport system exists.

7. LP. 4.6. Objective 9 - *"New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)."* In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or its partners undertake to achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

8. LP. 4.6. Objective 10 - *"Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets"*. Again, neither proposal is compliant. The distinctive elements of the district's character between the MOTO MSA and Ashby de la Zouch [south of the A453] are rolling countryside and farmland. Both these developments will totally destroy all aspects of local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. LP. 4.6. Objective 11 - *"Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance"*. Neither development can possibly protect any of the natural environment – nor the associated wildlife, plant life, etc. at present supported by this open countryside. In respect of IW1, even the SHELAA recognises this fact [SHELAA pages 362-3] and lists several exposed species, etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character since its entry in the Domesday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that *"In view of its scale, it is more likely that a change to policy/strategy would be required"*. So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states *"In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended"*. This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

10. LP Page 18. [Pollution]. This states that:- *"..new development is not itself detrimentally affected by noise."* Anyone purchasing a property on the IW1

site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect of the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechinons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

11. Traffic. The major access to/from both sites will be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, airport customer traffic and EMA freight lorries. The LW1 site, housing a further 4.7k houses will produce circa 16k car movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even more problematic than already, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in transport movements. In respect of EMP90, this site has no viable access from the south or west [which would be through the village of Diseworth. The only access available is from the A453. As SHELAA concedes [Appendix 2. Page 170], this is not compatible with the Leicestershire Highways Design Guidance [Policy INS3] - unless the LHA can be persuaded to change their mind. Again, change the rules to fit the proposal, not change the proposal to fit the rules.

12. Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs

contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- *“What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations.”* As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as *“...Settlements which have a*

limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development. Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies “...*an immediate need for additional employment land*”. It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly “...*detrimental to the amenities of...nearby residential properties and the wider environment*” – vis. Diseworth.

18. Summary. These proposals are both ill conceived schemes, in the wrong place, **on** an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove it's own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully
Marilyn Ardley



From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: local plan review consultstaion response
Date: 10 March 2022 16:59:40
Attachments: [REDACTED]

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Mr Louis della-Porta
[REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with it's boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The scale and scope of these proposals are completely out of scale to the local environment and are profoundly undemocratic if their conception.

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much

needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an "*immediate need for additional employment land*". Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being "*detrimental to ...nearby residential properties*". Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

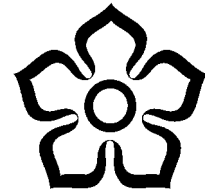
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Yours Faithfully,



Sent from [Mail](#) for Windows

Please ask for: Planning Policy Team
Telephone: [REDACTED]
Email: planning.policy@leicester.gov.uk
Date: 10th March 2022



Leicester
City Council

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

Planning
City Hall
115 Charles Street
Leicester LE1 1FZ
www.leicester.gov.uk/planning

By email to: planning.policy@nwleicestershire.gov.uk

North West Leicestershire Local Plan Review - Development Strategy Options and Policy Options (Regulation 18)

Thank you for consulting Leicester City Council on the North-West Leicestershire local plan review: Development Strategy Options and Policy Options (Regulation 18).

The City Council's response to specific questions in the Development Strategy and Policy options is as follows:

Question 5 – *Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.*

Response – In principle, concentrated urban expansion which contributes towards the delivery of major transport infrastructure is supported. Also, a mix of different land uses will reduce the need to travel and where travel is necessary.

Question 11 – *Which general employment land strategy option do you prefer? Is there a different option which should be considered?*

Response – General Employment Land Strategy Option 1, This would be a continuation of the adopted Local Plan distribution.

Question 12 – *Do you agree with the initial policy option for strategic warehousing? If not, why not?*

Response – Agree, 50% of the outstanding road-served requirement to be met in NWL which would equal approximately 150,000sqm, or about 106,000sqm.

Question 13 - Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?

Response - Option 4, amend Policy Ec2(2) to make it more specific/restrictive (b) – amend the alternative sites test to include sites with planning permission.

Question 14 – Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?

Response - Option 3, generic policy which would apply to all employment sites, whether allocated or not, to require a proportion of units to be for start-ups and/or a financial contribution towards provision elsewhere.

Question 16 - Do you agree with the proposed health and wellbeing policy? If not, why not?

Response - Yes, in principle from a transport perspective, we are supportive of such a policy approach, particularly if the built environment is shaped so people can access green spaces and are enabled to walk and cycle more.

Whilst most of the comments relate to detailed aspects of the development options and policy options, I would also add the following:

Housing

The City council agrees with the wording in the Duty to Cooperate section and the acknowledgement that our unmet need issue is an important matter for North West Leicestershire and others authorities in the Housing Market Area (HMA) to consider.

We welcome the consideration of our unmet need issue in your growth scenarios – High 1 and High 2.

In growth scenarios, we would also suggest adding to the main document a summary of the Sustainability Assessment as has been done in spatial options section.

Any housing targets would need to be aligned with the Statement of Common Ground (SoCG) which will agree the unmet need from Leicester City Council. Any changes to the SoCG needs will also need to be addressed.

If you have any questions about the City Council's comments please do not hesitate to contact the Planning Policy Team via email planning.policy@leicester.gov.uk or tel: 0116 454 0085.

Yours sincerely.

Grant Butterworth

Head of Planning, Leicester City Council

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: local plan review consultstaion response
Date: 10 March 2022 18:00:02

Local Plan Review. Consultation Response

Mrs A della-Porta

[REDACTED]
[REDACTED]
[REDACTED]

Dear Sirs,

This is my response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with it's boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My strongest objections are based on the following:-

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Yours faithfully

Annette della-Porta (Mrs)

From the office of: Joanna Clinton
Telephone: [REDACTED]
Email address: [REDACTED]

Date: 8 March 2022

By e-mail

Dear Planning Policy Team,

RE: North-West Leicestershire Local Plan Consultation 2022

On behalf of the Leicester, Leicestershire, and Rutland (LLR) Clinical Commissioning Groups (CCGs) I am submitting the response to the North-West Leicestershire District Council Local Plan consultation.

The LLR CCGs are supportive of the vision set out in the policy and would want to work collectively with you to understand in more detail how the local NHS can contribute to its delivery. Many of the themes identified in the policy will impact upon the wider determinants of health and as a result population health outcomes. We would therefore welcome working together to maximise opportunities to improve the health and wellbeing of the population.

We would welcome:

- Actions to support the development of community identity; maximising opportunities for residents to come together to create community cohesion and support each other.
- Sufficient green space and local recreational facilities that enable residents to access physical activity with ease.
- That new developments are designed in such a way to enhance physical and mental health and wellbeing.
- Designs that support the reduction in carbon emissions, as this has a direct impact on some resident's health

As well as the above generic comments it is important to note that any increase in the number of new residents in any area will have a direct impact upon local NHS services whether that is primary, hospital or community care and therefore any new demand from housing developments will require developer contributions to mitigate this.

I have attached a presentation which combines the outcome of the LLR Primary Care Estates Strategy (PCES) for North-West Leicestershire practices with information taken from SHAPE (a Strategic Planning tool). The presentation provides detail upon future housing growth across the district and the status of practices including if they are

impacted by housing growth, unsuitable premises and/or insufficient space (referred to in this letter as the 3 baskets).

The supporting narrative for the slide set is as follows:

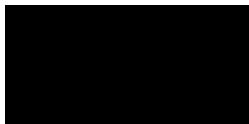
Slide Number/s	Supporting Narrative
Slide 2	This first slide provides an overview of the practices that make up the North West Leicestershire Primary Care Network (PCN).
Slide 3 & 4	These slides demonstrate housing 'hot spots' where there is housing growth over the next 1-5, 6-10 and/or 6-15 years.
Slides 5-15	<p>These slides show each practice in turn. There are 2 maps per slide, with the left map indicating the location of the practice, inner catchment area and planned housing growth. The map on the right overlays the number of registered patients, where the dark shading indicates a higher number of registrations.</p> <p>Where there is a table in the top right of the slide, this highlights practices which are deemed a priority for the CCGs to work with to improve the services due to them being in any one or more of the baskets explained above.</p> <p>I would like to draw your attention to the following practices in particular:</p> <ul style="list-style-type: none"> - Castle Donington Surgery (slide 5): this practice has been identified as one of the top 20 practices in Leicester, Leicestershire & Rutland that will be impacted by population and housing growth. It is clear from the maps on slide 5 that there is a large amount of housing growth planned within the practice's catchment area, and it is important to note that they are the only practice that serve the Castle Donington area, and so would currently be the only practice impacted by the 2709 new homes planned there - Manor House Surgery (slide 6): the proposed new town in Isley Walton will have a significant impact on this small practice, which could effectively see its' list size double if the development goes ahead, and as such we would expect them to require S106 contributions to help develop the practice to mitigate some of this impact - Castle Medical Group (slide 7): this practice has been identified as one of the top 20 practices in Leicester, Leicestershire & Rutland that will be impacted by population and housing growth - Whitwick Road Surgery (slide 11): this practice has been identified as one of the top 20 practices in Leicester, Leicestershire & Rutland in need of investment due to current capacity constraints, and so the additional housing growth planned in the area will create additional pressure

Slide Number/s	Supporting Narrative
	<ul style="list-style-type: none">- Measham Medical Unit: this practice has been identified as one of the top 20 practices in Leicester, Leicestershire & Rutland in need investment in their current premises both due to the condition of the premises and capacity pressures, which again will be exacerbated by planned housing growth in the area

I hope that you find this information helpful to gain an understanding of the current and future pressures upon Primary Care throughout North West Leicestershire due to the sizeable housing growth planned. We would seek to apply for S106 contributions for health for all developments within your district, to maximise opportunities to expand Primary Care services to support the population growth. We will continue to work collaboratively with yourselves via our quarterly meetings to plan and support the impacts across the Borough due to housing growth, and we would welcome your support in ensuring that contributions for health are included in all S106 agreements, especially where they will see significant population growth associated with new developments.

If you'd like to discuss any elements within our submission, then please do not hesitate to contact me.

Kind Regards



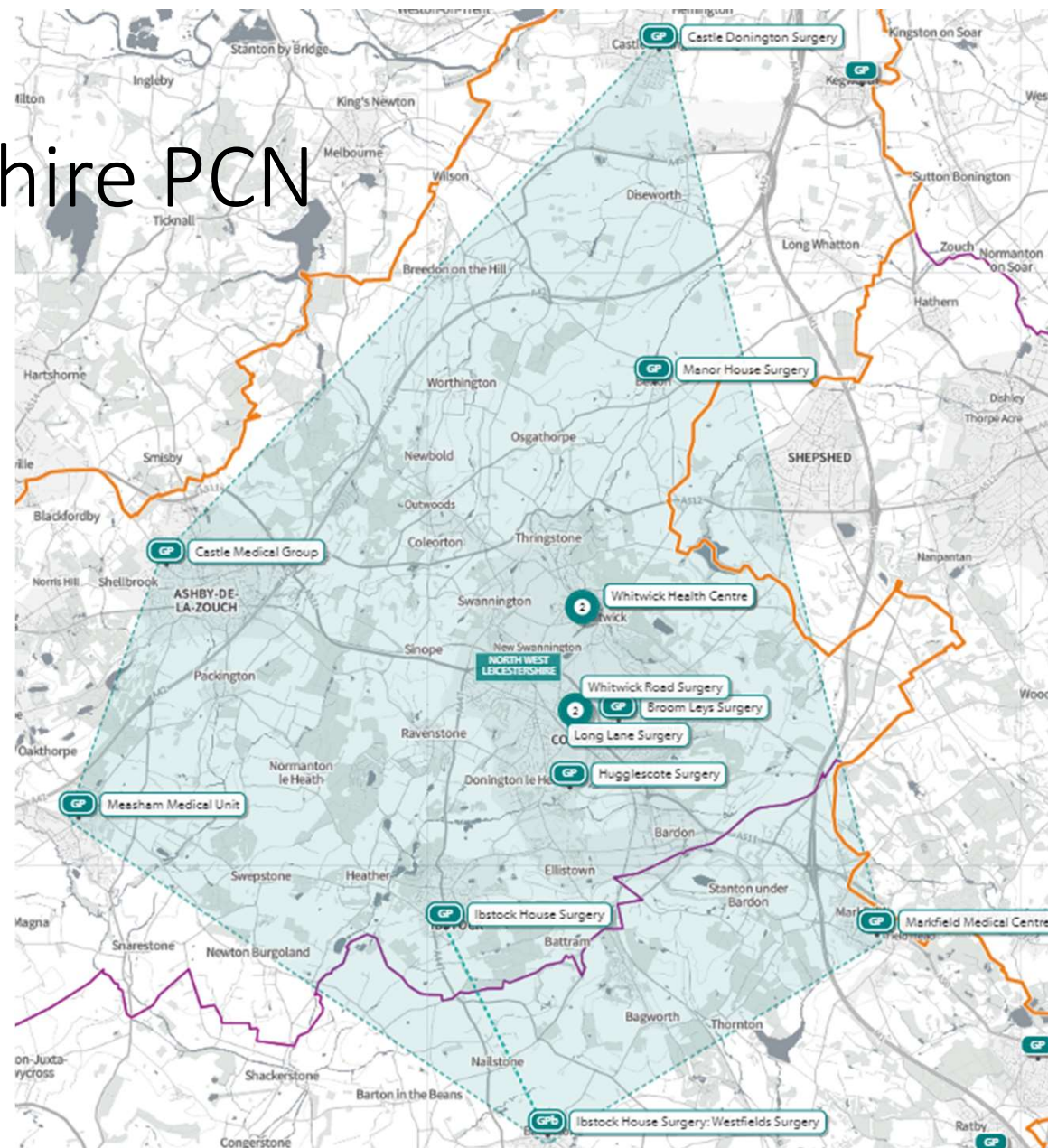
Joanna Clinton
Head of Strategy and Planning
LLR CCGs

North West Leicestershire PCES & SHAPE Information

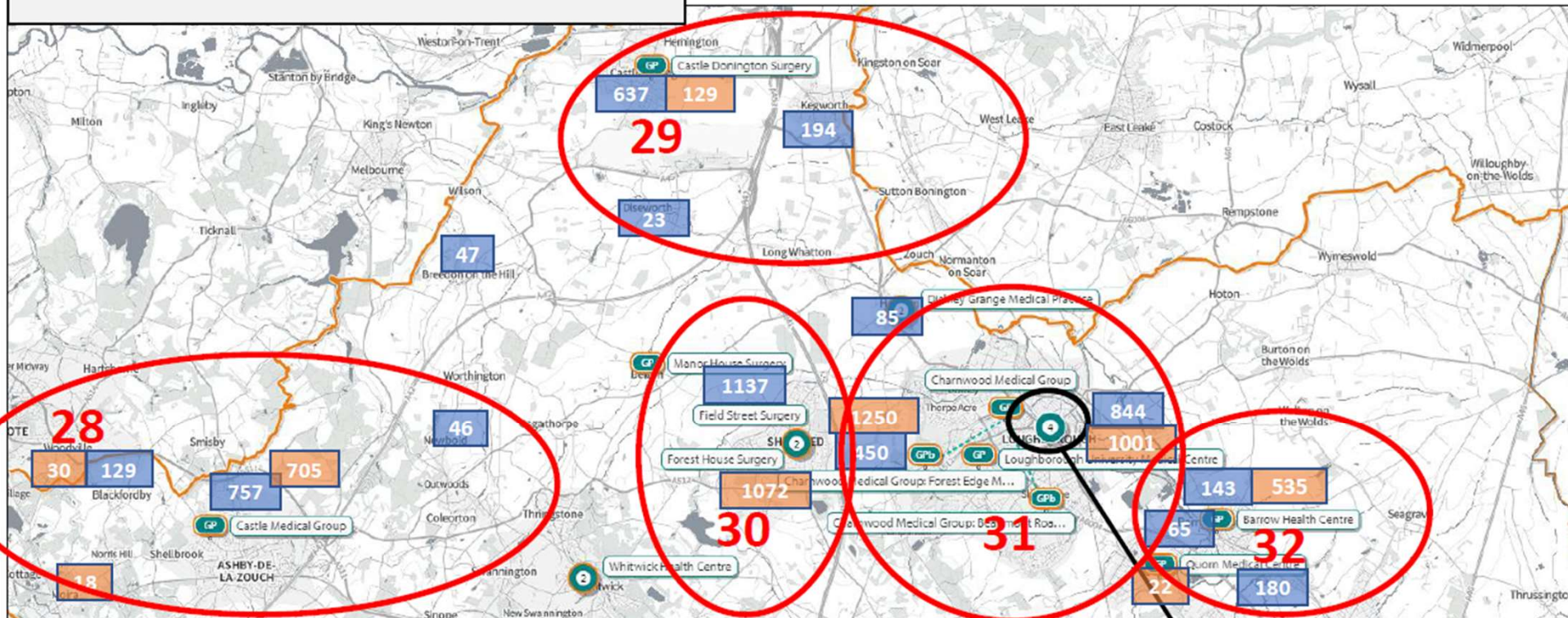
March 2022

North West Leicestershire PCN

North West Leicestershire	
o Primary Care Network	
C82072	Broom Leys Surgery
C82007	Castle Donington Surgery
C82014	Castle Medical Group
C82096	Hugglescote Surgery
C82012	Ibstock House Surgery Including 1 branch:
C82012001	Ibstock House Surgery: Westfields Surgery
C82050	Long Lane Surgery
C82102	Manor House Surgery
C82028	Markfield Medical Centre
C82017	Measham Medical Unit
C82052	Whitwick Health Centre
C82120	Whitwick Health Centre
C82045	Whitwick Road Surgery



Charnwood/North West Leicestershire



Key

Within 5 years 2021-26

6-10 years 2026-31

Notes

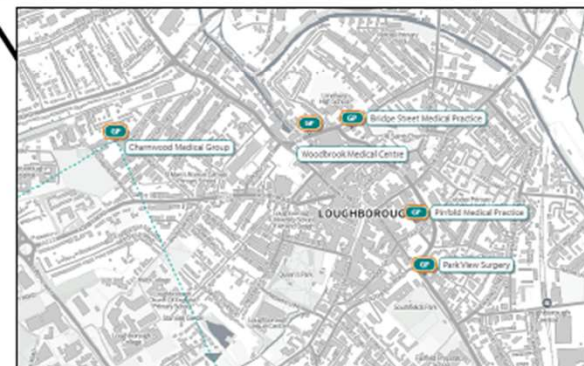
Housing data source: Charnwood BC Local Plan 2021-37 Draft July 2021 and NW Leicestershire Housing Trajectory 2021 Final.

Maps and Pharmacy locations: NHS Shape Atlas (Pharmacy listings updated from ODS data, NHS Digital, December 2022).

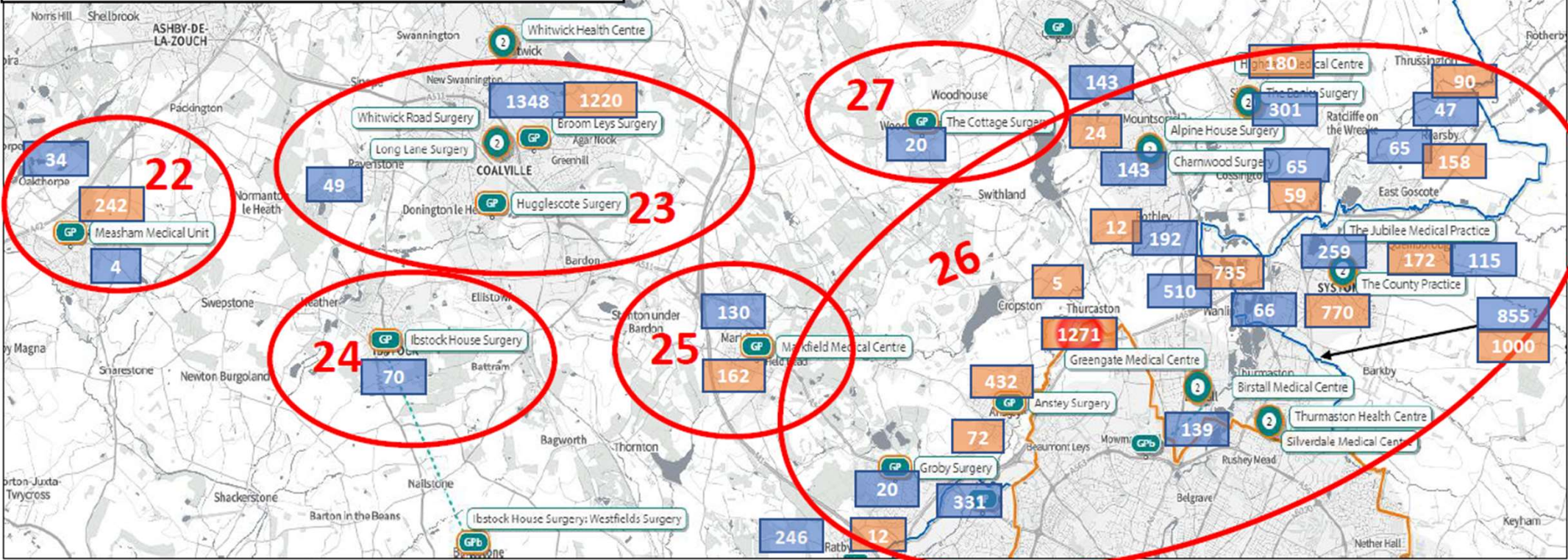
The map excludes any recent completed housing developments prior to Spring 2021.

The numbers shown on the map are the numbers of new dwellings. The number of additional patients should be calculated based on the Charnwood BC estimate of 2.29 residents per dwelling and/or NWL BC estimate of 2.38 residents per dwelling.

There are no prescribing Practices included on the maps.




Charnwood/North West Leicestershire



Notes
 Housing data source: Charnwood BC Local Plan 2021-37 Draft July 2021 and NW Leicestershire Housing Trajectory 2021 Final.
 Maps and GP Practice locations: NHS Shape Atlas.
 The map excludes any recent completed housing developments prior to Spring 2021.
 The numbers shown on the map are the numbers of new dwellings. The number of additional patients should be calculated based on the Charnwood BC estimate of 2.29 residents per dwelling and/or NWL BC estimate of 2.38 residents per dwelling.
 The 6 to 15 year entry relates to two LCC strategic sites located adjacent to the CBC boundary.

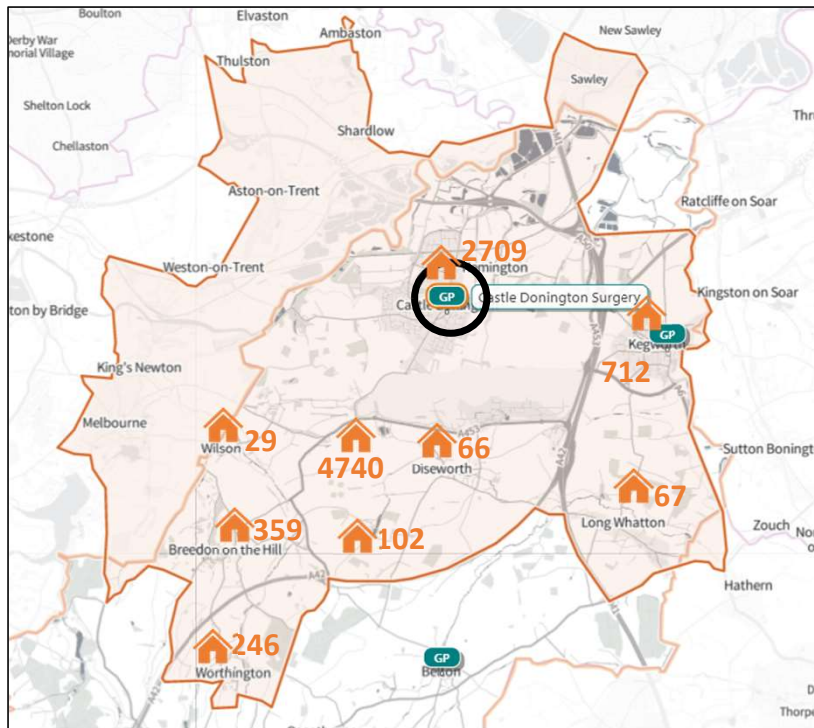
Key

	Within 5 years 2021-26	6-10 years 2026-31	6 to 15 years 2021-36
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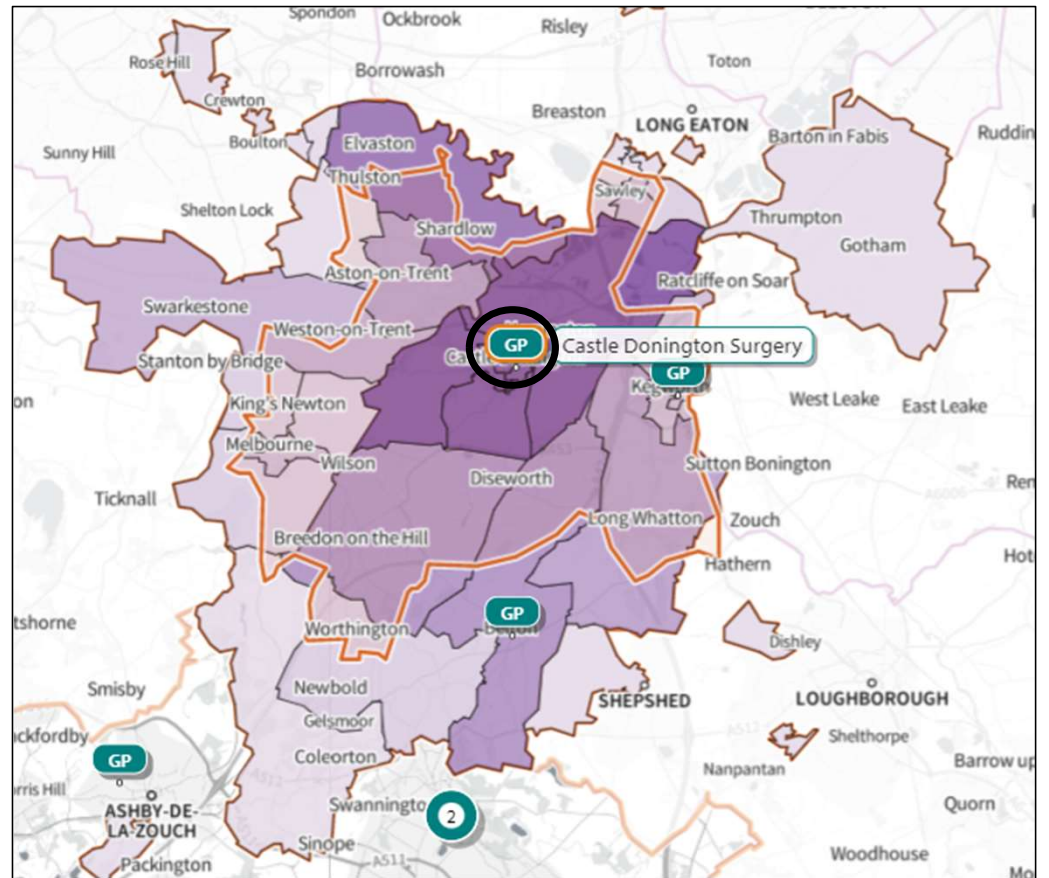
Castle Donington Surgery

NHS Contract Code	Practice Name	Branch Premises	PCN Area	Housing and Population Growth
C82007	Castle Donington Surgery		North West Leicestershire (Hub 3)	120

Practice Submitted Inner Catchment area



Registered patients (darker colour denotes higher numbers)



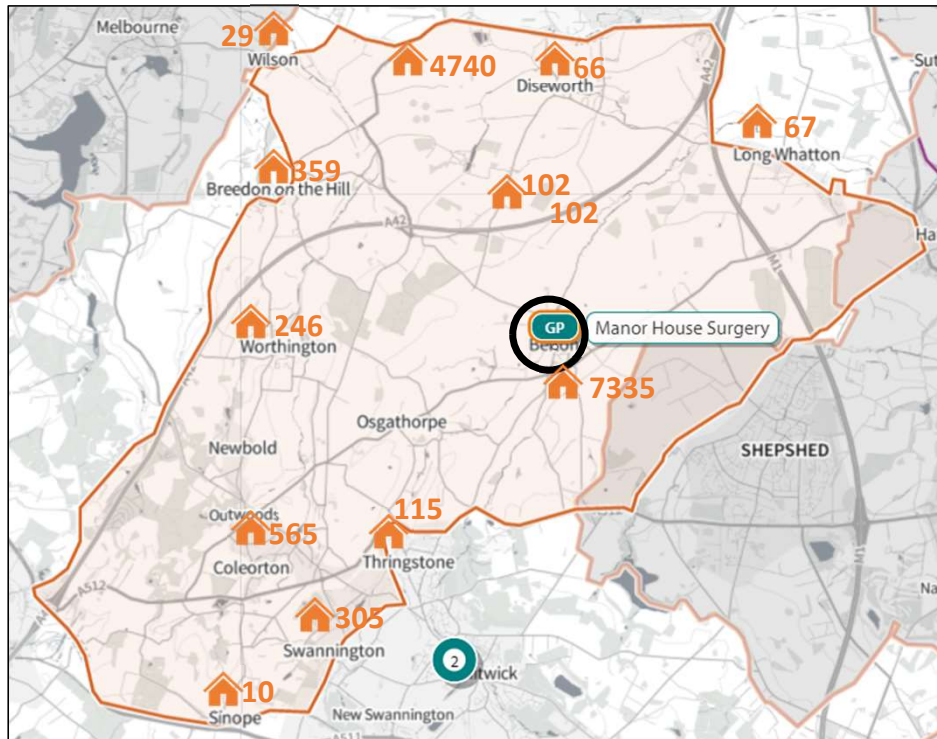
Key

- Planned Development
- Main Site
- Branch

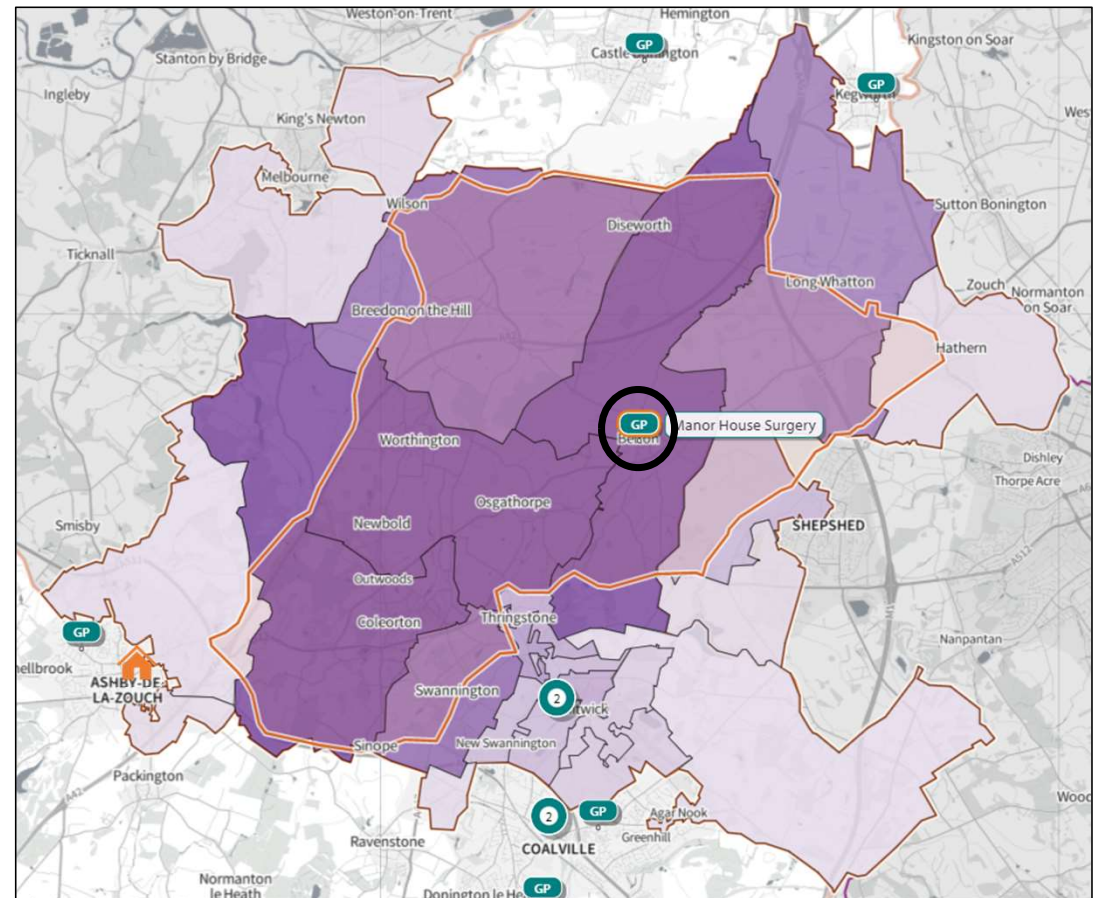


Manor House Surgery

Practice Submitted Inner Catchment area

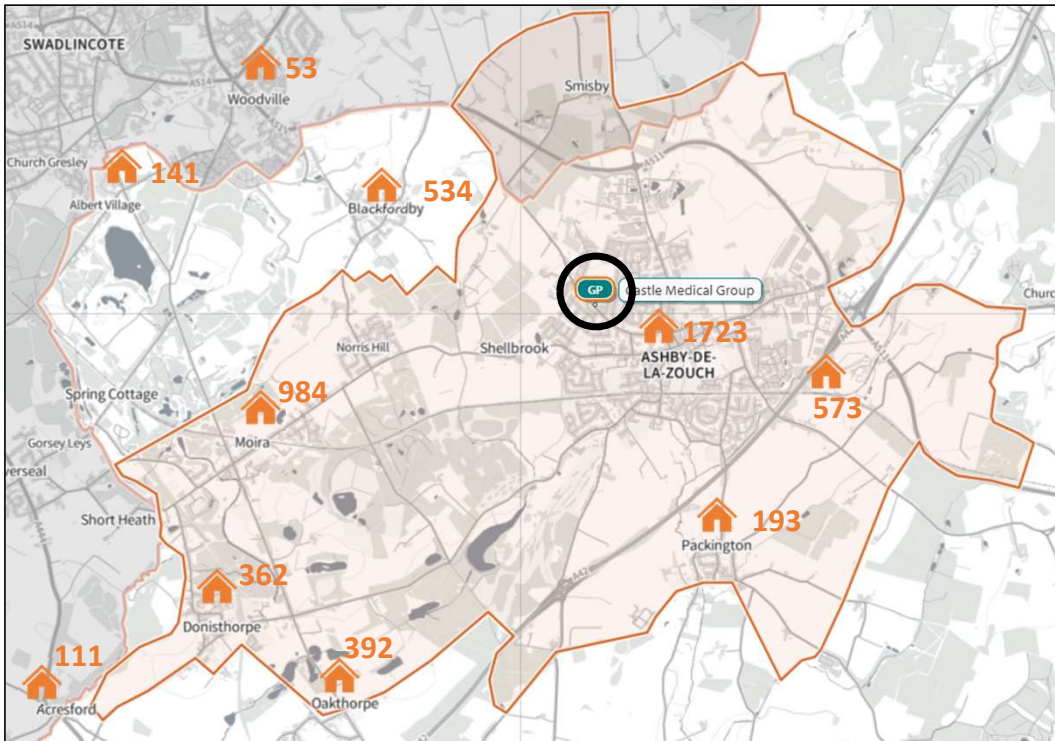


Registered patients (darker colour denotes higher numbers)



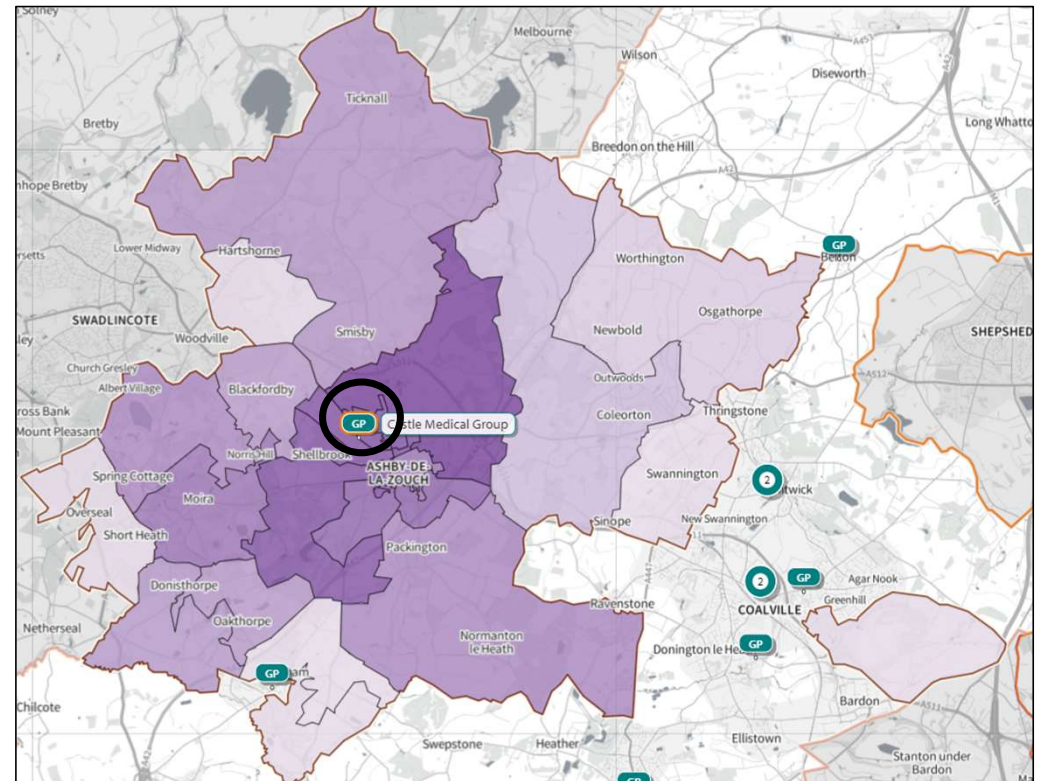
Castle Medical Group

Practice Submitted Inner Catchment area

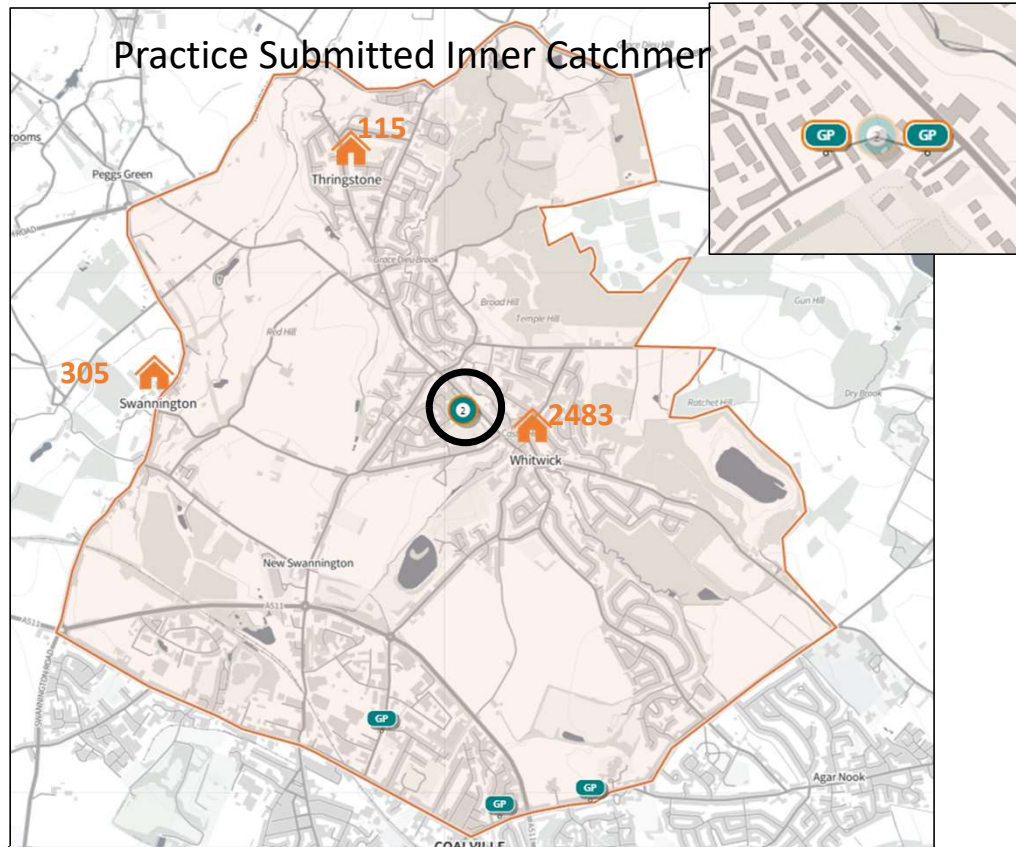


NHS Contract Code	Practice Name	Branch Premises	PCN Area	Housing and Population Growth
C820 14	Castle Medical Group	Stoke Golding	North West Leicestershire (Hub 1)	145

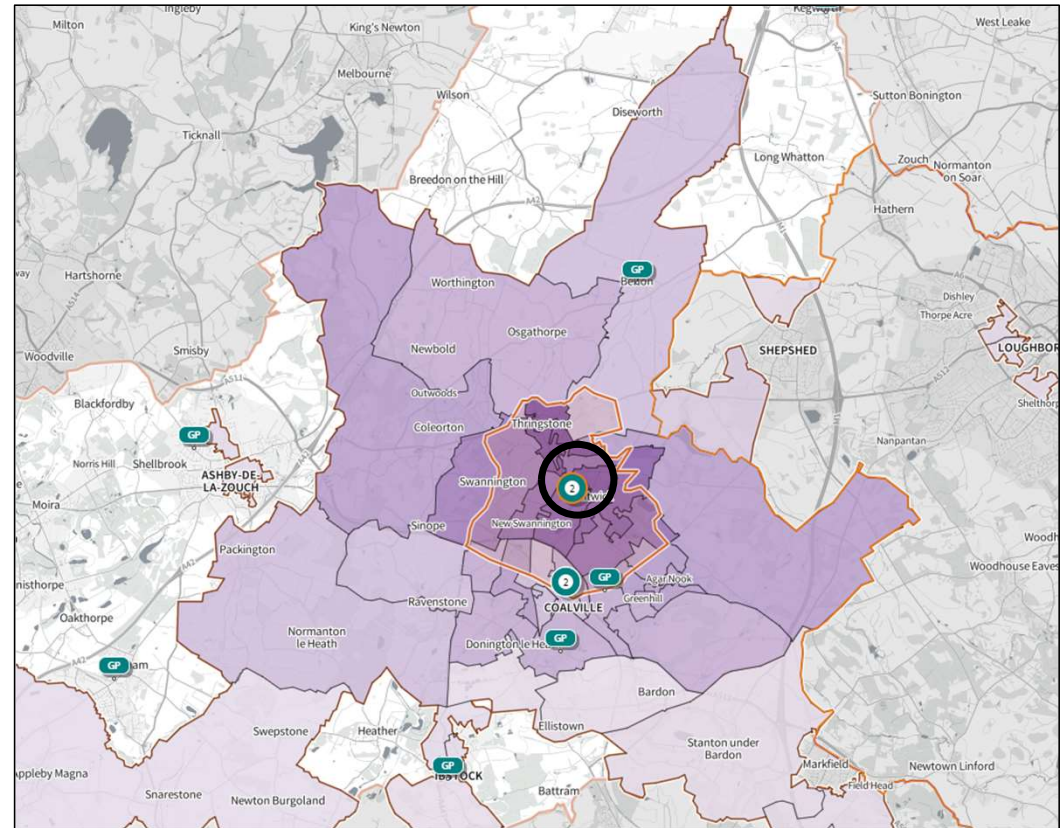
Registered patients (darker colour denotes higher numbers)



Whitwick Health Centre



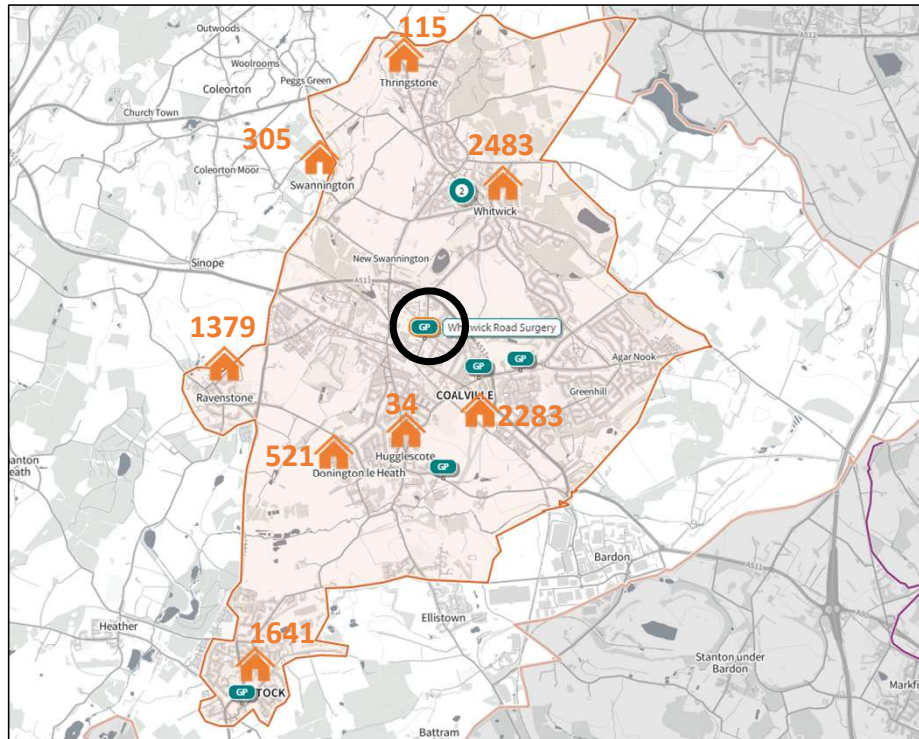
Registered patients (darker colour denotes higher numbers)



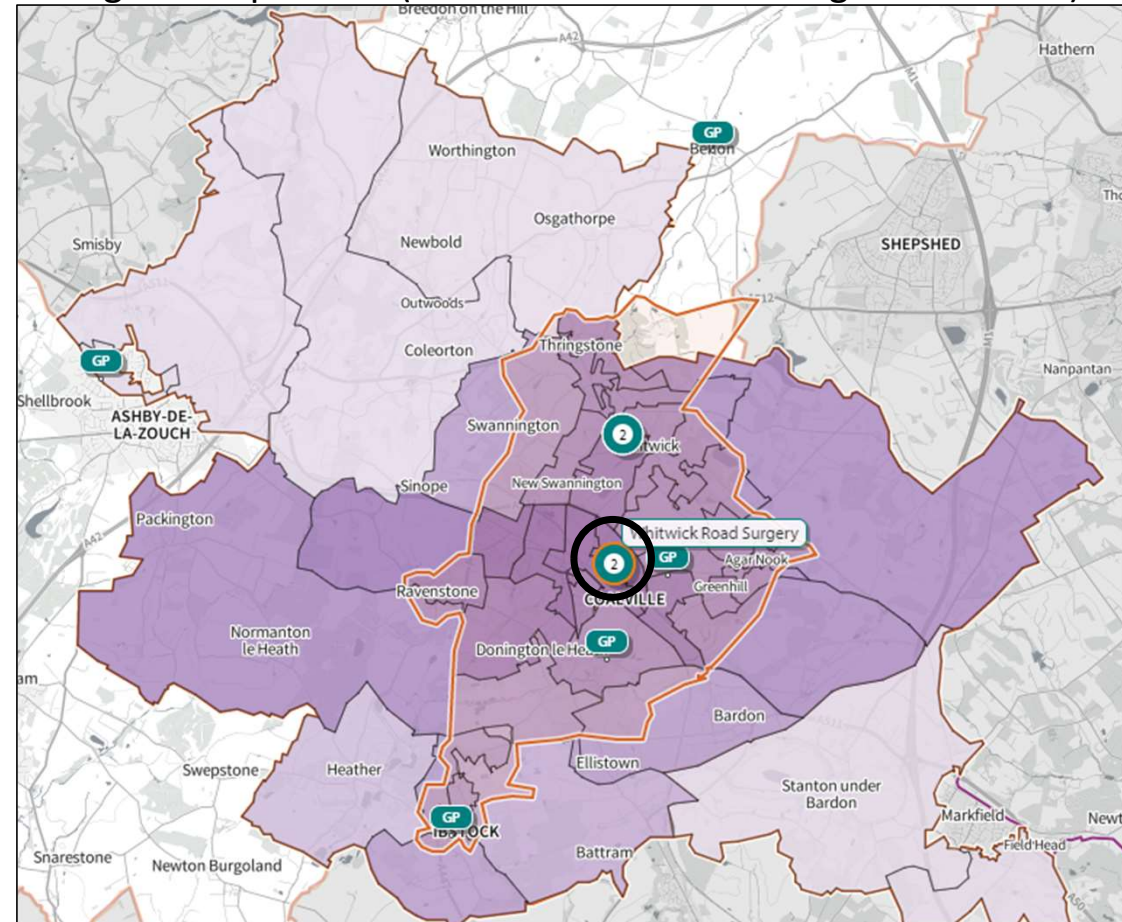
Whitwick Road Surgery

NHS Contract Code	Practice Name	Branch Premises	PCN Area	(Un) Suitability of Current Premises Inc. GIA Score
C82045	The Whitwick Road Surgery		North West Leicestershire (Hub 3)	135

Practice Submitted Inner Catchment area

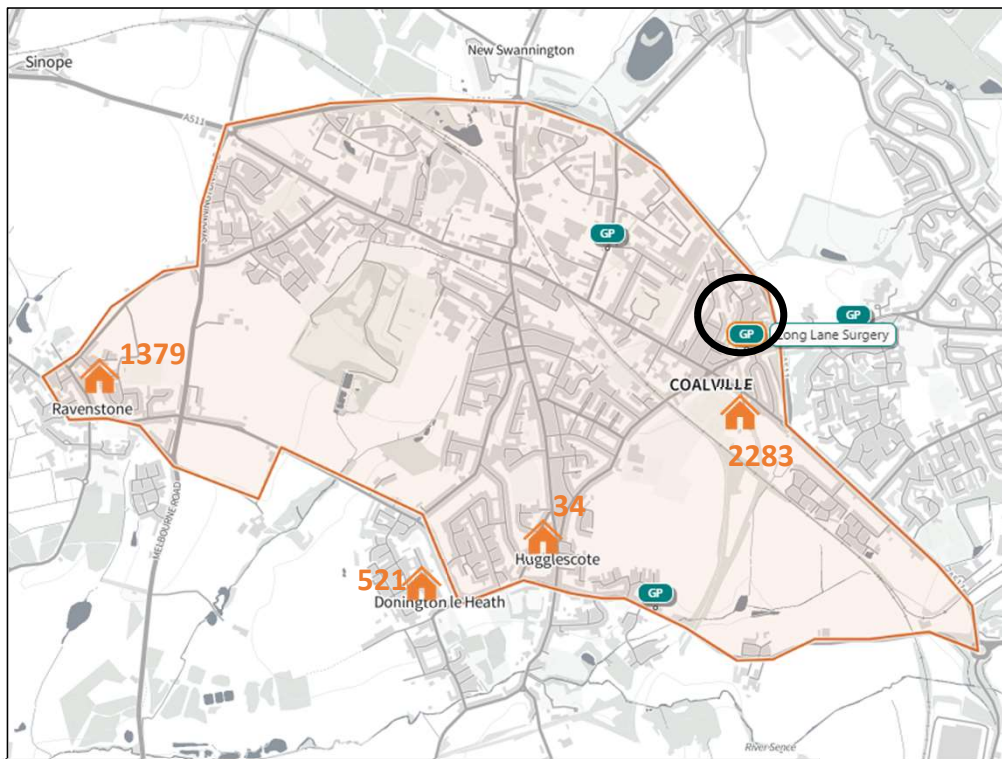


Registered patients (darker colour denotes higher numbers)

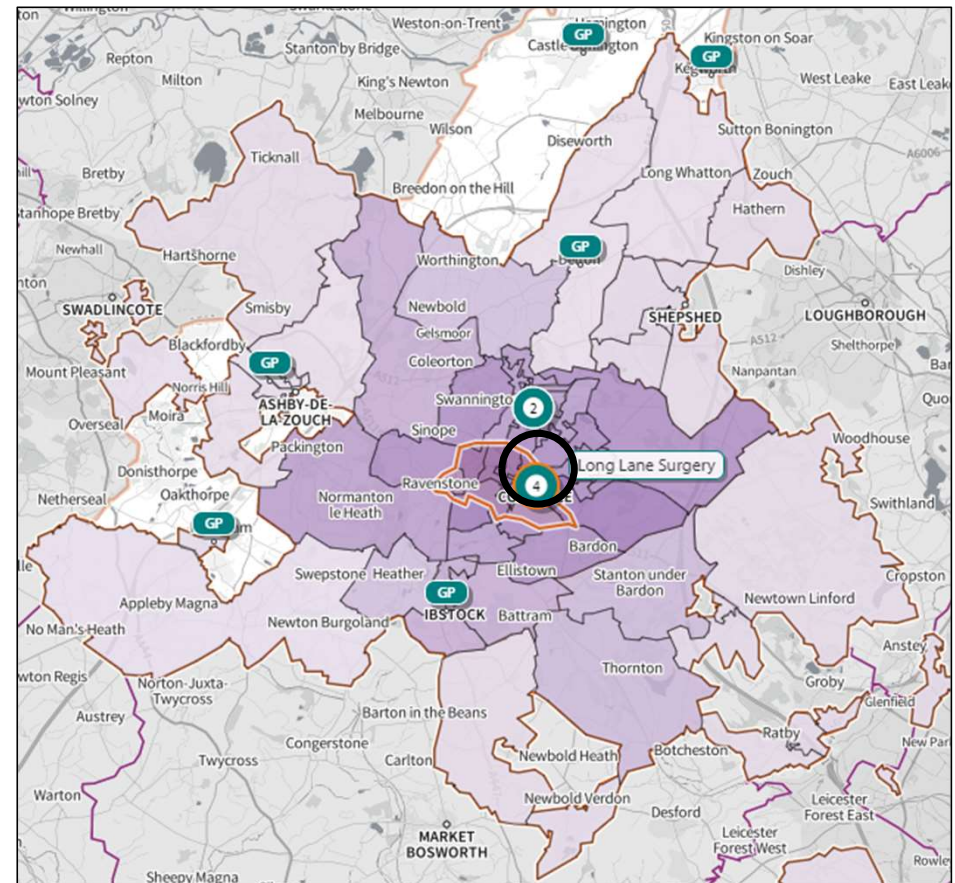


Long Lane Surgery

Practice Submitted Inner Catchment area

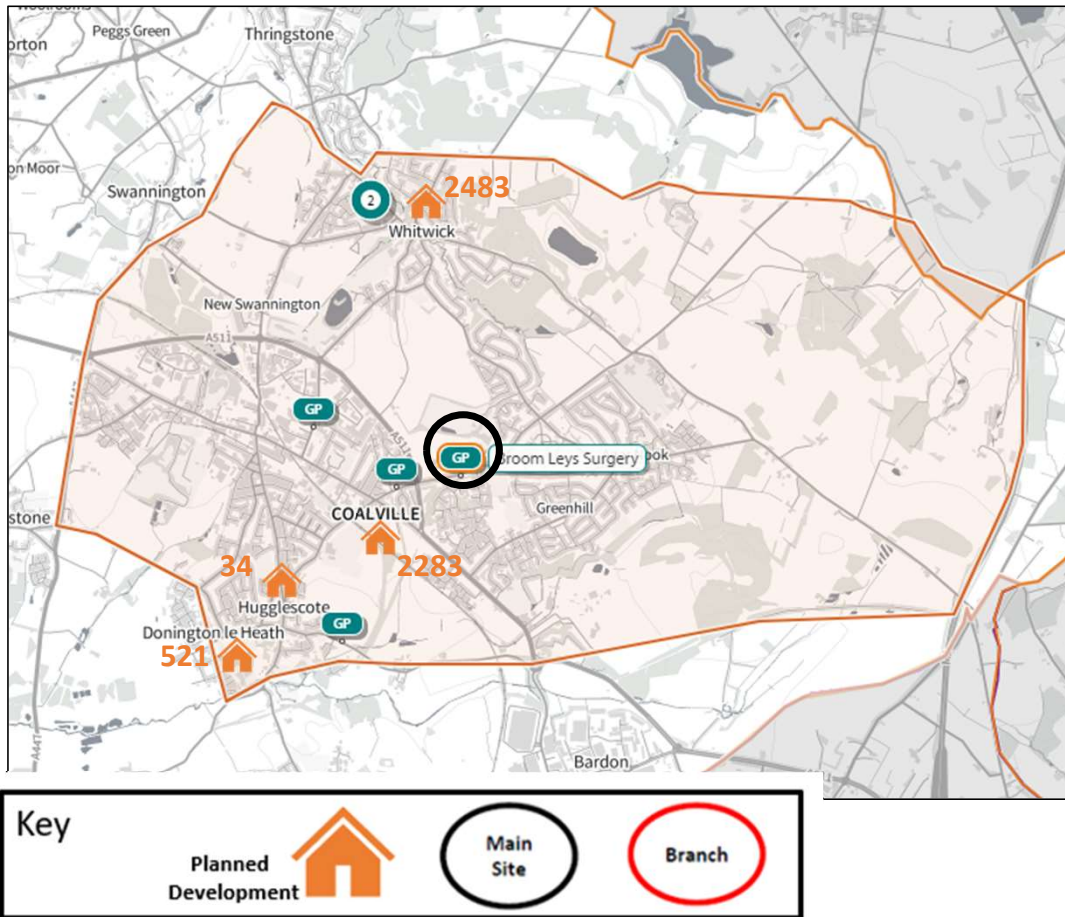


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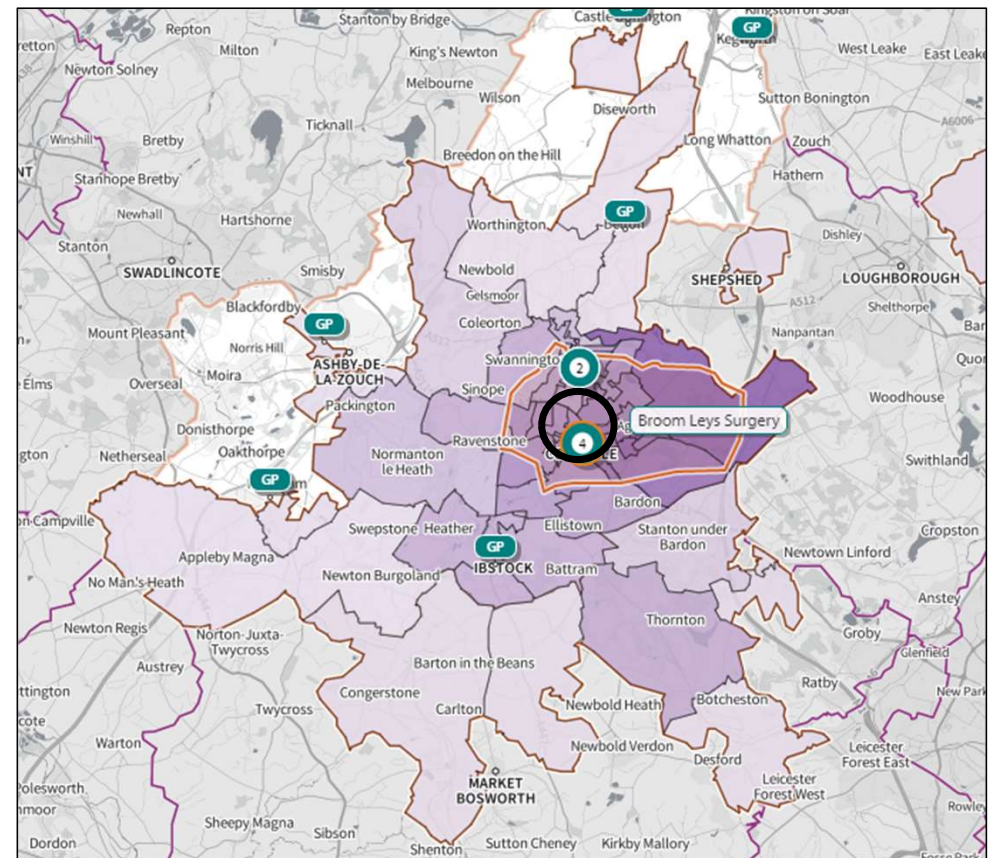


Broom Leys Surgery

Practice Submitted Inner Catchment area

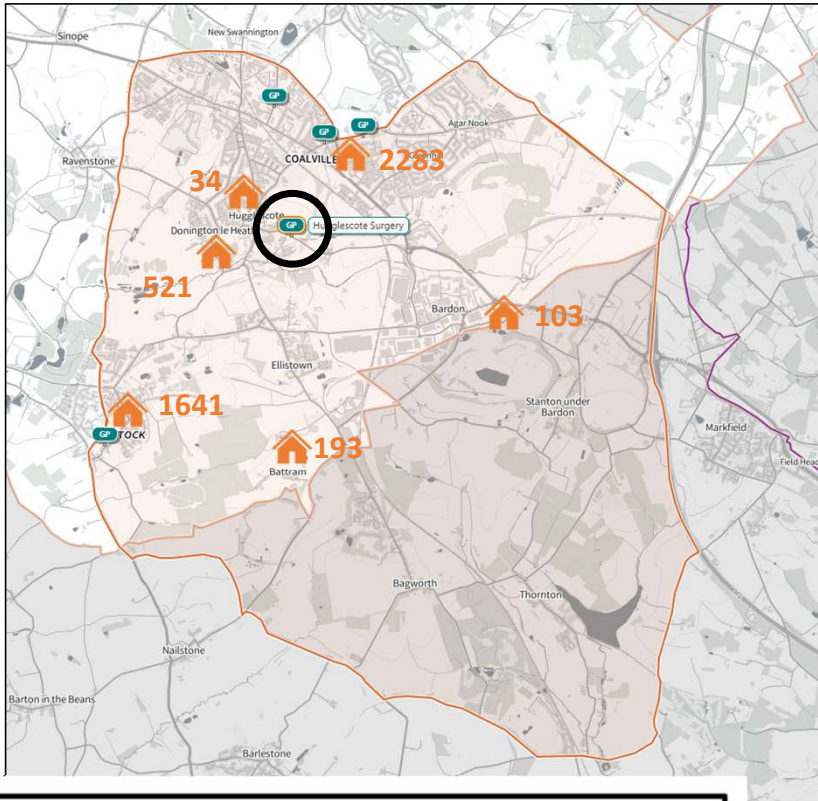


Registered patients (darker colour denotes higher numbers)

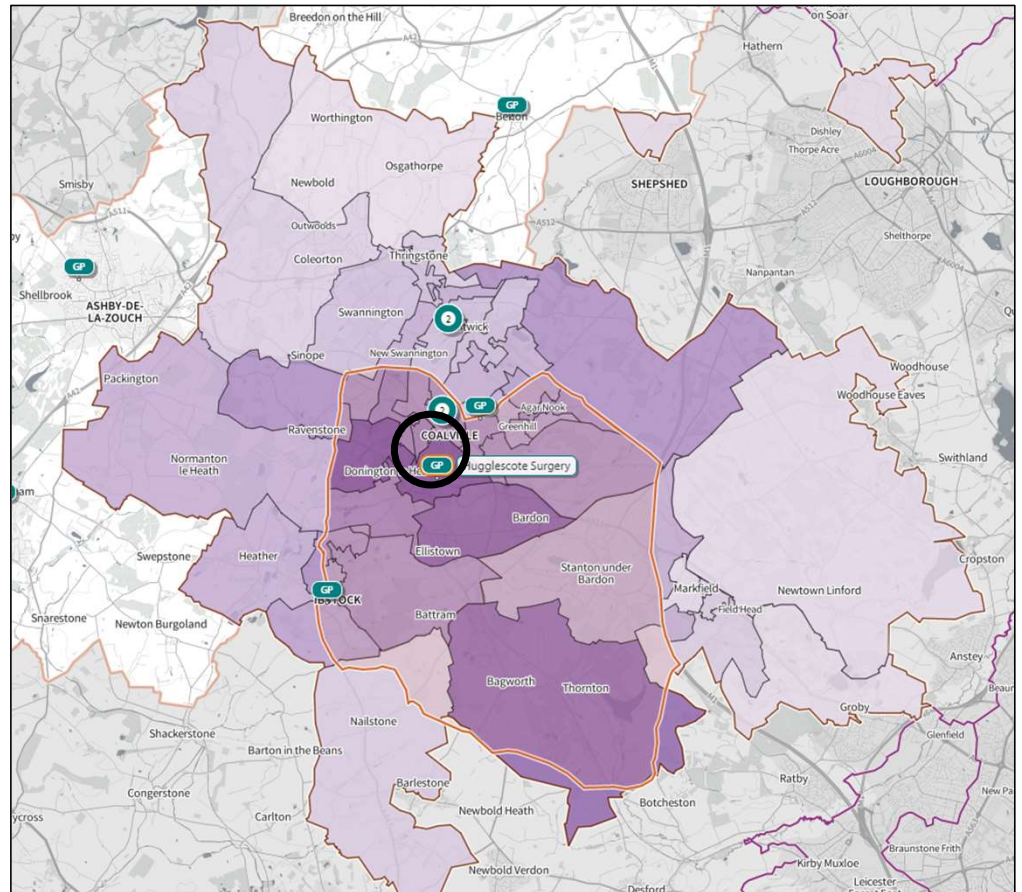


Hugglescote Surgery

Practice Submitted Inner Catchment area

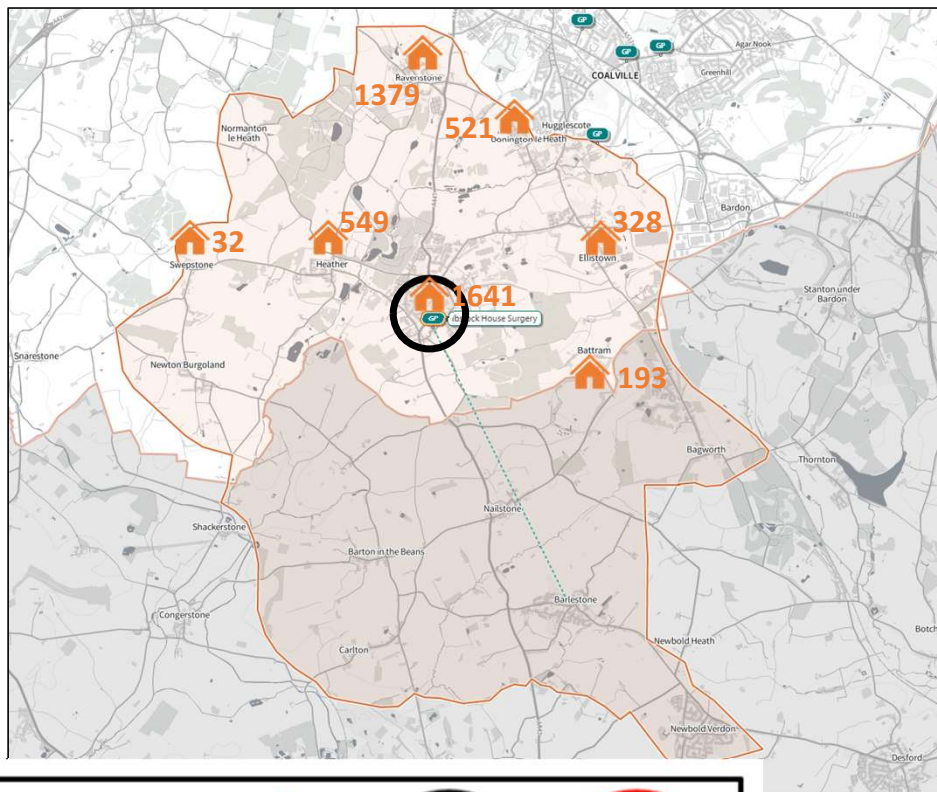


Registered patients (darker colour denotes higher numbers)

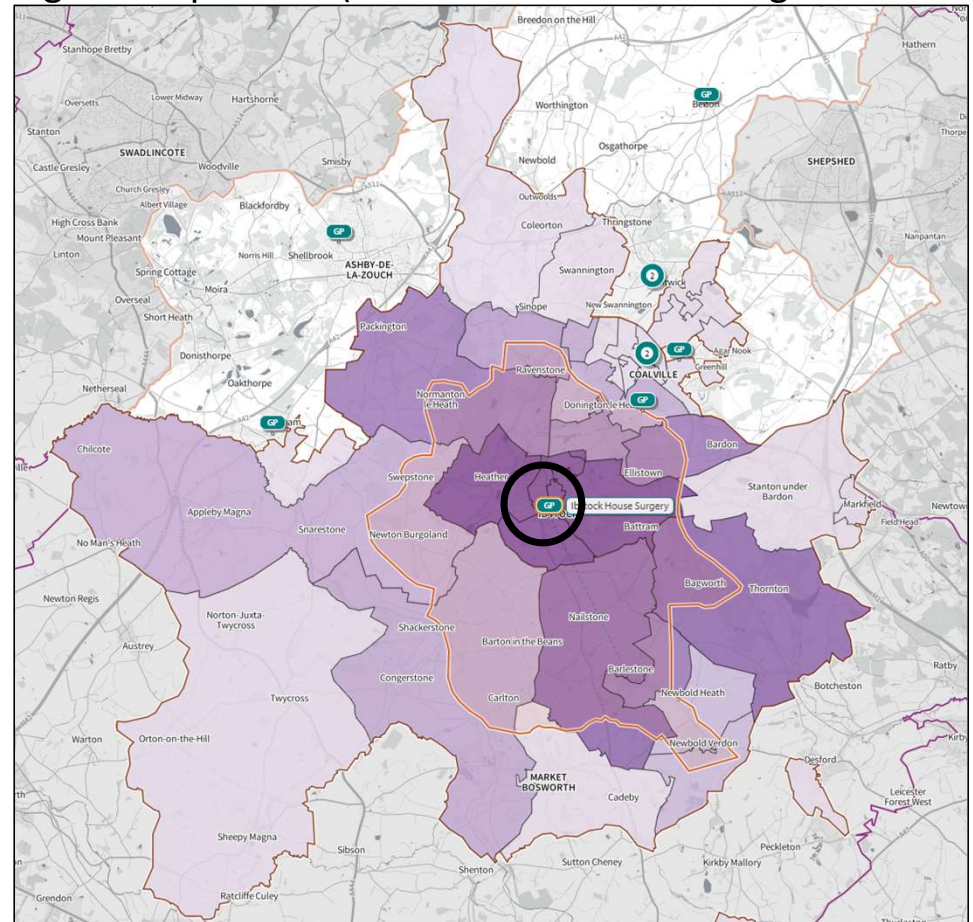


Ibstock House Surgery

Practice Submitted Inner Catchment area



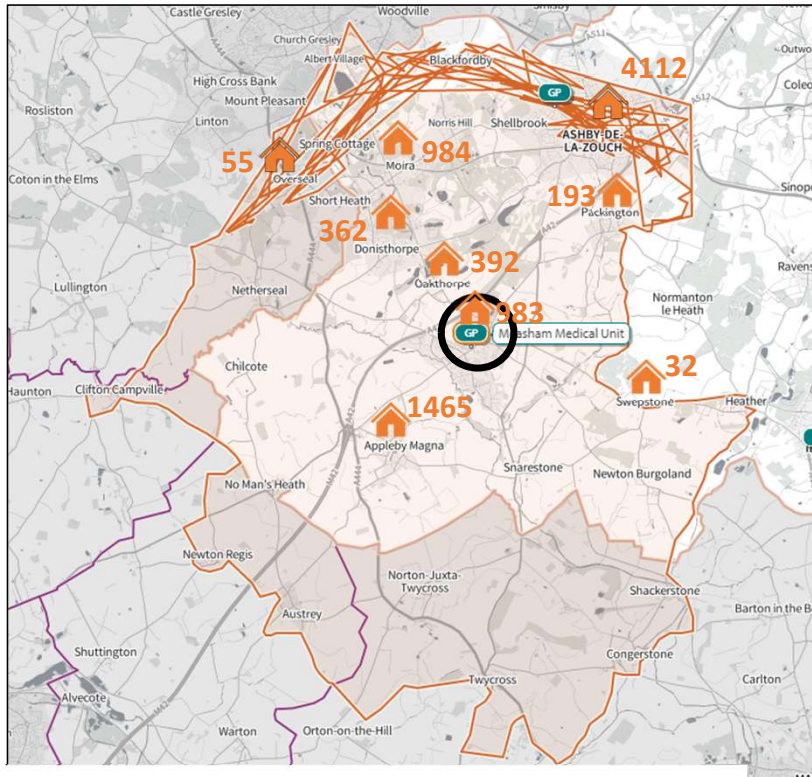
Registered patients (darker colour denotes higher numbers)



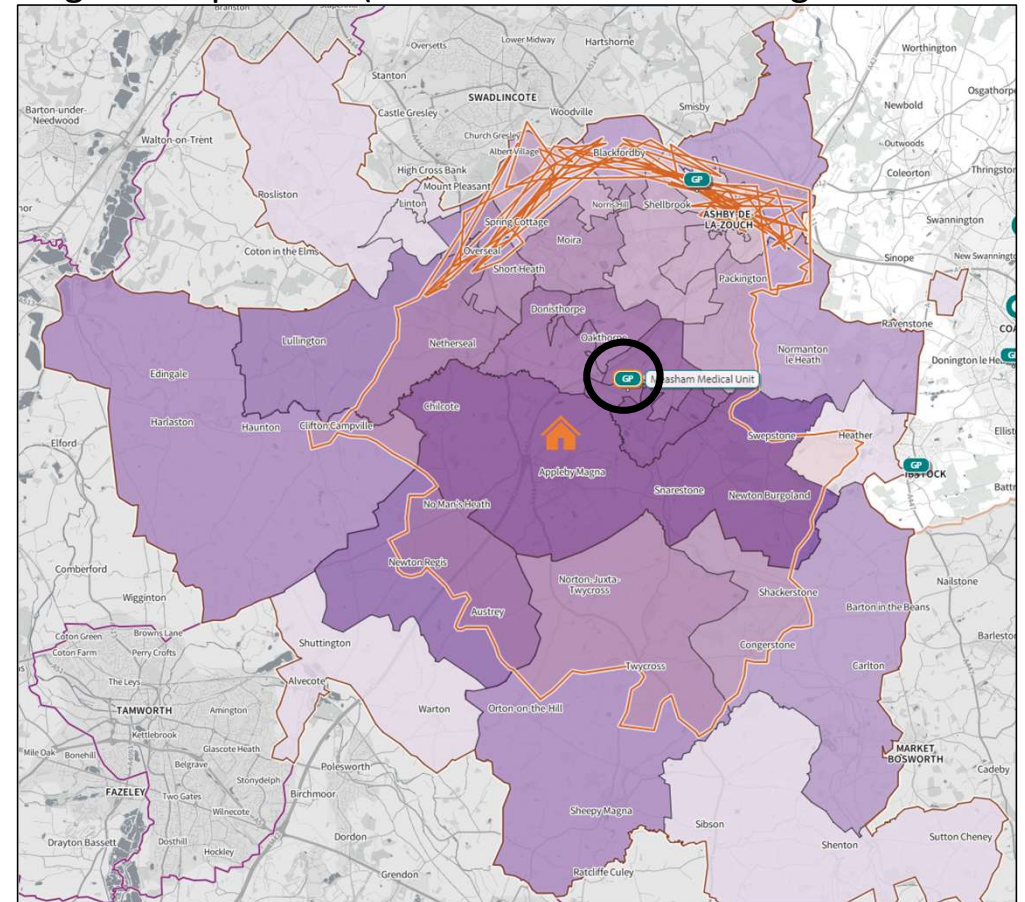
Measham Medical Unit

NHS Contract Code	Practice Name	Branch Premises	PCN Area	(Un) Suitability of Current Premises Inc. GIA Score
C82017	Measham Medical Unit		North West Leicestershire (Hub 1)	142

Practice Submitted Inner Catchment area



Registered patients (darker colour denotes higher numbers)



From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review
Date: 10 March 2022 19:11:33

Jeremy Hunt. [REDACTED]

10th March 2022

Dear Sir/Madam

Local Plan Review – Consultation Response

I wish to object to all new development in and around Diseworth in the local plan review. I would like for you to stop trying to build on our beautiful countryside.

My reasons for this are as follows:

- It does not recognise the intrinsic character and beauty of the countryside (NPPF Policy S3)
- Diseworth is a designated conservation village so any plans submitted for additional building surrounding the village must be rejected to protect this.
- The health and wellbeing of local residents living in the rural villages will be severely negatively affected. Years of heavy traffic, construction noise, large amounts of dust are just the obvious issues in the short term. Long term damage would be even more significant.
- There is no appetite for additional housing or industry in our area. A whole load of new houses are being built in the vicinity already (with some already completed). We now have the EM Gateway and all of the industrial units that came with that. We do not require any more. There are still advertising boards for the industrial units at the Gateway. If they can't fill that, this shows there is no need for more. There are also further industrial units being constructed at the northern end of new Castle Donington bypass. If further industrial units. Freeport are required I would suggest looking at the vast amounts of land backing onto the A50 which have no surrounding housing and are not, I believe, green belt land.
- This area of open countryside is an established home for many species of wildlife. Please stop destroying their habitat.
- Adding traffic to the A453 would be a disaster. It is already difficult to exit the side roads at busy times with large trucks and airport traffic, adding more to this would cause huge problems and would be incredible dangerous.

Anything downhill from the EMA is liable to heavy flooding. Adding more concrete to the situation is reckless. Soon the houses in the local villages will be uninsurable. Are you going to pay to repair damage from the floods caused by your irresponsible building on open fields?

To be clear, I object to any building of any further housing or industrial units to both the East and the West of Diseworth along with new housing plans within the village of Diseworth. This includes but is not limited to the Freeport plan, the planned 'new town' at Isley Walton and the mooted development on Grimes Gate in Diseworth. This wholesale throwing up of buildings in rural areas has to stop. Our children and their children will soon have to see our beautiful wildlife in zoos.

Regards



Jeremy Hunt





**DEVELOPMENT STRATEGY
OPTIONS & POLICY OPTIONS**
January 2022

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Joseph	
Last Name	Hall	
[Job Title]	Facilities Development Officer	
[Organisation]	Active Together (formerly Leicester-Shire & Rutland Sport)	
Address Line 1	██████████	
Address Line 2	██████████	
Address Line 3	██████████	
Address Line 4	██████████	
Postcode	██████████	
Telephone	██████████	
Email address	████████████████████	

PART B – Your Representation

Please use a separate sheet for each question you wish to respond to.

Please state which consultation question your response relates...

Q16

“Do you agree with the proposed health and wellbeing policy? If not, why not?”

Considering the Council’s Delivery Plan has an aim to ensure ‘Communities are safe, healthy and connected’, and that the National Planning Policy Framework highlights a social objective of planning, the inclusion of health and wellbeing policy is essential.

This addition to the local plan is welcome as the importance of health and wellbeing can become diluted when purely dispersed throughout a local plan, rather than being given a specific focus.

The draft policy is currently lacking detail and clarity is what is meant by terms such as ‘creating an inclusive built and natural environment’, ‘promoting and facilitating active and healthy lifestyles’ etc. as these terms feel somewhat ambiguous, which could lead to an inability to gauge whether proposed developments are complying with this policy, or paying it lip service. There is a risk that this policy could be hard to apply at development management level without sufficient clarity in what action is expected of those developing the built and natural environment.

There are a broad range of measures which could be taken to help achieve the aim of improved health and wellbeing – such as improving the quality of walking and cycling infrastructure, designing-in healthy lifestyles through an appropriate network of well-designed, functional open spaces, actively considering sport and active recreation needs, creating a playable environment, embracing Healthy Streets principles etc.

A bespoke platform – [Healthy Place Making](#) – has been developed for authorities across Leicestershire, Leicester and Rutland through consultation with local planning authorities, public health consultants and the local Active Partnership. This resource has been developed to highlight specific evidence, design guidance, frameworks, case studies and imagery which highlight good practice in the design of places to support health and wellbeing. The resource isn’t mentioned within the policy, which is a missed opportunity to support placemakers – planning officers, promoters, developers etc. – to embrace best practice and explore innovative approaches to securing better health outcomes. Healthy Place Making has been designed in a way to avoid contradicting or duplicating existing policies of the Local Planning Authority, and provide an opportunity to curate project-specific collections of content to support design at a bespoke site-by-site level to meet the needs of specific places and communities.

Please state which consultation question your response relates...

Q17

“Do you agree with the proposed Health Impact Assessment policy? If not, why not?”

HIA policy is welcome within the Local Plan. Option 3 is the preferred approach – ensuring that the focus on health outcomes is intensified, while also applying a sensible and proportionate approach to gauging the appropriate scale of the HIA. It is understood that additional resources may be required to achieve this, however the cost of this is outweighed by the potential benefit (noting the current cost to the health of our residents if we do not fully consider the health impact of development).

The threshold identified of 30 or more homes is considered appropriate to deliver greater health outcomes while recognising the need to support small and medium sized builders.

It must be recognised – through policy and practice – that a HIA should be completed at the point in which it is able to have the biggest impact on the design of a development. HIAs being developed as an afterthought to enable the progression of a planning application should not be acceptable. Potential health impacts should be at the forefront of design and development discussions to enable alterations to be made as required to deliver better health for communities, therefore HIAs should be completed at an appropriate time to allow for revisions to development proposals.

Please state which consultation question your response relates...

Q18

“Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?”

Yes. This would allow the council to request this process should a particular proposal be considered to need additional considerations to be made on the health impact.

A [HIA tool](#) has been developed as part of Healthy Place Making – produced in partnership between Leicestershire County Council’s Public Health team, and Active Together as the local Active Partnership. The HIA follows a recognised model, while providing access to local health data at local authority level. The tool provides a video introduction delivered by a public health consultant and follows a ‘smart form’ approach which prompts the user to consider a range of health implications. The form allows for saving of the completed assessment both within the website and exporting for other uses (such as uploading to local planning portals) and could therefore provide a consistent methodology and design to allow for easier review by NWLDC and/or other stakeholders.

The additional benefit of using this form is that this is hosted alongside the aforementioned content relating to how to design healthier places – and therefore this content can be reviewed to consider alternative approaches to development should there be any negative health impacts which need to be mitigated.

If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes

No

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 understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

Signed

J.Hall

Date

02/03/2022

Please send completed forms to planning.policy@nwleicestershire.gov.uk or
Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Monday 14 March 2022

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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	Personal Details	Agent's Details (if applicable)
Title		
First Name		
Last Name		
[Job Title]		
[Organisation]	Tambak Capital Ltd	Andrew Large Surveyors
Address Line 1	██████████	██████████
Address Line 2	██████████	██████████
Address Line 3	██████████	██████████
Address Line 4	██████████	██████████
Postcode	██████	██████
Telephone	██████████	██████████
Email address	████████████████████	████████████████████

PART B – Your Representation

Please use a separate sheet for each question you wish to respond to.

Please state which consultation question your response relates...

Q5

Please use this box to set out your answer to the question.

We are concerned about the proposed distribution for housing growth, in particular the plans for a new settlement. Many of the local villages are losing their services because they cannot maintain their sustainability. Post offices, village shops, public houses, regular bus services, and village facilities such as village halls etc all are coming under threat and need to be safeguarded. The argument regarding the reliance on the private car in rural settlements is completely flawed. The housing estates that are now being built in such places as Castle Donington are of such a large scale that occupiers have the same reliance on a car to access services and jobs, as that of a development in a rural village.

We would propose that more housing is directed towards sustainable villages, such as Oakthorpe. This would ensure that those with local services and facilities still remain viable and also give opportunity for new investment in small villages where services have been lost. With an increased amount of people now working from home, this further supports the idea that the traditional settlement hierarchy is flawed. The increased availability of food deliveries further negates the need to travel to the shops. It's interesting to note that following several new developments in Breedon on the Hill, the post office and village store is now being extended, due to the increased number of residents.

Paragraph 79 of the NPPF states that:

'To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.'

My company has a site off School Lane in Oakthorpe - SHLAA ref 0a5 – which is enclosed on three sides by the village and directly adjacent to other residential development on two sides. The site is in close proximity to the services in the village, and would make a suitable location for more housing, which would in turn support the existing services.

The negative effects listed in terms of directing growth towards smaller settlements can be negated with well thought out planning. Rural affordable and local needs housing can be promoted, sustainable construction techniques could be mandatory and landscape and wildlife corridors incorporated into schemes to ensure there is a biodiversity gain. The proposed direction for housing growth also seems to go against the arguments made by district councillors within the publicly available minutes for the Local Plan Advisory Committee and Planning Committee, who regularly voice support for housing in rural settlements.

A new settlement in open countryside would have no relationship to existing built form and would be an unnecessary urban development far more intrusive on the environment than infilling or edge of existing settlement development.

If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes

Y

No

Declaration

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Signed

Date

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	Personal Details	Agent's Details (if applicable)
Title		
First Name		
Last Name		
[Job Title]		
[Organisation]	Measham Road Properties Ltd	Andrew Large Surveyors
Address Line 1	██████████	██████████
Address Line 2	██████████	██████████
Address Line 3	██████████	██████████
Address Line 4	██████████	██████████
Postcode	██████	██████
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My company own a site in Oakthorpe off Measham Road that has been put forward for a SHLAA allocation (ref Oa7).

The site falls outside the development boundary of Oakthorpe, however it is enclosed on two sides by the village and directly adjacent to other residential development on two sides. The site is in close proximity to the services in the village and would make an ideal place for future housing.

The negative effects listed in terms of directing growth towards smaller settlements can be negated with well thought out planning. Rural affordable and local needs housing can be promoted, sustainable construction techniques could be mandatory and landscape and wildlife corridors incorporated into schemes to ensure there is a biodiversity gain. The proposed direction for housing growth also seems to go against the arguments made by district councillors within the publicly available minutes for the Local Plan Advisory Committee and Planning Committee, who regularly voice support for housing in rural settlements.

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From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response - Isley Walton and Diseworth Building Proposals
Date: 11 March 2022 11:56:51

Local Plan Review. Consultation Response

Name Noel McGough.

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90]. My objections are based on the following:-

1. LP. 5.25. Policy S3. The NPPF states that planning needs to *"take account of the different roles and character of different areas,"* and that planning should recognise *"the intrinsic character and beauty of the countryside"*. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *"There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)"*. The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to *"focus significant development in locations which are or can be made sustainable"*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local lives, wellbeing and emotional stability as well as significant increases in traffic exhaust pollution, light pollution, noise pollution, air pollution, loss of green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *"The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy"*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - "Promote the health and wellbeing of the district's population"

Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - "*Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances*". Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

6. LP. 4.6. Objective 4 – "*Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care*". The IW1 development is non-compliant. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion, will generate sufficient demand to justify 4.7k homes. This new village will therefore become primarily a dormitory town, increasing, rather than reducing, travel. Shopping will be at local supermarkets [Ashby, Loughborough, etc.] as will recreation and entertainment. ~10miles away. The principal transport used will be the car as no viable public transport system exists.

7. LP. 4.6. Objective 9 - "*New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)*." In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or it's partners undertake to achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

8. LP. 4.6. Objective 10 - "*Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets*". Again, neither proposal is compliant. The distinctive elements of the district's character between the MOTO MSA and Ashby de la Zouch [south of the A453] are rolling countryside and farmland. Both these developments will totally destroy all aspects of local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. L.P. 4.6. Objective 11 - "*Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance*". Neither development can possibly protect any of the natural environment – nor the associated wildlife, plant life, etc. at present supported by this open countryside. In respect of IW1, even the SHELAA recognises this fact [SHELAA pages 362-3] and lists several exposed species, etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character since its entry in the Domesday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that "*In view of its scale, it is more likely that a change to policy/strategy would be required*". So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states "*In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended*". This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

10. LP Page 18. [Pollution]. This states that:- "*..new development is not itself detrimentally affected by noise.*". Anyone purchasing a property on the IW1 site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect if the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechinons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

11. Traffic. The major access to/from both sites will be the A453. This is already a busy

road carrying local traffic, including heavy quarry trucks, airport customer traffic and EMA freight lorries. The LW1 site, housing a further 4.7k houses will produce circa 16k car movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even more problematic than already, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in transport movements. In respect of EMP90, this site has no viable access from the south or west [which would be through the village of Diseworth. The only access available is from the A453. As SHELAA concedes [Appendix 2. Page 170], this is not compatible with the Leicestershire Highways Design Guidance [Policy INS3] - unless the LHA can be persuaded to change their mind. Again, change the rules to fit the proposal, not change the proposal to fit the rules.

12. Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- *"What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations."* As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing

nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as *"...Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development.* Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies *"...an immediate need for additional employment land"*. It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly *"...detrimental to the amenities of...nearby residential properties and the wider environment"* – vis. Diseworth.

18. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove it's own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an

acceptable practice.

Yours Faithfully

Noel McGough

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Nikki Clarke

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *“immediate need for additional employment land”*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *“detrimental to ...nearby residential properties”*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

A thick black horizontal bar redacting the signature of the sender.

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: objection to development of housing from diesworth to Isley walton
Date: 11 March 2022 12:47:43

dear sir/madam

i live at Brooklet farm nr Isley walton. I have just recieved a leaflet through my door showing the proposed development at the back of our property..which we had had no consultation on .

We brought Brooklet Farmhouse in 2012 and have spent years getting the house into a liveable state and perfect family home..strangely enough we wanted to take a barn down and put a single dwelling for my disabled mother but were told we were outside of the Envelope for permitted development!!!!!!! amazed that its ok for 4700 houses to be built next door. The traffic has doubled since we moved here and with DHL extention and the development at Castle Donington we have traffic past our entrance at 60mph constant. (Nesting pairs of Kestrels and a family of Buzzards will also loose their habitat}
thanks for the nightmare...we are going up for sale asap.

suzanne and james price

[REDACTED]

North West Leicestershire Local Plan Representation on Development Strategy Options & Policy Options

On behalf of Hallam Land Management.

Date: 14 March 2022 | Pegasus Ref: EMS.2487

Author: Alan Siviter





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1. Introduction

- 1.1. This representation is submitted by Pegasus Group on behalf of Hallam Land Management, in response to the Local Plan Review – Development Strategy and Policy Options (Regulation 18) consultation.
- 1.2. This representation is made in relation to our client's land interests at Land off Ashby Road/Leicester Road, Measham.
- 1.3. The response form below sets out our client's comments on the proposed settlement hierarchy, and the Council's future policy approach to HS2 and the River Mease SAC in relation to the site's current Local Plan allocation.



DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

January 2022

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-

Part A – Personal details

Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

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, 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	Mr
First Name	Chris	Alan
Last Name	Gowlett	Siviter
[Job Title]	Senior Land and Planning Manager	Senior Planner
[Organisation]	Hallam Land Management	Pegasus Group
Address Line 1	██████████	██████████
Address Line 2	██████████	██████████
Address Line 3	██████	██████
Address Line 4		████
Postcode	██████	██████



Telephone		██████████
Email address	████████████████████	████████████████████

PART B – Your Representation
Please use a separate sheet for each question you wish to respond to.

Please state which consultation question your response

Q2

The continued inclusion of Measham as a 'Key Service Centre' in the proposed settlement hierarchy is supported, as evidenced by the Settlement Study 2021. In bringing forward the Local Plan Review it is necessary to have regard to the existing, adopted North West Leicestershire District Council Local Plan and to review the merits of outstanding, unimplemented allocations; Policy H3 – Housing provision: New Allocations includes site allocation H3c – Land off Ashby Road/Leicester Road, Measham (about 300 dwellings).

As an existing local plan allocation, this site has demonstrated it is a sustainable and appropriate location for growth. The site has not come forward for development because the policy states the site will be supported when:

- (a) The Government confirms the line of HS2 in the vicinity of Measham; and
- (b) The confirmed route passes through land West of High Street Measham (H2a); and
- (c) The site West of High Street Measham is not capable of being developed in its entirety as a result of the alignment of HS2.

The Integrated Rail Plan (November 2021) confirms the delivery of HS2 to Nottingham and the route's proposed alignment through the West of High Street allocated site remains. Deliberations over HS2 has blighted and will continue to blight housing delivery on the West of High Street site. The current policy criteria are inflexible, reliant on a third party decision (with no exact timetable), uncertain and is preventing the delivery of sustainable housing growth in Measham.

The Local Plan Review provides the opportunity to resolve the present impasse by rewording Policy H3 to remove the present restriction on the site's release. It is requested that Policy H3c is modified as set out below to provide greater certainty of housing delivery in Measham, a 'Key Service Centre' that remains a sustainable settlement for growth as evidenced by the Settlement Study 2021.

Suggested Policy Update/Approach:

H3c – Land off Ashby Road/Leicester Road, Measham (about 300 dwellings)

~~Development of this site will be supported when:~~

- ~~(a) The Government confirms the line of HS2 in the vicinity of Measham; and~~
- ~~(b) The confirmed route passes through land West of High Street Measham (H2a); and~~
- ~~(c) The site West of High Street Measham is not capable of being developed in its entirety as a result of the alignment of HS2.~~

Development will be subject to the following:

- (i) provision of vehicular access from Ashby Road and Leicester Road; and
- (ii) provision of walking and cycling connections from the site to Measham town centre and existing bus routes; and
- (iii) provision of a range of infrastructure including contributions towards education provision, affordable housing, open spaces, green infrastructure and community facilities and enhanced public transport provision; and
- (iv) design and layout of the proposed development should minimise the impact upon the setting of Measham Conservation Area; and



- (v) protection and enhancement of heritage assets, including their setting; and
- (vi) provision for the discharge of wastewater into the Mease catchment in accordance with the provisions of policy En2. Development which does not meet these provisions will not be permitted. In addition, development will not be permitted unless a 'development window' for the Developer Contributions Scheme is current and there is sufficient capacity to accommodate the proposed development in full; and
- (vii) provision of a mineral assessment identifying the potential effect of the proposed development on the mineral resources beneath and adjacent to the site.

River Mease SAC

Further to the policy update identified above, we also note that North West Leicestershire District Council are seeking to progress a further Developer Contributions Scheme (DCS) to facilitate the delivery of development allocations within the River Mease SAC catchment to ensure the integrity of the SAC is at least preserved.

This strategy mirrors the approach taken as part of the previous local plan and is fully supported by Hallam Land Management. Of course, we welcome the inclusion now of the allocated H3c - Land off Ashby Road/Leicester Road, Measham site as part of the capacity for the DCS works.

If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes

<input checked="" type="checkbox"/>
<input type="checkbox"/>

No

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 understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

Signed ALAN SIVITER

Date 09/03/2022

Please send completed forms to planning.policy@nwleicestershire.gov.uk or
 Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Monday 28 February 2022



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 publically 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 publically available.

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

Further information about the Council's privacy policy and how we collect, store and use your personal data can be found [here](#).

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.

Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

East Midlands

EastMidlands@pegasusgroup.co.uk
Offices throughout the UK and Ireland.

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We are ISO certified 9001, 14001, 45001



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From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review - Consultation Response
Date: 11 March 2022 13:36:27

Dear Sirs,

You will see that I have based my reply on a set of notes produced by people that know more about planning issues than me, but I have amended some points that I consider important.

The response to the Local Plan [LP] Review is not restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth. I include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections to both are similar in the two cases, hence the combined response wholly based of the effect it will have on our Parish (Diseworth & Long Whatton): -

It is my understanding that the Isley Walton [IW1] and Freeport industrial proposals both fail to meet several objectives of the NWLDC Local Plan [2017 – As amended 2021].

- 1. Objective 1.** Health and wellbeing. Both proposals fail this test.
- 2. Objective 3.** High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context.
- 3. Objective 4.** Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased for many years. I am most concerned about an increased traffic density and speed through our villages, it will also affect Long Whatton, (a) during any construction works and (b) once completed.
- 4. Objective 9.** Effective flood prevention. Both proposals will fail. Water management both sides of Diseworth have been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster, again for both villages.
- 5. Objective 10.** Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.
- 6. Objective 11.** Protect and enhance the natural environment. Again, both proposals fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.
- 7. Countryside.** National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the roles and character of different areas, the character and beauty of the countryside. Both proposals fall short of this requirement.
- 8. Sustainability.** The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.
- 9. Noise.** Page 18 of the Local Plan [Pollution] states that new developments should not be

affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Park Racing Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution. What particularly worries me regarding the industrial development is what I expect to be the constant (24 hour) 'warning alarms' when lorries are reversing to loading bays, we already suffer this from DHL, this will bring it much closer.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major 'rat-run' avenue for this new proposal.

11. Non-Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an "*immediate need for additional employment land*". Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being "*detrimental to ...nearby residential properties*". Diseworth is expected to be only separated by 75 metres.

12. The Settlement Hierarchy. In the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line for our conservation village and must be both respected and honoured. Effective protective levels of separation between rural villages and prospective new development MUST be included.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. Whilst I do see the logic in building a new settlement rather than adding large numbers of houses to existing villages you need to ensure adequate separation to these existing villages to ensure that they are not swallowed up which will inevitably result in the destruction of their individual identity.

14. Over Development. In general terms Diseworth has already accepted significant development in recent times. We suffer unacceptable and increasing levels of noise from night flights at Europe's only unregulated airport. We have seemingly constant noise from the M1 and A42, then MOTO, then Junction 23A of the M1. We have had the rail freight interchange close by which has generated a huge increase in HGV traffic, likewise from the earlier development of the DHL and UPS air freight hubs at EMA. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. In my opinion these proposals give no regard to the consequence of their development on either the local communities or the environment.

16. Conclusion and Planning Integrity. Recent proposals frighten me, they are too big, too close and will add an unacceptable burden on what is a small, but happy and thriving, village community. Something that is not mentioned above is that the Freeport development will also impose significantly increased light pollution on the area. I can only hope that through the planning process adequate consideration and protection can be given to the parish of Long Whatton and Diseworth.

Yours Faithfully,

████████████████████

[REDACTED]
[REDACTED]
[REDACTED]

The Detailed Template Letter:-

Local Plan Review. Consultation Response

Name Mr Alan Edward Wade

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90]. My objections are based on the following:-

1. LP. 5.25. Policy S3. The NPPF states that planning needs to *“take account of the different roles and character of different areas,”* and that planning should recognise *“the intrinsic character and beauty of the countryside”*. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *“There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)”*. The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to *“focus significant development in locations which are or can be made sustainable”*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local

lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *“The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy”*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of

the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - "*Promote the health and wellbeing of the district's population*" Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - "*Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances*". Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

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achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

8. LP. 4.6. Objective 10 - "*Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets*". Again, neither proposal is compliant. The distinctive elements of the district's character between the MOTO MSA and Ashby de la Zouch [south of the a453] are rolling countryside and farmland. Both these developments will totally destroy all aspects of local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. L.P. 4.6. Objective 11 - "*Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance*". Neither development can possibly protect any of the natural environment – nor the associated wildlife, plant life, etc. at present supported by this open countryside. In respect of IW1, even the SHELAA recognises this fact [SHELAA pages 362-3] and lists several exposed species, etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character since its entry in the Domesday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that "*In view of its scale, it is more likely that a change to policy/strategy would be required*". So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states "*In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended*". This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

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operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect if the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechincons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

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12. Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition: - *"What is planning"?- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations."* As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And

so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as *"...Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development*. Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies *"...an immediate need for additional employment land"*. It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly *"...detrimental to the amenities of...nearby residential properties and the wider environment"* – vis. Diseworth.

18. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully

Mr A. E. Wade

The Detailed Template Letter:-

Local Plan Review. Consultation Response

Name Mr Samantha Jane Wade

Address [REDACTED]

Dear Sirs,

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13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition: - *"What is planning"?- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations."* As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And

so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as *"...Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development*. Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies *"...an immediate need for additional employment land"*. It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly *"...detrimental to the amenities of...nearby residential properties and the wider environment"* – vis. Diseworth.

18. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

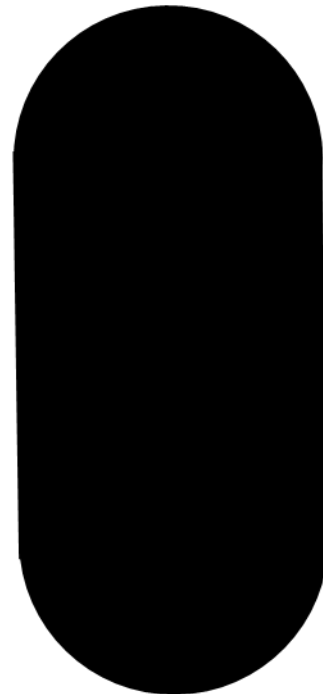
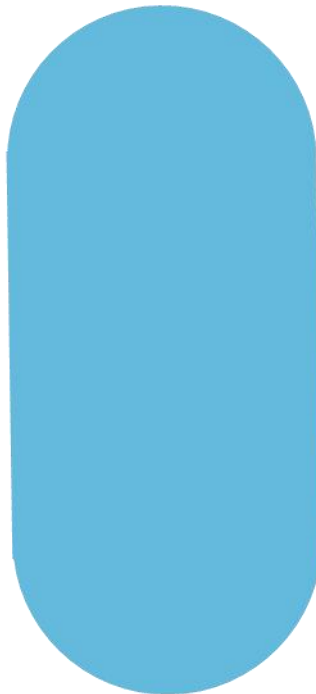
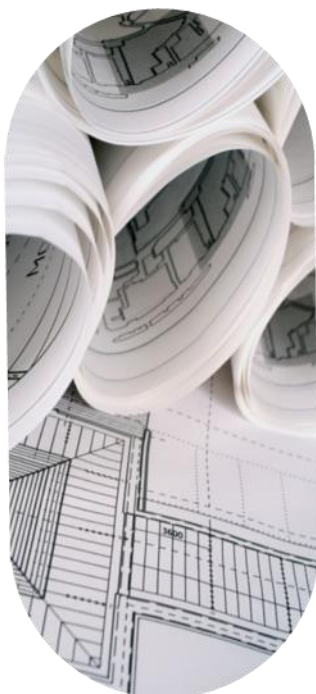
Yours Faithfully

Mrs S. J. Wade

**REPRESENTATION ON THE NORTH WEST LEICESTERSHIRE
LOCAL PLAN 2020-2039 (FEBRUARY 2022)**

LAND TO THE EAST OF MIDLAND ROAD, ELLISTOWN

On Behalf of Richborough Estates



1. INTRODUCTION

- 1.1 This representation is made on behalf of our client, Richborough Estates in respect of their interests at Land to the east of Midland Road, Ellistown. It responds specifically to the North West Leicestershire Local Plan 2020-2039 (Consultation Draft Plan).
- 1.2 The Consultation Draft Plan is currently the subject of consultation and representations are invited until the 14th March 2022.
- 1.3 This representation provides our views on the vision, spatial strategy and settlement hierarchy that the Draft Local Plan outlines. The representation also confirms support for Land to the east of Midland Road to be allocated for employment in the Regulation 19 Local Plan.

2. BACKGROUND AND CONTEXT

- 2.1 The National Planning Policy Framework (NPPF) confirms at paragraph 15 that the planning system should be genuinely plan-led. The presumption in favour of sustainable development applies to plan making and says that plans should positively seek opportunities to meet the development needs of their area, and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (paragraph 11).
- 2.2 Plans should be prepared positively, in a way that is aspirational but deliverable and be shaped by early, proportionate and effective engagement between plan-makers and, inter alia, local businesses. They should also contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).
- 2.3 Paragraph 20 says that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), and

community facilities (including education). Paragraph 22 goes into say that strategic policies should look ahead over a minimum 15 year period from adoption and larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery

- 2.4 Paragraph 23 of the NPPF says that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 2.5 Paragraph 31 says that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 2.6 Paragraph 32 recognises the legal requirement for local plans to be informed throughout their preparation by a sustainability appraisal demonstrating how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). It highlights that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.
- 2.7 Plans should set out the contributions expected from development, including the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for health). This should not undermine the deliverability of the plan (paragraph 34).
- 2.8 For a plan to be adopted it must pass an examination and be found to be 'sound'. Paragraph 35 identifies that plans are 'sound' if they are:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by

agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.9 Paragraph 78 recognises that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.

2.10 Paragraph 79 promotes sustainable development in rural areas and says planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

2.11 Paragraph 81 says that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

2.12 Paragraph 82 says that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth and paragraph 83 says that planning policies and decisions should recognise and address the specific locational requirements of different sectors.

2.13 Planning policies and decisions should also enable the sustainable growth and expansion of all types of business in rural areas (paragraph 84).

2.14 Importantly, planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist (paragraph 85 – emphasis added).

2.15 The national policy context for plan making is clear in that:

1. the plan must set out an overall strategy for the pattern of development that makes sufficient provision for housing to meet the needs of Hinckley and Bosworth as well as any needs that cannot be met within neighbouring areas;
2. Sufficient sites to deliver the strategic priorities of the area must be planned for and allocated;
3. a sufficient amount and variety of land can come forward where it is needed;
4. the plan should be positive, aspirational and be responsive to changes in local circumstances;
5. identify suitable locations for villages to grow and thrive, especially where this will support local services, including extensions to villages where this can help to meet identified needs in a sustainable way;
6. plans should create conditions in which businesses can invest,

expand and adapt with significant weight placed on the need to support economic growth and productivity; and

7. local business and community needs may have to be found adjacent to or beyond existing settlements, exploiting opportunities to improve access on foot, by cycling or by public transport through sites which are physically well-related to existing settlements. (emphasis added)

3. THE NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW (JANUARY 2022)

- 3.1 The Council has prepared a North West Leicestershire: The Need for Employment Land (December 2020 ['The Stantec Study']) providing for the period 2017 – 2039. The study finds a requirement for 11.28ha of land for office developments and 71.57ha of land for industrial/smaller warehousing.
- 3.2 The Local Plan Review also notes that an update to the 2017 HEDNA is being prepared which will contain an alternative assessment of employment land and that Leicester City Council has declared an unmet need of 23Ha of employment land. Having an understanding of the employment land requirements across Leicestershire together with agreement on the distribution of unmet employment need are both matters which the Local Plan Review will need to contend.
- 3.3 The Local Plan Review notes the Leicester and Leicestershire Strategic Growth Plan (SGP) includes an agreed vision and a strategy for the city and county up to 2050 to be delivered through individual authorities' local plans. The SGP also sets out employment needs for 50-56ha of B1a/b, 4ha of B1c/B2 and 21ha of small B8.
- 3.4 The Council has reviewed the evidence provided by the Stantec Study alongside commitments and considers there to be a need to allocate new sites sufficient for up to 2,000sqm of office space and at least 166,000sqm/33Ha of industrial/smaller warehousing.

3.5 The SPG and the Stantec Study do not present directly comparable figures. However, neither allows for any unmet need from Leicester City nor do they account for any strategic warehousing need. Both these matters will need to be considered and dealt with for the Local Plan Review not only to satisfy the Duty to Cooperate which has yet to be abolished, but also to ensure that employment development is not restricted or limited at a time of national and local economic recovery.

3.6 Against this context, the Local Plan Review identifies a set of objectives a number of which are particularly important to the development strategy and employment site selection process:

3 - Achieve high quality development which is sustainable, which responds positively to local character and which creates safe places to live, work and travel.

4 - Reduce the need to travel and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure.

5 - Support the district's economy, including its rural economy, by providing for a range of employment opportunities which respond to the needs of businesses and local workers.

11 - Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way.

3.7 The local plan sets out four options which have been identified as the reasonable alternatives for continuity of supply of employment land:

- Option 1: identify reserve site/s.

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- Option 2: increase the requirement figures by an additional factor.
 - Option 3: await the next review of the Local Plan.
 - Option 4: rely on Policy Ec2(2) or its equivalent.

3.8 Waiting for the next Local Plan Review would prejudice an overall strategy for the pattern and scale with sufficient provision for homes and jobs as required by paragraph 20 of the Framework. Similarly, reliance on the local policy Ec2(2) to meet employment needs on its own would not provide conditions for a clear strategy for employment that businesses could plan under, nor would it plan positively for the spatial relationship between homes and jobs. As a result, we do not consider either option 3 or 4 to be appropriate.

3.9 Option 2 would reduce the limitations on employment development at a time of economic recovery and also provide a safety valve for unmet need from Leicester City, consistent with the approach taken to employment development and is our preference as a result. Safeguarding of reserve sites under option 1, whilst not our preference, could provide an additional layer of flexibility to respond to changing or increased need and for that reason a hybrid of option 1 and 2 would not be inappropriate.

3.10 The Local Plan will need to consider not only the quantity of employment land needed but also the quality, location and relationship with homes. Four options for the distribution of future employment land are identified in the draft local plan:

- General Employment Land Strategy Option 1 – the continuation of the adopted Local Plan distribution. General employment land allocations would be principally at Coalville, Ashby and Castle Donington (i.e. the settlements at the top of the settlement hierarchy).
- General Employment Land Strategy Option 2 – allocating

employment land at Coalville, Ashby and Castle Donington (like Option 1) and also at Measham/Appleby Magna as a 'new', expanding employment location.

- General Employment Land Strategy Option 3 – a more widespread distribution of employment land, including to locations which are currently less well provided for such as the Local Service Centres – Ibstock, Kegworth, Measham – and, potentially, Sustainable Villages.
- General Employment Land Strategy Option 4 – allocating land in a single/new location for a high quality, mixed-use business park.

3.11 Restricting employment development to the settlements at the top of the hierarchy (options 1 and 2) or seeking a single/new location for a business park (option 4) would prevent opportunities for villages to grow and thrive (paragraph 79 of the Framework), would not help to create the conditions in which businesses can invest, expand and adapt and take into account both local business needs (paragraph 81 of the Framework) or allow recognition of the specific locational requirements of different sectors (paragraph 82). As a result, there would be some doubt that significant weight was being placed on the need to support economic growth and productivity.

3.12 Only Strategy Option 3 considers a wider spread of distribution including at Sustainable Villages which could provide for a range of sites to meet different business requirements, whilst supporting local employment needs. We note that a risk of piecemeal development on scattered plots has been identified. We consider that to be more of a risk for option 4 and that the relationship between homes and jobs can be considered as part of the assessment and selection of site allocations for housing and employment, managing the spatial arrangement positively to reduce travel (objective 4), supporting the district's economy including the rural area (objective 5) whilst maintaining and coordinating access to jobs (objective 11).

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- 3.13 The Local Plan Review also acknowledges that there has been considerable demand for new-build strategic warehousing (logistics) in the district in recent years. This reflects the district's exceptionally good strategic transport links, notably the M42/A42 transport corridor, the A50/Midland Main Line and M1/A511.
- 3.14 Since April 2011, permissions have been granted for some 423Ha of strategic warehousing including East Midlands Gateway (139Ha), plots at East Midlands Distribution Centre (22Ha), Mercia Park (97Ha), and Aldi at Sawley (39Ha). The level of provision in the district alone has exceeded what was predicted for the whole of Leicester and Leicestershire up to 2031 in the Strategic Distribution Study (2017) which signals the particular market strength of this sector.
- 3.15 A shortfall of 301,293 sqm at non-rail served warehouse sites is identified between 2020 and 2041. Permission has recently been granted on appeal for 89,200 sqm of industry (B2)/warehousing (B8) in Hinckley and Bosworth Borough (on the border with NWL). Depending on the split between uses, this would further reduce the shortfall to at least 212,093sqm.
- 3.16 A single policy option is considered - *50% of the outstanding road-served requirement to be met in NWL which would equal approximately 150,000sqm, or about 106,000sqm taking account of the recent appeal decision in Hinckley and Bosworth subject to confirmation with the other Leicester and Leicestershire authorities.*
- 3.17 The Council's approach is considered reasonable in terms of the amount of non-rail served warehouse land to be identified. However, any policy wording must provide for sufficient flexibility to allow for the delivery of larger sites in suitable locations required to meet market demand.
- 3.18 The Local Plan Review goes on to acknowledge the need for sufficient flexibility to deal with changing circumstances over the plan's lifetime and not simply plan for economic growth which is forecast at the current time. In addition to a flexibility margin the plan also considers the role of policy
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Ec2(2) which provides the framework for considering new, unallocated employment sites. Whilst we do not consider policy Ec2(2) to be a sensible tool for managing the overall strategy for the amount of employment land needed we do consider it able to provide flexibility in the supply of sites if required.

3.19 The plan identifies eight options ranging from deletion of policy Ec2(2) to retention in its current form with a variety of approaches to its specific restrictions. Our preference is for Policy Ec2(2) to be retained in its current form (Option 2).

3.20 The Local Plan Review also accepts its role in helping to identify and cater for specific sector requirements, including where a specific business need is not being met by the market in addition to the amount and location of new employment land. This is true in relation to a shortage of premises suitable for start-up businesses.

3.21 The Local Plan Review evidence base includes the Start-Up Workspace Demand Study (December 2020) which found evidence of occupiers struggling to find small scale industrial units in the district suitable for start-up firms, which the Plan draws out the following conclusions:

A link is made to viability issues; the development of small industrial space is constrained by low rental values and high building and fit-out costs, despite there being evidence of strong latent demand for such premises. Small businesses are also typically looking for shorter leases with more flexible terms and these are less attractive for many landlords. The study found that the existing small industrial units in the district are well occupied with little turnover or new stock.

An effect of this overall situation is that businesses may stay for too long in unsuitable accommodation which will impact on their productivity. An overall shortage of smaller scale space may mean that growing businesses do not vacate their start-up premises, blocking their availability for other new, fledgling businesses to move into, or it could mean they move out of the district completely to find suitable premises.

The Local Plan Review could help to deliver small workshop schemes (<100sqm) in the district, some of which could be available on flexible lease terms and with access to business support services. There is also a case to provide 'grow on' light industrial space of 150-500 sqm.

- 3.22 The draft local plan identifies six policy options for addressing this issue:
- Option 1 – allocate specific sites for start-up premises
 - Option 2 – specify a requirement for a proportion of start-up premises as part of the overall mix of employment floorspace on allocated employment sites only
 - Option 3 – generic policy which would apply to all employment sites, whether allocated or not, to require a proportion of units to be for start-ups and/or a financial contribution towards provision elsewhere
 - Option 4 – policy to support the provision of start-up space on suitable sites
 - Option 5 – policy that would allow start-up premises as an exception on sites where development would normally be restricted
 - Option 6 – no change
- 3.23 The evidence base acknowledges a shortage of premises suitable for start-up businesses and grow on light industrial space (150-500 sqm) and as a result, “no change” (Option 6) is not considered a sensible solution. The gap in supply of these spaces is likely to constrain economic growth in the district with both viability and sustainability key disadvantages across the considered options.
- 3.24 Option 1 and the specific allocation of start-up premises provides the most direct solution to address the shortfall and therefore is considered to the preferred option as it would provide the basis for identifying

opportunities for start-up sites rather than relying on start-up proposals coming forward on general employment sites.

4. REPRESENTATIONS IN RESPECT OF LAND TO THE EAST OF MIDLAND ROAD, ELLISTOWN

4.1 Ellistown is identified as a Sustainable Village, the 4th tier within the hierarchy. Importantly, the Settlement Study 2021 finds Ellistown to perform as highly as Local Service Centres for education, employment and connectivity and only marginally below Local Service Centres for convenience shops and availability of services and facilities.

4.2 Overall, it is the eighth most sustainable settlement in North West Leicestershire and the second best performing sustainable village (after Moira including Norris Hill) out of 18 sustainable villages. On this basis Ellistown not only cements its place at the top of the sustainable village tier it emerges as a sensible location for growth within that category.

4.3 We agree with the approach taken to arrive at the settlement hierarchy but have not had sight of the evidence that defines the Coalville Urban Area. In the absence of any assessment we presume that a broad consideration of connections from ribbon development at Hermitage Road and Thornborough Road provide the basis for Whitwick, Thringston and Coalville to be considered as one urban area rather than one of functional connectivity.

4.4 However, Ellistown also has connectivity to the Bardon Hill employment area (the largest employment area in the district) in the south of the Coalville Urban Area. Ellistown itself is of course also closer to the services and facilities of Coalville than parts of Whitwick and all of Thringstone. The 'Stantec Report' recognises that strategic warehousing completions at Ellistown between 2012/13 – 2019/20 comprise the largest percentage of total gains across the district (29%) – reflective of its location and links to Bardon Hill.

4.5 Ellistown not only has a clear physical relationship with urban area but

also a functional relationship. Even if Ellistown remains to be considered as a sustainable settlement the guidance at paragraph 79 of the Framework says that planning policies should identify opportunities for villages to grow and thrive and that development in one village may support services in a village nearby. These circumstances are suggestive of a role for growth at Ellistown which fit well with the Local Plan vision and objectives 4 and 11 that other sustainable settlements cannot match. We believe these more nuanced matters should be borne in mind when it comes to selecting site allocations with the benefits of development at Ellistown weighted accordingly.

- 4.6 Ellistown is located in the Coalville Sub-Area (see Fig 5.2 of the Employment Land Study November 2020) where demand is noted to be 'much in excess' of supply with an exceptionally tight market. The Land to the east of Midland Road is capable of accommodating non-strategic storage and distribution which could help meet the need for B8 uses and compliment the need for strategic storage and distribution in the Coalville Sub-Area.
- 4.7 However, there is also a serious undersupply of non-strategic industrial space in the area. Should a decision be taken to direct storage development to the Coaville sub-area specifically (notwithstanding the link Ellistown has with the urban area) it may be appropriate for the Land at Midland Road to be used for Class E(g) development - 'Uses which can be carried out in a residential area without detriment to its amenity', which include offices and research and development, as well as B2 'General Industrial' uses.
- 4.8 The Land to the east of Midland Road, Ellistown extends to approximately 10 hectares. The site is currently maintained as agricultural land and located on the north eastern edge of Ellistown bordering the South Leicester Industrial Estate to the east and strong connections to Bardon Hill.
- 4.9 Richborough Estates has prepared a vision document and indicative masterplan to respond to the constraints and opportunities (Appendix A).

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- The masterplan shows how the site could be developed for employment development whilst taking account of the local character and need for green infrastructure.
- 4.10 The land east of Midland Road is capable of providing a number of configurations to achieve employment growth and Richborough Estates are willing and able to take a flexible approach to the development and would welcome dialogue with the District Council, including in respect of the need for start-up space and for potential community facilities. To that end, the masterplan should not be taken as the final product but rather than a stage in an iterative process.
- 4.11 A Preliminary Ecological Appraisal has been undertaken and the land parcel comprises arable land bound by a combination of species-rich and species-poor hedgerows. The hedgerows hold high ecological value and provide opportunity for a range of commuting and foraging local fauna. Any hedgerow losses as a result of future development will be replaced by a minimum ratio of 2:1 with a native species-rich mix. Development of the site provides significant opportunity to enhance existing defunct hedgerows through infill planting, relaxed management and increasing margins.
- 4.12 The site is outside of, and not adjoining any local designations in the adopted Local Plan, such as Local Green Spaces, Strategy Gap, Strategic Wedge, Green Wedge or Important Local Gap. A sensible, landscape-led approach, including retention and augmentation of trees and hedges, prevents any coalescence and ensures development would be well related to the built form of Ellistown.
- 4.13 There are no heritage assets within, or adjoining the site, and the land parcel is outside of Historically Significant Landscape Areas. The entire site is within Flood Zone 1, land at the lowest risk of fluvial flooding.
- 4.14 Midland Road is a local distributor road connecting Ellistown with Hugglescote and Coalville to the north. The carriageway measures approximately 6.0m in width. The site is closely linked with Beveridge
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Lane a distributor road east out of Ellistown, providing access to the strategic road network via the A511 and subsequently M1 Junction 22.

- 4.15 The sites vehicular access onto Midland Road is proposed via a new priority T-junction. The access will provide a 7.3m wide carriageway with 10.0m turning radii, as well as 2.0m wide footways on both sides of the access road.
- 4.16 The development would provide an opportunity for new and improved bus shelters along the site frontage with Midland Road, serving and employees of the site. Providing real-time information displays and accessing the existing bus routes of the Numbers 15, 26, 125, 159.
- 4.17 Development of the site would provide an employment site at the northern edge of Ellistown which is flexible, technically feasible and which would be an appropriate and sustainable addition to the town, being located adjacent to other existing complementary uses. The masterplan also recognises the potential for community uses with land made available in the south west of the site.
- 4.18 An emerging masterplan has been prepared, provided in Appendix A, which responds to the technical assessment work to date and demonstrate the site's suitability for development.

5. CONCLUSION

- 5.1 The Local Plan Review should provide for an amount of employment land that is flexible and takes account of unmet need from Leicester City rather than restrict or limit growth at a time of national and local economic recovery.
- 5.2 Restricting employment development to the settlements at the top of the hierarchy (options 1 and 2) or seeking a single/new location for a business park (option 4) would prevent opportunities for villages to grow and thrive (paragraph 79 of the Framework), would not help create the conditions in which businesses can invest, expand and adapt and take

into account both local business needs (paragraph 81 of the Framework) or allow recognition of the specific locational requirements of different sectors (paragraph 82). As a result, there would be some doubt that significant weight was being placed on the need to support economic growth and productivity.

- 5.3 Only Strategy Option 3 considers a wider spread of distribution including at Sustainable Villages which could provide for a range of sites to meet different business requirements, whilst supporting local employment needs. We note that a risk of piecemeal development on scattered plots has been identified. We consider that to be more of a risk for option 4 and that the relationship between homes and jobs can be considered as part of the assessment and selection of site allocations for housing and employment, managing the spatial arrangement positively to reduce travel (objective 4), supporting the district's economy including the rural area (objective 5) whilst maintaining and coordinating access to jobs (objective 11).
- 5.4 Whilst we do not consider policy Ec2(2) to be a sensible tool for managing the overall strategy for the amount of employment land needed we do consider it able to provide flexibility in the supply of sites if required and it should be retained without additional restrictions.
- 5.5 We also consider that specific allocation of start-up premises would address the shortfall in provision and allow opportunities for start-up sites to be positively identified rather than relying on start-up proposals coming forward on general employment sites.
- 5.6 The Land to the east of Midland Road, Ellistown extends to approximately 10 hectares and borders the South Leicester Industrial Estate with strong connections to Bardon Hill. The Coalville Sub-Area, including Ellistown, is highlighted within the Employment Land Study (2020) as having demand 'much in excess' of supply with an exceptionally tight market.
- 5.7 The site is capable of accommodating non-strategic storage and

distribution which could help meet the need for B8 uses and compliment the need for strategic storage and distribution in the Coalville Sub-Area. Alternatively, the site may be better utilised for Class E(g) 'Uses which can be carried out in a residential area without detriment to its amenity', which include offices and research and development, as well as B2 uses 'General Industrial'.

- 5.8 The site is free of technical constraints and is both functionally and spatially well connected to the Coalville Urban Area and the strategic road network via the A511 and subsequently M1 Junction 22.
- 5.9 Richborough Estates are willing to explore how the Land to the east of Midland Road can deliver the much needed employment provision within the district and can take a flexible approach to the type and uses proposed. This includes the potential delivery of both start-up workspace and grow on light industrial space units.
- 5.10 The site can positively contribute towards employment provision in the short-term and as a result we respectfully request that Land off Midland Road is identified as an employment allocation in the Local Plan Review.

**Appendix A – Indicative Layout for Land off Midland Road, Ellistown
(Employment)**



Key	
	Application site boundary
	Existing (retained) trees & hedgerow
	Proposed tree/hedge removal
	Proposed National Forest planting
	Indicative wildflower and grassland planting
	Open space
	Indicative surface water attenuation basin
	Prominent contours (0.5m) (Free source LiDAR Data)
	Existing Public Right of Way
	Proposed pedestrian/cycle link
	Viewing point on area of high ground with line of sight to spire of St John Baptist Church, Hugglescote
	Proposed primary street
	Visual links
	Indicative employment use development cell
	Indicative community use development cell
	Potential locations of landmark buildings

Illustrative Masterplan



Vision Document

Employment

East of Midland Road,
Ellistown

Prepared by nineteen47 on behalf of
Richborough Estates

October 2021



Key	
	Application site boundary
	Existing (retained) trees & hedgerow
	Proposed tree/hedge removal
	Proposed National Forest planting
	Indicative wildflower and grassland planting
	Open space
	Indicative surface water attenuation basin
	Prominent contours (0.5m) (Free source LiDAR Data)
	Existing Public Right of Way
	Proposed pedestrian/cycle link
	Viewing point on area of high ground with line of sight to spire of St John Baptist Church, Hugglescote
	Proposed primary street
	Visual links
	Indicative employment use development cell
	Indicative community use development cell
	Potential locations of landmark buildings

Illustrative Masterplan



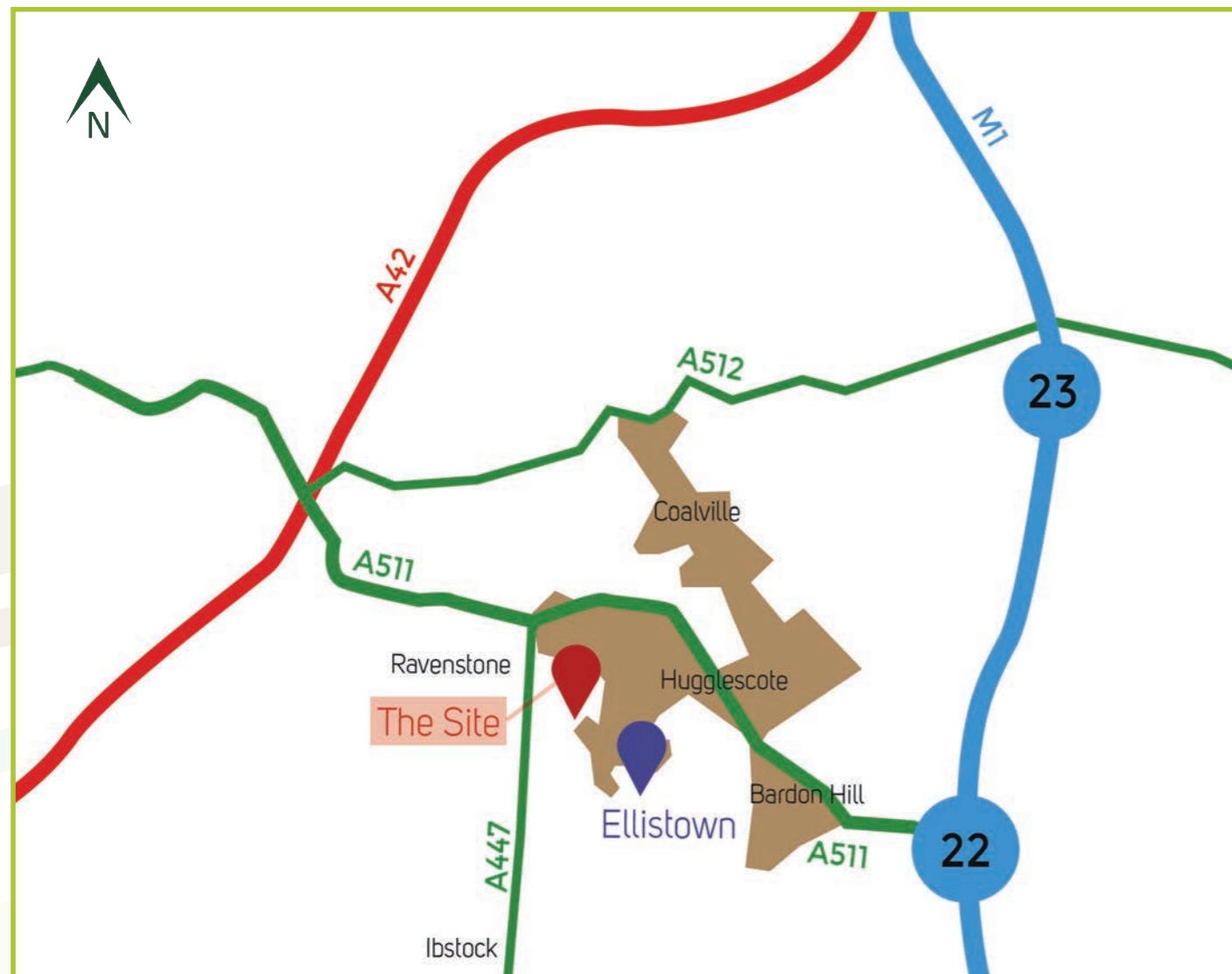
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1 BACKGROUND

The North West Leicestershire Local Plan was adopted in November 2017 and sets out a strategy for delivering the homes, jobs and infrastructure needed in the district between 2011 and 2031. The Council is now progressing with a full review of the adopted Plan (termed the 'Substantive Review') and this promotional document illustrates why land at Ellistown is a suitable site for a mixed-use allocation.

The adopted Local Plan sets out a settlement hierarchy with the Principal Town of Coalville at the top where the most development would take place. Whilst identified as a sustainable village, Ellistown adjoins the Coalville Urban Area allocations for around 3,600 homes at Grange Road, Hugglescote (Policies H1h and H1i) and employment areas protected under Policy EC3. The urban area of Ellistown is, therefore, physically and functionally attached to the Coalville Urban Area.



North West Leicestershire Local Plan highlighting Coalville Urban Area allocations

LOCAL PLAN REVIEW

The Council is committed to submitting the Local Plan Substantive Review for Examination by November 2022, using the Local Housing Need figure for North West Leicestershire, under the Standard Method, as a starting point. However, the recent adoption of a 35% urban uplift in housing need for urban areas has seen the housing requirement for Leicester City increase. The level of unmet need is now considered to be about 18,000 dwellings.

As such, North West Leicestershire may receive a significant share of the homes that cannot be accommodated in the City of Leicester with up to 14,000 homes being directed to North West Leicestershire to 2039.

A call for sites was held in Summer 2018 and consultation was undertaken on Emerging Options between November 2018 and January 2019. The land to the west of Midland Road was identified in the Strategic Housing and Employment Land Availability 'SHELAA' Assessment 2021 as site E7 and available for development and potentially suitable and achievable. The land to the east of Midland Road was identified in the SHELAA as site EMP24 and is also potentially suitable and achievable.



EMPLOYMENT

The need for new homes is intrinsically linked to the economy and growth in jobs. The Council has prepared a North West Leicestershire Need for Employment Land Study (November 2020) a Start-Up Workspace Demand Study (December 2020) and Warehousing and Logistics Study (April 2021). These identify that 47ha of land for non-strategic industrial space and 9ha of land for offices is needed between 2017 and 2039.

Ellistown is located in the Coalville Sub-Area (see Fig 5.2 of the Employment Land Study November 2020) where demand is noted to be 'much in excess' of supply with an exceptionally tight market. Overall, non-strategic industrial space across North West Leicestershire is seriously undersupplied as buoyant demand is frustrated by almost non-existent availability.

Across Leicester and Leicestershire, there is a shortfall of 768,000 sqm of rail served warehousing and logistics floorspace and 392,000 sqm of strategic scale warehousing. Ellistown is within one of six 'areas of opportunity' for warehousing and logistics in the county with good connections to the strategic road and rail network, access to markets served, access to labour and proximity to areas of employment need. The Study says that the location and type of new sites should be spread to meet the varying needs of different operators and recommends two allocations at each area of opportunity.

The land to the east of Midland Road is available, suitable and achievable and a constraints-led masterplan has been produced to illustrate the principle of development for employment use on the site.

The site is immediately adjacent to the South Leicester Industrial Estate and well related to the built form. Development has been arranged to avoid impacts of coalescence between Ellistown and Donington le Heath.

The site is capable of accommodating non-strategic storage and distribution which could help meet the need for B8 uses and complement the need for strategic storage and distribution in the Coalville Sub-Area. However, the serious undersupply of non-strategic industrial space in the area and need for land allocated specifically for those

uses suggest that the site could be better utilised for Class E(g) 'Uses which can be carried out in a residential area without detriment to its amenity', which include offices and research and development, as well as B2 uses 'General Industrial'.

The site is at the early stages of promotion and the emerging masterplan remains flexible, so ongoing discussions and engagement with the local planning authority on these matters will help to establish the best employment use on the site.

The site is capable of accommodating non-strategic storage and distribution 'B8 use' which could compliment the need for this type of development in the Coaville Sub-Area. However, the serious undersupply of non-strategic industrial space in the area and need for land allocated specifically for those uses suggest that the site could be better utilised for Class E(g) 'Uses which can be carried out in a residential area without detriment to its amenity', which include offices and research and development, as well as B2 uses 'General Industrial'. This is highlighted in the Start-Up Workspace Demand Study (December 2020) which claims in paragraph 6.1 that "there is likely to be demand for additional small industrial workspace, and that there is limited new supply coming forward". Moreover, it was found that there is a "demand from a wide variety of sectors, including small scale engineering companies and vehicle related activities, e-commerce and other small-scale distribution, storage and logistics, local trades (plumbers and electricians) and artisan traders" ... "occupiers struggle to find appropriate space, especially smaller units, due to lack of supply of appropriate space". In paragraph 6.2 it is claimed that "this gap in supply is likely to constrain economic growth in the district" and, as such, the report makes a number of suggested actions that the Council could explore to overcome supply issues. These include, but are not limited to, making specific allocations for this type of development or taking part in public private partnership or joint ventures. Therefore, as the site is at the early stages of promotion and the emerging masterplan remains flexible, we will look to maintain discussions with the Local Planning Authority on these matters to help to establish the best employment use on the site.



Aerial plan of sites E7 and EMP24

A Preliminary Ecological Appraisal has been undertaken on the site to assess baseline conditions with further survey work recommended to inform site design and any mitigation requirements. Consideration has been given to the emerging requirement for biodiversity net gain and a Biodiversity Impact Assessment will be completed to demonstrate the development's ability to achieve a biodiversity net gain.

DESIGNATED SITES

Thirty statutorily designated sites have identified within 10km of the site. The closest being Snibston Grange (LNR) located c.2km north. The Natural England SSSI Impact Risk Zones used to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites was consulted via the government's multi-agency website MAGIC (www.magic.gov.uk). Providing that any discharge of water or liquid water is not more than 20m³/day to ground or surface water (e.g. stream), it is not anticipated that Natural England will need to be consulted on any future application.

A Local Wildlife Site; Ellistown tip and railway triangle (LWS) runs along the north-eastern boundary of the eastern land parcel. The site has been designated due to species-rich grassland and scrub mosaic on embankment slopes (although full survey of this habitat has not been completed). Evidence of use for off-roading has also been documented.



View of from the western part of the site, looking east to the site boundary

HABITATS

All land parcels comprise arable land bound by a combination of species-rich and species-poor hedgerows. The hedgerows hold high ecological value and provide opportunity for a range of commuting and foraging local fauna. Any hedgerow losses as a result of future development will be replaced by a minimum ratio of 2:1 with a native species-rich mix. Development of the site also holds significant opportunity to enhance existing defunct hedgerows (e.g. along the northern and eastern boundaries of the eastern land parcel) through infill planting, relaxed management and increasing margins.

Two stands of Japanese knotweed are present along the northern hedgerow of the eastern land parcel (extending c.5m and c.15m respectively in length along this boundary). The eradication of this invasive, Schedule 9 species through an appropriate management plan would result in further enhancement at the site.

A number of mature trees are present within the site and are to be retained with appropriate root protection areas. Planting of additional native tree species is also proposed as part of the scheme.



Existing vegetation along the northern boundary of the site, looking to the east from Midland Road

PROTECTED SPECIES

The site provides suitable habitat for a range of protected species and further surveys have been recommended to establish the presence or likely absence of great crested newts and reptiles. A number of declining farmland bird species (e.g. yellowhammer) have been recorded on-site; therefore, breeding bird surveys have also been recommended. The hedgerows provide suitable commuting/foraging habitat for bat species and assessment of the value of the site for these species will also be undertaken to inform mitigation requirement.

An active badger sett is located close to the boundary of the eastern parcel of land, and is to be retained and protected as part of future development.



View of western part of the site, behind the Hedgerow to Midland Road

In terms of National and Local landscape designations, the land parcel is situated inside the limits of the National Forest area. That aside, the land parcel is outside of, and not adjoining any local designations in the adopted Local Plan, such as Local Green Spaces, Strategy Gap, Strategic Wedge, Green Wedge or Important Local Gap. Consequently, the site is not afforded elevated protection under National or Local planning policy.

There are no heritage assets within, or adjoining the site, and the land parcel is outside of Historically Significant Landscape Areas. The land parcel is situated outside of, but adjoining, the current Limits to Development for Ellistown.

The land parcel is managed for arable crop production. The land is comprised of two agricultural fields enclosed by robust native hedgerows with occasional scattered hedgerow trees. The eastern edge of the land parcel is enclosed by scrubby vegetation around steeper sloped areas edging Moore Road and the adjoining employment/industrial area. The field pattern is approximately regular in shape, and small to medium in scale. This is typical of the fields situated on the northern edge of Ellistown, with larger fields situated to the west of Ellistown within

open countryside, which forms its context along Leicester Road; this contrast between the scales is discernible from the wider open countryside.

The land parcel is sandwiched between Ellistown and Hugglescote which are both urban areas, and consequently in many situations, the site is not seen wholesale in these views. Whilst the land parcel is broad and open with direct views from the settlement edge of Ellistown to the south, the land parcel nestles within the mature landscape features and landform, and is not recognisable on the skyline.

A landscape-led approach to masterplanning has been adopted with extensive areas of green and blue infrastructure, retaining what is valued and providing the basis to promote biodiversity net gain.

The site's internal and boundary hedgerows provide containment and structure. The trees and hedges will be retained and augmented wherever possible, and integrated into future development proposals.



View across the site, looking south toward existing allotments and the South Leicester Industrial Estate

SITE-SPECIFIC CONTEXT:

Topography: Landform within the land parcel is undulating and irregular forming the open countryside between Ellistown and Hugglescote. The residential development (South Street) and employment/industrial built form (Moore Road), which adjoin the land's southern and south eastern edge, form a ridge line, which the land parcel is situated below.

The edge of Hugglescote has existing residential and employment built form situated below Midland Road, and this landform restricts the overall discernibility of the land parcel from the southern edge of Hugglescote.

LANDSCAPE FABRIC: Mature hedgerows generally surround the land parcel to the south east, south, west and north western boundaries. There is scrubby vegetation to the east and juvenile native woodland to the north east. Public allotments adjoin the land's south western edge, which is enclosed by a mixture of mismatched fencing, gappy hedgerows and mature trees. There is an individual mature oak tree situated centrally within the land parcel.

TRANQUILLITY AND SENSORY: The character and tranquillity of the interior of the site is eroded by the sections of outgrown hedgerow, as well as the site being overlooked by existing residential dwellings, associated domestic curtilages (South Street), as well as employment/industrial built form (Moore Road) and public allotments. These urban features diminish the perception of the site as open countryside and degrade the intactness of landscape character. The movement of vehicles along Midland Road and associated noise diminishes the perception of tranquillity.

RECREATION: There is no publicly accessible land or public access routes such as a Public Right of Way passing through the quantum of the land parcel, or adjoining its boundary.

Taking these matters into account, the site's most sensitive features are limited to the undulating landform, field boundaries and hedgerow trees which will look to be retained and integrated into future development proposals.



View across the site toward the south-east

VISUAL AMENITY:

- There is a limited network of Public Rights of Way surrounding the land parcel, situated predominately to the east of the land parcel. These routes are situated beyond the intervening woodland within landform which is situated lower than the land parcel. These physical features combined with the intervening employment/industrial built form (Moore Road) combine to filter, if not screen, views of the land parcel's interior. In many situations, the site is not seen wholesale in these views.
- Due to the combination of the built form overlooking the land parcel and the neighbouring Midland Road (with its associated vehicle movements and noise), the land is experienced less as open, but more confined, and influenced by the existing development. Consequently, the land parcel has an equivalence in a spatial sense to this neighbouring land use, particularly where the land is seen in combination.
- Views from the wider open countryside are limited (if any at all). The combination of urban form within Ellistown and Hugglescote, existing robust hedgerows, scattered hedgerow trees, woodland

blocks (to the east and north east) is sufficient to significantly filter, if not screen, views of the land parcel's interior in many situations. Where direct views might be possible, the land parcel is not seen wholesale in these views.

- There is limited scope of seeing the land parcel from the National Forest Long Distance Walking Route which passes through the western land parcel (approximately 0.2km west of the eastern land parcel at its closest point). In these situations, the combination of existing hedgerow and hedgerow trees along each side of Midland Road filters views of the land parcel. However, where views are possible, the land is seen in combination with this route, the allotments and the wider residential and industrial built form.

Overall, in terms of this land parcel the range of potential key visual receptors likely to be affected by future development proposals is limited, and views will be available which are already within the context of the existing settlement, with discernible commercial built form, vehicle routes and associated urban features.



Adjacent uses to the north-western corner of the site



View across the site with woodland blocks visible to the east and north-east



Allotments adjacent to the south-western corner of the site

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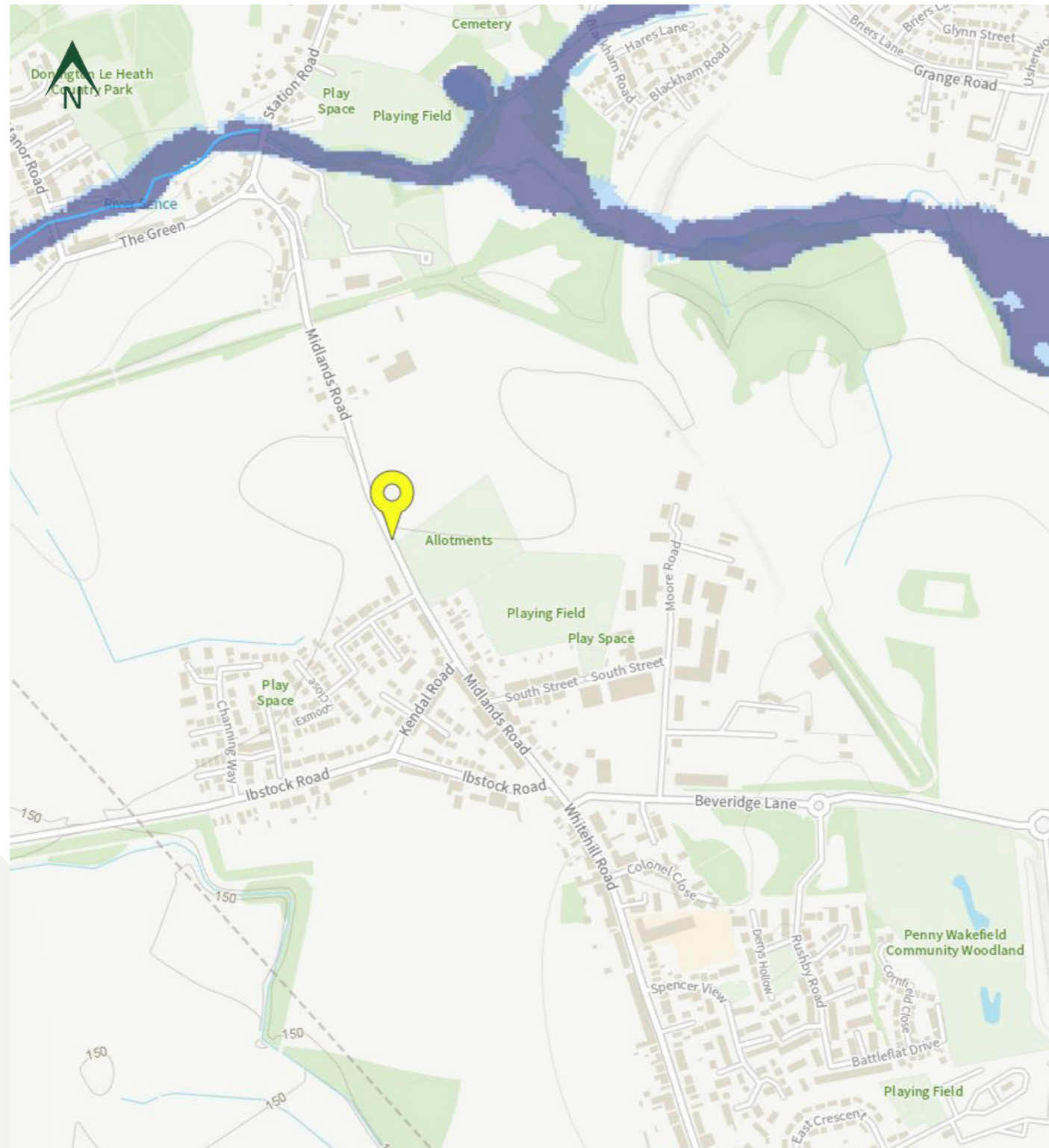
DRAINAGE

The entire site is within Flood Zone 1, land at the lowest risk of fluvial flooding, although the natural valley formed by the site topography creates a potential surface water flow route through the site.

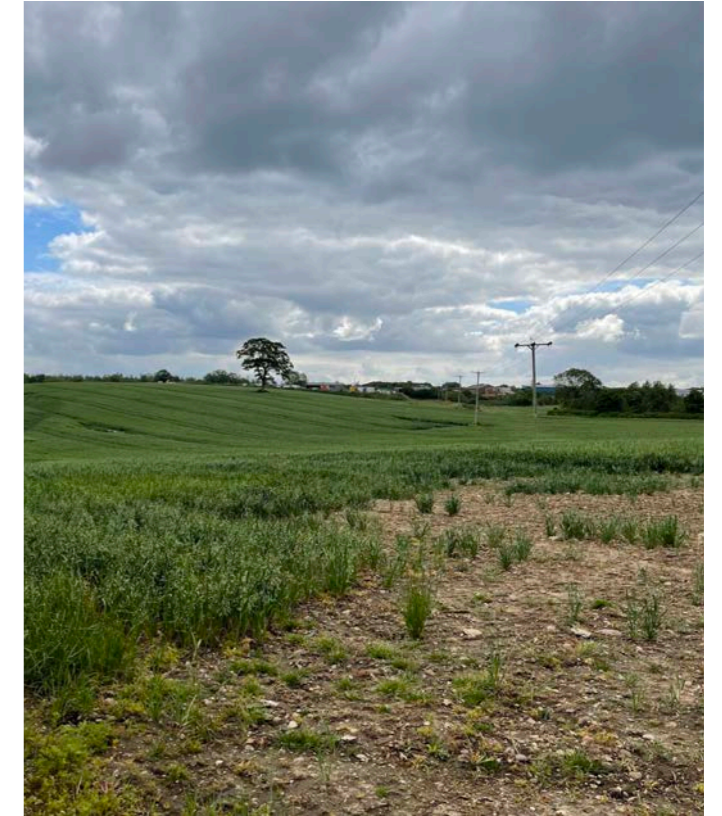
An open channel is present on the northern boundary of the track outside of the site boundary which travels into the site from the southeast. This enters a culvert at the end of the track which then traverses the site. It is believed that this is an existing storm sewer which is mapped within the site.

It is proposed that the site be split into three regions with employment either side of the valley, preserving the existing mapped flow route, and with a southern region marked for potential allotment expansion. This would also provide the opportunity to open the culvert which traverses the site pending further investigation into its current usage and status.

Due to the topography of the site and the intended employment use it is proposed that attenuation be provided on-plot beneath hard standing where feasible. This can then discharge to the existing surface water drain at the Greenfield Rate (QBar), providing significant betterment over the greenfield runoff in larger rainfall events.



Flood map for planning extract



'Valley' centrally within the site

LOCAL HIGHWAY NETWORK

Midland Road is a local distributor road connecting Ellistown with Hugglescote and Coalville to the north. The carriageway measures approximately 6.0m in width. Midland Road forms a three-arm mini roundabout, south of the site within the centre of Ellistown. A second mini roundabout is located c.30m from the roundabout, they are closely linked with the second junction providing access to Beveridge Lane. Beveridge Lane is distributor road east out of the settlement, providing access to the strategic road network via the A511 and subsequently M1 Junction 22.

In the vicinity of the proposed development, Midland Road is subject to a 30mph speed limit which continues through the village of Ellistown as well as north through Hugglescote. Along the site frontage, a footway is located on the eastern side of the carriageway. This is a continuous footway providing connections both south into Ellistown and north into Hugglescote.

Ellistown has a network of Public Right of Ways (PRoWs) running through the village and into the surrounding countryside. The National Forest Way can be found running north to south through the village.

On-site observations indicate that some congestion occurs within the centre of Ellistown, at the Midland Road/Beveridge Lane/Whitehill Road/Ibstock Road double mini roundabout junction. Some queues and delays were also observed at the Station Road/Ashburton Road/Central Road/Grange Road traffic signal junction to the north of the site.

It should be noted that as part of the South East Coalville Development proposals for 2,700 dwellings, mitigation schemes for the Midland Road/Beveridge Lane/Whitehill Road/Ibstock Road double mini roundabout junction were proposed. Furthermore, it is understood that Leicestershire County Council (LCC) have considered improvement options at the Station Road/Ashburton



Mini roundabout at the centre of Ellistown

Road/Central Road/Grange Road junction. The impact of the development proposals at these locations will be considered as part of a subsequent Transport Assessment. At that point, the need for mitigation at these locations will be discussed and agreed with LCC.



Leicester Transport Plan



National Planning Policy Framework

National Planning Policy Framework

POLICY CONSIDERATIONS

Leicestershire County Council's (LCC) Local Transport Plan (LTP) covers the period from 2011 to 2026 and sets out the long-term transport strategy for the area. The county's strategic transport goals include providing a transport system that supports a prosperous economy and provides successfully for population growth and an accessible and integrated transport system that helps promote equality of opportunity for all our residents.

The document also refers to encouraging active sustainable travel by working through the planning system to reduce the need to travel.

The content of this Promotional Document for the proposed development demonstrates that the location of the land is well placed to make use of existing local facilities and sustainable transport services/infrastructure with the need for only limited mitigation works to provide connections from the site to these facilities, sustainable infrastructure, and sustainable services.

Any subsequent planning application will be supported by a Travel Plan alongside a Transport Assessment. The Travel Plan will address the policy considerations set out in the LTP and seek to promote sustainable travel to and from the proposed employment site for staff and visitors.

The relevant national policy is set out in the National Planning Policy Framework (NPPF) which states that:

"Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe."

We shall, of course, be aiming for the much higher standards than that set out in local policy by encouraging active modes of travel alongside public transport as realistic opportunities to private car use.

PROPOSED ACCESS STRATEGY

The employment sites vehicular access is proposed via a new priority T-junction off the eastern side of Midland Road. The access will provide a 7.3m wide carriageway with 10.0m turning radii, as well as 2.0m wide footways on both sides of the access road.

As part of the access strategy there is also an opportunity to provide new and improved bus shelters along the site frontage with Midland Road, serving and employees of the site. Providing real-time information displays and accessing the existing bus routes of the Numbers 15, 26, 125, 159.

The Midland Road site access proposals are set out in Drawing T21529.001. Suitable visibility splays can be provided to/from both the access in line with the recorded speeds on Midland Road and in accordance with guidance set out in the Leicestershire Highway Design Guide.

The access proposals also indicate that there is potential to access the site to the west of Midland Road (should it

come forward for development) without impacting on the proposed employment development access. The stagger distance between the two junctions has been set in line with DMRB guidance.

The specific employment use will be decided following further consultation with the local planning authority. The traffic generation related to the employment site would be highly dependent on what specific employment use comes forwards. For example, an office development would be a significantly higher trip generator compared to B2 Industrial use. Nevertheless, the proposed access solution would be appropriate to serve either use. An assessment of the off-site traffic impacts would be undertaken once the specific employment use has been defined.

Reference has been made to accident data and, although all personal injury accidents are regrettable, the volume and pattern of accidents observed over a recent five-year period gives no undue cause for concern.



Site frontage to Midland Road

PROXIMITY TO LOCAL FACILITIES AND SUSTAINABLE TRAVEL OPTIONS

Ellistown is classed as a 'Sustainable Village' within the North West Leicestershire Local Plan. The plan provided as Figure 3.1 indicates the location of local facilities within Ellistown that may be of benefit to staff working at the site.

The village benefits from two convenience stores within 800m of the centre of the site. the nearest being just 450m from the development.

A Chinese takeaway and Fish & Chip takeaway are located within Ellistown and within 1.2km of the site. Both are within the preferred maximum walking distance of 2.0km, as set out in Chartered Institute of Highways and Transportation (CIHT) guidance Providing for Journeys on Foot.

Hugglescote Village Centre can be accessed within 1.5km of the site which offers several facilities such as further convenience stores, takeaways/restaurants, and public houses. Again, these facilities would be available within comfortable walking distance of the employments site.

A plan indicating walking distances from the site in line with guidance set out in Manual for Streets and the CIHT guidelines is provided in Figure 3.2. This demonstrates that all of Ellistown, Hugglescote, and the southern parts of Coalville could access the site within a 2km walk.

The National Cycle Network (NCN) Route 63 runs east to west to the south of Ellistown providing a link between Leicester and Swadlincote. The route can be accessed c.2.3km south of the site. NCN Route 52 runs through Coalville and beyond Ibstock to the north and west of Ellistown. The route can be accessed c.2.4km from the site off Leicester Road.

A plan of the local area showing the 5.0km cycling distance as well as the NCN Routes 63 and 52 through the region can be seen in Figure 3.3. This shows that the whole of Ellistown, Hugglescote, Ibstock and Coalville can be accessed within a 5km cycle ride providing staff who live in these areas the opportunity to cycle to work.

The majority of roads within Ellistown are subject to a 30mph speed limit and therefore offer opportunities for on-road cycling.

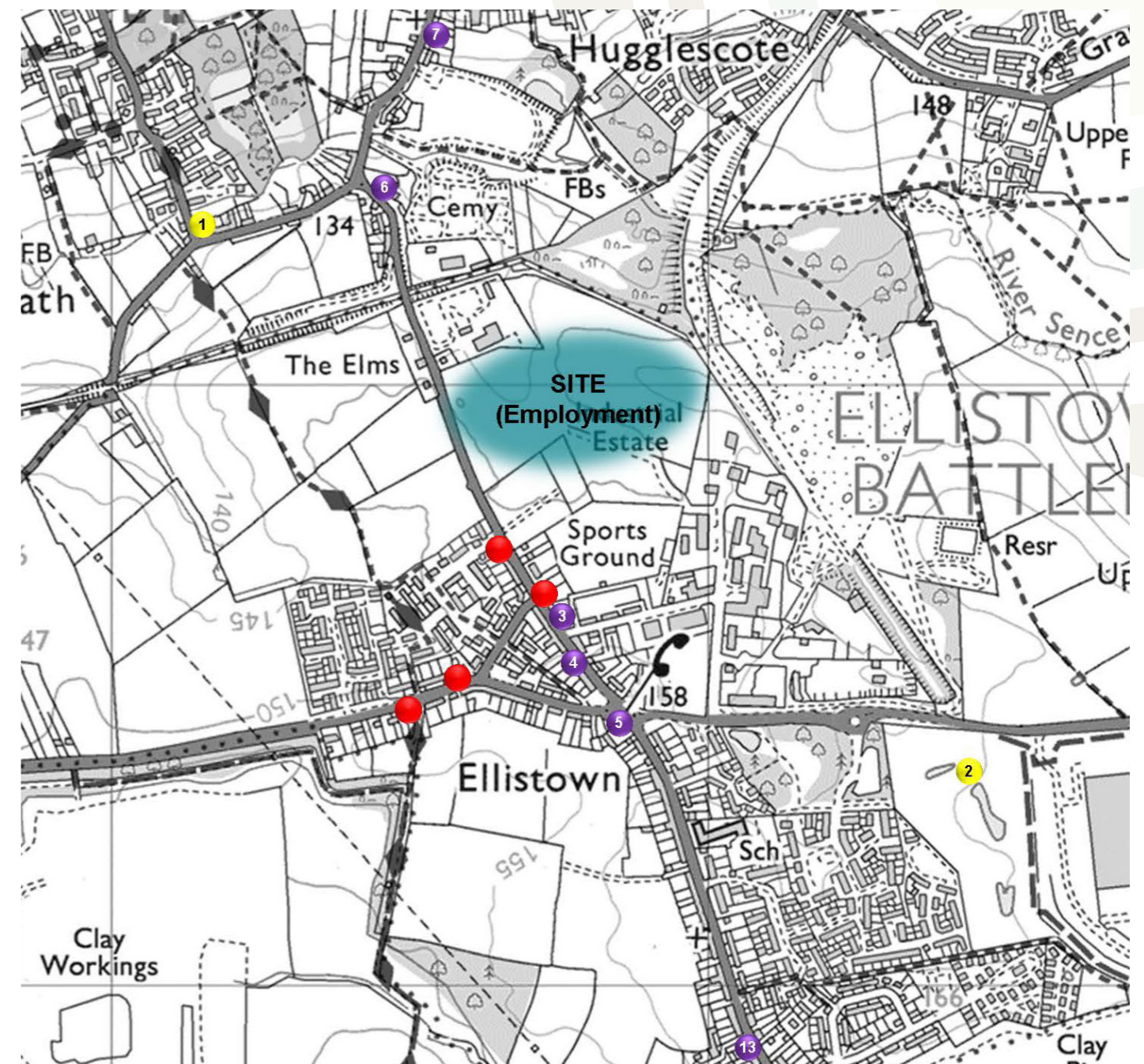
Existing bus stops are located on Midland Road and Leicester in the immediate vicinity of the site and are served by the number 15 and 159 services, the Midland Road stops are additionally served by the number 26 and 125 services. These services provide links to/from Ibstock, Coalville, Hinckley, and Leicester and provide regular services Monday to Saturday.

As part of the development proposals new bus stop will be implemented on Midland Road, accessing all four of the services running through Ellistown.

During the planning process opportunities to promote the sustainable travel for staff and visitors will be considered. These may include initiatives such as:

- Providing showers and changing facilities at the site to encourage staff to cycle;
- Providing safe and convenient cycle parking at the site;
- Encouraging car sharing between staff;
- Offering personalised travel planning for businesses located at the site.

The potential initiative to encourage sustainable travel will be set out in the Travel Plan which will support an eventual planning application.



Facilities plan

Legend

- | | | | |
|--|--|---|--|
| ● Bus Stops | ● 4 The Donnington Arms | ● 8 Sai Stores | ● 13 Ellistown Fish & Chips |
| ● 1 Ellistown Community Primary School | ● 5 Penny Wakefield Community Woodland | ● 9 Golden House Takeaway | ● 14 The Co-Op Food |
| ● 2 Hugglescote Community Primary School | ● 6 St Christopher's Church | ● 10 Londis | ● 15 Sunnyside Garden Centre |
| ● 3 Hugglescote Surgery | ● 7 Hugglescote Community Centre | ● 11 Buildbase Coalville | ● 16 South Leicester Industrial Estate |

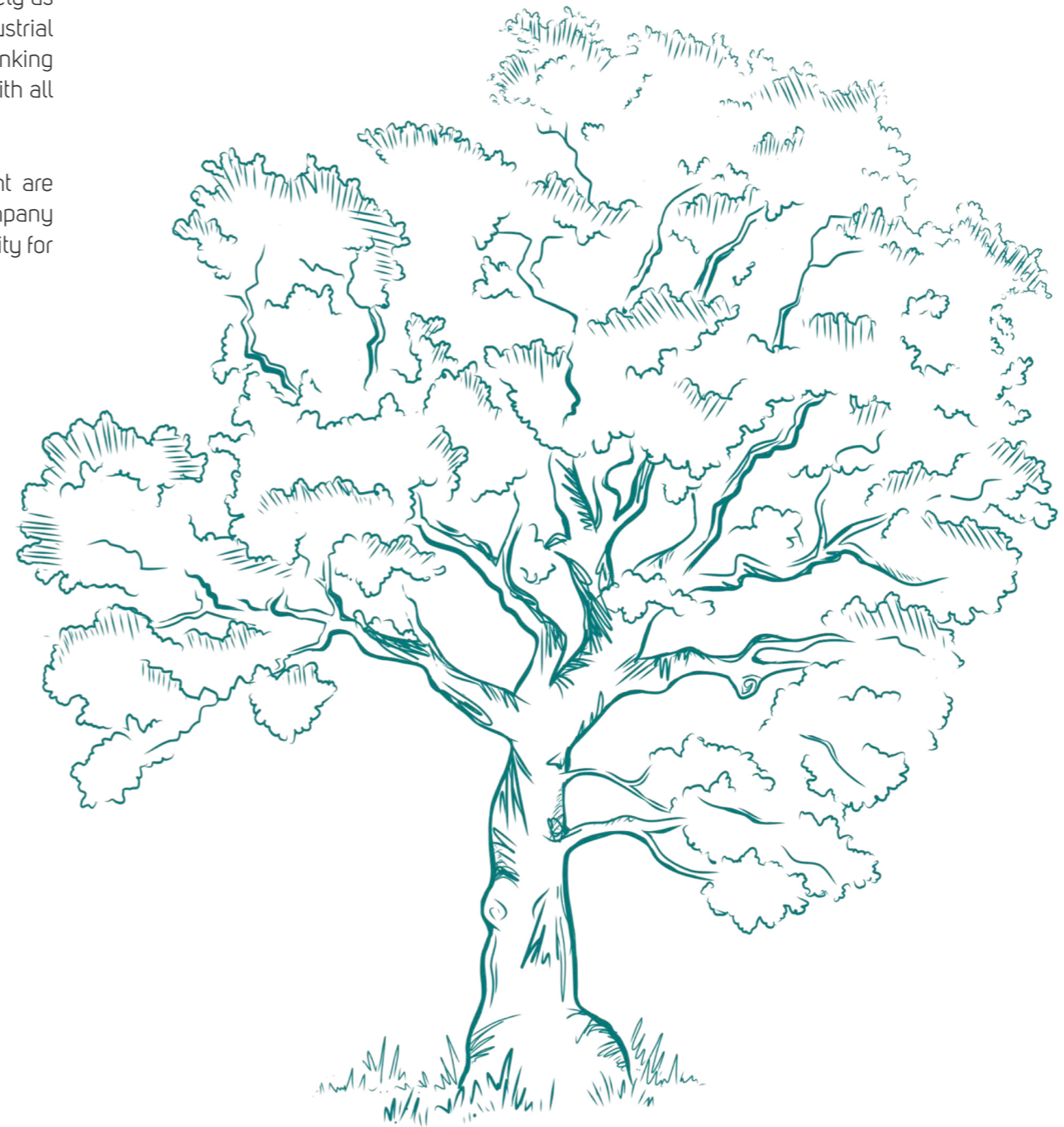
This document presents the potential for development providing employment opportunities at the northern edge of Ellistown which is flexible, technically feasible and which would be an appropriate and sustainable addition to the town, being located adjacent to other existing complementary uses. With the understanding of the site and its context summarised in this document, an initial masterplan has been prepared that responds positively to the known constraints and opportunities.

The masterplan is clearly at a very early stage, with evolution anticipated as the scheme responds to further detailed technical work and feedback received through the consultation process. The main elements of the proposals at this stage include;

- Two development zones, located to respond to the existing topography of the site, with the potential for a new blue corridor running through the natural valley within the centre of the site that includes the breaking out of an existing below-ground storm sewer.
- An opportunity for land to be made available for a community use at the south-western corner of the western development zone, with a frontage to and strong visual connection with Midland Road and the existing allotments.
- The potential for land to be made available to expand the existing allotments.
- Development set back from the frontage to Midland Road, with a corridor defined for new National Forest tree planting along the north and western boundaries, which will effectively contain the development and create a new strong edge to the site.
- A new vehicular access from Midland Road to serve development zones defined across the masterplan.
- Opportunities to create ecological enhancement areas on site and also to provide further National Forest planting.

The emerging masterplan has been prepared to respond to the outcomes of the assessment work and demonstrate the site's suitability for development. It shows how a high quality scheme could be brought forward to explore the opportunity to address the local employment needs of the area, as outlined in the 'Start-Up Workspace Demand Study' (December 2020), and one that is located appropriately as a logical expansion to the existing South Leicester Industrial Estate. The work presented represents our initial thinking and is intended to provide the basis for discussions with all stakeholders.

The emerging proposals presented in this document are being promoted by a responsible land promotion company and, overall, are considered to represent the opportunity for a positive and sustainable addition to Ellistown.





- Key**
- Application site boundary
 - Existing (retained) trees & hedgerow
 - Proposed tree/hedge removal
 - Proposed National Forest planting
 - Indicative wildflower and grassland planting
 - Open space
 - Indicative surface water attenuation basin
 - Prominent contours (0.5m) (Free source LiDAR Data)
 - Existing Public Right of Way
 - Proposed pedestrian/cycle link
 - Viewing point on area of high ground with line of sight to spire of St John Baptist Church, Hugglescote
 - Proposed primary street
 - Visual links
 - Indicative employment use development cell
 - Indicative community use development cell
 - Potential locations of landmark buildings



nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

Planning Policy & Land Changes Team
Northwest Leicestershire District Council
Whitwick Road, Coalville
LE67 3FJ

Robert Evans

Friday 11th March 2022

Dear Sirs,

Local Plan Review. Consultation Response

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth.

Please acknowledge receipt of my letter.

I also wish to comment on the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.
2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.
3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.
4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.
5. Objective 10. Preserve and enhance the district's natural and rural heritage. Both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.
6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.
7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.
8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an "*immediate need for additional employment land*". Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being "*detrimental to ...nearby residential properties*". Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, and would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours faithfully,

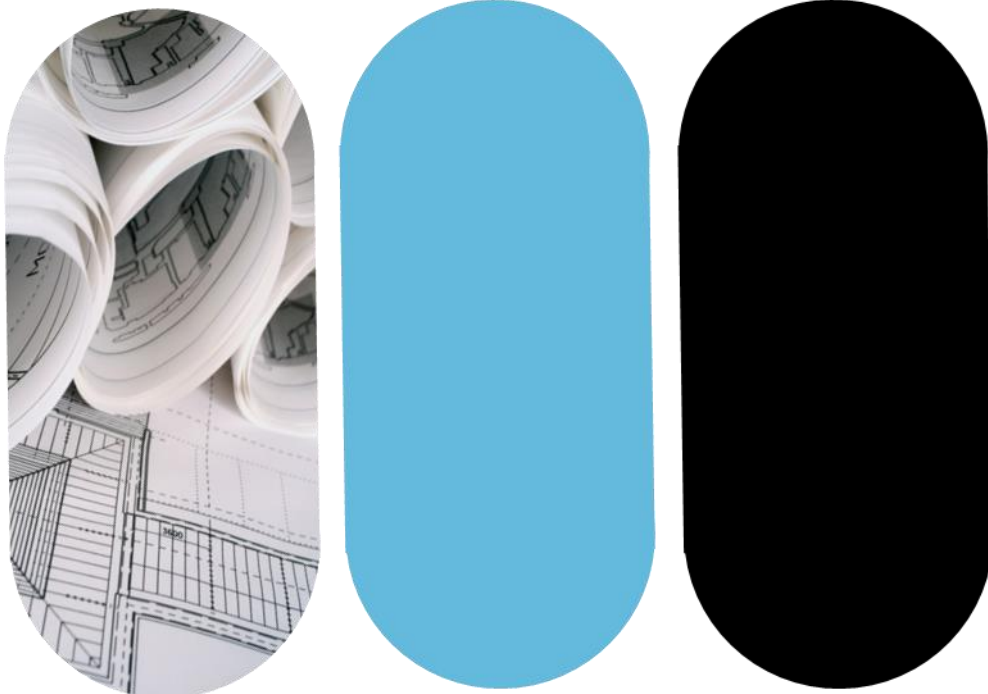
Robert Evans

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**REPRESENTATION ON THE NORTH WEST LEICESTERSHIRE
LOCAL PLAN 2020-2039 (FEBRUARY 2022)**

LAND TO THE WEST OF MIDLAND ROAD, ELLISTOWN

On Behalf of Richborough Estates



Waterfront House, Waterfront Plaza, 35 Station Street, Nottingham
www.marrons-planning.co.uk

1. INTRODUCTION

- 1.1 This representation is made on behalf of our client, Richborough Estates in respect of their interests at Land to the west of Midland Road, Ellistown. It responds specifically to the North West Leicestershire Local Plan 2020-2039 (Consultation Draft Plan).
- 1.2 The Consultation Draft Plan is currently the subject of consultation and representations are invited until the 14th March 2022.
- 1.3 This representation provides our views on the vision, spatial strategy and settlement hierarchy that the Draft Local Plan outlines. The representation also confirms support for Land to the west of Midland Road to be allocated for housing in the Regulation 19 Local Plan.

2. BACKGROUND AND CONTEXT

- 2.1 The National Planning Policy Framework (NPPF) confirms at paragraph 15 that the planning system should be genuinely plan-led. The presumption in favour of sustainable development applies to plan making and says that plans should positively seek opportunities to meet the development needs of their area, and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (paragraph 11).
- 2.2 Plans should be prepared positively, in a way that is aspirational but deliverable and be shaped by early, proportionate and effective engagement between plan-makers and, inter alia, local businesses. They should also contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).
- 2.3 Paragraph 20 says that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), and

community facilities (including education). Paragraph 22 goes into say that strategic policies should look ahead over a minimum 15 year period from adoption and larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery

- 2.4 Paragraph 23 of the NPPF says that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 2.5 Paragraph 31 says that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 2.6 Paragraph 32 recognises the legal requirement for local plans to be informed throughout their preparation by a sustainability appraisal demonstrating how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). It highlights that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.
- 2.7 Plans should set out the contributions expected from development, including the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for health). This should not undermine the deliverability of the plan (paragraph 34).
- 2.8 For a plan to be adopted it must pass an examination and be found to be 'sound'. Paragraph 35 identifies that plans are 'sound' if they are:
- a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by

agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.9 Paragraph 60 of the NPPF says that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.

2.10 Paragraph 61 of the NPPF says that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach and paragraph 62 confirms that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

2.11 Paragraph 66 of the NPPF says that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set

out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

2.12 Paragraph 68 of the NPPF says that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

2.13 Paragraph 69 of the NPPF recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Paragraph 72 of the NPPF goes on to say that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.

2.14 Paragraph 74 says that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies.

2.15 Paragraph 78 recognises that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.

2.16 Paragraph 79 of the NPPF says that to promote sustainable development

in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

2.17 The national policy context for plan making is clear in that:

1. the plan must set out an overall strategy for the pattern of development that makes sufficient provision for housing to meet the needs of North West Leicester as well as any needs that cannot be met within neighbouring areas;
2. Sufficient sites to deliver the strategic priorities of the area must be planned for and allocated;
3. a sufficient amount and variety of land can come forward where it is needed;
4. the plan should be positive, aspirational and be responsive to changes in local circumstances;
5. strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations;
6. In rural areas housing developments that enhances or maintains the vitality of rural communities should be supported; and
7. suitable locations for villages to grow and thrive should be identified, especially where this will support local services, including extensions to villages where this can help to meet identified needs in a sustainable way.

3. THE NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW (JANUARY 2022)

3.1 The Local Plan Review notes the Leicester and Leicestershire Strategic

Growth Plan includes an agreed vision and a strategy for the city and county up to 2050 to be delivered through individual authorities' local plans. The Strategic Growth Plan (SGP) is particularly relevant given Leicester City's unmet need and the implications for Local Plans currently being prepared in the county. We understand the local authorities are actively seeking to resolve housing distribution to manage unmet need.

3.2 Within this context, the Local Plan Review identifies a set of objectives, a number of which are particularly important to the development strategy and site selection process:

2 – Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type.

3 – Achieve high quality development which is sustainable, which responds positively to local character and which creates safe places to live, work and travel.

4 - Reduce the need to travel and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure.

3.3 The Local Plan Review proposes a Settlement Classification (paragraph 3.11) based upon the findings of the North West Leicestershire District Council Settlement Study 2021. The methodology includes an assessment of services and facilities available within a settlement, but also considered accessibility to services and facilities elsewhere by public transport. Given that such provision can contribute towards the sustainability of a settlement the site assessment should take into account settlements that are, or can be made, sustainable (paragraph 105 of the Framework). This is considered a sensible approach in the context of the settlement pattern within North West Leicestershire.

3.4 The Settlement Classification has Coalville Urban Area at the top of the

hierarchy, comprising of Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone and Whitwick as well as the Bardon employment area.

- 3.5 Ellistown is identified as a Sustainable Village, the 4th tier within the hierarchy. Importantly, the Settlement Study 2021 finds Ellistown to perform as highly as Local Service Centres for education, employment and connectivity and only marginally below Local Service Centres for convenience shops and availability of services and facilities.
- 3.6 Overall, it is the eighth most sustainable settlement in North West Leicestershire and the second best performing sustainable village (after Moira including Norris Hill) out of 18 sustainable villages. On this basis Ellistown not only cements its place at the top of the sustainable village tier it emerges as a sensible location for growth within that category.
- 3.7 We agree with the approach taken to arrive at the settlement hierarchy but have not had sight of the evidence that defines the Coalville Urban Area. In the absence of any assessment we presume that a broad consideration of connections from ribbon development at Hermitage Road and Thornborough Road provide the basis for Whitwick, Thringston and Coalville to be considered as one urban area rather than one of functional connectivity.
- 3.8 However, Ellistown also has connectivity to the Bardon Hill employment area in the south of the Coalville Urban Area. Ellistown itself is of course also closer to the services and facilities of Coalville than parts of Whitwick and all of Thringstone.
- 3.9 Ellistown not only has a clear physical relationship with urban area but also a functional relationship. Even if Ellistown remains to be considered as a sustainable settlement the guidance at paragraph 79 of the Framework says that planning policies should identify opportunities for villages to grow and thrive and that development in one village may support services in a village nearby. These circumstances are suggestive of a role for growth at Ellistown which fit well with the local plan vision

and objective 4 and which other sustainable settlements cannot match. We believe these more nuanced matters should be borne in mind when it comes to selecting site allocations with the benefits of development at Ellistown weighted accordingly.

3.10 The local plan goes on to identify four options for the housing requirement:

- 368 dwellings (this is the result from the standard method) – referred to as Low scenario;
- 448 dwellings (this is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA)) – referred to as Medium scenario;
- 512 dwellings (this is the figure from the Leicester and Leicestershire Strategic Growth Plan) – referred to as High 1 scenario; and
- 730 dwellings (this is based on the 2018 household projections with an allowance for vacancy rates in dwellings) – referred to as High 2 scenario.

3.11 These options have been assessed against demographic trends, build rates (market signals), unmet need and deliverability. The Council accept at paragraph 4.14 of the draft local plan, and the evidence clearly agrees, that any housing requirement included as part of the Local Plan will have to be higher than the standard method.

3.12 Scenarios High 1 and High 2 are concluded to represent potentially suitable options until such time as the issue of the redistribution of unmet housing need from Leicester City has been agreed. Recent correspondence between Charnwood Borough Council and the Inspector appointed to examine the Charnwood Local Plan indicates that work to underpin a Statement of Common Ground apportioning Leicester's unmet

need to 2036 will be completed in May 2022 and the SOCG The HENA and Sustainability Appraisal will be completed by May 2022 allowing an SOCG to be completed 'as soon as possible'. The Inspector has sought confirmation of the timescales for that SOCG. In this context, the bullet points within paragraph 4.19 of the draft local plan recognise that the High 2 scenario "performs the best" and provides a very significant degree of flexibility to help address issues of unmet need.

- 3.13 The latest Authority Monitoring Report (December 2021) sets out housing completions since 2011 with the most recent 5 years (2016-21) averaging 770 dwellings per year and peaking in 2017/18 at 978 dwellings. This evidence points to a higher housing requirement than any of the options identified.
- 3.14 Several Council's in Leicester and Leicestershire, including North West Leicestershire, have accepted there is an unmet need from Leicester City of approximately 18,000 dwellings (2020-36). The Framework is clear in its expectation that these homes should be accommodated somewhere in Leicestershire.
- 3.15 The Leicester and Leicestershire authorities continue to work together to agree how this will be distributed. At the time of writing the most up to date framework for strategic planning in the housing market area is set out in the SGP for Leicester and Leicestershire. The SGP appears to be have been based on unmet need from Leicester City for somewhere between 6,000 and 8,000 homes to 2036 and arrived at a housing requirement for North West Leicestershire for 512 dwellings each year between 2031-50. Clearly the unmet need is now known to be significantly higher.
- 3.16 The context for housing requirements in North West Leicestershire point to the Low scenario not being a sensible or sustainable approach. Limiting delivery would conflict with the SGP and will not allow for any flexibility in meeting unmet housing need from Leicester. Such an approach, directly conflicting with the recent joint work across Leicestershire, would result in a plan which has not been positively

-
- prepared and would almost certainly lead to challenges in respect of accommodating unmet need. Such an approach would also restrict future growth within the district, effectively acting as a moratorium.
- 3.17 The Medium scenario for 448 dwellings per annum is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA). This study was published 5 years ago and has its foundations under the pre-standard method approach utilising aged demographic data. The SGP was informed by the 2017 HEDNA and arrived at a higher figure for North West Leicestershire. Adopting a lower figure than the SGP would conflict with the HMA agreement, a backwards step and inappropriate in the context of increased unmet need.
- 3.18 High 1 scenario aligns with the Leicester and Leicestershire SGP to 2039, albeit the SGP envisaged growth across the longer period to 2050. As set out in respect of the Medium scenario, the Leicester City unmet need is now identified to be circa 18,000 homes rather than the 8,000 homes that underpinned the SGP. Pursuing High 1 would provide no relief to the additional 10,000 homes that now need to be found.
- 3.19 As set out in paragraph 4.19 of the draft local plan, High 1 is considered to *“provide a good buffer for accommodating unmet need from Leicester City, although it is not clear at this time whether it would be sufficient and so it would still represent a risk.”* Further, it is acknowledged that 512 dwellings per annum is below demographic trends and build rates for the district.
- 3.20 The Council’s own evidence points to consistently high delivery of homes and there is a danger that the standard method seriously underplays the demand for homes and the role the district plays in the housing market area. There are clear arguments to support a housing target higher even than the High 2 category which is below recent delivery.
- 3.21 On this basis, the High 2 scenario is considered to *perform the best* and provide a very significant degree of flexibility to address unmet need.
-

There are clearly arguments to support a higher growth scenario in the district. However, the preference for the High 2 scenario is considered appropriate given the scenario's considered.

3.22 The draft local plan sets out 9 options for the spatial distribution of development:

- Option 1: As per adopted Local Plan
- Option 2: Principal Town and Key Service Centres
- Option 3: Principal Town and Key Service Centres and Local Service Centres
- Option 4: Principal Town and New settlement
- Option 5: Principal Town, New settlement and Key Service Centres
- Option 6: Principal Town, New settlement and Key Service Centres and Local Service Centres
- Option 7: Principal Town, New settlement and Key Service Centres and Local Service Centres and Sustainable Villages
- Option 8: New settlement
- Option 9: Principal Town, New settlement and Key Service Centres and Local Service Centres, Sustainable Villages and Small Villages

3.23 The Council have identified a clear preference for the High 2 growth scenario and on the basis that only options 2b, 3b, 4b, 5b, 6b, 7b, 8 and 9b are capable of accommodating that level of growth we only comment on these options.

High 2 scenario (residual requirement = 5,100 dwellings)

Option 2b	Principal Town (3,060 dwellings) and Key Service Centres (2,040 dwellings)
Option 3b	Principal Town (2,550 dwellings), Key Service Centres (1,530 dwellings) and LSC (1,020 dwellings)
Option 4b	Principal Town (2,040 dwellings) and New Settlement (3,060 dwellings)
Option 5b	Principal Town (2,295 dwellings), New Settlement (2,295 dwellings) and KSC (510 dwellings)
Option 6b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (1,020 dwellings) and LSC (510 dwellings)
Option 7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)
Option 8	New Settlement (5,100 dwellings)
Option 9b	Principal Town (1,020 dwellings), New Settlement (1,785 dwellings), KSC (459 dwellings), LSC (255 dwellings), Sustainable Villages (1,377 dwellings) and Small Villages (204 dwellings)

3.24 We appreciate that the Plan identifies Options 3a and 7b as the preferred options, with 3a relating to the High 1 scenario and 7b the High 2 scenario. As acknowledged within the Plan, and set out in paragraph 3.21, the High 2 scenario performs best and therefore Option 3a is not considered suitable.

3.25 Option 7b represents a continuation of the strategy in the adopted Local Plan which has a demonstrable strong delivery record albeit that the option includes a new settlement and the existing strategy does not. The

Sustainability Appraisal (SA) identifies potential significant positive effects (SA4 - good quality homes to meet local needs and SA6 - enhance the vitality and viability of existing town and village centres). However, The SA also makes clear that the inclusion of a New Settlement causes potential significant negative effects for SA13 (conserve and enhance the quality of the District's landscape and townscape character) and SA14 (ensure land is used efficiently and effectively).

3.26 The Council will be aware of the guidance at paragraph 69 of the Framework which recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Such sites are often found at villages in the sustainable settlement tier and restricting such development through the inclusion of a new settlement is directly opposed to that approach. In our view, an option which distributes housing through the hierarchy, to sustainable settlements, without a new settlement should be considered and assessed.

3.27 A new settlement may provide a sensible solution for growth within Leicestershire in the future. However, it is not likely to deliver substantial numbers within a plan period to 2039. The Lichfields Report 'Start to Finish' (February 2020 second edition) found that it takes 5 to 8.4 years for the first home to be delivered from validation of an outline permission on schemes of more than 500 homes. In light of these timescales and the guidance in the Framework (paragraph 22) we consider a new settlement could only realistically be considered against a longer timeframe such as 2050 set out in the SGP or as part of a strategy for the next Local Plan.

3.28 The Framework recognises this position and says that new settlements require a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery. We agree with this and in our view a new settlement could be considered against a longer timeframe such as 2050 set out in the SGP or for the next Local Plan.

3.29 Only options 7b and 9b distribute growth to Sustainable Villages.

However, both options include a New Settlement at 1,785 homes. By contrast options 2b and 3b do not include a new settlement and distribute only to the principal town and key service centres (2b) and principal town, key service centre and local service centres (3b). In this respect, 2b and 3b provide for much greater growth in the higher order settlements. The inclusion of a new settlement in both options which distribute to sustainable settlements results in less opportunity for growth in those villages.

- 3.30 In our view, a hybrid strategy is required for the reasons sets out above and should be tested through SA. A distribution under such a hybrid option could be:

Principal Town (1,785 dwellings), Key Service Centres (1,330 dwellings), Local Service Centres (1,020 dwellings) and Sustainable Villages (965 dwellings)

4. REPRESENTATIONS IN RESPECT OF LAND TO THE WEST OF MIDLAND ROAD, ELLISTOWN

- 4.1 Ellistown is classed as a 'Sustainable Village' within the North West Leicestershire Local Plan and is well served in terms of facilities. The village benefits from two convenience stores within 800m of the centre of the site, the closest being just 450m away. In addition, Ellistown Community Primary School is located 700m from the site, while Hugglescote Community Primary School is located 1.2km from the site. Further facilities can be accessed on Coalville High Street which is within 2.75km of the site including supermarkets and restaurants.
- 4.2 Richborough Estates are promoting 12.6 hectares of land to the west of Midland Road, Ellistown for residential development. The site immediately adjoins and wraps around the existing built form with frontage to Leicester Road in the south and Midland Road to the east.
- 4.3 The site is entirely within Flood Zone 1, land at the lowest risk of fluvial flooding, and is not at risk from canals, reservoirs or large waterbodies. A

Preliminary Ecological Appraisal has been undertaken to assess baseline conditions and consideration has been given to the emerging requirement for biodiversity net gain. There are no heritage assets within, or adjoining the site, and is located outside of Historically Significant Landscape Areas.

- 4.4 The immediate context is provided by the urban influence from existing built form and internal and boundary hedgerows which provide containment and structure. A sensible, landscape-led approach, including retention and augmentation of trees and hedges, prevents any coalescence with Donington le Heath and ensures development would be well related to the built form of Ellistown.
- 4.5 Access can be taken from Leicester Road and Midland Road in the form of new priority controlled T-junctions, designed in accordance with the Leicestershire Highway Design Guide. Early work shows the junctions comfortably accommodate traffic generated from the development of up to 200 homes. New footways along the western side of Midland Road and northern side of Leicester Road would link the site to the existing footway provision within the village.
- 4.6 The land available has been assessed as suitable, available and achievable for development within a 5-year period.
- 4.7 Richborough Estates has prepared a vision document and indicative masterplan to respond to the constraints and opportunities (Appendix A). The masterplan shows how the site could be developed for up to 200 dwellings, significant open space and green infrastructure including the potential for a burial ground or green cemetery.
- 4.8 The Land west of Midland Road is capable of providing a number of configurations to achieve the number of homes and type of development required for Ellistown. Richborough Estates are willing and able to take a flexible approach to the development and would welcome dialogue with the District Council. To that end, the masterplan should not be taken as the final product but rather than a stage in an iterative process.

-
- 4.9 We believe small and medium sites at Sustainable Settlements would contribute to delivery of the housing trajectory. We also consider Ellistown to be well placed to receive growth as part of a hybrid development strategy in recognition of its performance as the second most sustainable settlement and its relationship with Coalville. There are no physical or technical constraints which would prevent development from taking place at the land to the west of Midland Road and we respectfully request that the site be selected as a housing allocation through the North West Leicestershire Local Plan Review.

5. CONCLUSION

- 5.1 We agree with the settlement hierarchy in principle although the high levels of services and facilities at Ellistown and its physical and functional relationship with the Coalville Urban Area should be taken into account when considering where growth should be directed.
- 5.2 We agree that the housing requirements proposed in the Low and Medium scenarios are not appropriate. The Council's own evidence shows that the High 1 scenario is below demographic trends and recent build rates for the district. There is clear evidence to support a growth scenario above the Standard Method and, taking into account the circumstances including increasing unmet need from Leicester City, the evidence suggests that High 2 is the most appropriate option. We endorse that finding.
- 5.3 We do not consider the Council's preferred option should be based upon the delivery of a new settlement, which is unlikely to deliver sufficient growth within the plan period. With the best two performing options including a new settlement we consider it necessary to test a hybrid option which distributes the 1,785 new settlement homes to other tiers in the hierarchy including sustainable settlements to allow for a greater focus on delivery from small and medium sites in accordance with paragraph 69 of the Framework.
- 5.4 Our proposed hybrid development strategy aligns with the benefits of

option 7b whilst removing the negative impacts from the new settlement and suggests the following distribution:

Principal Town (1,785 dwellings), Key Service Centres (1,330 dwellings), Local Service Centres (1,020 dwellings) and Sustainable Villages (965 dwellings).

- 5.5 The settlement hierarchy within the Local Plan Review identifies Ellistown as a Sustainable Village which performs as highly as Local Service Centres for education, employment and connectivity. Importantly, Ellistown is very well connected to the centre of Coalville and is in fact closer than Thringston which is identified within the Coalville Urban Area.
- 5.6 The Land west of Midland Road is suitable, available and achievable and Richborough Estates are committed to its promotion and willing to deliver homes in the short term.
- 5.7 Richborough Estates are willing to explore how the Land west of Midland Road can support infrastructure delivery and to take a flexible approach to the number of homes required to provide a sensible and meaningful contribution to the eventual housing requirement.
- 5.8 The site can positively contribute towards a five-year supply and as a result we respectfully request that Land west of Midland Road is identified as a housing allocation in the Local Plan Review.

**Appendix A – Vision document for Land west of Midland Road, Ellistown
(Residential)**



Vision Document



















Residential
Development

West of Midland
Road, Ellistown

Prepared by nineteen47 on behalf of
Richborough Estates

October 2021



- Key
-  Application site boundary
 -  Existing (retained) trees & hedgerow
 -  Proposed tree/hedge removal
 -  Proposed National Forest planting
 -  Proposed community orchard
 -  Indicative wildflower and grassland planting
 -  Open space
 -  Indicative surface water attenuation basin
 -  Prominent contours (0.5m) (Free source LIDAR Data)
 -  Existing Public Right of Way
 -  Proposed pedestrian/cycle link
 -  Proposed primary street
 -  Potential link between primary streets
 -  Potential for equipped play/LEAP
 -  Location of event inclusive of play, exercise and education
 -  Visual links
 -  Indicative development cell
 -  Potential locations of landmark buildings

Illustrative Masterplan



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6 Emerging Masterplan.....14

1 BACKGROUND

The North West Leicestershire Local Plan was adopted in November 2017 and sets out a strategy for delivering the homes, jobs and infrastructure needed in the district between 2011 and 2031. The Council is now progressing with a full review of the adopted Plan (termed the 'Substantive Review') and this promotional document illustrates why land at Ellistown is a suitable site for a mixed-use allocation.

The adopted Local Plan sets out a settlement hierarchy with the Principal Town of Coalville at the top where the most development would take place. Whilst identified as a sustainable village, Ellistown adjoins the Coalville Urban Area allocations for around 3,600 homes at Grange Road, Hugglescote (Policies H1h and H1i) and employment areas protected under Policy EC3. The urban area of Ellistown is, therefore, physically and functionally attached to the Coalville Urban Area.



North West Leicestershire Local Plan highlighting Coalville Urban Area allocations



LOCAL PLAN REVIEW

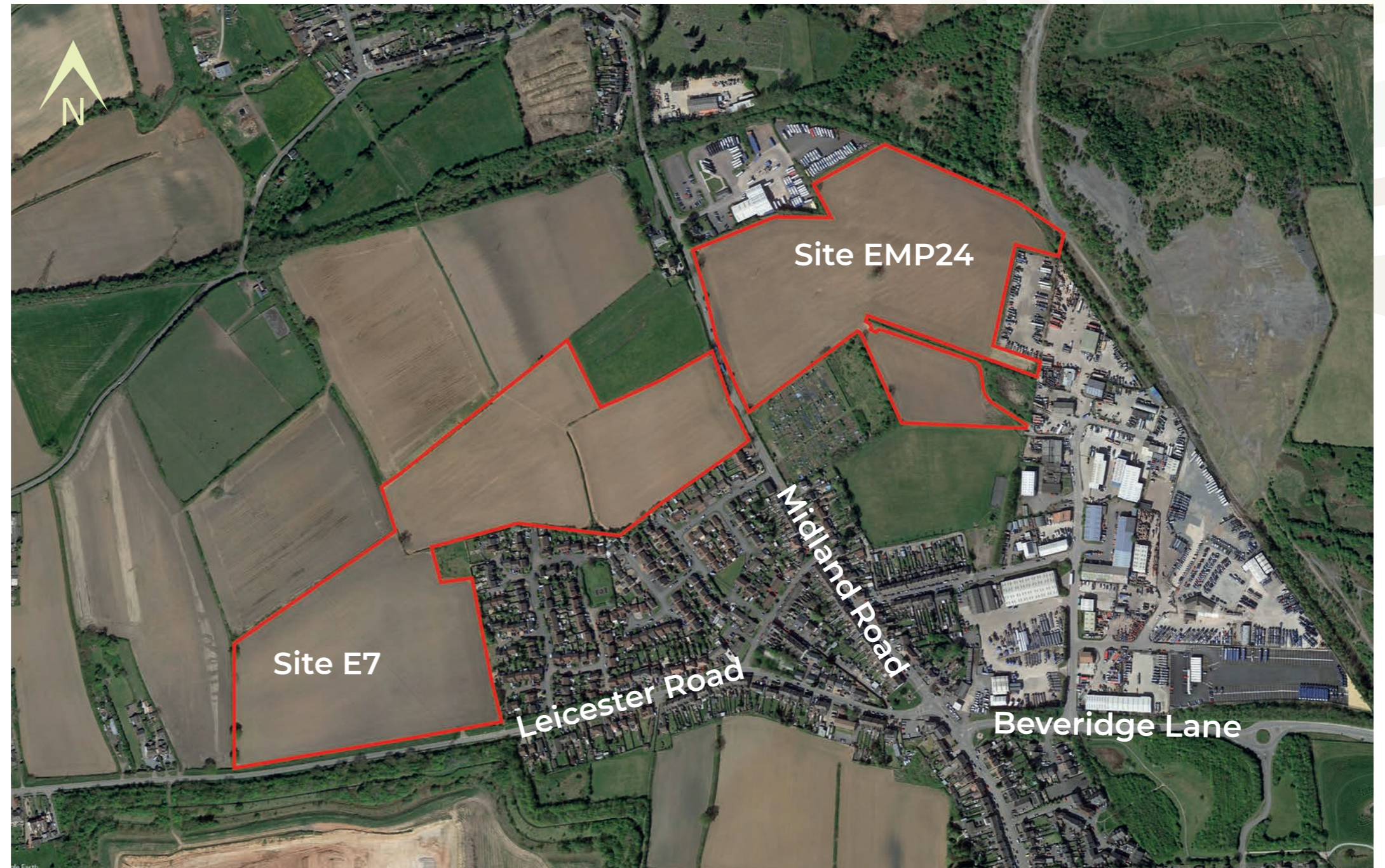
The Council is committed to submitting the Local Plan Substantive Review for Examination by November 2022, using the Local Housing Need figure for North West Leicestershire, under the Standard Method, as a starting point. However, the recent adoption of a 35% urban uplift in housing need for urban areas has seen the housing requirement for Leicester City increase. The level of unmet need is now considered to be about 18,000 dwellings.

Assuch, North West Leicestershire may receive a significant share of the homes that cannot be accommodated in the City of Leicester with up to 14,000 homes being directed to North West Leicestershire to 2039.

A call for sites was held in Summer 2018 and consultation was undertaken on Emerging Options between November 2018 and January 2019. The land to the west of Midland Road was identified in the Strategic Housing and Employment Land Availability 'SHELAA' Assessment 2021 as site E7 and available for development and potentially suitable and achievable. The land to the east of Midland Road was identified in the SHELAA as site EMP24 and is also potentially suitable and achievable.

HOUSING

The land to the west of Midland Road is available, suitable and achievable and capable of delivering in the region of 150 - 200 homes, should the Council be minded to allocate the whole site. A constraints-led masterplan process shows that the site can be developed for homes which are well related to the built form and do not impact upon the countryside gap between Ellistown and Donington le Heath, notwithstanding that this area has not been protected as an area of separation in the adopted local plan.



Aerial plan of sites E7 and EMP24

A Preliminary Ecological Appraisal has been undertaken on the site to assess baseline conditions with further survey work recommended to inform site design and any mitigation requirements. Consideration has been given to the emerging requirement for biodiversity net gain and a Biodiversity Impact Assessment will be completed to demonstrate the development's ability to achieve a biodiversity net gain.

DESIGNATED SITES

Thirty statutory designated sites have been identified within 10km of the site. The closest being Snibston Grange (LNR) located c.2km north. The Natural England SSSI Impact Risk Zones used to assess planning applications for likely impacts on SSSIs/SACs/SPAs & Ramsar sites was consulted via the government's multi-agency website MAGIC (www.magic.gov.uk). Providing that any discharge of water or liquid water is not more than 20m³/day to ground or surface water (e.g. stream), it is not anticipated that Natural England will need to be consulted on any future application.

HABITATS

All land parcels comprise arable land bound by a combination of species-rich and species-poor hedgerows. The hedgerows hold high ecological value and provide opportunity for a range of commuting and foraging local fauna. Any hedgerow losses as a result of future development will be replaced by a minimum ratio of 2:1 with a native species-rich mix. Development of the site also holds significant opportunity to enhance existing defunct hedgerows through infill planting, relaxed management and increasing margins.

A number of mature trees are present within the site and are to be retained with appropriate root protection areas. Planting of additional native tree species is also proposed as part of the scheme.

PROTECTED SPECIES

The site provides suitable habitat for a range of protected species and further surveys have been recommended to establish the presence or likely absence of great crested newts and reptiles. A number of declining farmland bird species (e.g. yellowhammer) have been recorded on-site; therefore, breeding bird surveys have also been recommended. The hedgerows provide suitable commuting/foraging habitat for bat species and assessment of the value of the site for these species will also be undertaken to inform mitigation requirement. Records of an active badger sett have been confirmed c.300m of the site although no setts were recorded incidentally during the survey. A full badger survey will be required to ensure full compliance with The Protection of Badgers Act, 1992.



North-South hedgerow defining existing field boundary



Existing boundary trees and hedgerow



Existing mature tree within the site

In terms of National and Local landscape designations, the land parcel is situated inside the limits of the National Forest area. That aside, the land parcel is outside and not adjoining, any local designations in the adopted Local Plan, such as Local Green Spaces, Strategy Gap, Strategic Wedge, Green Wedge or Important Local Gap. Consequently, the site is not afforded elevated protection under National or Local planning policy.

There are no heritage assets within, or adjoining the site, and the land parcel is outside of Historically Significant Landscape Areas.

The land parcel is situated outside of, but adjoining the current Limits to Development for Ellistown. There are urban influences provided by existing built form character in close proximity to the site. The land parcel has an equivalence in a spatial sense to this neighbouring land use, particularly where the land is seen in combination with the extensive and contiguous residential built form which neighbours the land parcel.

Due to the combination of the residential built form overlooking the land parcel and the neighbouring Leicester Road (with its associated vehicle movements and noise), the land is experienced less as open, but more confined, and influenced by the existing development. Consequently, the land parcel has an equivalence in a spatial sense to this neighbouring land use, particularly where the land is seen in combination.

The site's internal and boundary hedgerows provide containment and structure. The trees and hedges can be retained and augmented into a future development proposal.

A landscape-led approach to masterplanning has been adopted with extensive areas of green and blue infrastructure, retaining what is valued and providing the basis to promote biodiversity net gain.



The southern site boundary; adjacent to the existing Ellistown urban edge



The western urban edge of Ellistown, with the site in the foreground

SITE SPECIFIC CONTEXT

The site is situated on the urban edge of Ellistown below an existing ridgeline. The western area of the land is relative to the neighbouring residential development (Channing Way). The landform west of this land parcel is open and gently undulating between Ellistown and the eastern edge of Ibstock town, which is relative in topography to the western land parcel. The following is noted:

TOPOGRAPHY: Landform falls southwards through the land parcel to the northern edge of Ellistown (around Chichester Close and Sherwood Close). Landform within this neighbouring residential area rises way from the southern edge of the land parcel through Channing Way to the Leicester Road (circa 151m AOD).

LAND USE: The land parcel comprises of three agricultural fields which are managed for arable crop production. Open countryside forms the context of the land to the west which is managed for a mixture of arable and livestock pasture predominantly for arable crops. There are extensive clay pits situated south of Leicester Road, as well as a substantial solar PV farm.

LANDSCAPE FABRIC: Mature, overgrown and gappy field hedgerows enclose the land parcel's eastern boundary with Midland Road, which contains a limited number of scattered mature native hedgerow trees. There are further outgrown and gappy hedgerows along the land's northern boundary, with the southern boundary adjoining the existing settlement edge with a typical urban mismatch of boundary treatments. The western boundary of the land parcels is relatively open with a combination of outgrown hedgerow, native vegetation and a small number of mature native trees along its perimeter.

TRANQUILLITY AND SENSORY: The character and tranquillity of the interior of the site is eroded by the sections of outgrown hedgerow, as well as the site being overlooked by existing residential dwellings and associated domestic curtilages. Overhead cables cross the western area with pylons situated on the adjoining land parcel to the north and crossing Leicester Road to the south. These urban features diminish the perception of the site as open countryside and degrade the intactness of landscape character.

RECREATION: The National Forest Way Long Distance Walking route passes through the site connecting Ellistown with Hugglescote to the north.

Taking these matters into account, the site's most sensitive features are limited to the undulating landform, field boundaries and hedgerow trees which will look to be retained and integrated into future development proposals.



Rolling land form within the site



Neighbouring dwellings overlooking the southern boundary

VISUAL AMENITY

- The Long Distance Walking route heads north from the land parcel through an agricultural field and an extensive linear group of mature trees (remnants of a former now disused railway line) which significantly filters, if not screens, views of the land. This route then progresses westerly through landform of similar topography to the land. In many situations, views are significantly filtered, if not screened, by intervening woodland, scattered hedgerow trees and mature field hedgerows. Where views are possible, these are glimpsed and are of the peripheral areas of the land parcel to the northern and western edges. In these situations, the site is seen in combination with the existing settlement edge of Ellistown which is quite raw with a lack of boundary vegetation and obvious two storey built form.
- A number of residential dwellings neighbour and overlook the southern boundary. These views are broad and open across the land parcel, although due to the site wrapping around the existing settlement edge to the west, the land parcel is not seen wholesale.

Overall, as a consequence of the level change and enclosing vegetation to the north of the land parcel, there is limited (if any) intervisibility with open countryside beyond the site boundary and the site is experienced as divorced from the wider countryside. The western portion of the land parcel is seen in combination with the wider open countryside outside of Ellistown.

4 DRAINAGE

The site is entirely within Flood Zone 1, land at the lowest risk of fluvial flooding, and is not at risk from canals, reservoirs or large waterbodies. The site presently drains to the existing watercourse which separates the two parcels. This is reflected by the site topography with both parcels showing steady gradients towards the existing watercourse.

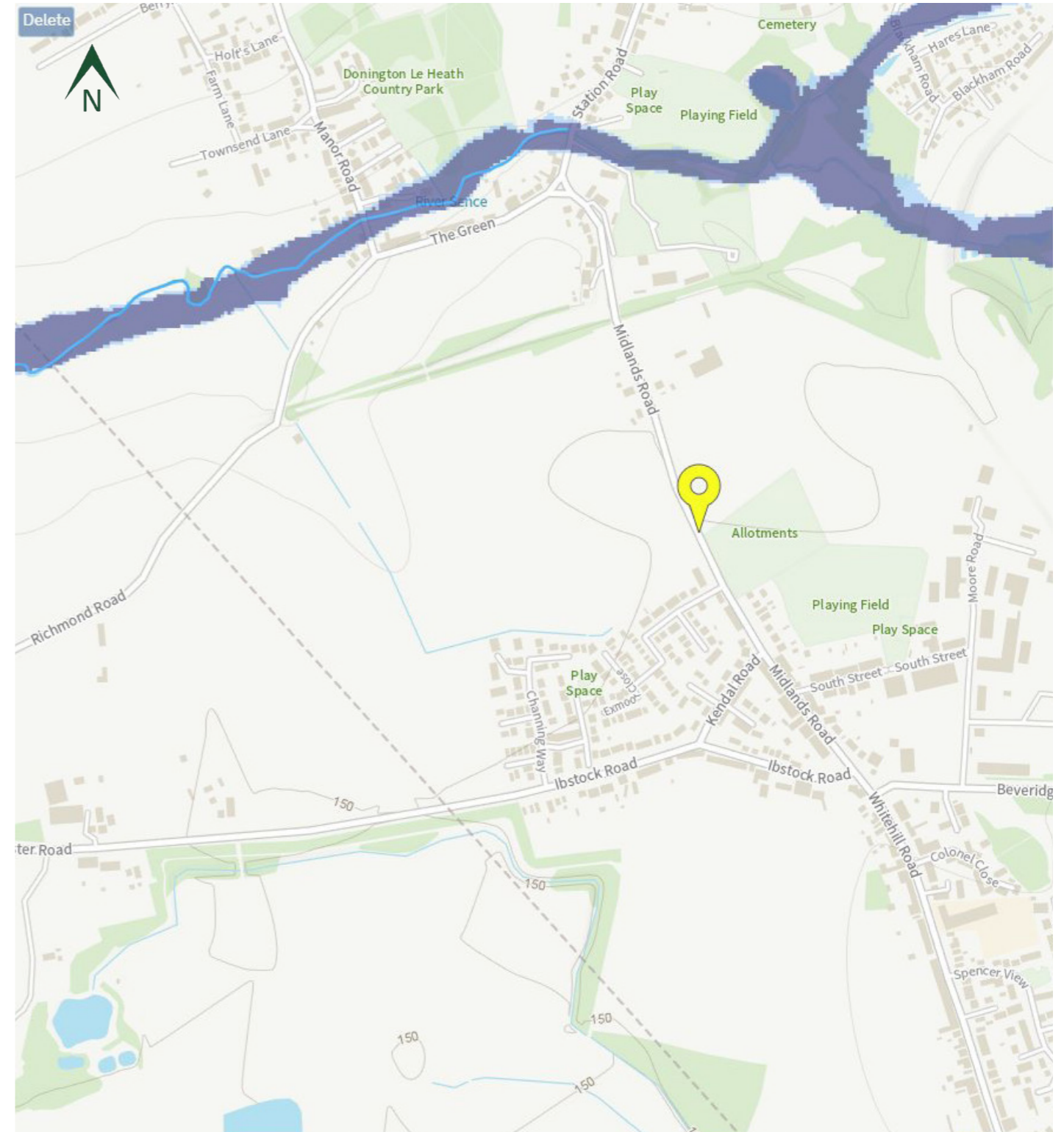
Due to an increase in impermeable area introduced by the proposed development, a surface water drainage strategy will be implemented to mitigate risk both to and from the development. It is proposed that this incorporates Sustainable Urban Drainage Systems 'SuDS' where appropriate with a piped network providing suitable conveyance from source to SuDS network incorporating swales and open attenuation to provide both appropriate water treatment and storage. Surface water discharge will be to the existing ordinary watercourse within the site and restricted to the Greenfield Rate (QBar). This provides significant betterment over the greenfield runoff in larger rainfall events.



Existing adjacent surface water attenuation basin



Existing on site watercourse



Flood map for planning extract

LOCAL AUTHORITY NETWORK

Both Midland Road and Leicester Road are local distributor roads connecting Ellistown with the neighbouring towns of Hugglescote to the north and Ibstock to the west. Both carriageways measure approximately 6.0m in width. Midland Road and Leicester Road converge in the centre of Ellistown forming a three-arm mini roundabout. A second mini roundabout is located c.30m from the roundabout, they are closely linked with the second junction providing access to Beveridge Lane. Beveridge Lane is distributor road east out of the settlement, providing access to the strategic road network via the A511 and subsequently M1 Junction 22.

In the vicinity of the proposed development, Midland Road is subject to a 30mph speed limit which continues through the village of Ellistown as well as north through Hugglescote. Leicester Road is subject to a 40mph speed limit along the frontage of the site, however immediately east of the site this changes to 30mph on approach to Ellistown.

Along the Midland Road site frontage, a footway is located on the eastern side of the carriageway. This is a continuous footway providing connections both south into Ellistown and north into Hugglescote. A footway is also located on the western side of Midland Road to the south of the site. Along the Leicester Road frontage, an existing footway is located on the southern side of the carriageway before expanding to both sides east of the site.

Zebra crossings are provided across Midland Road and Ibstock Road in the centre of Ellistown.

Ellistown has a network of Public Right of Ways (PROWs) running through the village and into the surrounding countryside. The National Forest Way can be found running north to south through the centre of the site. A PROW which runs north-south through the site provides access to Exmoor Close and Sherwood Close.

On-site observations indicate that some congestion occurs within the centre of Ellistown, at the Midland Road/Beveridge Lane/Whitehill Road/Ibstock Road double mini roundabout junction. Some queues and delays were also observed at the Station Road/Ashburton Road/Central Road/Grange Road traffic signal junction to the north of the site.

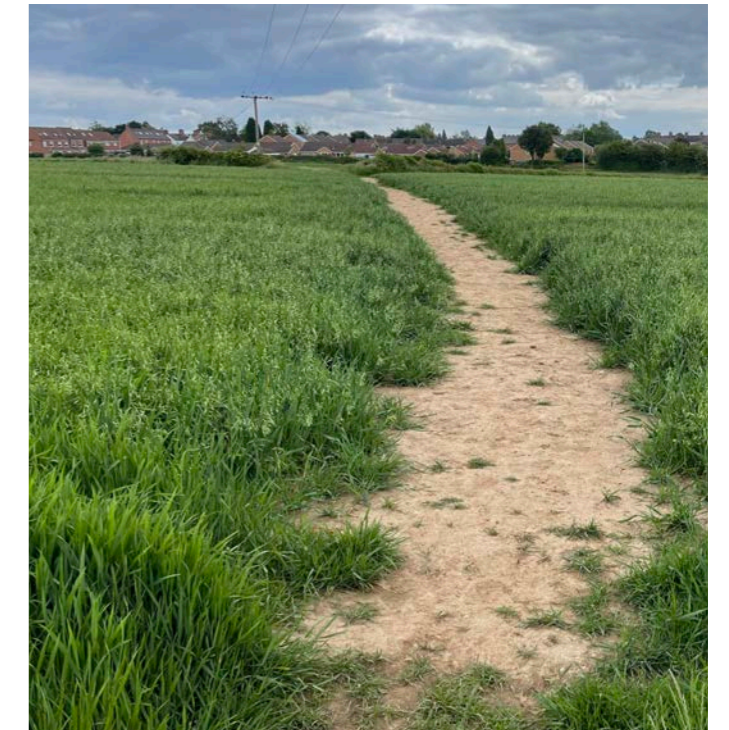
It should be noted that as part of the South East Coalville Development proposals for 2,700 dwellings, mitigation schemes for the Midland Road/Beveridge Lane/Whitehill Road/Ibstock Road double mini roundabout junction were proposed. Furthermore, it is understood that Leicestershire County Council (LCC) have considered improvement options at the Station Road/Ashburton Road/Central Road/Grange Road junction. The impact of the development proposals at these locations will be considered as part of a subsequent Transport Assessment. At that point, the need for mitigation at these locations will be discussed and agreed with LCC.



Mini roundabout at the centre of Ellistown



View east along Leicester Road



PROW footpath route within the site



Leicester Transport Plan

POLICY CONSIDERATIONS

LCC’s Local Transport Plan (LTP) covers the period from 2011 to 2026 and sets out the long-term transport strategy for the area. The county’s strategic transport goals include providing a transport system that supports a prosperous economy and provides successfully for population growth and an accessible and integrated transport system that helps promote equality of opportunity for all our residents.

The document also refers to encouraging active sustainable travel by working through the planning system to reduce the need to travel.

The content of this Promotional Document for the proposed development demonstrates that the location of the land is well placed to make use of existing local facilities and sustainable transport services/infrastructure with the need for only limited mitigation works to provide connections from the site to these facilities, sustainable infrastructure, and sustainable services.

Any subsequent planning application will be supported by a Travel Plan alongside a Transport Assessment. The Travel Plan will address the policy considerations set out in the LTP and seek to promote the residential development in a sustainable manner.

The relevant national policy is set out in the National Planning Policy Framework (NPPF) which states that:

“Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.”

We shall, of course, be aiming for much higher standards than that set out in local policy by encouraging active modes of travel, alongside public transport, as realistic alternatives to private car use.

PROPOSED ACCESS STRATEGY

At a potential site capacity of between 150 and 200 dwellings, residential vehicular access to the site is proposed via two new priority T-junctions; west off Midland Road and north off Leicester Road. Both access points will provide 5.5m wide carriageways with 2.0m wide footways on both sides of the access roads. This is in line with guidance set out in the Leicestershire Highway Design Guide.

As part of the overall access strategy, it is proposed to provide a new footway along the western side of Midland Road as well as a new footway along the northern side of Leicester Road; both linking the site to the existing footway provision within the village. As a result, residents will not have to cross Midland Road or Leicester Road to link to the existing footway network within the village.

In addition, the existing PRoW which runs north-south through the site will also provide a pedestrian link to Exmoor Close and Sherwood Close to the south of the site.

As part of the access strategy there is also an opportunity to provide new and improved bus shelters along the site frontage with Midland Road. Providing real-time information displays and accessing the existing bus routes of the Numbers 15, 26, 125, 159.

The Midland Road site access proposals are set out in Drawing T21529.001. Suitable visibility splays can be provided to/from the access in line with the recorded speeds on Midland Road and in accordance with guidance set out in the Leicestershire Highway Design Guide.

The access proposals also indicate that there is potential to access the site to the east of Midland Road (should it come forward for development) without impacting on the proposed residential development access. The stagger distance between the two junctions has been set in line with DMRB guidance.

The Leicester Road site access proposals are set out in Drawing T21529.002. Suitable visibility splays can be provided to/from the access in line with the recorded speeds on Leicester Road and in accordance with guidance set out in the Leicestershire Highway Design Guide.

The proposed residential development of around 150 to 200 dwellings would be expected to generate 70-80 two-way peak hour vehicle trips, this equates to just over one additional vehicle on the network every minute. The site access strategy of two accesses can comfortably accommodate such levels of traffic.

Reference has been made to accident data and, although all personal injury accidents are regrettable, the volume and pattern of accidents observed over a recent five-year period gives no undue cause for concern.



Approach to Ellistown along Midland Road

Ministry of Housing, Communities & Local Government

National Planning Policy Framework

National Planning Policy Framework

PROXIMITY TO LOCAL FACILITIES AND TRAVEL OPTIONS

Ellistown is classed as a 'Sustainable Village' within the North West Leicestershire Local Plan. The plan provided as opposite indicates the location of local facilities within Ellistown.

The village benefits from two convenience stores within 800m of the centre of the site, the closest being just 450m from the centre of the development.

Ellistown Community Primary School is located 700m from the site, while Hugglescote Community Primary School is located 1.2km from the site, both are within the preferred maximum walking distance of 2.0km, as set out in Chartered Institute of Highways and Transportation (CIHT) guidance Providing for Journeys on Foot.

The South Leicester industrial Estate is located within Ellistown, while Bardon Hill, which includes a large Amazon distribution centre, neighbours Ellistown to the east. Both provide a wide range of employment opportunities locally. The large employment areas will be within comfortable cycling distance from the proposed development site.

Coalville High Street can be accessed within 2.75km of the site which offers several facilities such as supermarkets and restaurants. Again, these facilities would be available within comfortable cycling distance of the site.

A plan indicating walking distances from the site in line with guidance set out in Manual for Streets and the CIHT guidelines is provided in Figure 3.2.

The National Cycle Network (NCN) Route 63 runs east to west to the south of Ellistown providing a link between

Leicester and Swadlincote. The route can be accessed c.2.3km south of the site. NCN Route 52 runs through Coalville and beyond Ibstock to the north and west of Ellistown. The route can be accessed c.2.4km from the site off Leicester Road.

A plan of the local area showing the 5.0km cycling distance as well as the NCN Routes 63 and 52 through the region can be seen in Figure 3.3.

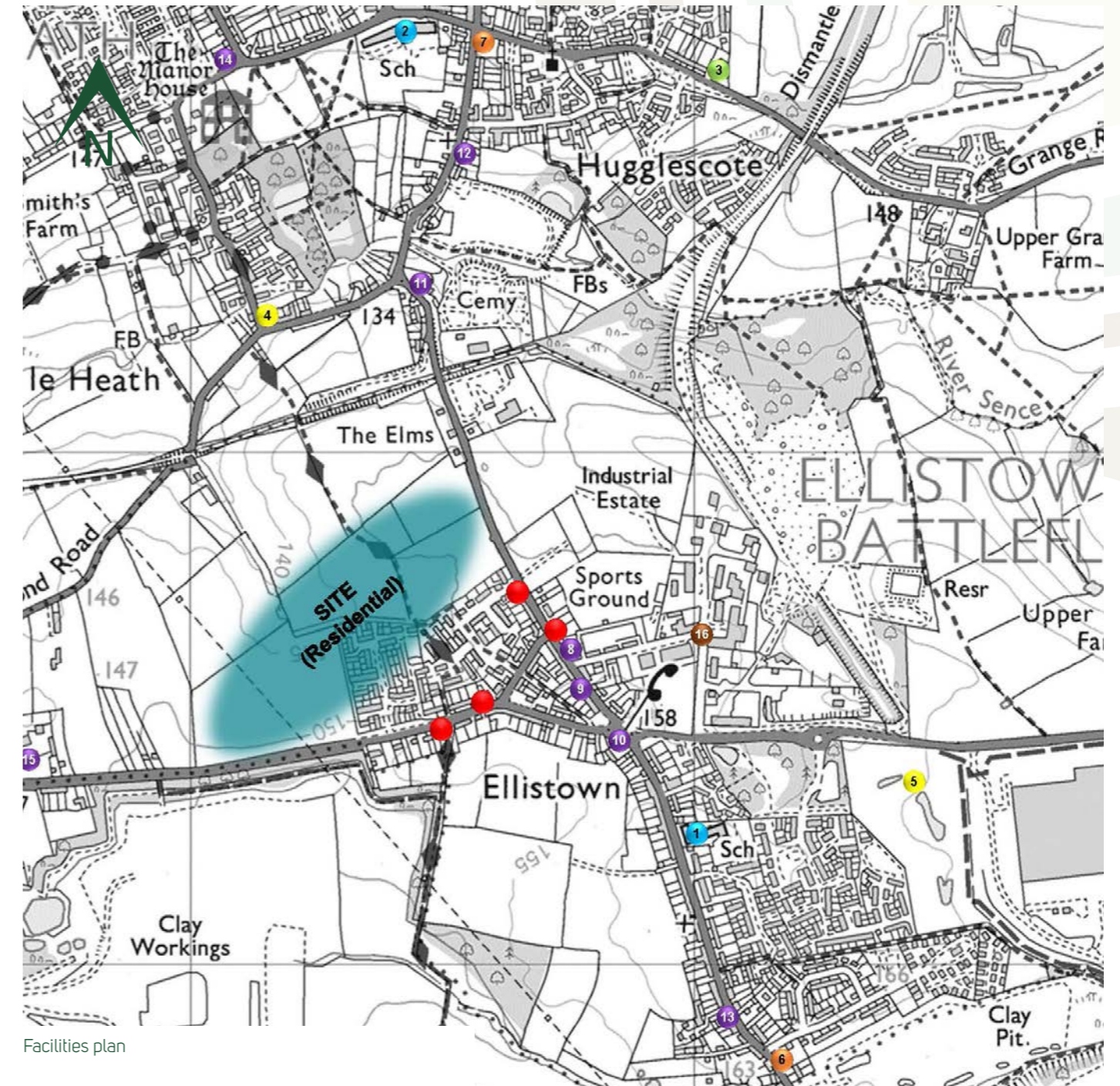
The majority of roads within Ellistown are subject to a 30mph speed limit and therefore offer opportunities for on-road cycling.

Existing bus stops are located on Midland Road and Leicester in the immediate vicinity of the site and are served by the number 15 and 159 services, the Midland Road stops are additionally served by the number 26 and 125 services. These services provide links to/from Ibstock, Coalville, Hinckley, and Leicester and provide regular services Monday to Saturday.

As part of the development proposals new bus stop will be implemented on Midland Road, accessing all four of the services running through Ellistown.

The closest railway station to the site is Loughborough Rail Station approximately 17.5km from the site. The station can be accessed via a 20 to 30 minute car journey. The station benefits from 180 parking spaces.

During the planning process opportunities to improve the sustainable travel credentials of the site will be considered and set out within the Travel Plan. This will look to promote sustainable travel options as a realistic option for new residents of the site.



Facilities plan

- | | | | |
|--|--|---|---|
| ● Bus Stops | ● The Donnington Arms | ● Sai Stores | ● Ellistown Fish & Chips |
| ● Ellistown Community Primary School | ● Penny Wakefield Community Woodland | ● Golden House Takeaway | ● The Co-Op Food |
| ● Hugglescote Community Primary School | ● St Christopher's Church | ● Londis | ● Sunnyside Garden Centre |
| ● Hugglescote Surgery | ● Hugglescote Community Centre | ● Buildbase Coalville | ● South Leicester Industrial Estate |
| | | ● China Chef | |

This document presents the potential for residential development at the north and western edges of Ellistown which is flexible, technically feasible and which would be an appropriate and sustainable addition to the town. With the understanding of the site and its context summarised in this document, an initial masterplan has been prepared that responds positively to the known constraints and opportunities.

The masterplan is clearly at a very early stage, with evolution anticipated as the scheme responds to further detailed technical work and feedback received through the consultation process. The main elements of the proposals at this stage include;

- Indicative development zones located adjacent to the existing urban edge and which demonstrate how new housing could be appropriately located to define a new and attractive outward-facing edge to Ellistown.
- Two new points of vehicular access to the development areas; one from Midland Road and one from Leicester Road. Subject to further and on-going discussions and design work, the masterplan currently shows the potential for a linking street between the two points of access.
- A network of footpath/cycle routes within the areas of open space and through the development areas, connected to the existing PRoW that crosses the site and also linking to the existing residential areas and to near-by services and facilities. A number of events are also shown along the new footpath network that could feature smaller play facilities, exercise opportunities and/or interpretation boards which could offer information about landscape/planting features, local history, or other relevant topics.
- A substantial green-infrastructure provision which includes retained existing trees and hedgerows wherever possible, a new equipped children's play area, a new community orchard, areas of wildflower meadow planting and a new country park in the west inclusive of blocks of new National Forest tree planting.
- A strong green corridor is defined along the northern edge of the site, which would visually contain the development.
- A sustainable drainage strategy inclusive of swales and attenuation basins that provides water treatment and storage and that could be attractively designed to enhance the biodiversity of the area.
- The potential for a burial ground/green cemetery in the south-western corner of the site which could be appropriately enclosed to create a tranquil environment for reflection. This is one potential use that is currently being presented and Richborough are keen to explore the appetite for this, or any other uses that are desired locally.
- The potential for positive areas of focal green space within each development zone, allowing space for tree planting within the public realm to help create a National Forest inspired character.
- Indicative locations of new locally important landmark buildings that would act to enhance character and aid legibility. This includes the recognition of existing views toward the site from the existing residential area, specifically along Channing Way and, to a lesser extent, Sherwood Close, Swinfen Close and Lawrence Close.



















There are a number of benefits for the future residents of the site. These include access to a range of house types and sizes, including affordable homes, being in close proximity to local services and facilities and the availability of public transport in the form of bus services.

The emerging masterplan has been prepared to respond to the outcomes of the assessment work and demonstrate the site's suitability for development. It shows how a high quality and sympathetic scheme could be brought forward. The work presented represents our initial thinking, confirms the potential capacity and is intended to provide the basis for discussions with all stakeholders.

The emerging proposals presented in this document are being promoted by a responsible land promotion company and, overall, are considered to represent the opportunity for a positive and sustainable addition to Ellistown.





- Key**
-  Application site boundary
 -  Existing (retained) trees & hedgerow
 -  Proposed tree/hedge removal
 -  Proposed National Forest planting
 -  Proposed community orchard
 -  Indicative wildflower and grassland planting
 -  Open space
 -  Indicative surface water attenuation basin
 -  Prominent contours (0.5m) (Free source LIDAR Data)
 -  Existing Public Right of Way
 -  Proposed pedestrian/cycle link
 -  Proposed primary street
 -  Potential link between primary streets
 -  Potential for equipped play/LEAP
 -  Location of event inclusive of play, exercise and education
 -  Visual links
 -  Indicative development cell
 -  Potential locations of landmark buildings

Illustrative Masterplan



nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS



NWLDC

11th March 2022

Dear Sirs,

I wish you to be aware of and acknowledge my strong objections to sections of the Local Plan for Review and take this moment to set out and explain my concerns. I limit my response to the Local Plan [LP] Review to the potential development of land based around Isley Walton [SHELAA 2021. IW1], and the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- ***“What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations.”*** As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

Furthermore the very sad current situation in Ukraine highlights amongst many issues the need for national self resource/reliance and the farmland is surely needed now and moreso in the future for the production of food for our country.

LP. 4.6. Objective 1 - *"Promote the health and wellbeing of the district's population"* Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be spoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing.

LP. 4.6. Objective 3 - *"Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances"*. Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

LP. 4.6. Objective 4 – *"Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care"*. The IW1 development is non-compliant. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county, adjacent, certainly within 1 mile, of massive recent and ongoing housing expansion as Castle Donington expands up to the airport. To consider IW1 as a NWLDC matter within a mile of Castle Donington adjacent to NWLDC is a clear sign of failing to look at the area rather than lines on a map. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion, will generate sufficient demand to justify 4.7k homes. This new village will therefore become primarily a dormitory town, increasing, rather than reducing, travel. Shopping will be at local supermarkets [Ashby, Loughborough, etc.] as will recreation and entertainment circa 10miles away. The principal transport used will be the car as no viable public transport system exists.

LP. 4.6. Objective 9 - *"New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)."* In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or it's partners undertake to achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid

roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

LP. 4.6. Objective 10 - *"Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets"*. Again, neither proposal is compliant. The distinctive elements of the district's character between the MOTO MSA and Ashby de la Zouch [south of the A453] are rolling countryside and farmland. Both these developments will totally destroy all aspects of local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

L.P. 4.6. Objective 11 - *"Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance"*. Neither development can possibly protect any of the natural environment – nor the associated wildlife, plant life, etc. at present supported by this open countryside. In respect of IW1, even the SHELAA recognises this fact [SHELAA pages 362-3] and lists several exposed species, etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character since its entry in the Domesday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that *"In view of its scale, it is more likely that a change to policy/strategy would be required"*. So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states *"In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended"*. This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

LP. 5.17. A core principle of the NPPF is to *"focus significant development in locations which are or can be made sustainable"*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local infrastructure. Furthermore the proposals will increase traffic exhaust pollution, light pollution, noise pollution, air pollution, destroy green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. Infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *"The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy"*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective

destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that "*There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)*". The IW1 development is not compliant with that requirement - see LP 25 comment above.

LP. 5.25. Policy S3. The NPPF states that planning needs to "*take account of the different roles and character of different areas,*" and that planning should recognise "*the intrinsic character and beauty of the countryside*". Neither of these proposals complies with either of these criteria. The proposed sites consist are exclusively open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

LP Page 18. [Pollution]. This states that:- "*..new development is not itself detrimentally affected by noise.*". Anyone purchasing a property on the IW1 site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect if the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechinons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct. Additionally, although appreciated only annually, the Download Rock Festival takes place at this location, has done so for many many years, attracting hundreds of thousands of visitors, the area being used for camping and car parking, the noise often audible as far as Diseworth.

Traffic. The major access to/from both sites will be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, airport customer traffic and EMA freight lorries. The LW1 site, housing a further 4.7k houses will produce circa 16k car movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even more problematic than already, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in transport

movements. In respect of EMP90, this site has no viable access from the south or west [which would be through the village of Diseworth. The only access available is from the A453. As SHELAA concedes [Appendix 2. Page 170], this is not compatible with the Leicestershire Highways Design Guidance [Policy INS3] - unless the LHA can be persuaded to change their mind. Again, do not change the rules to fit the proposal.

Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as "...Settlements which have a limited range of services and facilities where a limited amount of growth will take place **within the defined Limits to Development.** Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies "...an immediate need for additional employment land". It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly "...detrimental to the amenities of...nearby residential properties and the wider environment" – vis. Diseworth.

These proposals are both ill-conceived schemes, in the wrong place on an unprecedented scale, and would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and exploitative developer/developers who clearly have no real knowledge or interest in the locality. It seems they seek to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the long well established rules founded on wise consideration to suit a proposal is not an acceptable practice. I have had to comply with the rules regarding my proposed 12M2 residential extension, without question of changing the rules to suit my preferences, and the same principles should be upheld.

Yours Faithfully

N Curling

From: [REDACTED]
To: [PLANNING POLICY](mailto:PLANNING.POLICY@nwleicestershire.gov.uk)
Subject: Re: EXTERNAL: The development at Isley Walton and Diseworth
Date: 11 March 2022 10:21:32

Thank you so much for this very full and helpful reply - I can now follow this up. The Isley Walton/ Diseworth site does seem a tragic waste of a rare slice of beautiful countryside !

Best wishes and thank you
Griselda Kerr

Sent from my iPhone

> On 11 Mar 2022, at 09:16, PLANNING POLICY <PLANNING.POLICY@nwleicestershire.gov.uk> wrote:
>
> Dear Ms Kerr
>
> The site you refer to was submitted to us as part of a call for sites and can be found in the Strategic Housing Land Availability Assessment
> https://www.nwleics.gov.uk/pages/strategic_housing_and_economic_land_availability_assessment
>
> If you go to SHELAA 2021 Appendix 1 at the bottom of the page, the site reference is IW1. I would also encourage you to read the explanation of what a SHELAA is etc. which is contained on this page.
>
> We are currently consulting on the Local Plan Review https://www.nwleics.gov.uk/pages/local_plan_review
>
> This consultation document sets out several spatial distribution options (Table 4). Because IW1 has been submitted to us in the call for sites, we have considered it appropriate to include a New Settlement in one of the options.
>
> We will be carrying out a further consultation on our preferred spatial distribution option and our preferred sites later this year. Nothing has been decided at this stage about whether a new settlement will be required, although it remains a possibility.
>
> I hope this information helps.
>
> Kind regards,
>
> Joanne Althorpe
> Principal Planning Policy Officer
> Planning Policy and Land Charges Team
> [REDACTED] | www.nwleics.gov.uk

> -----Original Message-----

> From: Griselda Kerr [REDACTED]
> Sent: 10 March 2022 17:59
> To: PLANNING POLICY <PLANNING.POLICY@NWLeicestershire.gov.uk>
> Subject: EXTERNAL: The development at Isley Walton and Diseworth

> Dear Sir

> I cannot find the plan for thhe huge development at Diseworth/Isley Walton, nor can I find where to make any comments. Could you please guide me.

> My concerns will be both traffic and noise issues that will be so exacerbated around Donnington, the EMA and Melbourne. At times when Donnington have a festival on, no one can get anywhere on any road round the airport, and the noise is always appalling every weekend anyway, added to the aeroplanes. So the idea of another enormous source of noise/pollution/worsening of air quality/ambient light is truly disheartening and I do not know where I can express these views. Could you help me?

>

> Yours sincerely, Griselda Kerr

>

> Griselda Kerr

>

[REDACTED]

> [Cyber Essentials Compliant] You can report, request and pay for things online at
www.nwleics.gov.uk <<http://www.nwleics.gov.uk/>>

>

> [Hands Space Face] [ShawTrust Accessible] <<https://www.accessibility-services.co.uk/certificates/north-west-leicestershire/>>

>

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>

> [Achieve Forms Footer Banner] <<https://nwleics-self.achieveservice.com/>>

Mr Ian Nelson
Planning Policy and Sustainability
Manager
North West Leicestershire District
Council
Council Offices Whitwick Road
Coalville
Leicestershire
LE67 3FJ

Our ref: LT/2006/000022/CS-
10/IS1-L02
Your ref: Email 16 Feb 2022.
Date: 10 March 2022

Dear Mr Nelson

North West Leicestershire Local Plan Review: Development Strategy Options and Policy Options.

Thank you for giving the Environment Agency the opportunity to comment on your Local Plan Review: Development Strategy Options and Policy Options and which was received on 17 January 2022.

We have reviewed the submitted information and provide the following comments for your consideration:

Q1 - Do you agree with these Local Plan Review Objectives? If not, why not?

The Environment Agency is in general agreement with and welcomes the Objectives, particularly the 1st element of Objective 3 and also Objectives 7 and 10. We believe though that the wording of Objective 9 should be amended to read:

*“Conserve ~~and~~, enhance **and extend** the district’s natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the National Forest and Charnwood Forest as well as its other valued landscapes.”*

The justification for the change is that, in line with both the NPPF and the emerging Environment Bill, the requirements of biodiversity net gain include the need to increase the amount of biodiversity as development is brought forward, rather than merely enhance the existing biodiversity. We therefore consider that the above amendment should also be made elsewhere within the document where it is currently stated that biodiversity will be enhanced.

Environment Agency

Customer services line: 03708 506 506

www.gov.uk/environment-agency

Cont/d..

Where should new housing be located?

All new development, including housing, will need to be sustainable from an environmental perspective and this means locating development where:

- . it is at least flood risk and where the development would not increase flood risk elsewhere;
- . where the necessary infrastructure is in place such that the development would not cause a risk to water quality (i.e. by ensure the necessary water treatment facilities and infrastructure are in place);
- . in the case of development on potentially contaminated land that the necessary remediation works are undertaken to ensure there is no pollution risk to controlled waters.

The proximity of regulated process sites (i.e. those which operate with a Permit from the Environment Agency), e.g. Landfills, Incinerators, composting sites, waste transfer stations will need to be carefully considered when deciding the location of new sensitive receptor development, e.g. housing. If these two development types are in too close proximity then this could lead to amenity issues for the sensitive development but also an unnecessary burden being put on the operator of the Permitted site.

Employment (new employment sites)

Please refer to the comments above which are equally applicable to new employment sites.

Q16 - Do you agree with the proposed health and wellbeing policy? If not, why not?

We are general agreement with the policy and particularly welcome those requirements in points i and iii.

Renewable and low carbon

We welcome the commentary and the proposed policies in Chapter 9 of the Draft Plan and commend your Authority's commitment to making your operations carbon neutral by 2030.

We welcome the inclusion and focus on carbon reduction. Many of these topics are not directly within our remit to provide a technical response, but we generally support the approach to reduce carbon emissions and set out ways that the Local Plan can contribute to this. We have highlighted some particular areas of consideration and provided some additional links and information.

We strongly support development plan carbon mitigation policies and projects which:

- . Ensure climate resilience and environmental benefits at the heart of delivery of new homes and the infrastructure that enables healthy, productive places.
- . Increase uptake of nature-based solutions, including blue and green infrastructure, which provide multi-functional benefits including slowing the flow of flood waters, enhancing biodiversity and through recreation, increasing opportunities for the health and well-being of local communities.

Renewable energy is an important part of the solution to reducing greenhouse gas emissions and meeting future energy needs. We support sustainable renewable policies, as long as they do not unacceptably impact the environment. Any policy should consider the environmental requirements and support sustainable schemes ensuring that appropriate measures are in place to protect the local environment.

We are supportive of technologies and approaches that:

- . Consider environmental risks early and comprehensively. This includes:
 - a. Building environmental considerations into decision making at the earliest stage – not as an afterthought
 - b. Providing robust evidence that allows the environmental risks to be effectively managed and regulated, and which considers risks of deployment at commercial scale
 - c. Assessing all impacts from cradle-to-grave - including harvesting feedstocks & raw materials, decommissioning, and safe long-term storage of waste
 - d. Engaging the public so they understand the risks and benefits.

- . Minimise the impacts and risks to people and our environment – air, land and water. This includes:
 - a. Maximising decarbonisation and greenhouse gas reduction within safe environmental limits
 - b. Maximising resource, energy and water efficiency – wasted resources, energy and water represent harm without benefits
 - c. Maximising co-benefits for people and the environment.

- . Are fit for the future, including resilience to the impacts of climate change.

We have the following further comments on the specific text within Chapter 9.

Wind Energy and Solar Energy

Paragraph 9.13

The second bullet-point currently reads:

“Solar - Set a formal target for solar capacity in NWL from 89MW today to at least 140MW by 2050 in the Local Plan.”

However, the Zero Carbon Roadmap shows that 89MW is the capacity of currently installed and planning approved systems. Therefore consideration should be given to amending the above wording to the following:

“Solar – Set a formal target for solar generation in NWL from the current capacity of 89MW to at least 140MW by 2050 in the Local Plan...”.

The same consideration should be given to amending the wording for wind generation.

We understand the reasoning given for choosing Option 2 as the preferred approach to wind and solar energy.

Q19 - Do you agree with the proposed renewable energy policy? If not, why not?

We welcome the inclusion of the policy and offer the following suggested amendment.

The policy states that there should be a solar target of 37.11MW by 2039. However it is unclear whether this is an increase of 37.11MW from the current capacity of 89MW or an actual capacity target. In order to provide clarity we would suggest stating the following within the policy wording, for both wind and for the solar:

- Current generating capacity,
- The 2050 capacity target,
- The prorated 2039 target
- The required increase in generating capacity from current.

Energy Efficiency

Q20 - Do you agree with the preferred policy approach for energy efficiency? If not, why not?

We welcome the Councils ambition in considering Option 3 the preferred approach with regards to energy efficiency.

Please see the links below to some recommended resources for information and good practice examples of Local Authorities that have energy efficiency outcomes in their strategies.

- LGA providing links to both LGA resources and links to alternative resources - [Climate action: energy | Local Government Association](#)
- Local Partnerships - [Energy - Local Partnerships](#).

Demonstrating that new development is addressing climate change

We particularly welcome the inclusion of this section.

Q24 – Do you agree with the proposed policy for reducing carbon emissions? If not, why?

We warmly welcome the inclusion of this policy, but would like to make the following comment:

The hierarchy as defined states a ‘fabric first’ approach and this statement reflects the intentions set out elsewhere in the Plan each section. However, we consider that the hierarchy could start with firstly improving the building design and envelope in order to reduce the need for energy input, prior to control measures and prior to selective source of energy. This could be achieved as follows:

- a) Energy reduction through behavioural changes and use of passive heating, cooling and lighting design measures; then,
- b) Energy efficiency through better insulation, ‘smart’ heating and lighting and efficient appliances; then,
- c) Renewable energy etc...

Water Efficiency

We particularly welcome the inclusion of this section.

Paragraph 9.63:

the benefits identified in this section focus at the individual household level, however the system-wide benefits could also be illustrated, for example:

- Water efficiency measures will contribute to a reduction in the per customer carbon footprint of the water industry which are incurred through the abstraction, treatment, and conveyance of clean and wastewater.
- Water efficiency measures will help ensure sustainable management of existing water network infrastructure by relieving capacity stresses.

Q25 - Do you agree with the proposed policy for water efficiency standards? If not, why not?

We particularly welcome the requirement to achieve the national water efficiency standard of a maximum of 110 litres of water per person per day.

Overall this section has summarised the drivers, reasoning, and benefits of water efficiency succinctly. However, a driver that isn't explicitly stated here is that water efficiency measures are required to reduce the associated impact of a growing population accessing an already stressed resource and consideration should be given to including this in any future version of the report.

Q26 – What additional comments do you have about the Local Plan Review not covered by the preceding questions?

Climate Change and Adaptation

Whilst the submitted document provides welcome commentary and proposed policies to address climate change mitigation, less consideration appears to have been given to climate change adaptation, for example, regarding flood risk. Whilst adaptation may be a subject for future consultation, we wish to provide the following advice now regarding the importance of considering the issue of climate change in the Plan-making process, both mitigation *and adaptation*.

Section 19(1A) of the Planning and Compulsory Purchase Act 2004 places a legal duty on local authorities to ensure climate mitigation and adaptation are integrated across all local planning policy. National planning policy in England sets out the expectation that the planning system should deliver development that mitigates climate change, adapts to its impacts and improves biodiversity.

Revisions to the NPPF in 2021 include a requirement to promote a sustainable pattern of development, by mitigating climate change and adapting to its effects (para 11a). The NPPF also states (para 134) that enhanced local policies and government guidance on design should be given 'significant weight'.

We would advise your Authority to refer to the publication *Rising to the Climate Crisis: A Guide for Local Authorities on Planning for Climate Change* (tcpa, RTPi).

Further, we strongly advise that the following be taken into account as part of your Policy making process with regards to climate change:

Flood risk

Specific flood risk outcomes we would like to see delivered through Development Plans include:

Cont/d..

- . Steering development to areas with the lowest risk of flooding from any source. Where avoidance is not possible, government planning policy requires that development is designed to be safe for its lifetime without increasing flood risk elsewhere.
- . Policies for multifunctional SuDS (*See further commentary below).
- . Opportunities to incorporate natural flood management approaches, such as river restoration and the use of blue/green infrastructure are maximised, as part of an integrated approach to flood risk management.
- . In relation to advice on emergency planning, policies should ensure that there is adequate emergency planning procedures in the event of a flood.
- . Where climate change is expected to increase flood risk, in some locations existing development may not be sustainable in the long term. Where necessary and supported by evidence, Local Plans should consider opportunities to promote the relocation of such development, including housing to more sustainable locations.

Water Resources and Water Quality

The NPPF's policies expect LPAs to adopt proactive strategies to adapt to climate change that take full account of water supply and demand considerations. Early engagement between local planning authorities and water companies can help ensure the necessary water infrastructure is put in place to support new development.

Specific water resources focussed outcomes we would like to see include:

- . There is enough water for people and the environment, taking into account a changing climate.
- . There is early consideration of what water supply and sewerage infrastructure is needed to support climate resilient growth. For example through evidence/commitment of water companies to ensure adequate supply, water efficiency and treatment capacity is available and planned for.

Specific water quality focussed outcomes we want to see include:

- . The impacts of climate change on water quality are managed. This could include increased sewage infrastructure and capacity in some locations.

Nature based solutions to climate change

Nature needs to play a key role in tackling the climate emergency: climate change and biodiversity loss are closely inter-linked challenges that need to be tackled in an integrated way. Nature-based solutions help combat the climate emergency by protecting habitats and expanding natural carbon sinks such as forests, peat bogs, and wetlands. This helps prevent further nature loss and provides resilience against climate impacts such as sea-level rise, flooding and extreme weather events.

The Government's 25 Year Environment Plan, Nature Recovery Network and Net Gain policy landscape can help to deliver for biodiversity and climate change adaptation and mitigation. In relation to Biodiversity Net Gain (BNG), this is an approach which aims to leave nature in a measurably better state than before the development takes place. BNG is recognised as a powerful way to deliver wider outcomes that benefit the environment, wildlife and people, by creating climate resilient places.

We believe that development plan policies should enhance biodiversity and contribute to helping wildlife adapt to climate change. Specifically:

- Development should integrate and increase blue/green infrastructure, including SuDS, to build in multi-functional solutions to future impacts such as increased flood risk, water shortages and overheating.
- Tree planting, green walls and roofs should be encouraged as these can provide multi-functional benefits including carbon sequestration, biodiversity gains and providing adaptations and resilience to climate change in terms of flood mitigation (absorbing/storing water) and providing shading and cooling of buildings.
- More widely development plans should promote innovative solutions to climate risks, including measures to protect and enhance natural capital through the promotion of nature based solutions to climate change.

A natural capital approach underpins the delivery of both biodiversity and environmental net gain. By creating bigger and better natural capital assets, we improve the resilience and flow of ecosystem services and the benefits society receives from them. As well as providing value for nature, habitats can provide wider ecosystem services. Ecosystem services are functions and products that flow from natural assets and provide benefits to people. For example, ponds, reed beds and woodlands can absorb carbon and help mitigate the effects of climate change by slowing floodwater and cooling the air.

(* SuDS). This could have included some of the rainwater interception principles such as “rain gardens”. These are an example of mitigating *and* adapting to the impacts of climate change. As previously mentioned, the treatment and delivery of mains water has a significant embedded carbon footprint and therefore reducing the need for mains water (for use in the garden) can improve efficient water use whilst also reducing surface runoff at times of high rainfall (which will become more important as conditions change due to climate change). These solutions address multiple impacts such as carbon efficiency, sustainable resource use, improved water quality, flood protection, biodiversity and amenity improvements).

Protection of Controlled Waters

There will need to be policy(s) which ensure that new development does not pose a risk to controlled waters (the water environment), both during the construction phase, but also for the lifetime of the development.

Thank you for giving the Environment Agency the opportunity to comment on your Local Plan Review: Development Strategy Options and Policy Options document and we look forward to working with you further as your Plan-making process progresses.

Yours sincerely

Mr Nick Wakefield
Planning Specialist



Dr J Wragg & Mr J Coultas



11th March 2022

Re: Local Plan Review - Consultation Response

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. Neither proposal reflects the reflect local context and if successful, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self-evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. This will not be the case if either/both proposals are successful.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as highlighted in the Local Plan [5.17]. Both proposals will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal. The increased airborne particulate material is likely to cause harm to human health.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an "immediate need for additional employment land". Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being "detrimental to ...nearby residential properties". Diseworth is only separated by 75 metres and properties in Isley Walton will be subsumed by any new development.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

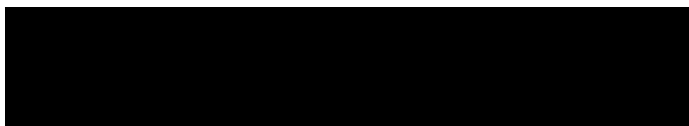
13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle e.g. environmental objective to protect and enhance our natural environment and improve biodiversity, and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

A large black rectangular redaction box covering the signature area.

Dr Joanna Wragg

Planning Policy & Land Changes Team,
North West Leicestershire District Council,
Council Offices
Whitwick Road
Coalville LE67 3FJ

11th March 2022

Alison Evans



Dear Sirs,

Local Plan Review. Consultation Response

I write in response to the Local Plan [LP] Review. My comments are restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test. A concrete jungle will result. Loss of access to walking and leisure facilities around our conservation village due to its surrounding by physical barriers on almost all sides has the potential for serious impact on both physical and mental well-being.
2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.
3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased. Since the housing proposal is to reflect the needs of the whole county with much of that being for Leicester, there seems little sense in providing accommodation in the very north west of the county. This area is more likely to attract people from nearby Derbyshire and Nottinghamshire than Leicester. Those working in and around Leicester will have to travel further.
4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties both for our village, Long Whatton and the surrounding area. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth will surely exacerbate the flooding problem. It will literally create a sea with a bed of concrete!
5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self-evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland. In order to retain this there is a need to retain open areas of countryside with designated wildlife corridors.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim. A monoculture of concrete will result.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable. Current news events demonstrate the need for greater self-sufficiency in food production. Destruction of countryside and prime farmland will only increase the UK's reliance on imported food with its associated carbon footprint and shortages during political conflicts.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution. Any housing within the area designated will likely be subject to greater levels of noise than Diseworth. There will be a need to restrict night flying which will impact on EMA's freight expansions and viability. Light pollution should also be considered as this will also be increased. EMA and its surrounding operations currently generate a constant nighttime glow due to the height above the surrounding countryside.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

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Please acknowledge receipt of my objections letter. Thank you.

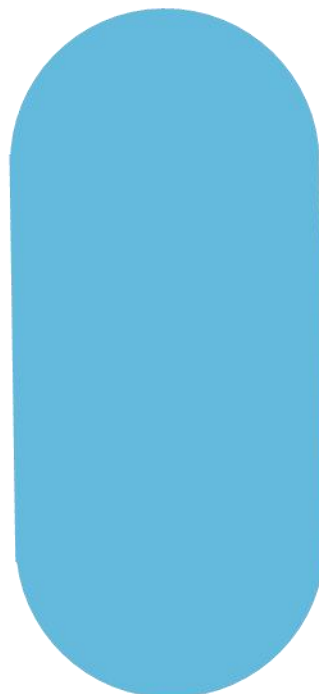
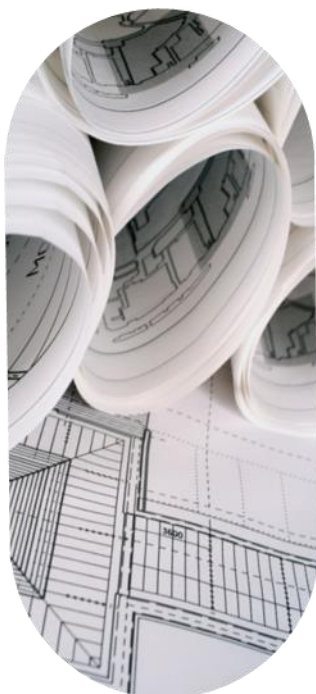
Yours faithfully,

Alison Evans

**REPRESENTATION ON THE NORTH WEST LEICESTERSHIRE
LOCAL PLAN 2020-2039 (FEBRUARY 2022)**

LAND EAST OF CORKSCREW LANE, ASHBY DE LA ZOUCH

On Behalf of Paul Fovargue, c/o Mather Jamie



1. INTRODUCTION

- 1.1 This representation is made on behalf of our client, Paul Fovargue c/o Mather Jamie in respect of land to the east of Corkscrew Lane, Ashby de la Zouch. It responds specifically to the North West Leicestershire Local Plan 2020-2039 (Consultation Draft Plan).
- 1.2 The Consultation Draft Plan is currently the subject of consultation and representations are invited until the 14 March 2022.
- 1.3 This representation provides our views on the vision, spatial strategy, the need for employment land provision to meet local and strategic needs and other issues relevant to the delivery of further commercial space that the Draft Local Plan outlines. The representation also confirms support for the commercial development of land to the east of Corkscrew Lane, for an assumed development in the region of 46,451sqm (500,000sqft).

2. BACKGROUND AND CONTEXT

- 2.1 The National Planning Policy Framework (NPPF) confirms at paragraph 15 that the planning system should be genuinely plan-led. The presumption in favour of sustainable development applies to plan making and says that plans should positively seek opportunities to meet the development needs of their area, and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (paragraph 11).
- 2.2 Plans should be prepared positively, in a way that is aspirational but deliverable and be shaped by early, proportionate and effective engagement between plan-makers and, inter alia, local businesses. They should also contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).
- 2.3 Paragraph 20 says that strategic policies should set out an overall

strategy for the pattern, scale and quality of development. Paragraph 22 goes onto say that strategic policies should look ahead over a minimum 15 year period from adoption and larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

- 2.4 Paragraph 23 of the NPPF says that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 2.5 Paragraph 31 says that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 2.6 Paragraph 32 recognises the legal requirement for local plans to be informed throughout their preparation by a sustainability appraisal demonstrating how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). It highlights that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.
- 2.7 Plans should set out the contributions expected from development, including the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for health). This should not undermine the deliverability of the plan (paragraph 34).
- 2.8 For a plan to be adopted it must pass an examination and be found to be 'sound'. Paragraph 35 identifies that plans are 'sound' if they are:
- a) **Positively prepared** – providing a strategy which, as a minimum,

seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.

2.9 Paragraph 78 recognises that in rural areas, planning policies and decisions should be responsive to local circumstances. Paragraph 79 promotes sustainable development in rural areas.

2.10 Paragraph 81 says that planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

2.11 Paragraph 82 says that planning policies should set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth.

2.12 Paragraph 83 says planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible

locations.

2.13 Paragraph 104 requires that transport issues be considered from the earliest stages of plan-making and development proposals, so that the potential impacts of development on transport networks can be addressed, opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised; opportunities to promote walking, cycling and public transport use are identified and pursued.

2.14 Paragraph 105 then goes on to say the planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health.

2.15 The national policy context for plan making is clear in that:

1. the plan must set out an overall strategy for the pattern of development that makes sufficient provision for housing and commercial development to meet the needs of North west Leicestershire as well as any needs that cannot be met within neighbouring areas;
2. sufficient sites to deliver the strategic priorities of the area must be planned for and allocated;
3. a sufficient amount and variety of land can come forward where it is needed;
4. the plan should be positive, aspirational and be responsive to changes in local circumstances;
5. plans should create conditions in which businesses can invest, expand and adapt with significant weight placed on the need to support economic growth and productivity, the approach taken should

allow each area to build on its strengths, counter any weaknesses and address the challenges of the future; and

6. local business and community needs may have to be found adjacent to or beyond existing settlements, exploiting opportunities to improve access on foot, by cycling or by public transport through sites which are physically well-related to existing settlements [emphasis added].

3. THE NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW (JANUARY 2022)

3.1 There has been considerable market demand for warehousing premises in North West Leicestershire over recent years and the supply of sites for these uses has been strong, already surpassing the estimated requirements in the Housing and Economic Development Needs Assessment 2017 (HEDNA). It is worth further noting that the supply of core industrial space, and non-strategic warehousing (which offers warehousing space up to 9,000sqm) and usually meeting local needs is in competition with the strong demand from the strategic warehouse sector (space requirements in excess of 9,000sqm) which generates higher land values with which non-strategic industrial development cannot compete. This site would be able to meet either of strategic or non-strategic warehousing needs or a combination of these needs. The Council has prepared a North West Leicestershire: The Need for Employment Land (December 2020 [‘The Stantec Study’] providing for the period 2017 – 2039. The study finds a requirement for 11.28ha of land for office developments and 71.57ha of land for industrial/smaller warehousing.

3.2 In addition, the Council, together with the other Leicester and Leicestershire, HMA Authorities and the Leicester and Leicestershire Local Enterprise Partnership commissioned a study into Warehousing and logistics. This study prepared by GL Hearn, MDS Transmodal and Icen Projects Limited and published in April 2021 sets out the need for

further road and rail served storage and distribution needs across Leicestershire suggesting that the Authorities plan for around 2,570,000 sqm of additional storage and distribution floorspace to 2041. The study also identifies the need for a further requirement of 112 ha of provision at non-rail served sites by 2041 and 307ha of provision at rail served sites by 2041.

Local Employment Land Needs

- 3.3 The Local Plan Review notes that an update to the 2017 HEDNA is being prepared which will contain an alternative assessment of employment land and that Leicester City Council has declared an unmet need of 23Ha of employment land. Having an understanding of the employment land requirements across Leicestershire together with agreement on the distribution of unmet employment need are both matters which the local plan review will need to contend.
- 3.4 The Local Plan Review notes the Leicester and Leicestershire Strategic Growth Plan (SGP) includes an agreed vision and a strategy for the city and county up to 2050 to be delivered through individual authorities' local plans. The SGP also sets out employment needs for North West Leicestershire of 50-56ha of B1a/b, 4ha of B1c/B2 and 21ha of small B8 (2011 to 2036).
- 3.5 The Council has reviewed the evidence provided by the Stantec Study alongside commitments and considers there to be a need to allocate new sites sufficient for up to 2,000sqm of office space and at least 166,000sqm/33Ha of industrial/smaller warehousing.
- 3.6 The SPG and the Stantec Study do not present directly comparable figures and neither allows for any unmet need from Leicester City. Clearly the Council will need to scrutinise the findings of any updated HEDNA which it expects to receive in Spring 2022. However, to its credit, the Council has sought to grapple with the issue of meeting needs that may arise elsewhere in the Housing Market Area.

3.7 Against this context, the Local Plan Review identifies a set of objectives, a number of which are particularly important to the development strategy and employment site selection process:

3 - Achieve high quality development which is sustainable, which responds positively to local character and which creates safe places to live, work and travel.

4 - Reduce the need to travel and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure.

5 - Support the district's economy, including its rural economy, by providing for a range of employment opportunities which respond to the needs of businesses and local workers.

11 - Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way.

3.8 The local plan sets out four options which have been identified as the reasonable alternatives for continuity of supply of employment land:

- Option 1: identify reserve site/s.
- Option 2: increase the requirement figures by an additional factor.
- Option 3: await the next review of the Local Plan.
- Option 4: rely on Policy Ec2(2) or its equivalent.

3.9 Waiting for the next local plan review would prejudice an overall strategy for the pattern and scale with sufficient provision for homes and jobs as required by paragraph 20 of the Framework. As a result, we do not

consider option 3 to be appropriate.

3.10 Similarly, reliance solely on the local policy Ec2(2) to meet employment needs would not provide conditions for a clear strategy for employment that business could plan under nor would it plan positively for the spatial relationship between for homes and jobs. However, we do agree that a criteria based policy such as Ec2(2), should be retained as part of the Council's approach to planning for employment land provision in order to ensure the Plan can remain flexible and responsive to future employment land needs.

3.11 Option 2 would reduce the limitations on employment development at a time of economic recovery and also provide a safety valve for unmet need from Leicester City and in our view would represent the most appropriate policy response. Option 1, could provide an additional layer of flexibility to respond to changing or increased need and for that reason a hybrid of option 1 and 2 may not be inappropriate.

3.12 The local plan will need to consider not only the quantity of employment land needed but also the quality, location and relationship with homes. Four options for the distribution of future employment land are identified in the draft local plan:

- General Employment Land Strategy Option 1 – the continuation of the adopted Local Plan distribution. General employment land allocations would be principally at Coalville, Ashby and Castle Donington (i.e. the settlements at the top of the settlement hierarchy).
- General Employment Land Strategy Option 2 – allocating employment land at Coalville, Ashby and Castle Donington (like Option 1) and also at Measham/Appleby Magna as a 'new', expanding employment location.
- General Employment Land Strategy Option 3 – a more widespread distribution of employment land, including to locations

which are currently less well provided for such as the Local Service Centres – Ibstock, Kegworth, Measham – and, potentially, Sustainable Villages.

- General Employment Land Strategy Option 4 – allocating land in a single/new location for a high quality, mixed-use business park.

3.13 On the basis that the plan-led approach should look to integrate the strategies for homes and jobs we have considered the potential for the options to manage the relationship between employment growth and the communities that will continue to see housing growth throughout the Plan period. With this in mind, it would appear that directing employment provision to a single large/new location (Option 4) would not deliver balanced growth and is unlikely to be sustainable.

3.14 Option 2 would support the delivery of local employment needs at Measham and Appleby Magna and reduce the ability to direct significant employment to the main centres and provide for local employment needs close to other workforces.

3.15 Option 3 considers a wider spread of distribution, which could meet different business requirements, whilst supporting local employment needs. Like Option 1 this option offers potential for new employment development to be balanced with growth at a local level whereby, for example, significant employment growth could be located in close proximity to the available workforce from existing and new development, an example being Ashby.

3.16 Option 1 will locate growth principally, though not exclusively, on the three highest tier settlements (Coalville, Ashby and Castle Donington). Having regard to Table 8 included in the Council's Consultation Report it is clear that 92% of offices, and 96% of all industrial and non-strategic warehousing provision has been delivered in Coalville, Ashby or Castle Donington in the period 2017-21. This, in effect is the distribution delivered by the adopted Local Plan.

3.17 This strategy has delivered significant levels of employment land provision within the current plan period and the Council will be aware that continued growth in Ashby can balance large scale population growth within the settlement likely in the next plan period, as well as support the continued provision of non-strategic B8 (of which 42% was located in Ashby in the last Plan period) and therefore respond to the markets clear demand for small scale B8 in this location.

3.18 It is our view that the relationship between homes and jobs should be considered as part of the assessment and selection of site allocations for housing and employment, managing the spatial arrangement positively to reduce travel (objective 4), supporting the District's economy including the rural area (objective 5) whilst maintaining and coordinating access to jobs (objective 11).

Strategic Warehousing

3.19 The Local Plan Review also acknowledges that there has been considerable demand for new-build strategic warehousing (logistics) in the district in recent years. This reflects the district's exceptionally good strategic transport links, notably the M42/A42 transport corridor, the A50/Midland Main Line and M1/A511.

3.20 The consultation document highlights that the Council have decided to proceed with plan making on the basis of an initial option and that making no/minimal provision for strategic distribution would be unrealistic in view of the intensity of the development pressure in the District for this sector. It is noted that the consultation document does go on to state any option at this stage is preliminary and does not signal the council's commitment or agreement to take a particular share of the remaining Leicester and Leicestershire need. Nonetheless the Council's positive approach to planning for further strategic warehousing needs is welcomed.

3.21 Since April 2011, permissions have been granted for some 423Ha of strategic warehousing including East Midlands Gateway (139Ha), plots at East Midlands Distribution Centre (22Ha), Mercia Park (97Ha), and Aldi

-
- at Sawley (39Ha). The level of provision in the district alone has exceeded what was predicted for the whole of Leicester and Leicestershire up to 2031 in the Strategic Distribution Study (2017) which signals the particular market strength of this sector.
- 3.22 A shortfall of 301,293 sqm at non-rail served warehouse sites is identified 2020-2041. Permission has recently been granted on appeal for 89,200 sqm of industry (B2)/warehousing (B8) in Hinckley and Bosworth Borough (on the border with NWL). Depending on the split between uses, this would further reduce the shortfall to at least 212,093sqm.
- 3.23 A single policy option is considered - *50% of the outstanding road-served requirement to be met in NWL which would equal approximately 150,000sqm, or about 106,000sqm taking account of the recent appeal decision in Hinckley and Bosworth subject to confirmation with the other Leicester and Leicestershire authorities.*
- 3.24 The Council's approach is considered reasonable in terms of the amount of non-rail served warehouse land to be identified, though we would point out that many commercial buildings and facilities have a design life of just 30 years and many older commercial buildings may become unsuitable for warehousing uses towards the end of the Plan period. Whilst some sites may be refurbished many are likely to come under pressure for alternative land uses. Moreover, demand for warehousing and distribution space has increased significantly in the logistics sector due to a combination of Brexit, the growth of e-commerce, which has grown much quicker than predicted as a result of changes to shopping habits during COVID, and increasing trends for transport freight demand to reflect consumption (including changes in tastes, fashions and technological developments). Some of these changes are very recent and may not be adequately reflected in the GL Hearn, MDS Transmodal and Icen Projects Limited report despite this only being published in early 2021.
- 3.25 For the above reasons, we would suggest that there is likely to be a requirement to aim for the upper space requirement outlined in the Draft
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Consultation Plan (notwithstanding the recent decision in Hinckley and Bosworth) to provide greater flexibility to the market and reflect most recent build out rates. In addition, any policy wording must provide for sufficient flexibility to allow for the delivery of larger sites in suitable locations required to meet market demand.

3.26 The Local Plan Review goes on to acknowledge the need for sufficiently flexibility to deal with changing circumstances over the plan's lifetime and not simply plan for economic growth which is forecast at the current time. In addition to a flexibility margin the plan also considers the role of policy Ec2(2) which provides the framework for considering new, unallocated employment sites. Whilst we do not consider policy Ec2(2) to be a sensible tool for managing the overall strategy for the amount of employment land needed we do consider it necessary to provide flexibility in the supply of sites.

3.27 The plan identifies eight options ranging from deletion of policy Ec2(2) to retention in its current form with a variety of approaches to its specific restrictions. Our preference is for Policy Ec2(2) to be retained in its current form (Option 2).

3.28 The Local Plan Review also accepts its role in helping to identify and cater for specific sector requirements, including where a specific business need is not being met by the market in addition to the amount and location of new employment land. This is true in relation to a shortage of premises suitable for start-up businesses.

4. REPRESENTATIONS IN RESPECT OF LAND AT CORKSCREW LANE, ASHBY DE LA ZOUCH

4.1 The site is located on the eastern edge of Ashby de la Zouch and approximately 3km from the western edge of Coalville. The site area is broadly defined by an existing railway to the south, by Corkscrew Lane to the west and by the alignment of the A511 to the north and north-east.

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- 4.2 Immediately to the west of the site, between Corkscrew Lane and the A42, is a 'brownfield' parcel of land that was part of the former UK Coal Lounge disposal point. The area is now characterised by the redundant infrastructure (including hard standings and internal roads and drainage lagoons), with large areas of natural regeneration; parts of the site have been restored with planting and seeding now established (largely drainage features and bunding). This parcel of land, immediately to the west of the site, is subject to an extant planning permission for Class B8 distribution unit(s) and ancillary offices (B1a) (along with other supporting components of that application (Reference 19/0652/FULM). This site, which received planning permission in May 2021, has been designed to accommodate build to suit logistics/warehousing up to 70,000 sqm gross internal floor area and will provide parking provision for nearly 200 HGVs and 550 cars. It will create between 750 and 900 jobs.
- 4.3 Our Client's site, which is located centrally within the 'Golden Triangle' with excellent connectivity to the Strategic Road Network will provide a logical extension to this already committed strategic warehousing and logistics site. It will lie within the A42 transport corridor, incorporating Ashby-de-la-Zouch; (which is identified in the GL Hearn Study as a future area of opportunity for road related storage and distribution growth¹) as well as in the Coalville Growth Corridor.
- 4.4 Clearly, the eastwards extension of this existing committed employment area could provide the flexibility to meet identified logistics and strategic warehousing needs (or non-strategic warehousing or a mix of both) depending on the Council's requirements. Moreover, given the sites proximity to existing storage and warehousing development within Ashby, it is our view that further commercial development as proposed could benefit both occupiers of the committed site and future occupiers of our Client's site as logistics companies typically benefit from being located near each other rather than operating in isolated locations.
- 4.5 It is also worth highlighting that the Corkscrew Lane site is very close to

¹ [General Report Template \(nwleics.gov.uk\)](https://www.nwleics.gov.uk)

Ashby. There has been very significant recent housing growth around Ashby and this is likely to continue to see future growth in any emerging Local Plan reflecting its status as a Key Service Centre. The development of further employment land and therefore jobs on the edge of the settlement will clearly help balance local housing and employment growth.

- 4.6 Moreover, further development in this area could help support enhanced walking, cycling and public transport provision around the site. Clearly the provision of additional employment land, on a strategic scale could provide opportunity to further improve local walking cycling and potentially support the delivery of improved public transport provision.
- 4.7 In respect of environmental aspects we consider this site to be unconstrained.
- 4.8 Our clients have commissioned a Preliminary Landscape and Visual Assessment. This notes that the site is not subject to any statutory or non-statutory landscape designations and there is no formal public access to the site in the form of rights of way. It further notes green infrastructure associated with the site is strongly linked to the transport infrastructure network, including linear planting along the A511 and the railway, as well as Corkscrew Lane and together these contribute to the visual containment of the site. Put simply the site is not widely visible from the surrounding area.
- 4.9 The site comprises an existing area of arable land, defined by established field boundary hedgerows and linear woodland and tree belts. The field pattern is medium to large scale and irregular in plan form; the immediate site appears to have formerly been part of a larger, more regular enclosure prior to being bisected by the route of the A511. Although there is no tree or woodland cover on the site (aside from along its boundaries), the surrounding context is characterised by several larger stands of trees and woodland which contribute to a mixed character between the agricultural land and woodland areas.

-
- 4.10 The topography of the site is broadly uniform across its extent, but slopes gradually from east to west; the high point of the site being located close to the north-eastern boundary at 150AOD, with a gradual fall down to the alignment of Corkscrew Lane.
- 4.11 Due to the nature of the transport corridors of the A511 and railway, access into the field enclosure is currently limited to the route of Corkscrew Lane. There is no formal access to the site by public rights of way. With the closest routes being located further to the north between Farm Town and the Ashby Road (A512) there are very few opportunities for access into the countryside around the site and as a result public views are inherently limited.
- 4.12 This report then goes on to state that the site and its surrounding landscape retains some value based on the nature of the landscape components (in terms of their condition and consistency with the wider landscape character), however the site is relatively ordinary in this context and, to a degree, sits slightly separate to the wider more rural landscape to the east. In terms of susceptibility to commercial development, the landform, field pattern and hedgerow network are considered to have some susceptibility to commercial development (as all landscape are due to the massing, footprint and scale of modern commercial developments of this nature). Although susceptibility is far lower to the west due to the previous uses and also the influence of the highway corridor and other areas of emerging commercial/industrial uses.
- 4.13 In summary therefore this site would have relatively minor landscape impacts owing to the extent of existing boundary vegetation, topographic containment within the site (especially to the north), the lack of local public rights of way and other areas offering views of the site, 'ordinary' nature of the landscape within the site which is well represented elsewhere within this character area and the potential for tree planting and other habitat creation to screen the site.
- 4.14 An initial appraisal of the transport matters likely to arise from a development of the land east of Corkscrew Lane in Ashby de la Zouch
-

had been prepared by ADC and is included as an appendix to this report.

- 4.15 The development site is opposite G-Park Ashby de la Zouch on Corkscrew Lane. In 2021, G-Park was granted outline consent for 70,000sqm of B8 floorspace. Given that precedent, it can be concluded with confidence that a development of up to 46,451sqm (500,000sqft) of B8 floorspace on the development site would be acceptable, subject to conditions and obligations. An appropriate access design with standard dimensions can be provided on Corkscrew Lane, in the form of a single ghost island T-junction.
- 4.16 Accessibility by sustainable modes of transport can be made acceptable by the provisions of a Travel Plan, including free bus passes and travel packs for employees, along with a public transport strategy that enables employees to travel by bus. Collaboration with the developer of G-Park would allow costs to be shared for a new shuttle bus, or diversion of an existing bus service and could provide opportunity to improve public transport provision to the G-Park site.
- 4.17 Adverse traffic impacts on the off-site highway network will be confined to the A511 corridor. Thus, they will be mitigated by the payment of a contribution towards the Coalville Transportation Infrastructure Fund. Further details on this issue is set out at Appendix C of this representation.
- 4.18 The site is in Flood Zone 1; therefore, the Sequential Test is not deemed to be required and the proposed residential development is considered appropriate at the site. It is however noted that the site is located in the catchment of the River Mease Special Area of Conservation (SAC)². The SAC is failing to meet its Conservation Objectives due to a combination of elevated phosphate levels in the river and its tributaries and unnaturalised flow levels. Reflecting this, the development will need to include measures to ensure it doesn't act alone or in combination with other development locally to give rise to likely significant effects of the

² [Mease Catchment Projects Map \(arcgis.com\)](https://arcgis.com)

SAC.

- 4.19 The nature of any measures we will take to protect the Mease will depend on the timing of delivery and the measures available at the time this project becomes operational. This is because it has been agreed that Severn Trent Water will pump out of catchment flows received by waste water treatment works at Packington (serving Ashby) and most likely Measham from 2027.
- 4.20 Should development come forward before 2027 there are a number of mitigation measures available as follows:
- Discharge to a Sealed Tank/Cess Pit
 - Connect to a foul sewer outside of the Mease Catchment;
 - Do nothing (dependent on the agreement between the River Mease Programme Board Partners on 'Pain before Gain'; or
 - Pay a contribution to the emerging Developer Contribution Scheme (DCS3).
- 4.21 In light of ongoing uncertainty regarding the timing of DCS3 and the likely cost and unsustainable nature of relying on a non mains system our Client's preference is to connect to a sewerage network served by a waste water treatment works located outside of the Mease catchment. We are satisfied that we have control of land to allow for a connection in the vicinity of Farm Town as indicated in the Drainage Statement appended to this response. Obviously exporting any effluent out of catchment would allow the developer to appropriately protect the Mease from impacts associated with foul flows. However, we will keep under review alternative options outlined above.
- 4.22 In addition we are aware that Natural England has recently published its 4th edition of its standing advice for development in the Mease catchment. This raises two noteworthy issues. Firstly there is a requirement set out in that guidance for commercial development and service areas to include 4 treatment trains within any sustainable

drainage scheme. This guidance is noted. Secondly, the consequence of this guidance, is that we will need to introduce measures into the design that are there specifically to mitigate impacts on the SAC. In this context our Clients recognises that the Council would be a need to undertake a stage 2 Habitat Regulations Assessment (Appropriate Assessment) as part of the plan-making process and at the Planning application stage. Our Clients are prepared to work proactively with the Council to assist in discharging these statutory obligations.

- 4.23 A Preliminary Ecological Appraisal has been undertaken by Ramm Sanderson for the site. This indicates that there are 6 statutorily protected sites within 5km of the proposal site, although none are within 2km. There are 65 non statutory wildlife sites (Local Wildlife Sites) within 2km of the site (none are within the proposal site). Of these 65 wildlife sites two are within 40m (including a site within the adjoining Lounge Scheme). The remaining LWSs are all excess of 400m from our Clients site. As would be expected on a site of this scale and nature there is some potential for protected and notable species to be present locally and measures would be included in any development proposal to protect these. We are also aware that a development of this scale will require 30% tree planting in accordance with National Forest tree planting requirements and that this would likely provide opportunity to deliver 10% biodiversity net gain which will become a mandatory requirement in the near term. These minimum requirements can be easily met on adjacent land within the same ownership.

5. CONCLUSION

- 5.1 The Local Plan Review should provide for an amount of employment land that is flexible and takes account of unmet need from Leicester City rather than restrict or limit growth at a time of national and local economic recovery. The Council's approach to making some provision for Strategic Warehousing and Storage and Distribution is welcomed and our Clients site could make a notable contribution to the provision of additional employment space (equivalent to around 25-35% of the Council's

indicative strategic warehousing requirement).

- 5.2 Alternatively this site could also contribute to meeting the Council's requirement for 'general' employment land to meet local needs or a combination of these two different needs.
- 5.3 The site is well related to the Junction 13 (Flagstaff Island) of the A42 and the Strategic Road Network and located within the A42 transport corridor, incorporating Ashby-de-la-Zouch; (which is identified in the GL Hearn Study as a future area of opportunity for road related storage and distribution growth) as well as in the Coalville Growth Corridor.
- 5.4 The site adjoins a committed strategic warehousing and distribution site which is likely to be built out in the near term. Further commercial development would benefit the consented G-Park proposal by supporting the provision of additional infrastructure and services locally and by increasing the potential for end-users to benefit from clustering.
- 5.5 Moreover, this site's location close to Ashby could help to balance continuing strong housing growth within the Plan period and would provide jobs close to a growing population. And whilst the site is principally being aimed at meeting emerging strategic warehousing and distribution needs there is potential to provide smaller units to meet for 'general' employment needs as outlined elsewhere in this report.
- 5.6 The site is free of technical constraints. It is well contained by existing transport infrastructure and associated tree belts and other vegetation as well as local topography. The site does not contain any statutory or non-statutory wildlife designations, is located in flood zone 1 and provides significant opportunity to deliver biodiversity enhancements owing to its location in the National Forest. As set out in detail above, measures to protect the River Mease SAC are available and can be delivered.
- 5.7 The site can positively contribute towards employment provision in the short-term and as a result we respectfully request that Land at Corkscrew Lane is identified as an employment allocation in the Local Plan Review.

Appendix A – Land at Corkscrew Lane Preliminary Ecological Appraisal Report

Corkscrew Lane, Ashby-de-la-Zouch

Preliminary Ecological Appraisal
Report (PEAR)



Client:

Mather Jamie

Report Reference:

RSE_5818_01_V1

Issue Date:

21 February 2022

PROJECT


Client: Mather Jamie


Project: Corkscrew Lane, Ashby-de-la-Zouch


Reference RSE_5818_01_V1

Report Title Preliminary Ecological Appraisal

DOCUMENT CONTROL

Originated:	Nicola Woods BSc SCIEEM	Assistant Ecologist		15/02/2022
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Technical Reviewed:	Oliver Ramm BSc MCIEEM	Director		21/02/2022
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Issued to Client:	Oliver Ramm BSc MCIEEM	Director		21/02/2022
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Revisions:

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DISCLOSURE:

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1 EXECUTIVE SUMMARY

1.1 Background

- i RammSanderson Ecology Ltd was instructed by Mather Jamie to carry out a Preliminary Ecological Appraisal of land adjacent to Corkscrew Lane, Ashby-de-la-Zouch, Leicestershire to inform a representation to the LPA's call for sites process.
- ii The site was predominantly a single large arable field compartment with boundary hedgerows and patches of plantation in places.

Table 1: Summary of Ecological Features

Ecological Feature	Comment	Further Surveys Recommended	Avoidance	Mitigation	Compensation/Enhancement	Residual Impact
Designated Sites	Six statutory designated sites within 5km of the Site and 65 non-statutory designated sites within two kilometres of the Site. Site is within the Impact Risk Zone of the River Mease SAC/SSSI and <50 metres from two LWS so it is considered possible that proposals will have an impact on designated site(s).	No, but consultation with Natural England will be required for later planning application.	Provided drainage and surface water flows are dealt with on site, and water released from the site is not polluted, impacts to the Mease are considered highly unlikely, however this will need to be screened, potentially through the HRA process.	Pollution control measures, potentially water quality monitoring to evidence the lack of impacts.	N/A	Possible. Further assessment may be required
Habitats	Hedgerows on Site are Habitats of Principal Importance and, as such, are a material consideration in planning.	No	Retain hedgerows.	Replacement of hedgerows if they must be removed to facilitate development.	Enhancement opportunity to create native-species rich hedgerows and reinforcement planting in gaps.	Negligible

Ecological Feature	Comment	Further Surveys Recommended	Avoidance	Mitigation	Compensation/Enhancement	Residual Impact
Great Crested Newt	Six ponds within 250 metres, considered likely to contain breeding GCN. Hedgerows on Site facilitate commuting however the Site is completely separated from these ponds by barriers to dispersal (roads and newt fencing).	No	N/A	Precautionary Methods of Works for amphibians		Negligible
Bats	Several mature trees immediately outside of the Site boundary. No potential roost features for bats identified during the survey. Hedgerows likely used by bats for commuting and foraging since they represent dark corridors and are well connected, especially to the south-western boundary.	No	Retain hedgerows.	Sensitive bat lighting strategy required if night-lighting to be installed.	Increase native species in hedgerow will encourage invertebrates and, in turn, insectivorous mammals. Bat boxes could be incorporated into a new development.	Negligible
Birds	Potential for works to disturb nesting birds in hedgerows but unlikely the site supports significant populations.	No	Conduct works outside of nesting bird season.	Nesting bird check by ecologist immediately prior to works if occurring March – September.	Bird boxes could be incorporated into a new development.	Negligible
Reptiles	Habitats on site unlikely to support reptiles but they could be present transiently on Site.	No	N/A	Follow a Precautionary Method of Works	N/A	Negligible

Ecological Feature	Comment	Further Surveys Recommended	Avoidance	Mitigation	Compensation/Enhancement	Residual Impact
				for reptiles to avoid injury/fatality during any hedgerow removal.		
Otter and water vole	Minor watercourses (drains/ditches) within 500 metres of the Site but not well connected to the nearest river. Considered highly unlikely for these species to be present on Site. However, any development on site must be sensitive to pollution of watercourses, which could degrade their habitat, since they are likely present in the locality.	No	N/A	Follow pollution prevention guidelines.	N/A	Negligible
Badger	No setts or signs recorded but potential for badgers to be present transiently on Site.	No, unless works are to commence > 6 months following the survey.	Retain hedgerows.	Follow a Precautionary Method of Works for badgers to avoid injury/fatality.	N/A	Negligible
Terrestrial Invertebrates	Vegetation on Site likely used by a range of terrestrial invertebrates for foraging but not unique in the wider landscape.	No	Retain hedgerows.	N/A	Planning of native species will benefit invertebrate species, such as pollinators. Potential to	Negligible

Ecological Feature	Comment	Further Surveys Recommended	Avoidance	Mitigation	Compensation/Enhancement	Residual Impact
					incorporate insect refugia into development.	
Principal Species	Potential for hedgehogs, brown hare, and common toad to use the Site but does not contain particularly suitable or high quality habitat for these species in the landscape.	No	Retain hedgerows.	Following Precautionary Method of Works for badgers and reptiles will also protect these species.	Hedgehog nest boxes and ponds could be incorporated into the development.	Negligible
Invasive species	No invasive species present on Site but records in the locality.	No, unless works are to commence > 1 year following the survey.	N/A	N/A	N/A	Negligible
Biodiversity Net Gain	Hedgerows and small area of tall ruderal vegetation of biodiversity value. Baseline habitat units are 23.59 and baseline hedgerow units are 11.23 according to the DEFRA Metric 3.0.	No	To avoid a net loss of biodiversity, retain hedgerows and incorporate areas of good condition native species planting into the development.	N/A	Compensation may be required off-site to achieve a net gain for biodiversity.	TBC following full calculation on confirmation of proposals.

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2 INTRODUCTION AND BACKGROUND

2.1 Purpose and Scope of this Report

- i RammSanderson Ecology Ltd was commissioned by Mather Jamie to assess the potential for protected species and habitats to be present on a site at Corkscrew Lane, Ashby-de-la-Zouch, to inform the local plan. The survey area included an arable field and associated margins and hedgerows.
- ii To complete a preliminary ecological assessment of the proposals, a desk-based assessment, Extended Phase 1 Habitat Survey, and a preliminary protected species assessment were carried out. Taken together, in common with the Chartered Institute of Ecology & Environmental Management's (CIEEM) 2017 publication this is termed as a Preliminary Ecological Appraisal (PEA). This report aims to provide general advice on ecological constraints associated with any development of the site. Therefore, this assessment is considered 'preliminary' until any required protected species, habitat or invasive species surveys can be completed and the results are then updated into a final 'Ecological Impact Assessment', which can be used to lawfully determine a planning application in line with current planning policy¹. A standalone PEAR can be used for the following:
 - Scoping for an Environmental Impact Assessment (EIA);
 - an assessment as to whether a particular site should be included as an allocated site in a development plan;
 - nature conservation development plans;
 - sustainability appraisals (e.g. BREEAM); or
 - an assessment of likely compliance with statutory obligations for developments which do not require planning consent or under Permitted Development Rights.
- iii The study area was defined within an image provided by the client as well as considering desk study data and applicable legislation (Appendix 2) as shown in the enclosed Site Location Plan (Figure 1) and Phase 1 Habitat plan (Figure 2) plus a buffer zone extended to include the Zone of Influence (see section below) of the proposals (hereafter referred to as the "Site").
- iv This preliminary appraisal is based on a review of the development proposals provided by the Client, desk study data (third party information) and a survey of the Site. The aims of this report are to:
 - Classify the habitat types at the site based on standard Phase 1 Habitat survey methodology;
 - Evaluate any potential for protected or priority species/habitats to be present;
 - Identify any ecological constraints that may affect the scheme design;
 - Provide recommendations for any further surveys that might be required (for example to confirm presence / likely absence of protected species), which would need to be obtained for a subsequent EclA in order for a planning decision to be concurrent with current planning policy; and
 - Identify opportunities for ecological enhancement to provide net biodiversity gain in line with the National Planning Policy Framework (NPPF, 2021).
- v This report pertains to these results only; recommendations included within this report are the professional opinion of an experienced ecologist and therefore the view of RammSanderson Ecology Ltd.

¹ Office of the Deputy Prime Minister Circular 06/05: Biodiversity and Geological Conservation - Statutory Obligations and Their Impact Within The Planning System

- vi The surveys and desk-based assessments undertaken as part of this review and subsequent report including the Ecological Constraints and Opportunities Plan are prepared in accordance with the British Standard for Biodiversity Code of Practice for Planning and Development (BS42020:2013).

2.2 Zone of Influence

- i The Zone of Influence (Zoi) is used to describe the geographic extent of potential impacts of a proposed development. The Zone is determined by the development proposals in relation to individual species' ecological requirements indicated in best practice guidelines.
- ii In relation to great crested newts (GCN), the Zoi is considered to be up to 500m from the site boundaries, as this is the distance that Natural England would require to be considered in relation to GCN licensing.
- iii For badgers (*Meles meles*), the zone of influence is typically 30-50m from the Site boundary as this is the distance within which a sett can be damaged or disturbed by heavy machinery.
- iv As bats are highly mobile species, the Zoi for these can be 5km from a site wherein high-quality habitat will be impacted by proposals.
- v For designated sites, the Zone of Influence can be >10km from the site and this is termed the Impact Risk Zone (IRZ). Where sites occur within an IRZ the requirement for a Habitat's Regulations Assessment or Environmental Impact Assessment may be triggered.

2.3 Site Context and Location

- i The Site (central grid reference: SK 37787 16196) is situated to the east of Ashby-de-la-Zouch, a town in north-west Leicestershire. Corkscrew Lane lies immediately adjacent to its north-western boundary and the A511 is immediately adjacent to its eastern boundary. The KSL Knighton Junction Swannington and Leicester Junction Railway Line is immediately adjacent to its south-western boundary. The land surrounding the Site is predominantly agricultural and woodland, with Breach Wood beyond the railway line to the south of the project, which links onwards to other woodland in the area forming part of the National Forest.

Figure 1: Site Location Plan



3 METHODOLOGY

3.1 Preliminary Appraisal

- i The preliminary ecological appraisal is based on the standard best practice methodology provided by the Guidelines for Preliminary Ecological Appraisal (CIEEM, 2017). The assessment identifies sites, habitats, species, and other ecological features that are of value based on factors such as legal protection, statutory or local site designations such as Sites of Special Scientific Interest (SSSI) or Local Wildlife Sites (LWS) or inclusion on Red Data Book Lists or Local Biodiversity Action Plans. Based upon this, recommendations for further, more detailed surveys are made as appropriate to confirm presence / likely absence of a protected species.
- ii In identifying constraints, the review considers the Client's Site proposals and any subsequent recommendations made are proportionate / appropriate to the site and have considered the Mitigation Hierarchy as identified below:
 - **Avoid:** Provide advice on how the development may proceed by avoiding impacts to any species or sites by either consideration of site design or identification of an alternative option.
 - **Mitigate:** Where avoidance cannot be implemented mitigation proposals are put forward to minimise impacts to species or sites as a result of the proposals. Mitigation put forward is proportionate to the site.
 - **Compensate:** Where avoidance cannot be achieved any mitigation strategy will consider the requirements for site compensatory measures.
 - **Enhance:** The assessment refers to planning policy guidance (e.g. NPPF) to relate the ecological value of the site and identify appropriate and proportionate ecological enhancement in line with both national and local policy.

3.2 Desk Based Assessment

- i Data regarding statutory and non-statutory designated sites, plus any records of protected or Priority species and habitats was requested from the local ecological records centre and online resources, details of which are provided in Table 2 below.

Table 2: Consulted resources

Consultee/Resource	Data Sought	Search Radius from Boundary
Leicestershire and Rutland Environmental Records Centre	Non-Statutory Site Designations Protected/Principal Species Records	2km
www.magic.gov.uk ^{2 3}	Statutory Site Designations and Impact Risk Zones	5km
	Habitats of Principal Importance (NERC Act, 2006)	1km
	Granted European Protected Species Licences	5km

² Multi Agency Geographic Information for the Countryside Interactive GIS Map.

³ MAGIC resource was reviewed on the 15th February 2022.

NB: Desk study data is third party controlled data, purchased or consulted for the purposes of this report only. RammSanderson Ecology Ltd cannot vouch for its accuracy and cannot be held liable for any error(s) in these data.

3.3 Phase 1 Habitat Survey

- i An extended Phase 1 Habitat Survey of the site was completed to identify habitats present. All habitats within the site boundary were described and mapped following standard Phase 1 Habitat Survey methodology (JNCC, 2010), which categorises habitat type through the identification of individual plant species.
- ii Nomenclature follows Stace (Stace, 2010) for vascular plant species and the DAFOR scale for relative abundance was used in the field to determine dominant plants within habitats and communities (D = dominant, A = abundant, F = frequent, O = occasional and R = rare).

3.4 Protected / Priority Species Scoping Assessment

- i The habitats on site were assessed for their suitability for supporting any legally protected or Priority species that would be affected by the proposed development. This includes invasive non-native plant species such as Japanese knotweed (*Fallopia japonica*), Himalayan balsam (*Impatiens glandulifera*) and giant hogweed (*Heracleum mantegazzianum*).

3.5 Biodiversity Impact Assessment – Baseline Calculations

3.5.1 Outline Procedure

- i An initial Biodiversity Impact Assessment was carried out in accordance with guidelines published by DEFRA and via the DEFRA Metric Calculation Tool 3.0. The existing value of individual habitats on site is initially calculated by accurately mapping the proposed development site from information collected during a Biodiversity Scoping Assessment/Phase 1 Habitat Survey and by dividing the land into individual habitat parcels. This part of the study is informed by JNCC Phase 1 habitat and UK habitats classification systems. The distinctiveness, condition, connectivity, and strategic significance of these parcels is then assessed and together with the area of each habitat, a value is assigned. A summary of how habitat distinctiveness, condition assessment, connectivity and strategic significance is determined is detailed within DEFRA best practice literature.

3.5.2 Calculation

- ii Once the habitat types have been input into the Biodiversity Impact Assessment calculator, along with their area, distinctiveness, condition, connectivity and strategic significance an overall score in biodiversity units is calculated.

3.5.3 Compensation

- iii Since there are no finalised proposals for the site at this stage, the value of proposed habitat cannot be calculated and it cannot be determined whether plans will achieve a net gain in biodiversity.
- iv This can, however, be calculated at a later stage. This would be calculated using the methodology applied above, taking into account the area/length of indicatively proposed habitats, their distinctiveness, condition, connectivity and strategic significance once this is established. A further two parameters are also taken into consideration at this stage. These are the time it will take to reach this target condition and the difficulty of creating/restoring each habitat type proposed. By using these parameters, the calculation takes into account that the time it takes for a habitat to establish may result in a loss of biodiversity for a period of time and also the risk of failure associated with any habitat creation/restoration.

3.6 Limitations

- i It should be noted that whilst every effort has been made to provide a comprehensive description of the site, no investigation could ensure the complete characterisation and prediction of the natural environment.
- ii The main floristic season is April to September. Surveys conducted outside of this time may under record botanical species and habitats of note. However, due to the types of habitats present in the survey area, the time of year is not seen as a limitation to overall habitat classification in this instance.

3.7 Accurate lifespan of ecological data

- i The majority of ecological data remain valid for only short periods due to the inherently transient nature of the subject. The survey results contained in this report are considered accurate for approximately 18 months from the date of survey, notwithstanding any considerable changes to the site conditions, the presence of mobile species such as bats, otters and badgers, or where species/county specific guidance dictates otherwise (CIEEM, 2019).

4 RESULTS

4.1 Surveyors and Survey Conditions

- i The survey was carried out by Oliver Ramm BSc, MCIEEM. Oliver has been a professional ecologist for 18 years and holds level 2 bat (2015-18804-CLS-CLS) and great crested newt (2016-22560-CLS-CLS) licences. The survey was completed during suitable conditions as detailed in the table below.

Table 3: Summary of conditions during survey

Abiotic Factor	Survey 1
Survey type	PEA
Date completed	02/02/2022
Temperature (°C)	5
Wind speed (Beaufort Scale)	3
Cloud cover (Oktas Scale)	8
Precipitation	0

4.2 Desk Study

- i A total of six statutory designated sites were recorded within the search area, the details of which are summarised in Table 4 below. The site is located within the Impact Risk Zone (IRZ) of a statutory designated site.

Table 4: Statutory Designated Sites

Site Name	Designation	Location	Brief Description
New Lount	LNR ⁴	2.4km NE	Includes four ponds, with support a range of invertebrate fauna, especially Odonata. Also noted for its bird diversity.
River Mease	SSSI ⁵ /SAC ⁶	2.4km SW	Represents a lowland clay river supporting nationally significant populations of spined loach (<i>Cobitis taenia</i>) and bullhead (<i>Cottus gobio</i>), two internationally notable species of native freshwater fish with a restricted distribution in England.
Lount Meadows	SSSI	2.7km N	Includes some of the best examples of slightly acidic neutral grassland in Leicestershire and is representative of such grasslands in the English Midlands.
Nature Alive	LNR	3.8km E	A site rich in flora and fauna. Noted for aquatic fauna, such as water voles (<i>Arvicola amphibius</i>) and great crested newts (<i>Triturus cristatus</i>).

⁴ LNR – Local Nature Reserve

⁵ SSSI - Sites of Special Scientific Interest

⁶ SAC - Special Areas of Conservation

Site Name	Designation	Location	Brief Description
Snibston Grange	LNR	4km SE	Includes a Victorian arboretum with a diverse range of mature tree species, a wetland area, a wildflower meadow, and two fishing lakes.
Dimminsdale	SSSI	5km N	Contains ancient semi-natural woodland of a type uncommon in lowland Britain, one of the largest areas of unimproved acidic grassland remaining in Leicestershire, and disused lead workings of national geological importance.

- ii The Site lies within 5km of River Mease SSSI/SAC, Lount Meadows SSSI, and Dimminsdale SSSI. The proposals are of a type (listed below) that is included within the Impact Risk Zones for these European and Nationally designated sites.
- iii Sixty-five non-statutorily designated sites were also identified within the search radius, details of which are provided in Table 5.

Table 5: Non-Statutory Designated Sites

Site Name	Designation	Location	Brief Description
Corkscrew Lane Roadside Verge (North Side)	cLWS ⁷	30m NE	Mesotrophic grassland.
Lounge former coal site	cLWS	40m NW	Post-industrial site with mixed grassland, including calcareous and acid grassland indicators; large population great crested newt (<i>Triturus cristatus</i>); early successional communities, ponds and wet flushes.
Ashby de la Zouch – M42, A511, A512 and bypass verges	cLWS	405m NW	Verges and flood basin associated with M42 junction - species-rich mesotrophic and mixed grassland.
Packington, Coleorton Lane hedges	cLWS	0.5km SW	Species-rich hedgerow on either side of Coleorton Lane between village and Leicester Rd.
Demoniac Plantation	cLWS	0.6km SE	Oak/Ash Woodland with native Bluebells and patches of wet Alder/Willow/Aspen woodland, with stream in deep gully and bank along western edge; plus damp ride between Demoniac and Breach plantations.
Coalfield Way, Plot 13	cLWS	0.7km W	Mesotrophic grassland.
Demoniac Plantation Ash	cLWS	0.7km S	Mature tree.
Alton Woodland and Scrub	cLWS	0.8km SE	Woodland; large multi-stemmed <i>Tilia cordata</i> .

⁷ cLWS – Candidate Local Wildlife Site

Site Name	Designation	Location	Brief Description
Ashby de la Zouch, East of Leicester Road Ash 3	cLWS	0.8km W	Mature Tree.
Ashby de la Zouch, west of Leicester Rd	cLWS	0.8km W	Two unmanaged fields, with species-rich wet grassland in E/SE parts of eastern field and centre/NE/SE parts of western field. Drier areas relatively species-poor.
Coalfield Way, Plot 14	cLWS	0.8km NW	Mesotrophic and wet grassland, scrub, on post-industrial land.
Coleorton Farm Town West Farm Hedgerow	cLWS	0.8km E	Hedgerow.
Ashby de la Zouch, East of Leicester Road Ash 2	cLWS	0.9km W	Mature Tree.
Coleorton, A511 (N) verges west of Sinope	cLWS	0.9km SE	Verge in steep cutting along main road, species-rich grassland and tall herbs.
Alton Grange grassland	cLWS	1km S	Wet grassland.
Alton Grange Ponds 1 & 2	cLWS	1km S	Two Ponds, surrounded by species-rich grassland.
Ashby de la Zouch, former aquatic plant nursery, Nottingham Rd	cLWS	1km NW	Lake with marginal swamp; smaller ponds with great crested newts, barn owl (<i>Tyto alba</i>) roost, species-rich wet grassy fringes, plantation woodland.
Coleorton, hedges along Farm Town lane (S) and new plantation	cLWS	1km SE	Species rich hedgerows.
Alton Grange Pond 3 and Grassland	cLWS	1.1km S	Pond and species-rich wet grassland.
Alton Woodland 2 (Daisy Plantation)	cLWS	1.1km S	Wet woodland.
Ashby de la Zouch, East of Leicester Road Ash 1	cLWS	1.1km W	Mature Tree.
Church Town Woodland (72866)	cLWS	1.1km NE	Woodland and mature tree.
Packington, Sunnyside Wood pond and rides	cLWS	1.1km SW	Large pond, with fringe of reeds and other emergent vegetation, plus <i>Salix spp</i> ; rides and area under sparse Poplar plantation species-rich marshy grassland.

Site Name	Designation	Location	Brief Description
Mature Oak	pLWS ⁸	1.2km SW	Mature tree.
Alton Grange hedgerow	pLWS	1.3km S	Species rich field hedge between arable and ley fields, with standard Ash.
Ashby Meadow	cLWS	1.3km N	Mesotrophic grassland.
Coleorton Woodland	cLWS	1.4km E	Woodland.
Packington Field Pond and grassland	cLWS	1.4km S	Pond with Floating pondweed, plus fringe of species-rich grassland; strip of species-rich grassland and tall herbs along woodland edge to east.
Alton Grange Ash	pLWS	1.5km SE	Large Ash in field corner, with branch scars and crown deadwood, and two large exposed roots.
Quaker's Wood (part)	cLWS	1.5km S	Woodland.
Ashby de la Zouch balancing pond	cLWS	1.6km N	Balancing pond with floating pondweed.
Coleorton, Alton Hill/A511(S) road verge	cLWS	1.6km SE	Verge along main road and lane junction, species-rich grassland and tall herbs.
Coleorton, railway wood W of Sinope	cLWS	1.6km SE	Woodland, plus large multi-stemmed elm tree; well-used by local community.
Nottingham Road Service Res. Grassland	cLWS	1.6km N	Mesotrophic grassland.
Pingle Plantation	cLWS	1.6km S	Woodland.
Pingle Plantation Ash	cLWS	1.6km S	Mature tree.
Quaker Wood Pond and grassland	cLWS	1.6km S	Pond; wet grassland.
Church Town Grassland	cLWS	1.7km E	Mesotrophic grassland.
Lount disused workings	cLWS	1.7km N	Mesotrophic grassland, scrub, pond.
Old Parks Ash 3	cLWS	1.7km N	Mature tree.

⁸ pLWS – potential Local Wildlife Site

Site Name	Designation	Location	Brief Description
Old Parks Hedgerow	cLWS	1.7km N	Hedgerow.
Old Parks Oak 3	cLWS	1.7km N	Mature tree.
Packington, Springfield Wood Stream	cLWS	1.7km S	Small river or stream.
Quaker Wood Pond 1	cLWS	1.7km S	Pond.
The Altons Track Woodland	cLWS	1.7km S	Woodland.
Ashby de la Zouch, Prior Park Beech and Horse Chestnut	cLWS	1.8km E	Three veteran horse chestnuts (<i>Aesculus hippocastanum</i>) and one beech (<i>Fagus sylvatica</i>) of 1200mm diameter (=3.77m girth) plus two further near-veteran Horse Chestnut and Beech of 1000mm girth along a path in open space parkland.
Nottingham Road Hedge Ash	cLWS	1.8km N	Mature tree.
Packington Nook Ash 2	cLWS	1.8km SW	Mature tree.
Packington, Coleorton Lane Ash	pLWS	1.8km SW	Large veteran Ash in hedgerow of horse paddock.
Packington, Drum and Monkey Lane Hedgerow and Ash	cLWS	1.8km SW	Total species 5 plus 3 associated features: old layers/deadwood, 4 standards (inc LWS) and parallel hedgerow (species rich).
Church Town Churchyard	cLWS	1.9km E	Mesotrophic grassland.
Church Town Marsh	cLWS	1.9km E	Wet grassland.
Church Town Woodland (72842)	cLWS	1.9km E	Woodland.
Eastern Old Parks Farm Hedgerow 5	cLWS	1.9km N	Hedgerow.
Hill Farm Pond 1	cLWS	1.9km S	Pond with <i>Potamogeton natans</i> .
Packington Nook Ash 3	cLWS	1.9km SW	Mature tree.
Packington Nook Willow 3	cLWS	1.9km W	Mature tree.
Packington Nook Willow and Ash trees	cLWS	1.9km SW	Mature tree.
Packington, Spring Lane hedgerows	cLWS	1.9km SW	Two species rich hedges on edge of paddock (proposed development site).

Site Name	Designation	Location	Brief Description
Sinope Grassland	cLWS	1.9km SE	Mesotrophic grassland, destroyed in 2015.
Church Town Pasture	cLWS	2km E	Mesotrophic grassland.
Church Town Pasture 2	cLWS	2km E	Mesotrophic grassland.
Coleorton Moor Grassland	cLWS	2km E	Mesotrophic grassland.
Eastern Old Parks Farm Hedgerow 3	cLWS	2km E	Hedgerow; <i>Tilia cordata</i> , presumed planted.
Jubilee Plantation	cLWS	2km S	Woodland.

- iv There are 75 Habitats of Principal Importance under Section 41 of the NERC Act, 2006 located within a 1km radius of the site. These are shown in table 6 below, with the distance and direction of the closest habitats in regard to the site referenced. The closest is a parcel of young trees adjacent to the south-western boundary.

Table 6: Habitats of Principal Importance within 1km of the Site

Habitat	Quantity	Closest Habitat - Distance to Site	Closest Habitat - Direction to Site
Woodland- Young Trees	10	Adjacent	South-west
Assumed woodland	8	200m	South-west
Deciduous Woodland	40	400m	East
Broad leaved woodland	15	400m	East
Woodland – ground prep	1	0.6km	East
Wood-pasture and parkland	1	0.9km	North

- v Records of previous European Protected Species Licences (EPSL) were discovered within a 5km search area around the site. This included:
- Seven records of bat licences, concerning brown long-eared bat (*Plecotus auritus*), common pipistrelle (*Pipistrellus pipistrellus*), and soprano pipistrelle (*Pipistrellus pygmaeus*). The most recent licence (2018-37869-EPS-BDX) was granted in October 2018 and allowed destruction of a soprano pipistrelle breeding site and resting place. The closest licence (2017-31234-EPS-MIT) was located approximately 2.5 kilometres to the north-east and allowed destruction of a common pipistrelle resting place.
 - Five records of great crested newt (*Triturus cristatus*) licences. The most recent licence (2020-49282-EPS-MIT) was granted in September 2020 and allowed damage to a resting place. This was also the closest licence was located approximately 160 metres to the north-west. The fencing from this licence remains in place and is the main barrier to GCN disposal toward the site.

- vi Protected species records were received from Leicestershire and Rutland Environmental Records Centre. A summary of the records considered most relevant to the site and/or proposed development are provided in Table 7. Full species records are available to view upon request.

Table 7: Summary of Protected and Notable Species Records

Common Name	Scientific Name	Records	Conservation Status
Amphibians			
Smooth newt	<i>Lissotriton vulgaris</i>	99 records; closest 125m W	Partial protection under WCA ⁹
Common frog	<i>Rana temporaria</i>	89 records; closest 125m W	Partial protection under WCA
Great crested newt	<i>Triturus cristatus</i>	89 records; closest 130m WSW	EPS ¹⁰ , NERC ¹¹ , WCA (5) ¹²
Common toad	<i>Bufo bufo</i>	10 records; closest 215m WSW	NERC, Partial Protection under WCA
Palmate newt	<i>Lissotriton helveticus</i>	3 records; closest 0.9km W	Partial protection under WCA
Mammal			
Pipistrelle species	<i>Pipistrellus sp.</i>	16 records; closest 440m WNW	EPS, WCA, NERC
European hedgehog	<i>Erinaceus europaeus</i>	39 records; closest 0.8km W	NERC
Brown long-eared bat	<i>Plecotus auritus</i>	7 records; closest 0.9km NW	EPS, WCA, NERC
Unidentified bat	<i>Chiroptera</i>	6 records; closest 1km NNW	EPS, WCA
European otter	<i>Lutra lutra</i>	1 record; 1.3km WSW	EPS, WCA, NERC
Noctule	<i>Nyctalus noctula</i>	5 records; closest 1.5km WNW	EPS, WCA, NERC
Water vole	<i>Arvicola amphibius</i>	2 records; closest 1.5km NW	WCA, NERC
Myotis species	<i>Myotis sp.</i>	3 records; closest 1.7km WNW	EPS, WCA

⁹ WCA – Wildlife & Countryside Act (1981) Section 5 protecting against trade or sale of species.

¹⁰ EPS – European Protected Species - protected by the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019

¹¹ NERC – Species of Principle Importance under Section 41 of the Natural Environment Rural Communities Act (2006) Species of Principal Conservation Importance; UKBAP & LBAP

¹² WCA (5) – Schedule 5 protected species - Wildlife & Countryside Act (1981)

Common Name	Scientific Name	Records	Conservation Status
Brown hare	<i>Lepus europaeus</i>	1 record; 1.7km SSE	NERC
Soprano pipistrelle	<i>Pipistrellus pygmaeus</i>	2 records; closest 1.9km NW	EPS, WCA, NERC
Daubenton's	<i>Myotis daubentonii</i>	1 record; 2km ENE	EPS, WCA
Eurasian badger	<i>Meles meles</i>	33 records within 2km of the site.	PBA ¹³
Birds			
Willow tit	<i>Poecile montanus</i>	5 records; closest 365m E	BoCCRed ¹⁴ , NERC
Barn owl	<i>Tyto alba</i>	7 records; closest 440m WNW	WCA (1)
Bullfinch	<i>Pyrrhula pyrrhula</i>	14 records; closest 440 WNW	BoCCAmber, NERC
Cuckoo	<i>Cuculus canorus</i>	15 records; closest 440m WNW	BoCCRed, NERC
Dunnock	<i>Prunella modularis</i>	16 records; closest 440m WNW	BoCCAmber, NERC
Grasshopper warbler	<i>Locustella naevia</i>	2 records; closest 440m WNW	BoCCRed, NERC
Lapwing	<i>Vanellus vanellus</i>	18 records; closest 440m WNW	BoCCRed, NERC
Linnet	<i>Linaria cannabina</i>	7 records; closest 440m WNW	BoCCRed, NERC
Little ringed plover	<i>Charadrius dubius</i>	1 record; 440m WNW	WCA(1)
Marsh tit	<i>Poecile palustris</i>	2 records; closest 440m WNW	BoCCRed, NERC
Reed bunting	<i>Emberiza schoeniclus</i>	8 records; closest 440m WNW	BoCCAmber, NERC
Song thrush	<i>Turdus philomelos</i>	14 records; closest 440m WNW	BoCCAmber, NERC
Starling	<i>Sturnus vulgaris</i>	10 records; closest 440m WNW	BoCCRed, NERC
Swift	<i>Apus apus</i>	14 records; closest 440m WNW	BoCCRed

¹³ PBA – Protection of Badgers Act 1992¹⁴ Birds of Conservation Concern (2021)

Common Name	Scientific Name	Records	Conservation Status
Yellowhammer	<i>Emberiza citrinella</i>	16 records, closest 440m WNW	BoCCRed, NERC
Yellow wagtail	<i>Motacilla flava</i>	7 records; closest 0.5km SSE	BoCCRed, NERC
Curlew	<i>Numenius arquata</i>	6 records; closest 0.6km WSW	BoCCRed, NERC
Grey partridge	<i>Perdix perdix</i>	3 records; closest 0.8km SSE	BoCCRed, NERC
Tree sparrow	<i>Passer montanus</i>	6 records; closest 0.8km SSE	BoCCRed, NERC
Fieldfare	<i>Turdus pilaris</i>	7 records; closest 1km NW	BoCCRed, WCA (1)
Hobby	<i>Falco subbuteo</i>	2 records; closest 1km NW	WCA (1)
Lesser redpoll	<i>Acanthis cabaret</i>	2 records; closest 1km SSE	BoCCRed, NERC
Spotted flycatcher	<i>Muscicapa striata</i>	2 records; closest 1km SSE	BoCCRed, NERC
Lesser spotted woodpecker	<i>Dryobates minor</i>	1 record; 1.2km SSE	BoCCRed, NERC
Turtle dove	<i>Streptopelia turtur</i>	1 record; 1.2km ENE	BoCCRed, NERC
Peregrine	<i>Falco peregrinus</i>	1 record; 1.3km W	WCA1
Red throated diver	<i>Gavia stellata</i>	1 record; 1.4km WSW	WCA1
House martin	<i>Delichon urbicum</i>	2 records, closest 1.8km WSW	BoCCRed
Redwing	<i>Turdus iliacus</i>	7 records; closest 1.8km SSE	BoCCAmber, WCA (1)
Skylark	<i>Alauda arvensis</i>	17 records; closest 1.8km SSE	BoCCRed, NERC
Brambling	<i>Fringilla montifringilla</i>	1 record* ¹⁵	WCA (1)
Common crossbill	<i>Loxia curvirostra</i>	1 record	WCA (1)

Invertebrates

¹⁵ *No precise grid reference provided but deemed to be within 2km of the site.

Common Name	Scientific Name	Records	Conservation Status
Dingy skipper	<i>Erynnis tages</i>	15 records; closest 300m NW	NERC
Grizzled skipper	<i>Pyrgus malvae</i>	1 record; 440m WNW	NERC
Cinnabar	<i>Tyria jacobaeae</i>	4 records; closest 0.5km N	NERC
Small heath	<i>Coenonympha pamphilus</i>	9 records; closest 0.5km N	NERC
Forester	<i>Adscita statices</i>	1 record; 0.5km N	NERC
Garden tiger	<i>Arctia caja</i>	1 record; 0.5km N	NERC
Broom moth	<i>Ceramica pisi</i>	1 record; 0.6km WSW	NERC
Narrow-bordered five-spot burnet	<i>Zygaena lonicerae</i>	2 records; closest 0.7km NW	WCA(5)
Blood-vein	<i>Timandra comae</i>	1 record; 1.2km NNW	NERC
Wall	<i>Lasiommata megera</i>	1 record; 1.9km NE	NERC
Latticed heath	<i>Chiasmia clathrata</i>	1 record; 2km N	NERC

Plants¹⁶

Bluebell	<i>Hyacinthoides non-scripta</i>	50 records; closest 360m E	WCA (8)
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Invasive Species

Himalayan balsam	<i>Impatiens glandulifera</i>	9 records; closest 0.9km NW	WCA (9) ¹⁷
Canadian waterweed	<i>Elodea canadensis</i>	5 records; closest 0.9km NW	WCA (9)
New Zealand pigmyweed	<i>Crassula helmsii</i>	9 records; closest 0.9km NW	WCA (9)
Sika deer	<i>Cervus nippon</i>	2 records; closest 0.9km NW	WCA (9)
Wall cotoneaster	<i>Cotoneaster sp.</i>	0.9km NW	WCA (9)
Japanese knotweed	<i>Fallopia japonica</i>	5 records; closest 1.1km NNW	WCA (9)

¹⁶ Local rare plant register species not included.

¹⁷ WCA (9) - Schedule 9 Wildlife and Countryside Act 1981 (as amended)

Common Name	Scientific Name	Records	Conservation Status
Variegated yellow archangel	<i>Lamiastrum galeobdolon</i> subsp. <i>argentatum</i>	3 records; closest 1.1km NNW	WCA (9)
Montbretia	<i>Crocsmia pottsii</i> x <i>aurea</i> = <i>C. x crocosmiiflora</i>	3 records; closest 1.1km NW	WCA (9)
Canada goose	<i>Branta canadensis</i>	1 record*	WCA (9)

NB: The desk study data is third party controlled data, purchased for the purposes of this report only. RammSanderson Ecology Ltd cannot vouch for its accuracy and cannot be held liable for any error(s) in these data.


4.3 Habitat Connectivity and Closest Relevant Records

- i. A review of online resources and desk study data was undertaken to assess the site with respect to its connectivity to the wider environment, particularly along linear features (rivers, railways, canals etc.) and any designated or protected sites. This assessment enables the evaluation of a particular proposal in context of the wider environment with regard to the site itself and any species which may utilise the site.
- ii. The A511, a major road, is located to the Site's eastern boundary, and a railway line is located to the Site's south-western boundary. These features present a barrier to dispersal for terrestrial fauna across them (perpendicularly) but can encourage fauna to spread along them (linearly).
- iii. There are, however, well connected parcels of woodland and hedgerows surrounding the site and providing access to the wider landscape for commuting terrestrial species and avian species.

4.4 Phase 1 Habitat Survey

- i The survey area was dominated by an arable field, bordered by species-poor hedgerows. Full habitat descriptions and photos are provided below. For a Phase 1 Habitat Survey Plan refer to Figure 2.
- ii Habitat types detailed below are listed in order of the JNCC (2010) Handbook. The species list provided in this report reflect only those taxa observed during the survey. Species are listed in Appendix 4.

Table 8: Results of Site Survey

Habitat	Description	Area (m ²)	Proportion of site (%)	Ecological Importance & Outcome of Proposal	Photograph
C3.1 Tall herb and fern - ruderal	An approximately 0.5m wide field margin of tall herb vegetation was present alongside hedgerow 1 on the northern boundary. Species present included rosebay willowherb (<i>Chamaenerion angustifolium</i>), foxglove (<i>Digitalis sp.</i>), creeping thistle (<i>Cirsium arvense</i>), spear thistle (<i>Cirsium vulgare</i>), common nettle (<i>Urtica dioica</i>), and lesser burdock (<i>Arctium minus</i>).	47	<1%	Important as habitat for small mammals, herptiles, and invertebrates. Any clearance due to development will reduce habitat available for these species, however, due to the small size of this habitat, it is unlikely to have a significant impact.	

<p>J1.1 Arable land</p>	<p>Arable land was the predominant habitat on the Site and spanned the extent of the area.</p>	<p>117838</p>	<p>>99%</p>	<p>Of minimal ecological importance but clearance for development still likely to reduce biodiversity value of the site.</p>	
<p>J2.1.2 Intact species-poor hedgerow</p>	<p>There were three species-poor hedgerows on the Site. All hedgerows consisted of the same species composition: dominant common hawthorn (<i>Crataegus monogyna</i>), blackthorn (<i>Prunus spinosa</i>), elder (<i>Sambucus nigra</i>), holly (<i>Ilex aquifolium</i>), dog rose (<i>Rosa canina</i>), and bramble (<i>Rubus fruticosus</i>). Climbing species included ivy (<i>Hedera helix</i>) and honeysuckle (<i>Lonicera periclymenum</i>).</p> <p>Hedgerow 1 was located along the north-western and northern boundary, alongside Corkscrew Lane. It had been recently flailed to approximately 1.5 metres in height. Below hedgerow 1 on the northern boundary was a ditch containing standing water. To the south of hedgerow 1 on the northern boundary was an approximately 0.5 metre field margin separating it from the arable land. Along this north-western boundary this ditch continued but was dry.</p> <p>Hedgerow 2 was located along the eastern boundary to the north of the site, alongside the A511. It had been flailed on the eastern side (next to the arable field) but had grown higher on the top and the roadside. It consisted of the same species as Hedgerow 1. Below this hedgerow, there was a dry ditch adjacent to the road with dominant bramble.</p>	<p>1281m</p>	<p>N/A</p>	<p>Important for nesting birds, bat commuting and foraging activity, mammal and herptile commuting and refuge seeking.</p> <p>Considered a Priority Habitat and should be retained where possible during developments.</p>	

Hedgerow 3 began on the eastern boundary to the south of the site and continued along the south-western boundary. It had also been flailed on the side of the arable field but not on the road/rail side. There were two gaps in the hedgerow, of approximately 20 metres where de-vegetation had taken place on the cutting for bank stabilisation works.

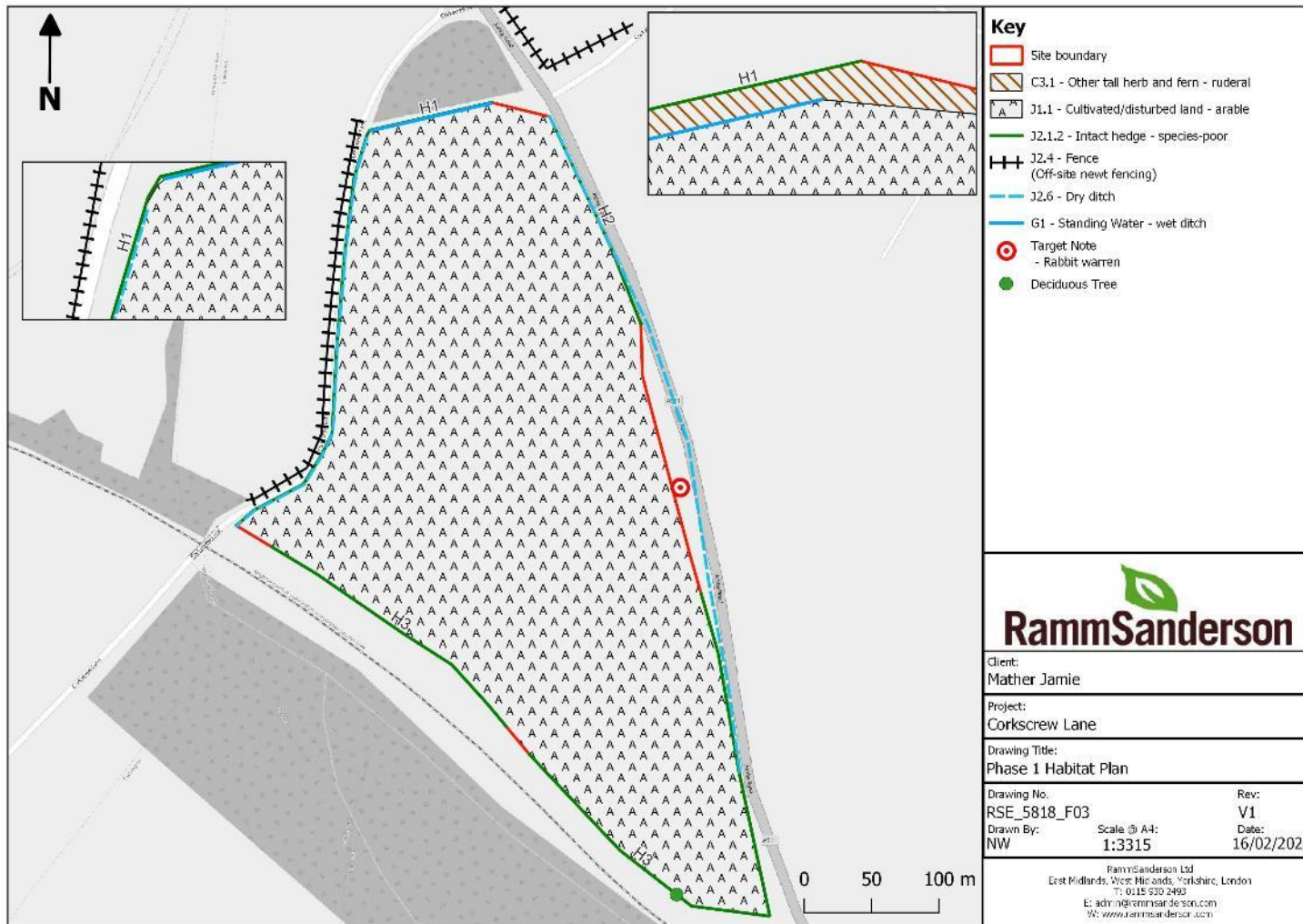
There was a single semi-mature English oak (*Quercus robur*) adjacent to the south-western corner of hedgerow 3. This was assessed as having negligible bat roost potential.



J2.4 - Fence	Off-site, to the north-west, on the other side of Corkscrew Lane, and to the north-east, on the other side of the A511, great crested newt (<i>Triturus cristatus</i>) mitigation fencing was noted.	N/A	N/A	An intentional (licensed) barrier to dispersal for great crested newts and other common amphibians.
Target note - rabbit warren	Amongst the area of woodland on the eastern boundary, a rabbit (<i>Oryctolagus cuniculus</i>) warren was recorded.	N/A	N/A	Of limited ecological importance but could be used by hibernating herptiles.
Target note - hedge gaps	Several gaps in hedgerow along railway line where works to cutting banks have been carried out and all vegetation removed. Off site, but noteworthy as it created gaps in the boundary vegetation.	N/A	N/A	N/A



Figure 2: Phase 1 Habitat Plan



4.5 Biodiversity Baseline

- i When assessed against the DEFRA Metric 3.0 for biodiversity, the site contains 23.59 baseline biodiversity units for habitat areas and 11.23 for hedgerows. No proposals for the site including post-intervention habitat creation has been incorporated into this calculation at present.
- ii These results can be viewed in Figure 3, and in the document RSE_5818 Biodiversity Metric 3.0.

Figure 3: Results of Biodiversity Impact Assessment

On-site baseline	Habitat units	23.59
	Hedgerow units	11.23
	River units	0.00
On-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
On-site net % change (Including habitat retention, creation & enhancement)	Habitat units	0.00%
	Hedgerow units	0.00%
	River units	0.00%
Off-site baseline	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Off-site post-intervention (Including habitat retention, creation & enhancement)	Habitat units	0.00
	Hedgerow units	0.00
	River units	0.00
Total net unit change (including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-23.59
	Hedgerow units	-11.23
	River units	0.00
Total on-site net % change plus off-site surplus (including all on-site & off-site habitat retention, creation & enhancement)	Habitat units	-100.00%
	Hedgerow units	-100.00%
	River units	0.00%
Trading rules Satisfied?	No - Check Trading Summary	

4.6 Preliminary Protected / Priority Habitats Assessment

4.6.1 Statutorily and Non-Statutorily Designated Sites

- i There are six statutory designated sites within five kilometres of the Site, namely New Lount LNR, River Mease SSSI/SAC, Lount Meadows SSSI, Nature Alive LNR, Snibston Grange LNR, and Dimminsdale SSSI. New Lount LNR is located approximately 2.4 kilometres to the north-east, and River Mease SSSI/SAC is located approximately 2.4 kilometres to the south-west; these are the closest sites. New Lount is designated for its wetland habitat but is not considered to be well connected to the Site. The River Mease is designated for its populations of spined loach (*Cobitis taenia*) and bullhead (*Cottus gobio*). There is a watercourse approximately 250 metres to the south-west of the site that appears to be continuously connected to this river. The Site is within the Impact Risk Zone of this statutory designated site, with relevance to all planning applications except for householder applications.
- ii As the River Mease is a European site classified under the Habitats Directive, the potential for Likely Significant Effects upon its citation criteria will need to be screened as the local plan process progresses, via a Habitats Regulations Assessment (Screening (Stage 1) and Appropriate Assessment (Stage 2)). If this

site is not incorporated into the local plan, a shadow Habits Regulations Assessment would be completed to accompany a planning application.

- iii There are 65 non-statutory designated sites within two kilometres of the Site, all of which are Local Wildlife Sites. The closest of these sites is Corkscrew Lane Roadside Verge (North Side), which is located approximately 30 metres to the north-east of the Site and is designated for its mesotrophic grassland. The next closest is Lounge Former Coal Site, approximately 40 metres to the north-west of the site, designated for its grassland, wetland, and great crested newt (*Triturus cristatus*) population (which has been fenced off and development proposals submitted). Development of the Site must be sensitive to not disturb or degrade these Local Wildlife Sites, through mechanisms such as pollution or increased visitor pressure.

4.6.2 Habitats

- iv The habitats on Site were generally of limited botanical interest and poor species diversity. The value of the hedgerows was noted in their potential to support some protected/Priority faunal species, rather than for their botanical interest. No protected or Priority plant species were observed, and all plant species encountered were common, widespread and characteristic of the common habitat types they represent. However, given the time of year the survey was conducted, it is possible some plant species present on the Site were not recorded.
- v The hedgerows bordering the Site offer value as ecological corridors for the dispersal of fauna and flora into the wider countryside. Whilst none of the hedgerows were considered 'ecologically important' under the Hedgerow Regulations (1997), all hedgerows formed of >80% native woody species are a 'Habitat of Principal Importance' under the NERC Act (2006). As such, they are a material consideration for planning.
- vi During the survey it was recorded that there were parcels of woodland immediately adjacent to the Site. To the northern boundary, there was a parcel of deciduous plantation woodland with semi-mature trees. To the south of hedgerow 3, there was a copse of broad-leaved woodland, consisting of birch (*Betula sp.*), oak (*Quercus sp.*), and hawthorn (*Crataegus sp.*). To the east of the site, alongside the boundary, between hedgerow 2 and hedgerow 3, there was a parcel of mixed broad-leaved and coniferous plantation woodland: larch (*Larix sp.*), Scots pine (*Pinus sylvestris*), ash (*Fraxinus excelsior*), alder (*Alnus glutinosa*), silver birch (*Betula pendula*), elder (*Sambucus nigra*), hazel (*Corylus avellana*), cherry (*Prunus avium*), field maple (*Acer campestre*), and English oak (*Quercus robur*). Adjacent to the south-western boundary, on the other side of the railway line, a larger parcel of mixed woodland (Breach Wood) was present, which had been identified by the desk study as 'young trees', planted presumably as part of the National Forest community woodland scheme. These parcels of woodland provide connectivity for commuting species and are linked via hedgerows.

4.6.3 Invasive Floral Species

- vii No invasive floral species were recorded on the Site.
- viii The closest invasive floral species records identified by the desk study were approximately 0.9km to the north-west and were Himalayan balsam (*Impatiens glandulifera*), Canadian waterweed (*Elodea canadensis*), New Zealand pigmyweed (*Crassula helmsii*) and *Cotoneaster sp.*

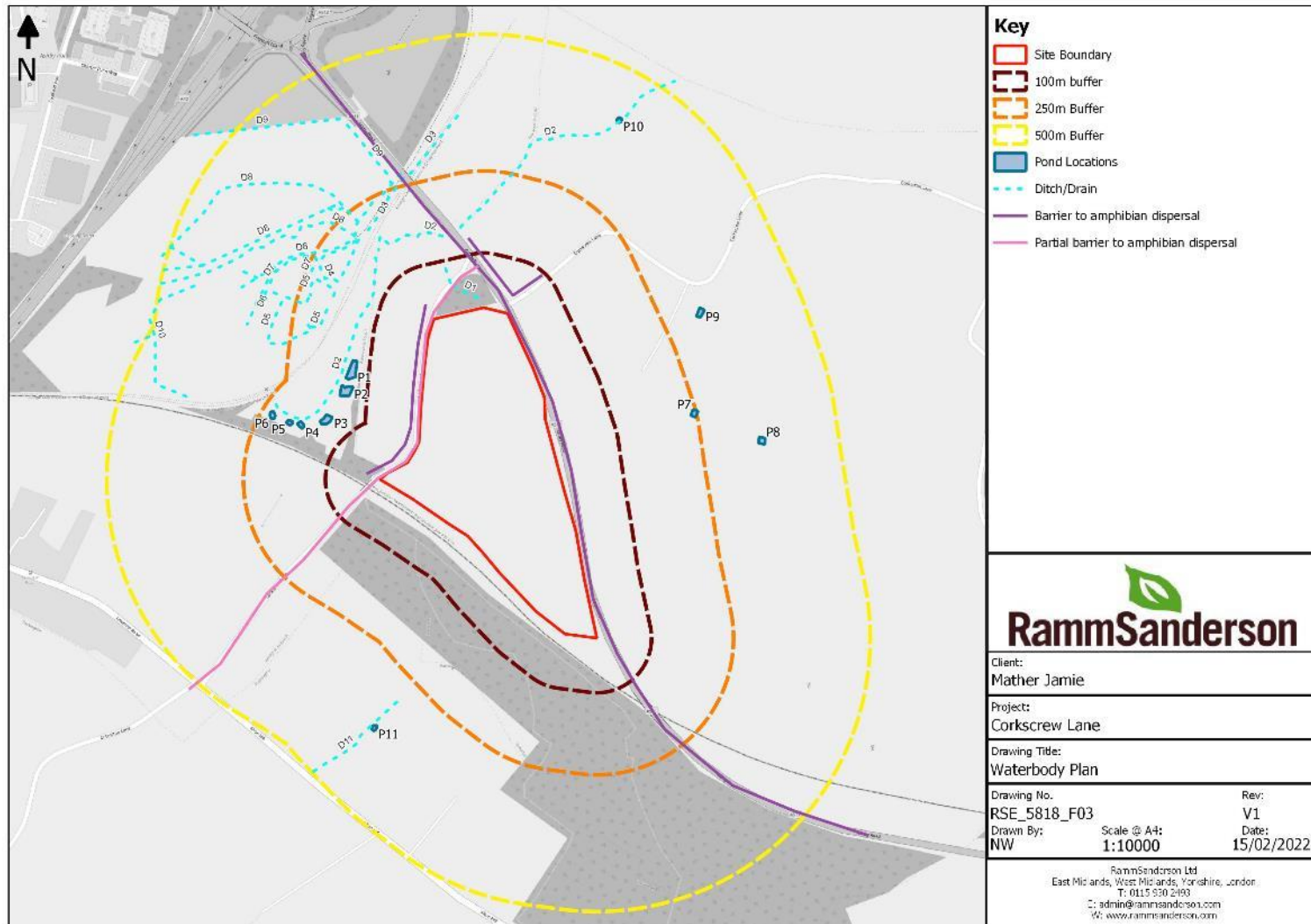
4.7 Preliminary Protected / Priority Species Assessment

- i The potential for protected species to be present on site and impacted by the proposals is discussed under the headings below.

4.7.2 Great Crested Newt (GCN)

- ii No ponds were located on the Site or within 100 metres. There were seven ponds within 250 metres of the Site (see Figure 4) and a further four ponds within 500 metres of the Site.
- iii Ponds 7 to 11 were located beyond major barriers to dispersal, i.e. the A511 and the railway line, therefore, they are discounted from further consideration.
- iv Ponds 1 to 6 were located to the west of the Site, beyond Corkscrew Lane. This road was not considered busy enough to present a major barrier to dispersal for any great crested newts (*Triturus cristatus*) or other amphibians. However, during the survey, newt fencing was recorded to the west and was deemed to be associated with these ponds, creating a barrier to dispersal.
- v A great crested newt licence was granted in 2020 approximately 160 metres to the north-west of the site. The Local Wildlife Site 'Lounge Former Coal Site' was also in this direction and was noted for its great crested newt population. It is therefore considered likely that ponds 1 to 6 are associated with this licence and development scheme.
- vi The desk study returned 89 local records of great crested newts within two kilometres of the Site (closest 130 metres west) and a total of five records of great crested newt licences within five kilometres of the Site. It can therefore be determined with a high level of certainty that great crested newts are present within the Zone of Influence of the Site.
- vii Most of the habitat on Site, i.e. the arable land, was deemed unsuitable for amphibian terrestrial activity. However, the tall ruderal, hedgerows, and woodland areas are suitable for great crested newt commuting and refuge seeking. Additionally, GCN are known to utilise mammal burrows for refuge and hibernation, and these were present on Site.
- viii Given the presence of GCN fencing and a road between ponds 1-6 and the site, taking all of the above into consideration, it is considered highly unlikely that GCN would be affected by proposals to develop this site and no further surveys, or mitigation are recommended for the species.

Figure 4: Waterbody Location Plan



4.7.3 Bats

Trees

- ix A semi-mature oak (*Quercus sp.*) was noted adjacent to the south-western corner of hedgerow 3. This was deemed to have negligible potential to support roosting bats due to a lack of potential roost features.
- x Whilst no potential roost features for bats were sighted from the surveyor's vantage point, a full assessment of the trees within the woodland parcels immediately adjacent to Site was not possible. Therefore, at this stage, it cannot be determined if any of the large trees immediately adjacent to the boundary have suitability to support roosting bats.

Foraging Habitat

- xi A total of 40 records of bat species were identified during the desk study. The closest record (*Pipistrellus sp.*) was located approximately 440 metres north-west. Seven records of bat licences were identified, the closest of which was approximately 2.5 kilometres to the north-east and allowed destruction of a common pipistrelle resting place. The presence of bat records in the locality increases the likelihood of them being present on the site.
- xii The hedgerows bordering the Site are likely used by bats for commuting and foraging activities, since these represent dark corridors in the landscape. This is especially relevant along the south-western boundary adjacent to the railway where there would be even less disturbance without passing vehicle headlights and it is well connected to a larger area of woodland.

Buildings

- xiii There were no buildings on the Site.

4.7.4 Birds

- xiv 16 bird species were recorded within half a kilometre of the site, including the following Schedule 1 or Birds of Conservation Concern Red List species: Willow tit (*Poecile montanus*), Barn owl (*Tyto alba*), Cuckoo (*Cuculus canorus*), Grasshopper warbler (*Locustella naevia*), Lapwing (*Vanellus vanellus*), Linnet (*Linaria cannabina*), Little ringed plover (*Charadrius dubius*), Marsh tit (*Poecile palustris*), Starling (*Sturnus vulgaris*), Swift (*Apus apus*), Yellowhammer (*Emberiza citronella*) and Yellow wagtail (*Motacilla flava*). A further 16 species were recorded within two kilometres of the Site.
- xv During the survey, a buzzard (*Buteo buteo*) was recorded flying over the site to the north. Three long-tailed tits (*Aegithalos caudatus*) were also recorded flying to the north-west.
- xvi The hedgerows and the woodland bordering the site provide suitable habitat for breeding birds. However, given the limited extent of this habitat, the Site is unlikely to support significant population numbers. The inundated parts of the field compartment would be suitable for lapwing, but as these areas are planted with crops, it is likely only be inundated temporarily.

4.7.5 Reptiles

- xvii The largest habitat area within the Site, i.e. arable, is not suitable for reptiles. The hedgerows offer some opportunities for reptiles to commute through the Site, however, the A511 and the railway line present major barriers to dispersal.
- xviii The desk study returned no records of reptiles within 2km of the Site. However, this is not evidence of their absence from the area.
- xix While unlikely, there is a residual chance reptile presence on the Site.

4.7.6 Water Vole, Otter and White Clawed Crayfish

- xx Not including the wet ditch on Site, there are 11 watercourses within 500 metres of the Site, all of which are ditches or drains. These are shown in Figure 4. The majority of these are to the north-west of the site, beyond ponds 1 to 6. These do not appear to be well connected to the wider landscape and mostly lead to an area of development in the town of Ashby-de-la-Zouch. Watercourse D11 to the south-west of the Site is well connected to the River Mease SSSI/SAC, however, it is separated from the Site by the railway line.
- xxi The desk study returned two records of water vole (*Arvicola amphibius*) of which the closest was approximately 1.5km north-west and one record of otter (*Lutra lutra*) approximately 1.3km south-west. These records are beyond barriers to dispersal and it is deemed unlikely these aquatic mammals are present on the Site.
- xxii The desk study returned no records of white clawed crayfish (*Austropotamobius pallipes*) within two kilometres of the Site. Due to a lack of suitable habitat and local records, further consideration of this species within this report is deemed unnecessary.

4.7.7 Badgers

- xxiii No evidence of badger (*Meles meles*) was detected during the survey.
- xxiv The desk study returned 33 records of badger within two kilometres of the site.
- xxv The hedgerows, woodland parcels and railway cuttings would be suitable for badger sett building and commuting activities, however, the A511 presents a major barrier to dispersal.
- xxvi Badgers could, however, reach the site from other directions without crossing this major road so it is considered possible that badgers are, at least transiently, present on the Site.

4.7.8 Other Priority Fauna Species

- xxvii The desk study returned 39 records of European hedgehog (*Erinaceus europaeus*) within two kilometres of the Site, the closest of which was approximately 0.8 kilometres west. Whilst the A511 and railway represent major barriers to dispersal for this mammal, the hedgerows on Site are suitable for hedgehog commuting, foraging, and refuge seeking. It is considered possible that this species is present on the Site, at least transiently.
- xxviii The desk study also returned one record of brown hare (*Lepus europaeus*), approximately 1.7km south-east. Hedgerows provide good connectivity to the wider landscape for this species and, whilst they usually favour grassland habitat, their presence on Site cannot be ruled out.
- xxix The desk study returned records of 11 Priority moth species within two kilometres of the Site. The closest of which was dingy skipper (*Erynnis tages*), recorded approximately 300 metres north-west. Moths may use the hedgerows on Site for foraging activities but this habitat is not unique to the site within the wider landscape is unlikely to support significant populations.
- xxx The desk study returned 10 records of common toad (*Bufo bufo*) within two kilometres of the site, the closest of which was approximately 215 metres to the west, likely associated with ponds 1 to 6. There were also 99 records of smooth newt (*Lissotriton vulgaris*) and 89 records of common frog (*Rana temporaria*), the closest of which were also likely associated with these ponds. Despite the barriers to dispersal for amphibians, as discussed in section 4.7.2, it is deemed possible that they are present on Site and that they may use the hedgerows for commuting and refuge seeking.
- xxxi The River Mease SSSI/SAC is designated for its notable fish species; spined loach (*Cobitis taenia*) and bullhead (*Cottus gobio*). Whilst these fish will not be present on the Site due to a lack of watercourses, impacts of development must be sensitive to pollution of watercourses.

xxxii Due to a lack of suitable habitats, the Site is not considered likely to support any other legally protected or Priority species.

5 DISCUSSION & RECOMMENDATIONS

5.1 Protected / Priority Species and Habitats Impact Appraisal

- i The potential for protected species or habitats to be present on site and impacted by the proposals is provided below.

Table 9: Assessment of Likelihood of Impacts to Protected Species/Habitats

Species/Habitat	Suitable Habitat on Site	Local Records	Likelihood of Impacts by Proposals	Mitigation	Further inputs
Designated sites – local and national designations	N/A	Six statutory designated sites within five kilometres of the Site and 65 non-statutory designated sites within two kilometres of the Site.	Site within the Impact Risk Zone of a SSSI and <50 metres from two LWS so it is considered likely that proposals will have an impact on designated site(s).	Consultation with Natural England will be required for any planning applications. SSSI/ LWS to be mitigated via on site drainage design and landscaping.	Mitigation strategy and condition assessment for LWS prior to pursuing planning permission.
Designated sites – International designations	N/A	River Mease SAC is 2.4km south west	Water borne pollution could enter the headwaters of the Mease via ditch and brook networks.	Potential for LSE should be screened through the Local Plan process via a Habitats Regulations Assessment.	Consult Natural England as part of Local Plan consultation
Habitats	Hedgerows on Site are Habitats of Principal Importance (NERC Act, 2006) and, as such, are a material consideration in planning.	Aside from the hedgerows, the closest Habitat of Principal Importance is woodland adjacent to the site to the north, south, and south-west.	Proposals unconfirmed at this stage but could involve removal of areas of hedgerow or de-vegetation works.	Retain hedgerows.	None recommended.
Great crested newt	No ponds on, or within 100 metres of, Site. But six ponds within 250 metres, considered likely to contain breeding GCN.	Five records of GCN licences within five kilometres of the site (closest 160m north-west in 2020). 89 records of GCN within	Although fencing is present currently, it is on 3 rd party land and could be removed. If any of ponds 1 to 6 were breeding ponds an	A District Level Licence could be sought to negate this issue and remove the risk of fencing being	No further surveys required, but a licence may need to be sought prior to commencement of proposals, once permission for development of the site is in place.

Species/Habitat	Suitable Habitat on Site	Local Records	Likelihood of Impacts by Proposals	Mitigation	Further inputs
	Hedgerows on Site facilitate commuting and Site not completely separated from these ponds by barriers to dispersal.	two kilometres of the site (closest 130m west).	offence caused by development would be likely in absence of mitigation. If GCN are present on Site, the works have the potential to disturb, injure, or kill them.	removed causing an issue in future.	
Bat tree roosts	Several large trees immediately outside of the Site boundary. No potential roost features for bats identified during the survey but full assessment not possible.	Seven bat licence records within 5km – unclear if for a building or tree roost.	Trees unlikely to be impacted by proposals.	Not required unless trees are to be felled or otherwise disturbed.	Not required unless trees are to be felled or otherwise disturbed.
Bat building roosts	No buildings on Site.	Seven bat licence records within 5km – unclear if for a building or tree roost.	N/A	N/A	None required.
Bat activity	Yes – hedgerows likely used by bats for commuting and foraging since they represent dark corridors and are well connected, especially to the south-western boundary.	40 records within two kilometres of the site (closest 440m north-west).	Proposals unconfirmed at this stage but if hedgerows are retained then impacts will only be anticipated if large amounts of nocturnal artificial lighting are installed. Any hedgerow removal unlikely to have a significant negative impact on local bat populations since it is limited in extent and there is other suitable habitat	Implement a bat-sensitive lighting strategy if night lighting to be installed, detailed within a CEMP and LEMP.	None recommended.

Species/Habitat	Suitable Habitat on Site	Local Records	Likelihood of Impacts by Proposals	Mitigation	Further inputs
			for commuting and foraging nearby.		
Birds	Yes – hedgerows likely used by birds for nesting.	32 species recorded within 2km of Site (16 within 0.5km).	Proposals unconfirmed at this stage but if hedgerows are retained no impacts are anticipated. Any hedgerow removal unlikely to have a significant negative impact on local bird populations since it is limited in extent and there is other suitable habitat for nesting nearby, i.e. woodland.	Avoid any vegetation clearance in hedgerows during bird nesting season (March – September, inclusive).	Where vegetation clearance must happen during nesting bird season, a nesting bird check will be required immediately prior to works. This must be carried out by a suitably qualified ecologist, and works will not be allowed to proceed if any active nests are found until all chicks have fledged.
Reptiles	Hedgerows suitable to allow commuting but limited suitable habitat for other activities.	No records identified in the desk study.	Proposals unconfirmed at this stage but if hedgerows are retained no impacts are anticipated. Removal of hedgerows unlikely to impact a population or sever linkages between populations and resources. If hedgerows to be removed, there is a risk of injury/death to any reptiles present during the works.	Follow a Precautionary Method of Works for reptiles during any hedgerow removal.	None required.
Water Vole and Otter	Minor watercourses (drains/ditches) within 500 metres of the Site	Two records of water vole (closest 1.5km NW) and one record of otter	Considered highly unlikely for these species to be present on Site. However, any development on site	Follow pollution prevention guidelines.	None required.

Species/Habitat	Suitable Habitat on Site	Local Records	Likelihood of Impacts by Proposals	Mitigation	Further inputs	
	but not well connected to the nearest river.	(1.3km SW) within two kilometres of the site.	must be sensitive to pollution of watercourses, which could degrade their habitat, since they are likely present in the locality.		If works are to commence > 6 months following the survey (i.e. after 02/08/2022), another walkover should be completed to check for any new badger setts, and appropriate action taken.	
Badger	Yes – hedgerows suitable for badger sett building and commuting.	33 records within 2km.	Proposals unconfirmed at this stage but if hedgerows are retained no impacts are anticipated. There are however risks to any badgers passing through the Site during construction works.	Follow a Precautionary Method of Works for badgers.		
Terrestrial invertebrates	Yes – hedgerow vegetation likely used by Priority moth species.	Records of 11 priority moth species within 2km (closest 300m NW).	Proposals unconfirmed at this stage but if hedgerows are retained no impacts are anticipated. Removal of hedgerows unlikely to have a significant negative impact on populations since they do not represent unique habitat in the landscape.	Not required.		None required.
Fish	No watercourses on site.	River Mease SSSI/SAC designated for its fish populations.	These species will not be present on Site, however, any development on site must be sensitive to pollution of watercourses, which could degrade their habitat, since they are	The local plan should be screened for Likely Significant Effects on the SAC via the HRA process. During construction, follow pollution prevention guidelines.		None required.

Species/Habitat	Suitable Habitat on Site	Local Records	Likelihood of Impacts by Proposals	Mitigation	Further inputs
			likely present in the locality.		
Priority Species	Yes – hedgerows suitable for hedgehog commuting, foraging, and refuge seeking. Brown hare may use hedgerows to commute. Common toad and other amphibians may also use the hedgerows and ditches for commuting and refuge seeking.	39 records of hedgehog (closest 0.8km west), one record of brown hare (1.7km south-east), and 10 records of common toad (closest 215m west).	Proposals unconfirmed at this stage but if hedgerows are retained no impacts are anticipated. Removal of hedgerows unlikely to have a significant negative impact on populations since they do not represent unique habitat in the landscape. However, development has the potential to injure or kill any of these species present at the time of the works.	Follow precautionary methods of works.	None recommended.
Invasive species	No invasive plants identified during survey.	Himalayan balsam, Canadian waterweed, New Zealand pigmyweed and <i>Cotoneaster sp.</i> 0.9km north-west.	No impact due to absence of invasive species on Site.	None required.	None required.
Biodiversity	Hedgerows and small area of tall ruderal vegetation of biodiversity value. Baseline habitat units are 23.59 and baseline hedgerow units are 11.23 according to the DEFRA Metric 3.0.	N/A	Proposals unconfirmed at this stage but should consider enhancements for biodiversity, such as native planting and pond creation in order to achieve a net gain.	If net gain cannot be achieved on site, further off-site compensation or payment of a tariff or changes to proposals will be required in order to achieve a net-gain for biodiversity.	None required.

6 ENHANCEMENTS

- i It is a requirement of the NPPF (2021) that developments provide a measurable net gain for biodiversity post development.
- ii In order to achieve this, suggestions of enhancement measures to incorporate into any new development are listed below.
- iii According to Natural England's Biodiversity Metric 3.0, if a net gain cannot be achieved on the site, compensation will be required off-site, or via payment of a tariff, paid per biodiversity unit, with the cost determined by the local planning authority.

6.2 Hedgerow enhancement

- i The hedgerows can be enhanced with native species plug planting. A minimum of 6 species should be planted, which may include blackthorn (*Prunus spinosa*), field maple (*Acer campestre*), alder (*Alnus glutinosa*), common dogwood (*Cornus sanguinea*), hazel (*Corylus avellane*) and guelder rose (*Viburnum opulus*). Standard trees such as English oak (*Quercus robur*) and wild cherry (*Prunus avium*) can also be planted at 50m intervals.
- ii Planting should be undertaken during early winter, providing the ground is not frozen. Planting up gaps can be done in conjunction with coppicing existing plants, to give new plants minimum competition. To further reduce competition and aid establishment of the planted-up sections, the bases of the plants would be kept weed free through spot treatment of herbicide for the first three years.

6.3 Grassland planting

- i If a new development is to include areas of amenity grassland, this is a good opportunity to enhance the arable land. In order to achieve good condition neutral grassland, areas can be sown with Naturescape's N14 Flowering Lawn Mixture¹⁸. This mixture contains 80% grasses and 20% wildflowers, with species such as bird's-foot trefoil (*Lotus corniculatus*), selfheal (*Prunella vulgaris*), hard fescue (*Festuca trachyphylla*), and smooth stalked meadow grass (*Poa pratensis*). This can be managed as amenity grassland since the species in the mix will tolerate close mowing to a height of c. 5cm for the majority of the year. Therefore, it will be appropriate for the development and will enhance biodiversity by providing for invertebrates, especially pollinators. This in turn will provide an ample food source for insectivores, such as bats and hedgehogs.
- ii The ground could be prepared for supplementary planting with minimal effort, using a chain harrow. Any existing vegetation should be removed, and the soil should be raked to break it up, producing a fine, firm later of soil. Seeds should be sowed during autumn or spring, and if there is a dry period, the soil being sowed should be watered.

6.4 Tree planting

- i A new development could include tree planting on the site. Native species should be used, for example Rowan (*Sorbus aucuparia*), silver birch (*Betula pendula*) and cherry (*Prunus avium*). All three are relatively quick growing with limited crown spread. Rowan in particular will provide berries for bird sustenance. Ash (*Fraxinus*

¹⁸ <https://www.naturescape.co.uk/product/n14-flowering-lawn-mixture/>

excelsior) and elm (*Ulmus sp.*) should be avoided due to prevalence of disease (Ash die-back and Dutch elm disease) in these species; stocks of these species cannot be guaranteed to be free from disease.

6.5 Wildlife ponds and associated wetlands

i If planted sympathetically, these could provide significant ecological enhancement to the site. Areas of permanent wet waterbodies and associated vegetation can provide an important invertebrate habitat area and increasing the foraging capacity for fauna. The value of these ponds for wildlife can be maximised by utilising the following principles, recommended from the Freshwater Habitats Trust, as illustrated in Figure 5:

5:

- Creating complexes of ponds rather than single waterbodies
- Include both permanent and seasonal ponds
- Almost all pond slopes are at least 1:2 in gradient
- Create broad, undulating wetland areas around and between ponds
- Create underwater bars and shoals to benefit aquatic plants

Figure 5: Pond Complex Example



© Freshwater Habitats Trust

ii Where the ponds are designed to hold some degree of permanent standing water, they could be planted with native marginal plug planting species and with marginal vegetation, such as Naturescapes N8 Water's Edge Meadow Mixture is recommended. This comprises 24 wildflower species and 9 grass species. The species in this mix will tolerate flooding once established and many would grow in the ponds themselves.

iii Where areas of willow scrub are proposed to be planted, this should utilise a mixture of native willow species such as goat willow (*Salix caprea*), grey willow (*Salix cinerea*) and crack willow (*Salix fragilis*). These areas of scrub should also be managed sensitively for wildlife, with sections cleared on a rotational basis to produce clearings within this habitat. In addition, areas of scrub should be planted around the new ponds to provide suitable refugia for any herpetofauna (amphibians and reptiles) that may utilise these habitats. The provision of this scrub would also provide suitable habitat for a variety of nesting bird species.

6.6 Bat roost boxes

- i Bat roost boxes can be easily incorporated into a development. The Vivara Pro WoodStone Bat Box¹⁹ (Figure 6) can provide summer roosting spaces for bats. It is made from a mix of concrete and wood fibre so is durable and maintains a consistent temperature. It can be attached to walls or trees and should be sited at least 3m from the ground. They are best clustered in small groups.
- ii An alternative is to incorporate built-in bat boxes into new buildings. These, such as the Vivara Pro Build-in WoodStone Bat Box²⁰ (Figures 7 and 8), are designed to fit into wall cavities, with the discreet entrance sitting flush with the wall. These will provide roosting habitat for bats, whilst fitting seamlessly into designs. They should be positioned at least 2m above ground and away from artificial light sources.

Figure 6: Vivara Pro WoodStone Bat Box



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Figure 7: Vivara Pro Build-in WoodStone Bat Box



¹⁹ <https://www.nhbs.com/vivara-pro-woodstone-bat-box?bkfno=210820>

²⁰ <https://www.nhbs.com/vivara-pro-build-in-woodstone-bat-box>

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Figure 8: Vivara Pro Build-in WoodStone Bat Box in wall



© NHBS

6.7 Bird nest boxes

- i Bird nest boxes can also be easily incorporated into a development. The Vivara Pro Seville 32mm WoodStone Nest Box²¹ (Figure 9) is suitable for common garden birds, such as blue tits and house sparrows, is made of a mix of concrete and wood fibre for durability and predator protection and would make an attractive addition to trees or wooden posts. It should be installed above 3m to avoid interference from domestic cats.

Figure 9: The Vivara Pro Seville 32mm WoodStone Nest Box



© NHBS

²¹ <https://www.nhbs.com/vivara-pro-seville-32mm-woodstone-nest-box>

6.8 Invertebrate refugia

- i To further enhance the biodiversity value of a development, invertebrates can be encouraged with the provision of 'insect houses', for example the National Trust Apex Insect House²² (Figure 10). These are an attractive addition to areas of greenspace and provide refuges and nest building opportunities for species such as ladybirds, butterflies, and solitary bees. They can be hung on walls or sheds less than 2m from the ground, or placed in sheltered positions amongst vegetation.

Figure 10: National Trust Apex Insect House



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6.9 Hedgehog nest boxes and 'highways'

- i Beneath hedgerows, hedgehog nest boxes could be placed to enable this species to find refuge. These must be well hidden and secluded amongst dense vegetation. An example hedgehog nest box is shown in Figure 11.
- ii Where any fencing is to be constructed or retained, 15 x 15cm mammal holes should be installed at ground level. 'Hedgehog highway' signs, as shown in Figure 12, could be installed above these holes to prevent them from being filled in the future. This will help to maintain their permanency and improve connectivity for mammals between the site and the surrounding landscape.

²² <https://www.nhbs.com/national-trust-apex-insect-house>

Figure 11: Hedgehog Nest Box Example



© NHBS

Figure 12: Hedgehog Highway Sign



© NHBS

APPENDIX 1: REFERENCES AND CONSULTED INDUSTRY GUIDANCE

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- Department of Communities & Local Government, 2021. 'National Planning Policy Framework', London: DCLG.
- Joint Nature Conservancy Council, 2010. 'Handbook for Phase 1 habitat survey'. Peterborough: JNCC.
- Office of the Deputy Prime Minister, 06/2005. 'Government Circular: Biodiversity and Geological Conservation - Statutory Obligations and their impact within the planning system'. London: ODPM.
- Crested Newt (*Triturus cristatus*). *Herpetological Journal* 10 (4), 143-155.

APPENDIX 2: LEGISLATION AND PLANNING POLICY

6.10 General & Regionally Specific Policies

- i. Articles of British legislation, policy guidance and both Local Biodiversity Action Plans (BAPs) and the NERC Act 2006 are referred to throughout this report. Their context and application is explained in the relevant sections of this report. The relevant articles of legislation are:
 - North-west Leicestershire Local Plan (2011 – 2031)
 - The Environment Act (2021)
 - The National Planning Policy Framework (2021);
 - ODPM Circular 06/2005 (retained as Technical Guidance on NPPF 2021);
 - The Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019;
 - The Wildlife and Countryside Act 1981 (as amended);
 - EC Council Directive on the Conservation of Wild Birds 79/409/EEC;
 - National Parks and Access to the Countryside Act 1949;
 - The Protection of Badgers Act 1992;
 - The Countryside and Rights of Way Act 2000;
 - The Hedgerow Regulations 1997;
 - The Natural Environment and Rural Communities (NERC) Act 2006.

Appendix 3: SPECIES LIST









Table 10: C3.1 Tall herb and fern - ruderal

SPECIES	SCIENTIFIC NAME	DAFOR SCALE
rosebay willowherb	<i>Chamaenerion angustifolium</i>	O
foxglove	<i>Digitalis sp.</i>	O
creeping thistle	<i>Cirsium arvense</i>	O
spear thistle	<i>Cirsium vulgare</i>	O
common nettle	<i>Urtica dioica</i>	O
lesser burdock	<i>Arctium minus</i>	R

Table 11: J2.1.2 Species-poor hedgerows

SPECIES	SCIENTIFIC NAME	DAFOR SCALE
hawthorn	<i>Crataegus monogyna</i>	D
bramble	<i>Rubus fruticosus</i>	O
elder	<i>Sambucus nigra</i>	O
dog rose	<i>Rosa canina</i>	O
blackthorn	<i>Prunus spinosa</i>	O
holly	<i>Ilex aquifolium</i>	R
ivy	<i>Hedera helix</i>	R
honeysuckle	<i>Lonicera periclymenum</i>	R



- KEY**
-  Site boundary
 -  Preliminary development area
 -  Existing key green infrastructure
 -  Proposed structural planting
 -  Proposed linear planting
 -  Proposed landscape buffer to Corkscrew Lane
 -  Indicative access point
 -  Consented development north-west of the site

Land east of Corkscrew Lane
Ashby de la Zouch

Client: Mather Jamie

Fig 3: Preliminary Development and Landscape Strategy

Drawing no. : P20-0281-03
Date : 21 Feb 2022
Drawn by : AC
Checked by : JWA
Scale : 5000 @ A3



Appendix B – Land East of Corkscrew Lane, Ashby de la Zouch. Flood Risk and Drainage Note

Technical Note

Project:	P22-024 Corkscrew Lane		
Subject:	Drainage Strategy		
Prepared by:	Peter Sparham - Associate Director	Date:	09.03.22
Authorised by:	Kriston Harvey –Director	Status:	Information
Document Ref:	22024-RLL-22-XX-RP-C-001	Revision:	P02

1 Introduction

1.1 Terms of Reference

Rodgers Leask Ltd have been instructed to produce a technical note to discuss the philosophy, constraints and opportunities relating to the foul and surface water drainage for the proposed development for the site off Corkscrew Lane, located to the south east of Ashby-de-la-Zouch, Leicestershire. The proposed development is to consist of 500,000sqft of B8 employment use, potentially in the form of multiple buildings.

1.2 Site Parameters

The site is located to the south of the A42 and bound by Corkscrew Lane to the northwest, Ashby Road (A511) to the north and east and a train line to the south of the site. The train line is significantly lower in level than the adjacent site.

From a site walkover and LiDAR data it can be seen that the site slopes from south to north from approximately 147mAOD in the south to 140mAOD adjacent to the drainage ditch along the northern boundary of the site, at an average gradient of approximately 1 in 100.

From the site walkover it can be seen that an overhead electricity cable runs east to west across the northern part of the site. It is considered this apparatus would have to be diverted to facilitate the proposed site development.

It is proposed to access the site with priority junctions in two locations along Corkscrew Lane to the west of the site.

The total site area is estimated at 11.4ha.

1.3 Flood Risk

The site is located in Flood Zone 1 and considered to be at Low risk from fluvial flooding. The low point, located to the north of the site, between the site boundary, Corkscrew Lane and the A511 Ashby Road is shown to be at High risk of surface water flooding. A small area of the site in the north and west are shown to be at Low risk of flooding from surface water, however, the vast majority of the site is shown to be at Very Low risk of flooding from surface water.

1.4 Foul Drainage

It is considered the nearest foul outfall location (outside of the River Mease catchment) is in Farm Town, located approximately 930m east of the site.

A foul pumping station and approximately 1,250m of offsite rising main will be required to outfall to the existing Severn Trent Water combined manhole MH8501 in Farm Town Lane. The rising main will be required to cross the A511 Ashby Road, then following the route of Farm Town Lane to the outfall. It is considered the rising main will be laid in land adjacent to Farm Town Lane under the ownership of the applicant to the outfall.

As the downstream pipes are 150mm diameter, Severn Trent Water will require additional information to determine the extent of any downstream upgrade works that may be required. Capacity modelling of their network to assess the extent of any upgrade works necessary can be undertaken by Severn Trent Water once the development details have been finalised and planning permission has been obtained.

A pre-development enquiry response from Severn Trent Water has been obtained and is included in the supporting information to this note.

Drawing 22024-RLL-22-XX-DR-C-003 is included in the supporting information to this note. The drawing shows the pumping station located at the lower end of the site and the route of the proposed offsite rising main.

1.5 Surface Water Drainage

It is considered the development proposals will consist of B8 employment use, potentially in multiple buildings, with a total internal area of 500,000sqft and a total site wide impermeable area of approximately 9.53ha.

Drawing 22024-RLL-22-XX-DR-C-003 is included in the supporting information to this note and shows that the surface water attenuation to serve the development is likely to be in the order of 8,000m³.

As part of the surface water drainage network serving the proposed site it is considered that interceptors will be required to service parking areas. To appease Leicestershire, in their role as the Lead Local Flood Authority (LLFA), permeable paving is likely to be required in car parking areas of the site. Green roofs may also be requested by the LLFA.

From BGS mapping it can be seen that sandstone is present to the south of the site and therefore it is recommended infiltration testing is undertaken to understand if the attenuation volume can be reduced by using infiltration to discharge surface water from the site as well as an off-site connection. The north of the site is underlain by Coal Measures consisting of Mudstone and is unlikely to be suitable for infiltration type drainage.

The existing equivalent greenfield run-off rate (QBar) is 50.1 l/s, therefore, in the absence of infiltration test results, it is proposed that surface water will discharge to the ditch along the northern boundary of the site via gravity and run-off from the site will be restricted to the 50.1 l/s, for storm events up to and including the 1 in 100 year storm event, including a 40% allowance for climate change.

It is considered significant earthworks may be required to create development platforms and aid the facilitation of a gravity surface water drainage solution from the site. However, a topographical survey will be required to determine the extent of the works required.

1.6 Summary & Future Works

In summary, foul and surface water outfall locations have been determined and initial surface water attenuation volumes have been estimated, it is considered the attenuation volumes could comfortably be accommodated within the site layout.

Future works to better define the drainage strategy and potential earthworks for the proposed development are as follows:

- Undertake a topographical survey of the site and Farm Town Lane;
- Undertake infiltration testing;
- Liaise with the LLFA to determine the extent of SuDS required on the site;
- Undertake a detailed drainage strategy for the site once a proposed layout has been finalised.

WONDERFUL ON TAP



Severn Trent Water Ltd
Leicester Water Centre
Gorse Hill
Anstey
Leicester
LE7 7GU

Contact: Emma Nowak

Email:
Network.Solutions@SevernTrent.co.uk

Our ref: 1032447

Rodgers Leask,
The Courtyard,
Ground Floor,
35-37 St Mary's Gate,
Nottinghamshire,
NE1 1PU.

FAO: Laurence Lee

9th February 2022

Dear Mr Lee

Proposed Commercial Development (12 x Office Units & 12 x Warehouse Units) at: Corkscrew Lane, Coleorton, Coalville, Leicestershire, LE67 8FF.

X: 437824 / Y: 316194

I refer to your Development Enquiry Request submitted in respect of the above site. Please find enclosed the sewer records that are included in the fee together with the Supplementary Guidance Notes (SGN) referred to below.

Public Sewers in Site – Required Protection

There are no public sewers crossing the proposed development area.

Due to a change in legislation on 1 October 2011, there may be former private sewers on the site which have transferred to the responsibility of Severn Trent Water which are not shown on the statutory sewer records but are located in your client's land. These sewers would also have protective strips that we will not allow to be built over. If such sewers are identified to be present on the site, please contact us for further guidance.

Foul Water Drainage

The nearest public foul sewer in public land which would achieve a gravity connection is the 150mm foul water sewer southwest of the site in Leicester Road at MH9905.

Although the proposed foul flows from the development are low, our sewer records show multiple flooding events along the foul network

further downstream. As a result, we feel sewer modelling may be needed to determine the impact of the development on the existing system.

As you may be aware, we no longer charge developers for the hydraulic modelling service. All sites now go forward for prioritization against our risk matrix that takes into account such things as planning status and potential impact on the environment or our existing customers. Currently, we would like to progress this through to modelling once the site has achieved full planning permission.

We may contact you in due course for further information and will liaise with you over time with regard to the outcome of our investigations and any impact that may have on the planning status, occupation, or phasing of the site. However, while we can provide a brief summary of our findings if you need us to, we will no longer provide the full external SCA report. In the meantime, as you progress matters for your site, we would appreciate any updates you have regarding the development progression, as we will be reviewing the modelling requirements on a weekly basis. I would therefore be grateful if you would forward as soon as possible the following details:

- Proposed submission of your Planning Application
- Proposed planned start and completion date.
- Proposed point of connection
- Whether a pumped connection is needed and the proposed pump rate
- Planned occupation dates

Surface Water Drainage

Under the terms of Section H of the Building Regulations 2000, the disposal of surface water by means of soakaways should be considered as the primary method. If these are found to be unsuitable, satisfactory evidence will need to be submitted. The evidence should be either percolation test results or by the submission of a statement from the SI consultant (extract or a supplementary letter).

Note, STW will need to be fully satisfied that all sustainable options have been satisfied before discharge to network is considered, we

expect all surface water from the development to be drained in a sustainable way to the nearest watercourse or land drainage channel.

Subject to the above, sewer records show a number of watercourses within the vicinity of the site. All surface water from the new development should be able to gravitate to this watercourse within the site and to the north west. Please note that the crossing of third-party land may be required at this point, and that the appropriate consent must be sought. It is advised to contact the landowner to negotiate an agreement. Flow rates to the watercourse would be subject to LLFA approval as statutory consultee in the planning process.

New Connections

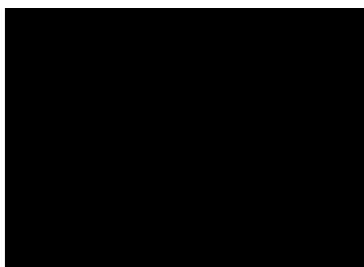
For any new connections including the use, reuse and indirect to the public sewerage system, the developer will need to submit Section 106 application. Our Developer Services department are responsible for handling all such enquiries and applications. To contact them for an application form and associated guidance notes please call 0800 707 6600, email new.connections@severntrent.co.uk or download from www.stwater.co.uk

Please quote the above reference number in any future correspondence (including e-mails) with STW Limited. Please send **all correspondence** to the network.solutions@severntrent.co.uk email inbox address, a response will be made within 15 days.

If you require a VAT receipt for the application fee please email MISCINCOME.NC@SEVERNTRENT.CO.UK quoting the above Reference Number.

Please note that Developer Enquiry responses are only valid for 6 months from the date of this letter.

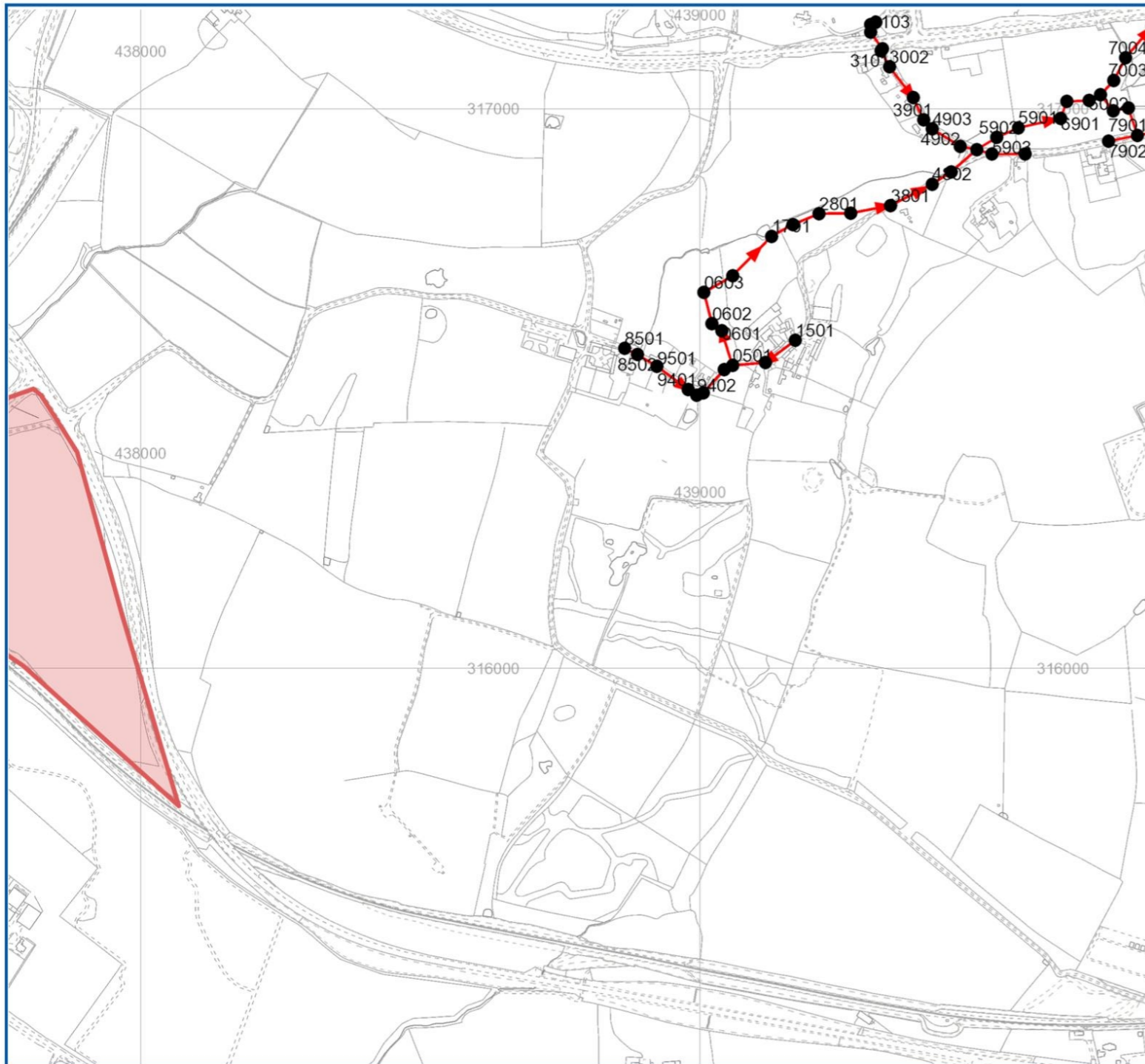
Yours sincerely,



WONDERFUL ON TAP



Emma Nowak.
Senior Evaluation Technician
Network Solutions
Developer Services



Reference	Cover Level	Invert Level Upstream	Invert Level Downstream	Purpose	Material	Pipe Shape	Max Size	Min Size	Gradient	Year Laid
SK39177001	<UNK>	<UNK>	116.91	C	<UNK>	<UNK>	<UNK>	<UNK>	0	31/12/1899 00:00:00
SK39176001	<UNK>	<UNK>	117.18	C	<UNK>	<UNK>	<UNK>	<UNK>	0	31/12/1899 00:00:00
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SK39173001	132.66	130.87	127.18	C	VC	C	150	<UNK>	11.64	31/12/1899 00:00:00
SK39177004	119.43	115.75	115.03	C	VC	C	150	<UNK>	102.44	31/12/1899 00:00:00
SK39173102	141.11	139.63	139.6	C	VC	C	150	<UNK>	120.33	31/12/1899 00:00:00
SK39161501	157.4299	155.76	154.38	C	VC	C	150	<UNK>	47.54	31/12/1899 00:00:00
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SK39166901	119.12	117.9	<UNK>	C	VC	C	150	<UNK>	0	31/12/1899 00:00:00
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SK39160603	145.3	141.28	140.33	C	VC	C	150	<UNK>	61.76	31/12/1899 00:00:00
SK39177002	118.44	116.6	116.15	C	VC	C	150	<UNK>	78.62	31/12/1899 00:00:00
SK39164901	125.7099	123.7	122.12	C	VC	C	150	<UNK>	26.38	31/12/1899 00:00:00
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LEGEND

<ul style="list-style-type: none"> Ancillary Balancing Lagoon Grease Trap Interceptor Screen Chamber Flushing Chamber Scalway Overflow Fitting Blind Shaft Facility Connector Head Node Lamphole Sewerage Air Valve Sewerage Chemical Injection Point Sewerage Hatch Box Sewerage Pressure Washout Vent Column Waste Water Outfall Control Valve Hydroblock Penstock 	<ul style="list-style-type: none"> Sewerage Isolation Valve Sewerage Non Return Valve Manhole Foul Bifurcation Manhole Combined Bifurcation Manhole Surface Water Bifurcation Manhole Dual Manhole Foul Single Manhole Combined Single Manhole Surface Water Single Manhole Twin Manhole Foul Adopted Manhole Combined Adopted Manhole Surface Adopted Manhole Transfered Manhole Unsurveyed Manhole Operational Site Waste Water Pump S104 Transfered Asset S102 Null STW Adopted Sewer 	<ul style="list-style-type: none"> None Highway Drain Null Private S24 Storage Disposal Site Off-Line Waste Water Storage On-Line Waste Water Storage Weir Well Waste Water Process Structure S1P Sewage Treatment Point S1S Sewage Treatment Structure S11P Sludge Treatment Point S11S Sludge Treatment Structure Gravty Sewer Pipe Foul Gravity Sewer Combined Gravity Sewer Surface Water Gravity Sewer S104 Surface Water Gravity Sewer S104 Combined Gravity Sewer S104 Foul Gravity Sewer Private Surface Water Gravity Sewer Private Combined Gravity Sewer Private Foul Gravity Sewer Private Pressure Sewer Combined Pressure Sewer Foul Pressure Sewer S104 Surface Water Pressure Sewer S104 Combined Pressure Sewer S104 Foul Pressure Sewer Private Surface Water Pressure Sewer Private Combined Pressure Sewer Private Foul Pressure Sewer Service Pipe 	<ul style="list-style-type: none"> Private Foul Gravity Sewer Surface Water Unserved Pipe Combined Unserved Pipe Foul Unserved Pipe Transfered Surface Water Sewer Transfered Combined Sewer Transfered Foul Sewer Disposal Pipe Overflow Pipe Culverted Water Course Waste Internal Site Pipe Sewer Service Connection Gravty Sewer Others Pressure Sewer Pipe Surface Water Pressure Sewer Combined Pressure Sewer Foul Pressure Sewer S104 Surface Water Pressure Sewer S104 Combined Pressure Sewer S104 Foul Pressure Sewer Private Surface Water Pressure Sewer Private Combined Pressure Sewer Private Foul Pressure Sewer Surface Water Vacuum Sewer Foul Vacuum Sewer Combined Vacuum Sewer S104 Surface Water Vacuum Sewer S104 Combined Vacuum Sewer S104 Foul Vacuum Sewer Private Surface Water Vacuum Sewer Private Combined Vacuum Sewer Private Foul Vacuum Sewer Surface Water Siphon Combined Siphon Foul Siphon Private Surface Water Siphon Private Combined Siphon Private Foul Siphon S104 Surface Water Siphon S104 Combined Siphon S104 Foul Siphon Surface Water Unserved Pipe Combined Unserved Pipe Foul Unserved Pipe Disposal Pipe 	<ul style="list-style-type: none"> Surface Water Lateral Drain Combined Lateral Drain Foul Lateral Drain S104 Surface Water Lateral Drain S104 Combined Lateral Drain S104 Foul Lateral Drain Private Surface Water Lateral Drain Private Combined Lateral Drain Private Foul Lateral Drain Transfered Surface Water Lateral Drain Transfered Combined Lateral Drain Transfered Foul Lateral Drain Private Surface Water Siphon Private Combined Siphon Private Foul Siphon S104 Surface Water Siphon S104 Combined Siphon S104 Foul Siphon Surface Water Unserved Pipe Combined Unserved Pipe Foul Unserved Pipe Disposal Pipe
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MATERIALS

- NONE
- AC - ASBESTOS CEME
- BR - BRICK
- CC - CONCRETE BOX CULVERT
- CI - CAST IRON
- CO - CONCRETE
- CSB - CONCRETE SEGMENTS (BOLTED)
- CSU - CONCRETE SEGMENTS (UNBOLTED)
- DI - DUCTILE IRON
- GRP - GLASS REINFORCED PLASTIC
- MAC - MASONRY IN REGULAR COURSES
- MAR - MASONRY RANDOMLY COURSED
- PE - POLYETHYLENE
- PF - PITCH
- PP - POLYPROPYLENE
- PSC - PLASTIC STEEL COMPOSITE
- PVC - POLYVINYL CHLORIDE
- RPM - REINFORCED PLASTIC MATRIX
- SI - SPUN (GREY) IRON
- ST - STEEL
- U - UNKNOWN
- VC - VITRIFIED CLAY
- XXX - OTHER

CATEGORIES


- W - WEIR
- C - CASCADE
- DB - DAMBOARD
- SE - SIDE ENTRY
- FV - FLAP VALVE
- BD - BACK DROP
- S - SIPHON
- D - HIGHWAY DRAIN
- S104 - SECTION 104

SHAPE

- C - CIRCULAR
- E - EGG SHAPED
- O - OTHER
- R - RECTANGLE
- S - SQUARE
- T - TRAPEZOIDAL
- U - UNKNOWN

PURPOSE

- C - COMBINED
- E - FINAL EFFLUENT
- F - FOUL
- L - SLUDGE
- S - SURFACE WATER



Severn Trent Water Limited
 Asset Data Management
 PO Box 5344
 Coventry
 CV3 9FT
 Telephone: 0345 601 6616

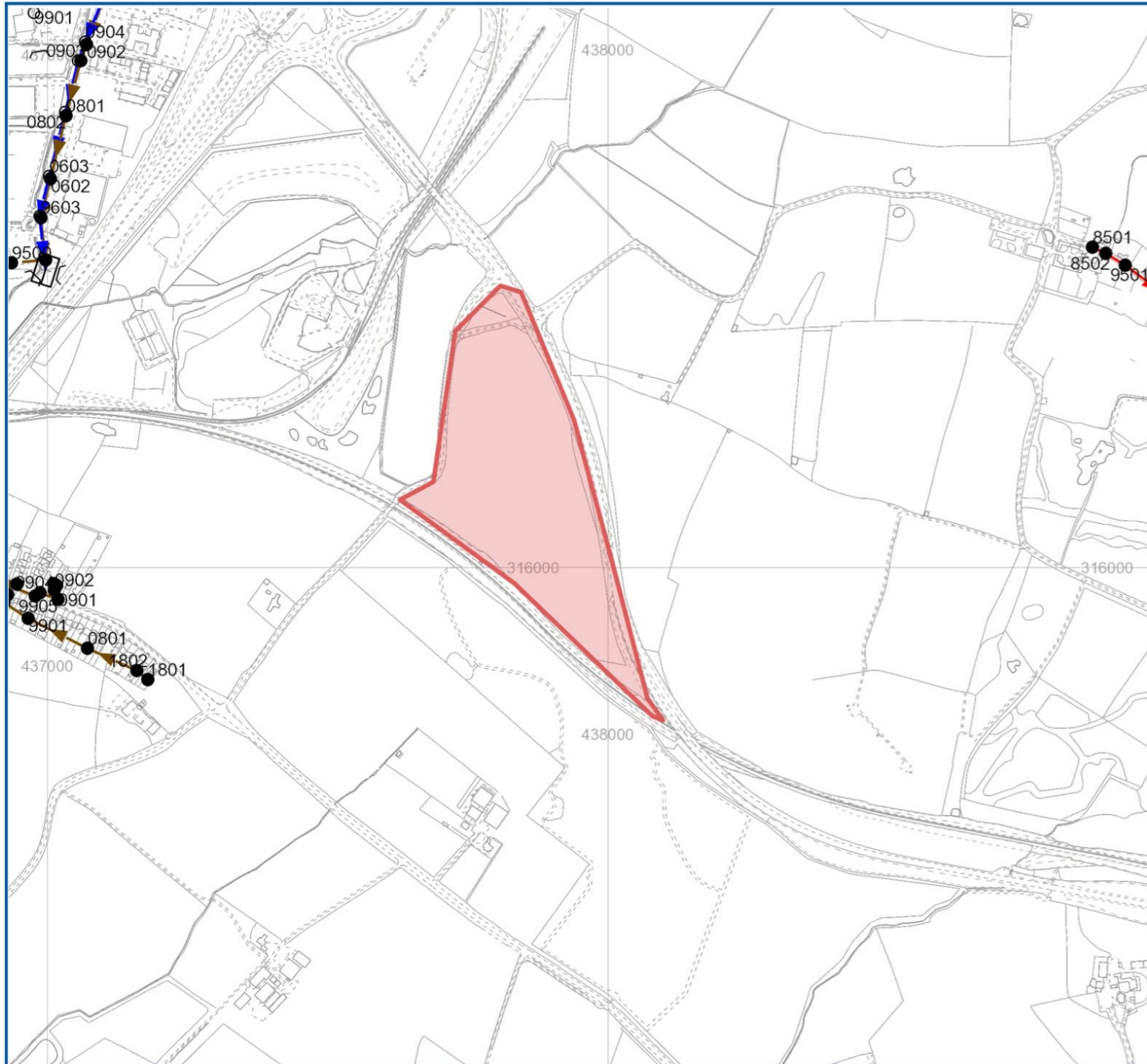
SEWER RECORD (Tabular)

O/S Map Scale: 1:10,000 **This map is centred upon:**

Date of Issue: 15-02-22 **X:** 438781.52 **Y:** 316234.91

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- On 1 October 2011 most private sewers and private lateral drains in Severn Trent Water's sewerage area, which were connected to a public sewer as at 1 July 2011, transferred to the ownership of Severn Trent Water and became public sewers and public lateral drains. A further transfer takes place on 1 October 2012. Private pumping stations, which form part of these sewers or lateral drains, will transfer to ownership of Severn Trent Water on or before 1 October 2016. Severn Trent Water does not possess complete records of these assets. These assets may not be displayed on the map.
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Reference	Cover Level	Invert Level Upstream	Invert Level Downstream	Purpose	Material	Pipe Shape	Max Size	Min Size	Gradient	Year Laid
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SK37160902	129.38	126.47	126.125	F	VC	C	300	<UNK>	85.94	31/12/1899 00:00:00
SK37160802	127.9899	125.536	124.748	S	CO	C	675	<UNK>	149.46	31/12/1899 00:00:00
SK36169501	125.11	122.619	122.334	F	CO	C	450	<UNK>	209.59	31/12/1899 00:00:00
SK37160901	128.9299	126.125	125	F	VC	C	300	<UNK>	91.24	31/12/1899 00:00:00
SK36169500	125.3899	122.334	121.961	F	CO	C	450	<UNK>	309.32	31/12/1899 00:00:00
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SK36159905	132.7579	130.868	127.989	F	VC	C	150	<UNK>	25.4	31/12/1899 00:00:00
SK36159906	131.261	129.591	128.35	F	VC	C	150	<UNK>	23.51	31/12/1899 00:00:00
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SK37151802	135.7429	134.633	133.098	F	VC	C	150	<UNK>	62.77	31/12/1899 00:00:00
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SK36159904	133.0169	131.027	130.868	F	VC	C	150	<UNK>	62.5	31/12/1899 00:00:00
SK38169501	160.0899	158.01	155.54	C	VC	C	150	<UNK>	28.34	31/12/1899 00:00:00
SK38168501	160.1399	158.52	158.35	C	VC	C	150	<UNK>	150	31/12/1899 00:00:00
SK37150900	<UNK>	<UNK>	<UNK>	F	VC	U	100	<UNK>	<UNK>	31/12/1899 00:00:00
SK37150902	<UNK>	<UNK>	<UNK>	F	VC	U	100	<UNK>	<UNK>	31/12/1899 00:00:00

LEGEND

<p>Ancillary</p> <ul style="list-style-type: none"> Balancing Lagoon Grease Trap Interceptor Screen Chamber Flushing Chamber Scalway Overflow Fitting Blind Shaft Facility Connector Head Node Lamp Hole Sewerage Air Valve Sewerage Chemical Injection Point Sewerage Hatch Box Sewerage Pressure Washout Vent Column Waste Water Outfall Control Valve Hydroblock Penstock 	<p>Manhole</p> <ul style="list-style-type: none"> Foul Bifurcation Manhole Combined Bifurcation Manhole Surface Water Bifurcation Manhole Dual Manhole Foul Single Manhole Combined Single Manhole Surface Water Single Manhole Twin Manhole Foul Adopted Manhole Combined Adopted Manhole Surface Adopted Manhole Transfered Manhole Unsurveyed Manhole 	<p>Storage</p> <ul style="list-style-type: none"> Disposal Site Off-Line Waste Water Storage On-Line Waste Water Storage Wet Well 	<p>Waste Water Process Structure</p> <ul style="list-style-type: none"> Sewage Treatment Point Sewage Treatment Structure Sludge Treatment Point Sludge Treatment Structure 	<p>Gravty Sewer Pipe</p> <ul style="list-style-type: none"> Foul Gravity Sewer Combined Gravity Sewer Surface Water Gravity Sewer S104 Surface Water Gravity Sewer S104 Combined Gravity Sewer S104 Foul Gravity Sewer Private Surface Water Gravity Sewer Private Combined Gravity Sewer 	<p>Pressure Sewer Pipe</p> <ul style="list-style-type: none"> Surface Water Pressure Sewer Combined Pressure Sewer Foul Pressure Sewer S104 Surface Water Pressure Sewer S104 Combined Pressure Sewer S104 Foul Pressure Sewer Private Surface Water Pressure Sewer Private Combined Pressure Sewer Private Foul Pressure Sewer 	<p>Service Pipe</p> <ul style="list-style-type: none"> Private Foul Gravity Sewer Surface Water Unserved Pipe Combined Unserved Pipe Foul Unserved Pipe Transfered Surface Water Sewer Transfered Combined Sewer Transfered Foul Sewer Disposal Pipe Overflow Pipe Culverted Water Course Waste Internal Site Pipe Sewer Service Connection Gravty Sewer Others Surface Water Vacuum Sewer Foul Vacuum Sewer Combined Vacuum Sewer S104 Surface Water Vacuum Sewer S104 Combined Vacuum Sewer S104 Foul Vacuum Sewer Private Surface Water Vacuum Sewer Private Combined Vacuum Sewer Private Foul Vacuum Sewer Surface Water Siphon Combined Siphon Foul Siphon Private Surface Water Siphon Private Combined Siphon Private Foul Siphon S104 Surface Water Siphon S104 Combined Siphon S104 Foul Siphon Surface Water Unserved Pipe Combined Unserved Pipe Foul Unserved Pipe Disposal Pipe
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MATERIALS

- NONE
- AC - ASBESTOS CEME
- BR - BRICK
- CC - CONCRETE BOX CULVERT
- CI - CAST IRON
- CO - CONCRETE
- CSB - CONCRETE SEGMENTS (BOLTED)
- CSU - CONCRETE SEGMENTS (UNBOLTED)
- DI - DUCTILE IRON
- GRP - GLASS REINFORCED PLASTIC
- MAC - MASONRY IN REGULAR COURSES
- MAR - MASONRY RANDOMLY COURSED
- PE - POLYETHYLENE
- PF - PITCH
- PP - POLYPROPYLENE
- PSC - PLASTIC STEEL COMPOSITE
- PVC - POLYVINYL CHLORIDE
- RPM - REINFORCED PLASTIC MATRIX
- SI - SPUN (GREY) IRON
- ST - STEEL
- U - UNKNOWN
- VC - VITRIFIED CLAY
- XXX - OTHER

CATEGORIES

- W - WEIR
- C - CASCADE
- DB - DAMBOARD
- SE - SIDE ENTRY
- FV - FLAP VALVE
- BD - BACK DROP
- S - SIPHON
- D - HIGHWAY DRAIN
- S104 - SECTION 104

SHAPE

- C - CIRCULAR
- E - EGG SHAPED
- O - OTHER
- R - RECTANGLE
- S - SQUARE
- T - TRAPEZOIDAL
- U - UNKNOWN

PURPOSE

- C - COMBINED
- E - FINAL EFFLUENT
- F - FOUL
- L - SLUDGE
- S - SURFACE WATER

Severn Trent Water Limited
 Asset Data Management
 PO Box 5344
 Coventry
 CV3 9FT
 Telephone: 0345 601 6616

SEWER RECORD (Tabular)

O/S Map Scale: 1:10,000 **This map is centred upon:**

Date of Issue: 09-02-22 **X:** 437948.25 **Y:** 316055.98

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SUPPLEMENTARY GUIDANCE NOTES RELATING TO DISPOSAL OF SURFACE WATER



Introduction

The purpose of this guidance note is to provide advice to applicants when completing the surface water drainage design for a new development, both for Greenfield and Brownfield sites. This does not affect foul drainage disposal which should be discussed with Severn Trent as early as possible to ensure additional flows can be accommodated without undue delay to the development.

Lead Local Flood Authority (LLFA) Consultation

Since April 2015, the LLFA have assumed the role of being a statutory consultee in the planning process for developments of 10 dwellings or more; or equivalent non-residential and/or mixed development. The LLFAs role is vital to ensure that surface water disposal on new development is adequately assessed so that the local planning authority can satisfy themselves that drainage proposals are satisfactory and to make sure, through the use of planning conditions or planning obligations, that there are clear arrangements in place for future maintenance of sustainable drainage systems (SuDS) over the lifetime of the development. This will also ensure surface water disposal aligns with local planning policies, flood risk strategies and national policies, such as the National Planning Policy Framework (NPPF).

It is strongly recommend that the LLFA are involved in early pre-application discussions when the development of a site is initially being considered. Pre-application discussions will help to ensure that SuDS are appropriately considered ahead of or as part of preliminary development layouts, and that they are fully integrated into the final development layout. Whilst Severn Trent are willing to advise on sewerage availability this does to negate the planning requirement relating to adequacy of SuDS on new development.

SuDS Hierarchy

Severn Trent is fully supportive of the fundamental SuDS principle that priority should be given to managing surface water as close to source as possible. In accordance with national standards and guidance a sequential series of checks should be undertaken to ensure the relevant SuDS features are being proposed whereby (in order of priority) rainwater re-use, infiltration to ground and controlled discharge to a water body are properly considered ahead of any controlled connection to a culverted watercourse/other drainage system or public surface water sewer.

A controlled connection to a public combined/foul sewer would only be considered under rare exceptional circumstances where all other options have been completely exhausted. Acceptance of surface water into a combined sewer is not only unsustainable because of the need to convey/treat rainwater but is also takes away existing capacity which could constraint the connection of foul flows on future development. It is also possible that connection of additional surface water flows will require capacity upgrades to the existing sewerage system which may delay development.

Connection to a Public Sewer

Whilst Severn Trent will be able to provide advice on potential public surface water sewer connection options, it is essential that a developer contacts the LLFA as early as possible to discuss surface water disposal as they will be able to provide guidance on surface water flood risk policy which may influence SuDS requirements. It is strongly recommended that LLFA discussions take place before contacting Severn Trent. Where the outcome of LLFA discussions concludes that a controlled discharge to the public sewerage system is the only viable option

then Severn Trent would be pleased to discuss sewer connection options, satisfied that the LLFA have been consulted in line with their surface water management role and in their capacity as statutory consultee.

Evidence must be provided to demonstrate why the sequential SuDS checks have concluded that a connection to the public sewer is required. This must include a Site Investigation Report including percolation test data/graphs/calculations/results together with relevant correspondence with the LLFA.

Design Standards

Surface water disposal design should consider the interactions between the adoptable sewer design criteria based on a 30 year design storm (outlined in 'Design and Construction Guidance') and the "Non-statutory technical standards for SuDS" requirement to restrict discharge from a site up to and including the 1 in 100 year critical storm event plus an allowance for climate change as required by the LLFA.

For Greenfield development, the peak runoff rate should never exceed the peak pre-development run-off rates/volumes for the same rainfall event irrespective of the design storm duration consistent with the national non-statutory technical standards. For developments which were previously developed (Brownfield), the peak runoff rate must be as close as reasonably practicable to the greenfield runoff rate from the development for the same rainfall event, but should never exceed the rate of discharge from the development prior to redevelopment again for the same rainfall event. This requirement to remove pre-development surface water discharges to the sewerage system will help remove capacity constraints and aid future development.

To establish the pre-development run-off rates a detailed existing drainage survey will be required indicating pipe locations including sizes and levels, impermeable area connectivity to each pipe and topographical information to support existing drainage assumptions. Photographs of the existing buildings and surface features should be provided and where necessary a CCTV sewer survey should be provided to support the drainage survey to demonstrate connectivity.

In line with 'Design and Construction Guidance', the drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur on any part of the site for a 1 in 30 year rainfall event. For higher storm return periods the drainage system must be designed so that, unless an area is designated to hold and/or convey water as part of the design, flooding does not occur during a 1 in 100 year rainfall event in any part of: a building (including a basement); or in any utility plant susceptible to water (e.g. pumping station, electricity substation, water booster station) within the development.

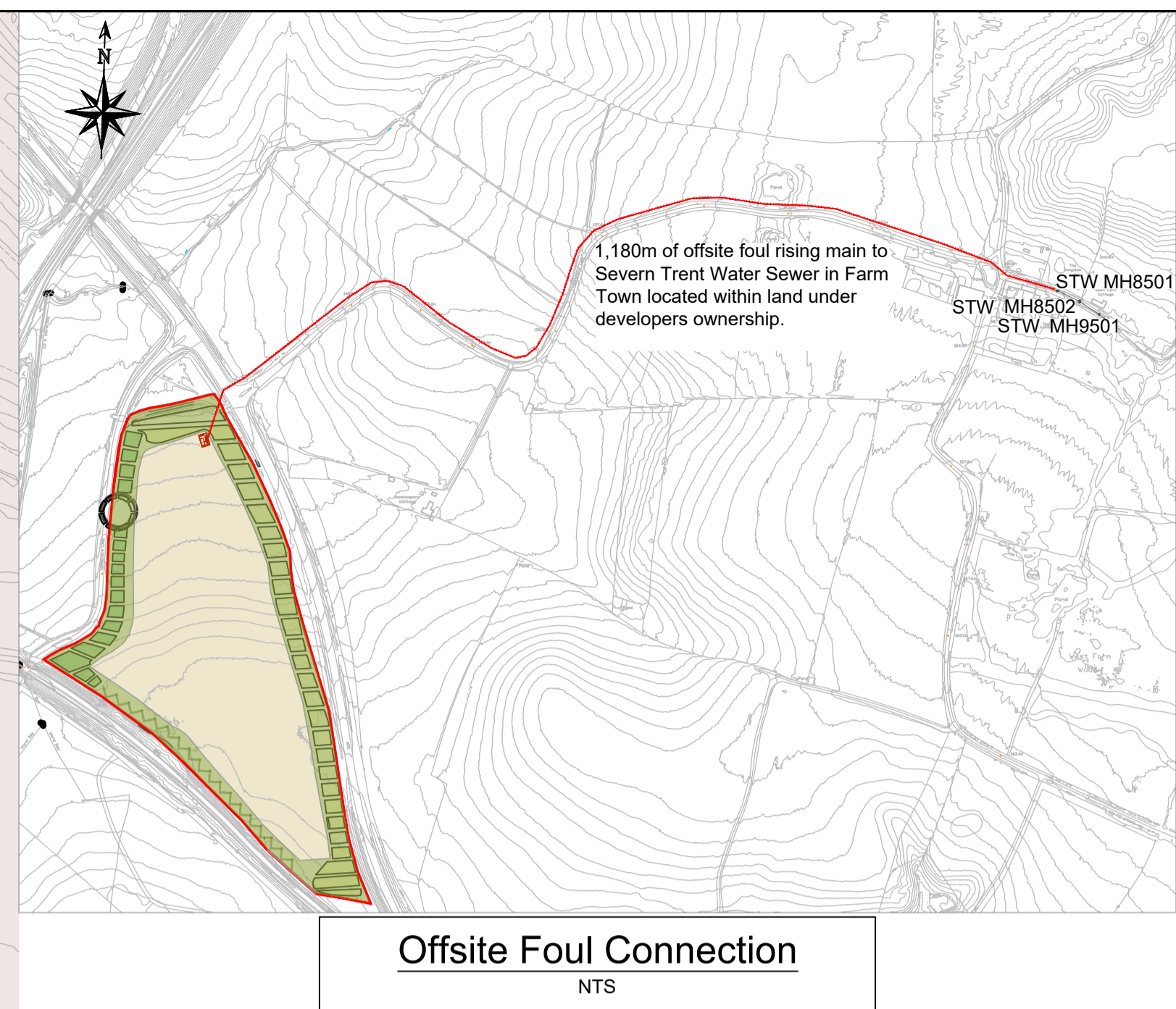
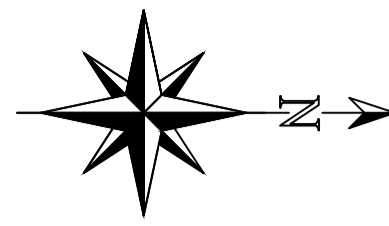
Small Developments

Whilst developments of fewer than 10 dwellings (or their equivalent) are excluded from the post April 2015 planning requirements the underlying principles regarding sustainable surface water management are still valid. The collective impacts of surface water discharges from smaller developments can have an adverse impact on flood risk, especially in smaller rural catchments where smaller sewerage systems are more susceptible to increases in surface water inflow. On small developments infiltration to ground and peak flow attenuation must be considered to mitigate flood risk in the community but where a sewer connection is envisaged then the developer is recommended to discuss surface water disposal options with Severn Trent as early as possible.

Contact

For further assistance please contact our Network Solutions team via: network.solutions@severntrent.co.uk

Appendix C - Foul Sewerage Drainage Strategy



- GENERAL NOTES**
- DO NOT SCALE.
 - This drawing is to be read in conjunction with all other relevant drawings and details.
 - Should there be a conflict between the details indicated on this drawing and those on other drawings the Engineer should be informed PRIOR to construction on site.
 - Until technical approval has been obtained from the relevant Authority, it should be understood that all drawings issued are Preliminary and NOT for construction. Should the Contractor commence site works prior to such approval being provided it is entirely at their own risk.
 - Sketch proposals are for illustrative purposes only and as such are subject to detailed site investigation including ground conditions, contaminants, drainage, design and planning / density negotiations.
 - All dimensions are in metres unless otherwise stated.
 - The Rodgers Leask Designer's Risk Assessment(s) for this project must be reviewed PRIOR to the commencement of any works on site.
 - Drainage design subject to detail design.
 - Drawing based of architect layout drawing number 19345 F0001 dated 19.12.2019 by UMC architects, LIDAR data accessed 22.02.22 & British Geological Survey accessed 22.02.22

- Key**
- Helsby Sandstone bedrock formation. No superficial deposits present.
 - Pennine lower coal measure bedrock formation. Mustone, Siltstone and Sandstone. No superficial deposits present.
 - Proposed rising main
 - Site Boundary

Total site area = 11.46 Ha
 Estimated Total impermeable area = 9.53 Ha
 Estimated surface water attenuation = 8,000 m³

Sandstone present, infiltration may be viable and testing should be undertaken prior to finalising the drainage strategy

The site slopes from south to north from 147mAOD to 140mAOD at outfall. Significant earthworks will be required to achieve development platforms and retaining walls are likely to be required in the south of the site.

Foul Pumping Station. Pumping to Severn Trent Water combined manhole number STW MH8501 out of River Mease catchment

Surface water outfalling to existing ditch via hydrobrake or similar approved flow control device discharging at a maximum rate of 50.1 ls (equivalent QBar rate)

Surface water drainage and outfall subject to Severn Trent Water, Environment Agency and Lead Local Flood Authority approval.

Site Plan
 Scale 1:1000

Rev	Date	Title block amended	PS	KH
P02	09.03.22	Title block amended	PS	KH
		Amendments	By	Chk

RLRE
 Consulting Engineers
 Client

MJ Loughborough Ltd
 Project
 CORKSCREW LANE
 ASHBY-DE-LA-ZOUCH

Drawing Title
DRAINAGE STRATEGY PLAN

Status
FOR INFORMATION

Scale	Drawn	Checked	Date
1:1000 @ A1	JA	KH	23.02.22

Drawing Number	Revision
22024-RLL-22-XX-DR-C-003	P02

Scale Bar
 1:1000 to 70
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Appendix D - Land East of Corkscrew Lane, Ashby de la Zouch. Transport Note

MATHER JAMIE

LAND EAST OF CORKSCREW LANE, ASHBY DE LA ZOUCH

TRANSPORT APPRAISAL

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project number: ADC2883			report reference: ADC2883-RP-B
version	date	author	comments
1		David Cummins	internal draft
2	31/01/2022	David Cummins	first version to Mather Jamie
3	09/03/2022	David Cummins	second version following Mather Jamie comments
4	09/03/2022	David Cummins	revised to amend typo

Introduction

1. Mather Jamie instructed this report, to provide an initial appraisal of the transport matters likely to arise from a development of the land east of Corkscrew Lane in Ashby de la Zouch (**Figure 1**). The local planning authority is North West Leicestershire District Council, and the local highway authority is Leicestershire County Council.



Figure 1: aerial view of the site

2. The criteria to satisfy for a development proposal to be acceptable are set out in paragraph 110 of the NPPF:
“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:
 - a) *appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
 - b) *safe and suitable access to the site can be achieved for all users; and*
 - c) *the design of streets, parking areas, other transport elements and the content of associated standards reflects current national guidance, including the National Design Guide and the National Model Design Code⁴⁶; and*
 - d) *any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.*
3. The key themes are therefore accessibility by sustainable modes of transport, safe and suitable access, and the mitigation of traffic and safety impacts. Those themes are explored in the following paragraphs.

4. A separate report reviews the flood risk and drainage matters. That report finds that there are no drainage issues, such as the need for dry access, to affect the highway considerations.

Site location and highway network

5. **Figure 2** shows an extract from the OS map of the triangular shaped greenfield site, which is 28.39 acres (11.49ha) in size. The on-site gradients fall in a broadly south to north direction with levels dropping from around 150m to around 140m AOD. There are no rights of way crossing the site. The southern boundary of the site is a freight only railway line.

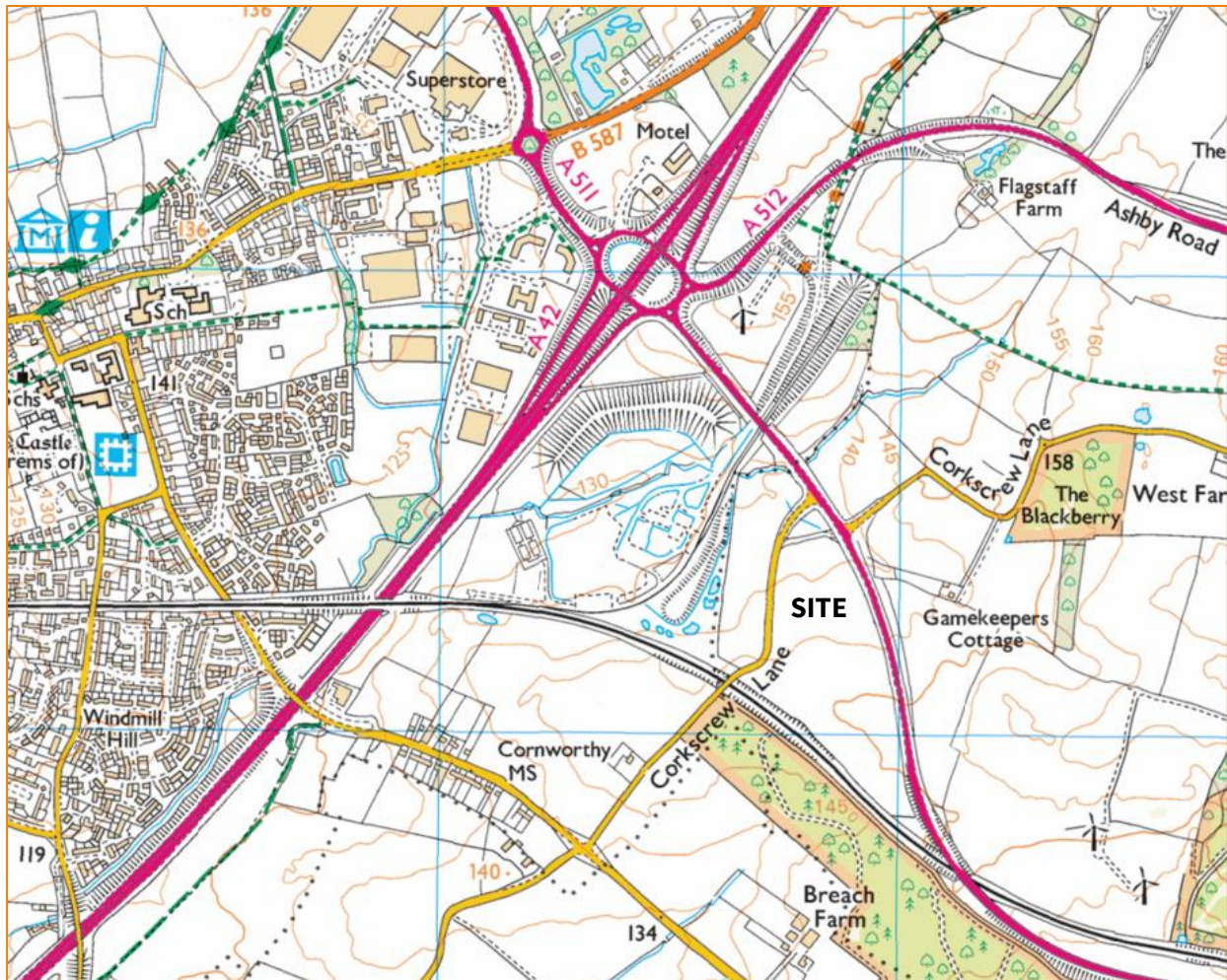


Figure 2: OS map of the site and its surroundings

6. The site would be accessed from Corkscrew Lane, a C class single carriageway road with a national speed limit. Corkscrew Lane has a 7.5 tonne weight limit (except for loading), a 5.0m wide carriageway, with grass verges both sides and no footways. A typical cross-section is shown in **Figure 3**.



Figure 3: typical highway conditions on Corkscrew Lane, looking south with the site on the left

7. Corkscrew Lane joins the A511 Ashby Road at a priority controlled ghost island T-junction. Corkscrew Lane is the signposted route to Packington. The A511 Ashby Road is an A class road with a national speed limit and part of Leicestershire's Major Road Network. There are no footways beside the A511 (**Figure 4**).



Figure 4: looking northwards along the A511 Ashby Road across its junction with Corkscrew Lane

8. The A511 joins A42 Junction 13; a grade separated signal controlled roundabout. The A42 is part of the Strategic Road Network under the control of National Highways.

G-Park Ashby de la Zouch

9. On the opposite side of Corkscrew Lane from the site, the former Lounge Disposal Point site has outline planning consent and is being marketed as G-Park Ashby de la Zouch (**Figure 5**).



Figure 5: extract from GLP marketing brochure showing one potential development option for G-Park Ashby

10. Outline planning consent for G-Park was gained by Decision Notice dated 13 May 2021¹. The form of development is controlled by a Parameters Plan and condition that allows development of up to 70,000sqm (753, 474sqft) gross internal area of B8 use.
11. A copy of the Decision Notice is in **Appendix B** and it sets out various conditions. Those relevant to highways matters at this stage are summarised in the table below. The table also includes the obligations that are in the S106 Agreement.

¹ 19/00652/FULM | Hybrid planning application for redevelopment of the site comprising: Outline application (all matters reserved) for the erection of Class B8 distribution unit(s) and ancillary offices (B1a), service yards and HGV parking, fuel and wash facilities, vehicular and cycle parking, gatehouse(s) and security facilities, plant, hard and soft landscaping including boundary treatments and retaining walls, pedestrian and cycling infrastructure, internal roads, and foul and surface water drainage infrastructure. Full application for site clearance works (including removal of railway, existing trees/hedgerows and existing hardstanding), access from (and alterations to) Corkscrew Lane, brook diversion and crossings, earthworks and structural landscaping (including boundary treatments), associated utilities infrastructure, surface water drainage outfall, and construction access and compounds | Former Lounge Disposal Point Ashby Road Coleorton Leicestershire
From <<https://plans.nwleics.gov.uk/public-access/applicationDetails.do?activeTab=summary&keyVal=PPDNW5LR0JR00>>

Conditions relating to full application	
27	No occupations until a) access arrangement shown on drawing 10256-HYD-xx-XX-DR-S-0230-P3 have been implemented b) vehicular visibility splays of 4.5m x 215m have been provided at the site access
Conditions relating to outline application	
56	No occupation of any plot until an amended Travel Plan has been agreed.
57	No occupation of any plot until a Public Transport Strategy has been approved. The agreed strategy to be implemented so that it is available for use by employees from the first day of the first building to be occupied.
S106 Agreement signed 11 May 2021	
£756,963.58 Coalville Transportation Infrastructure Fund Contribution	
£75,240 Bus Pass Contribution - being 25% of the Confirmed Employees multiplied by the cost of a Bus Pass (£360), index linked.	
<ul style="list-style-type: none"> • Bus Pass - Bus passes to be provided to a Confirmed Employee following an application to the County Council entitling the holder to travel free of charge on local bus services for 6 months • Confirmed Employees – number of employees for each unit, provided that the number of employees does not exceed 835 	
Travel Pack – provided to all employees on or before day one of their employment	
Travel Plan Co-ordinator – responsible for the implementation of the Travel Plan, appointed from occupation until five years from occupation	
£11,337.50 Travel Plan Monitoring Fee	

12. A consultation response by Highways England dated 17 June 2020 raised no objections. They determined that any adverse traffic impacts were mitigated by the Coalville Transportation Infrastructure Fund Contribution.
13. Network Rail raised no objections, although raised several requirements to be met. The proposed route of HS2 is shown on Figure 5, and accordingly HS2 provided a consultation response with no objection subject to informatives.
14. The Transport Assessment² that supported the application was updated through the determination period, so that the findings in the final version have not been superseded by later assessments and clarifications.
15. An extract from the officer’s report to committee is included in **Appendix C**. The whole section about transport and highways is extracted, because the broad themes expressed will also apply to the site east of Corkscrew Lane.

Development proposal

16. To prepare this report, it has been assumed that the site could accommodate up to 500,000sqft (46,451sqm) of B8 floorspace in a number of separate buildings.
17. A plan showing the site in its context with G-Park is in **Appendix A**, and an extract is shown in **Figure 6**. The development is shown to be accessed from Corkscrew Lane, south of the G-Park access. Access is explored in more detail below.

² Transport Assessment, Hydrock, 5 January 2021 (doc ref 10256-HYD-XX-RP-TP-5001.P1.9)



Figure 6: extract from the preliminary development and landscape strategy drawing in Appendix A

Sustainable Transport

18. It is evident from the G-Park application that accessibility by sustainable modes of transport was a problematic consideration, with an objection being largely avoided by the condition that requires a public transport strategy to be agreed.
19. **Figure 7** shows a 2km walking catchment from the site east of Corkscrew Lane. There is relatively little residential population within walking distance, other than on the eastern fringes of Ashby de la Zouch.
20. There are no footways on Corkscrew Lane or the A511, roads with a national speed limit and no street lighting. It would be an intimidating walk to the site. The G-Park application proposed no improvements to the pedestrian provisions.

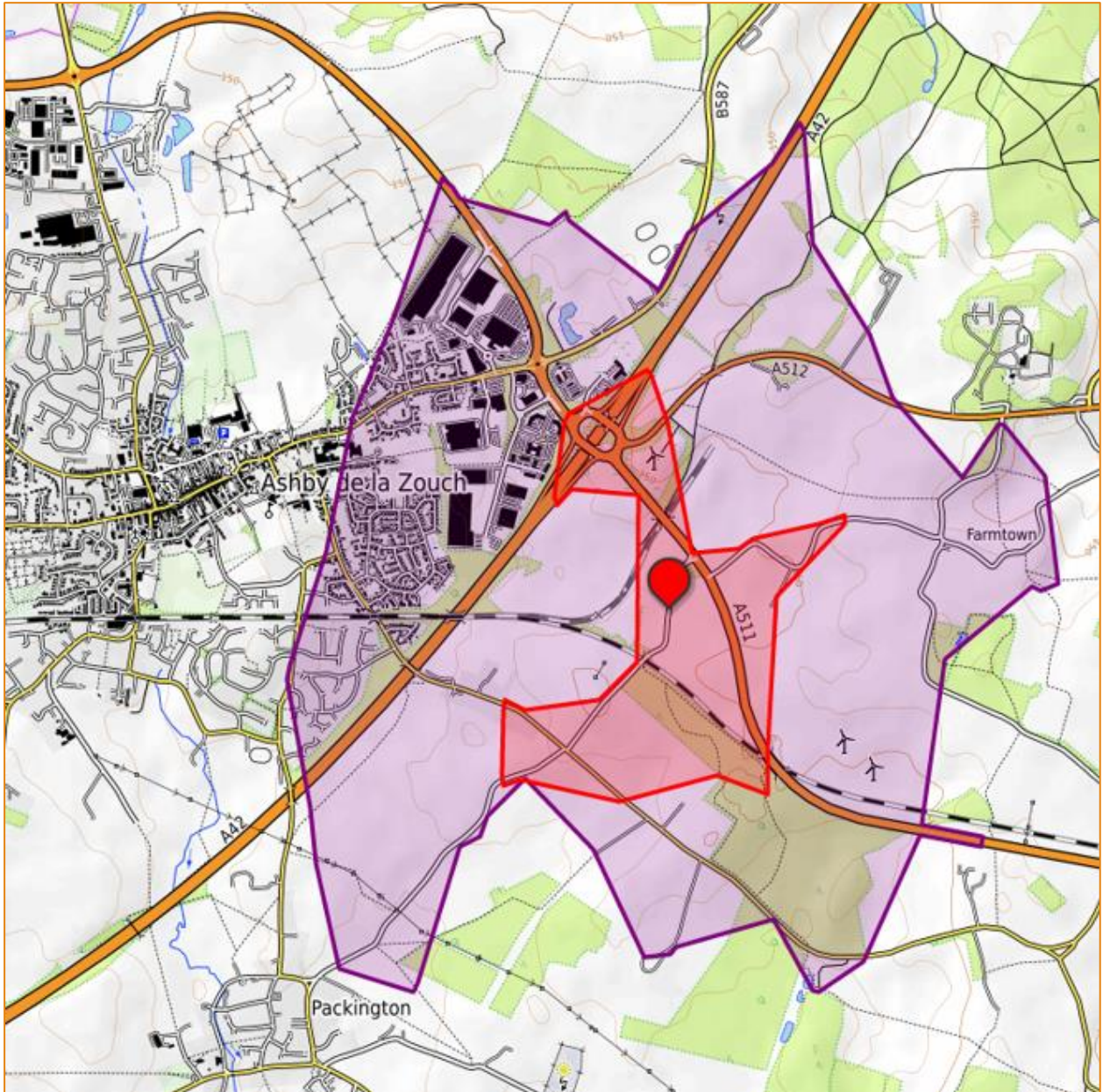


Figure 7: 1km and 2km walking catchments from an access on Corkscrew Lane

21. Cyclists travel an average of 22 minutes in their journeys to work³, equivalent to around 7.3km at a 20kmph absolute minimum design speed⁴. **Figure 8** shows the cycling catchment in 1km intervals, up to 7km. There is a significant population within cycling distance of the site, including Ashby de la Zouch and most of Coalville.

³ Office for National Statistics, Labour Force Survey

⁴ Department for Transport, Local Transport Note 1/20, Cycle Infrastructure Design, July 2020, Table 5-4: Design Speed for off-carriageway cycle routes

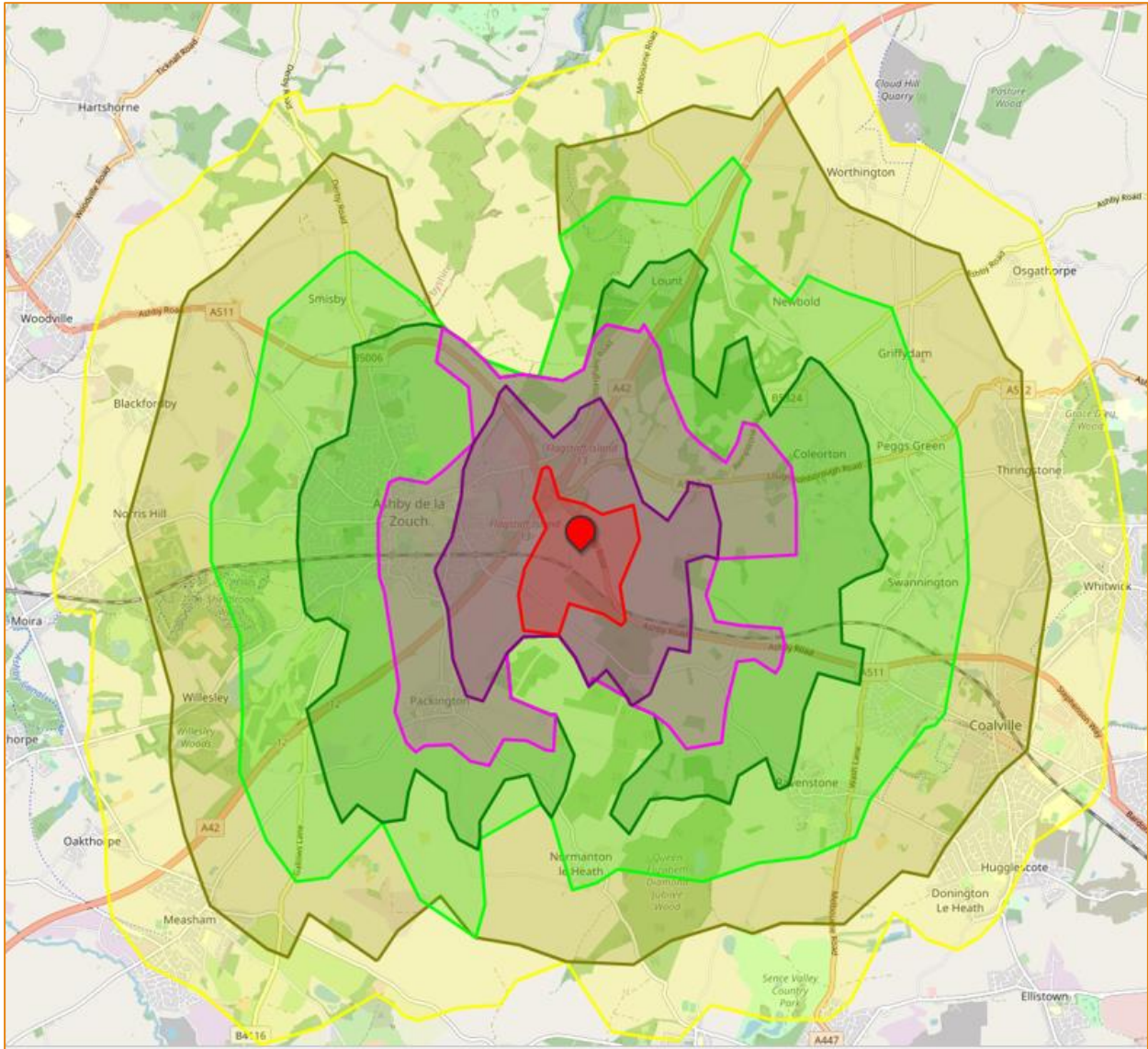


Figure 8: 7km cycle catchment in 1km intervals, from the development access on Corkscrew Lane

22. There would be little dedicated cycle infrastructure to allow access to the development, although there are a number of designated quieter roads recommended for cycling, away from the busier A511, including Leicester Road and Corkscrew Lane (**Figure 9**).

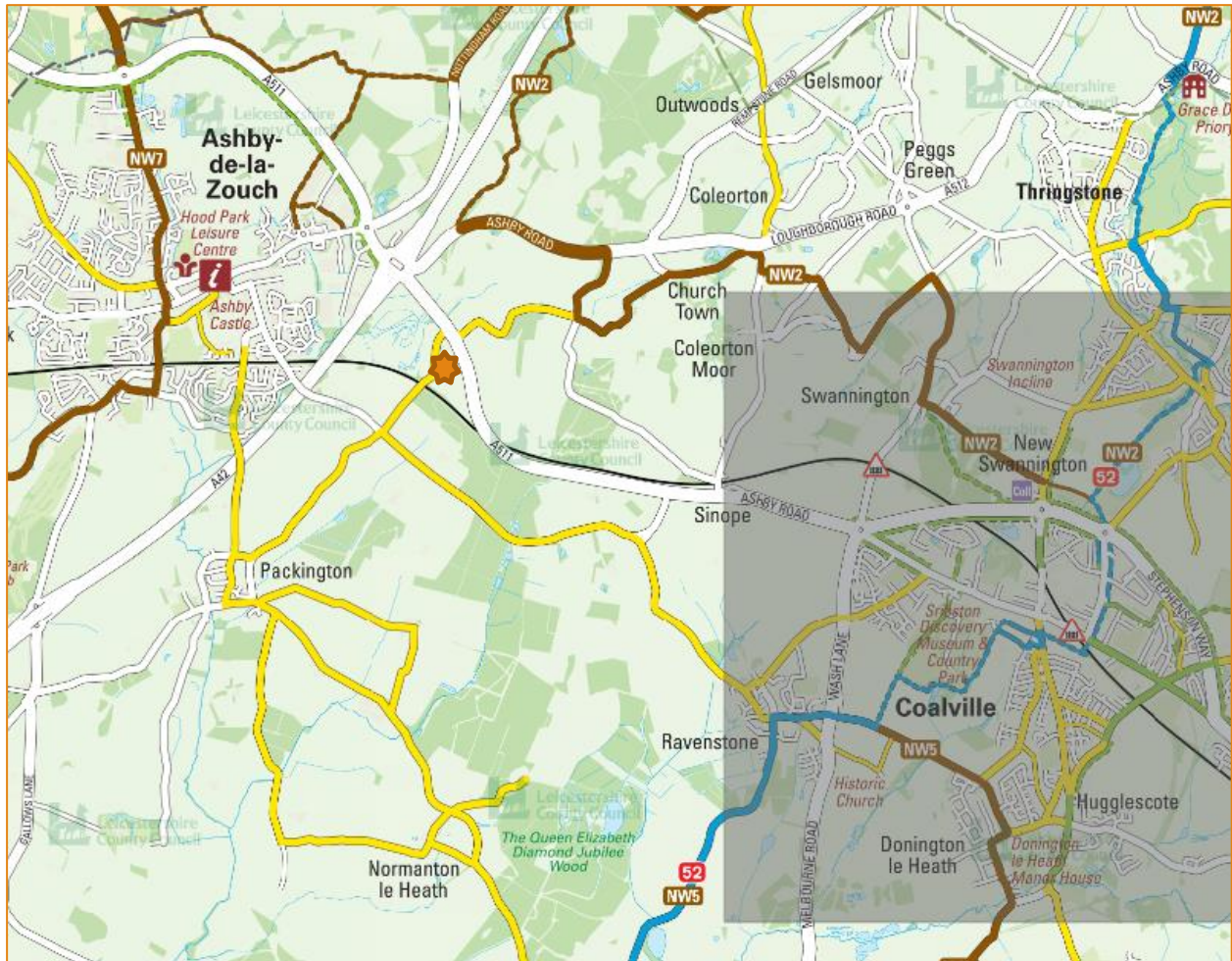


Figure 9: extract from LCC's cycle map, where yellow roads are quieter roads recommended for cycling

23. Bus stops are too far from the site to be within reasonable walking distance (**Figure 10**). To overcome that deficiency, G-Park is conditioned to produce a Public Transport Strategy to ensure its employees can access G-Park by bus. Their Transport Assessment and Travel Plan discuss the potential for a shuttle bus, or diversion of an existing bus service. Details have yet to come forward.
24. The patronage created by a further development on Corkscrew Lane, in addition to G-Park, and hence income created, should be attractive to a commercial operator. Two recent examples where existing Arriva bus services have been diverted to serve newly built employment units are the Amazon unit on Beveridge Lane, and the VF Corporation unit on West Lane, both in the Bardon Hill industrial area.
25. Car sharing is also a sustainable form of transport, and large employment units are well placed to enable car sharing. Tools such as employee intranets, websites, and apps, can put drivers and passengers in touch with each other. Car sharing can cater for employees on the same site, as well as those travelling to other destinations.
26. Electric vehicle charging points will also be required as part of the development, as part of the package of measures to ensure that the environmental impacts of travel demand would be minimised.

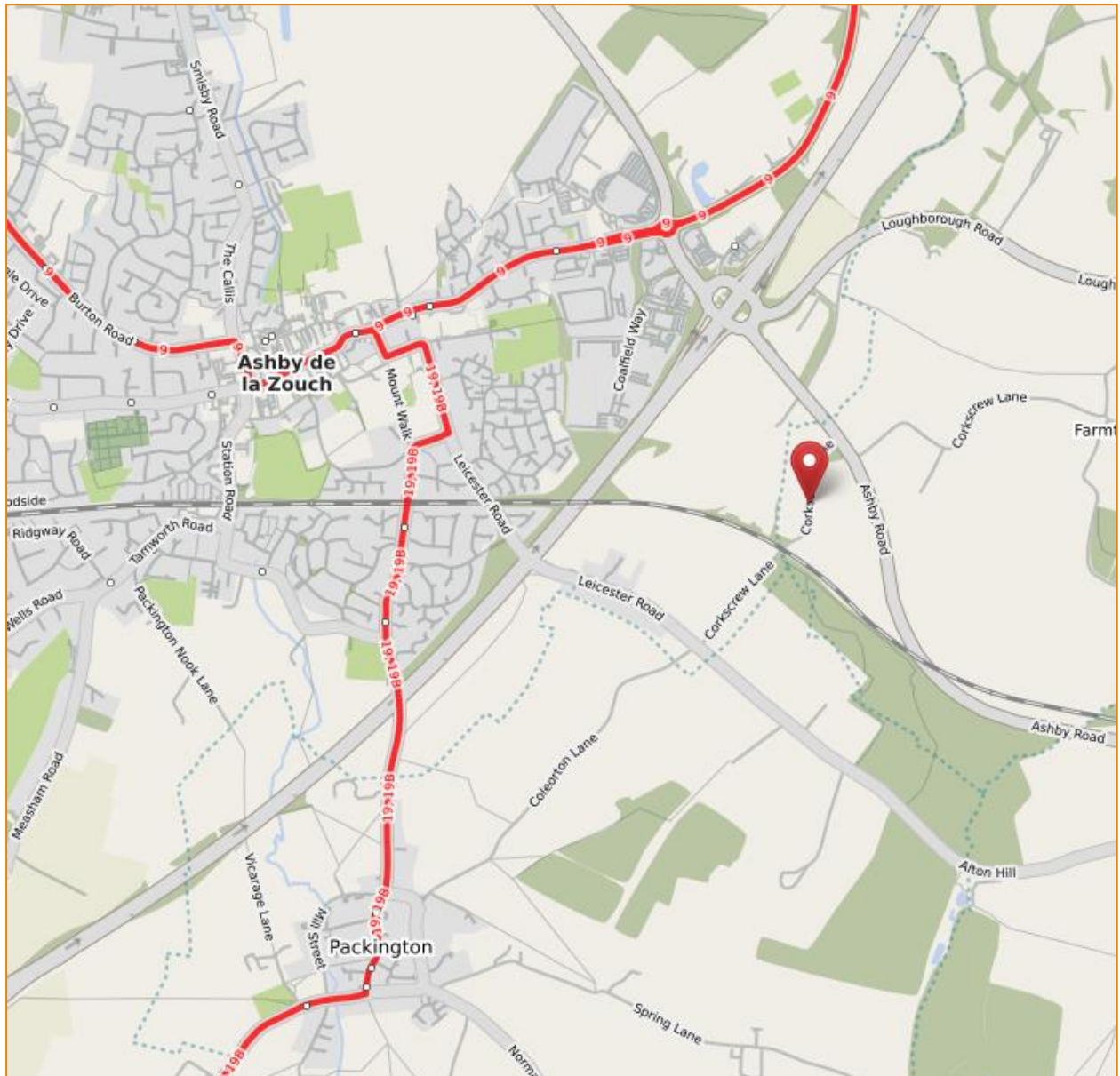


Figure 10: bus routes

27. A Travel Plan will be required to manage transport demand post-occupation. As with G-Park, there will be a requirement for each occupier to appoint a Travel Plan Co-Ordinator, and a S106 Agreement will secure monies towards travel packs, free bus passes, and a monitoring fee.
28. Overall, given the approval granted to G-Park, it would be unreasonable to prevent the development based on accessibility by sustainable modes of transport. However, measures will need to be put in place, and funded, such as a Public Transport Strategy, to ensure that not all employees drive to the proposed development.

Access

29. On Corkscrew Lane, the key consideration for delivering an acceptable access would be achieving adequate visibility splays. The Leicestershire Highway Design Guide requires splays for a B8 development to be measured from a 4.5m setback. The distance to be seen along Corkscrew Lane depends on the 85th percentile speed of vehicles. In the G-Park application there was no speed survey carried out and the Transport Assessment incorrectly asserted that 123m splays would be appropriate based on MfS parameters and the 60mph speed limit. Condition 27 was

therefore introduced to require 4.5m x 215m splays, because in the absence of a speed survey, 215m is the required distance for 85th percentile speeds up to 62mph.

30. Given the geometry of the road, it is highly unlikely that the 85th percentile speed is much over 50mph. There is a relatively short distance from the A511, from where vehicles have to slow to turn. The railway bridge to the south of the site is narrow and there is an S-bend to its immediate north. These factors control speeds.
31. To support an access design that would be acceptable to LCC, a speed survey will be required, to demonstrate the 85th percentile speeds. In advance of that, at this stage, an access has been designed at a location towards the northern end of the site frontage, on the straight length of Corkscrew Lane. It will only be possible to provide one point of access, but that is acceptable, and was deemed acceptable for the G-Park development.
32. The access design is shown on **Drawing ADC2883-DR-001-P2**. The proposed access location would be around 90m from the G-Park access, a sufficient separation distance. From that location, the achievable visibility splays to the left and right, for vehicles emerging from the access, are shown in the table below. Also shown in the table is the corresponding 85th percentile speed. As Corkscrew Lane is a C class road it should be acceptable to provide the absolute minimum splays. However, given the exiting vehicles will be slow moving HGVs, there may be an insistence on desirable minimum distances. If that were the case, the 85th percentile speeds would need to be no more than 51mph for the visibility splays to be acceptable.

	visibility left	visibility right
achievable distance	153m	147m
equivalent 85 th percentile speed – DMRB absolute minimum	60mph	59mph
equivalent 85 th percentile speed – DMRB desirable minimum	51mph	50mph

33. For the reasons set out above, it is likely that the 85th percentile speeds are around 50mph. Plus, although it is unlikely to be able to alter the speed limit, measures could be introduced to ensure that speeds were further controlled, for example a chicane at the railway bridge. Overall, an acceptable access would be achievable, but this is an item on which greater work would be required at an early stage - a speed survey will be necessary to evidence driven speeds.
34. In terms of the other features of the access, from the G-Park application it is evident that a ghost island T-junction would have sufficient capacity to accommodate the development traffic. A standards compliant design of a ghost island T-junction can be provided, and the drawing shows an access road with a 7.3m wide carriageway and 15m kerb radii.
35. The G-Park access introduced a central island on the access road designed to try and prevent HGVs turning right out of the G-Park access and routing through Packington. Such an occurrence is unlikely to occur, but the feature was introduced to try and appease objectors. It would be harder to prevent left turns out of the proposed access to the land east of Corkscrew Lane, although other measures such as ANPR monitoring could be introduced if it was felt necessary to address this issue.

Off-site traffic impacts

36. The 70,000sqm B8 floorspace at G-Park was estimated to generate the traffic movements shown in the table below⁵.

70,000sqm B8	AM peak (7-8am)			PM peak (3-4pm)		
	arrive	depart	2way	arrive	depart	2way
cars	92	26	118	31	87	118
HGVs	20	18	38	16	17	33
PCUs*	150	78	228	77	136	213

* cars and HGVs were assumed to have PCU (Passenger Carrier Unit) values of 1.0 and 2.9 respectively

37. On a pro-rata basis, 46,451sqm (500,000sqft) of B8 use would generate the traffic movements shown in the table below.

46,451sqm B8	AM peak (7-8am)			PM peak (3-4pm)		
	arrive	depart	2way	arrive	depart	2way
cars	61	17	78	21	58	79
HGVs	13	12	25	11	11	22
PCUs	100	52	152	51	90	141

38. The car movements generated by the development will split at the access, with the majority coming to and from the A511. They will disperse again at the A511, and at subsequent junctions. HGVs will all route to the A511. The majority will then route to and from the A42, although some will route to and from the east in the Coalville direction. The study area, where material traffic increases would occur, will consist of the following junctions:

- Corkscrew Lane/site access junction(s)
- A511/Corkscrew Lane junction
- A42 J13

39. The capacity analysis of the A511/Corkscrew Lane junction from the G-Park Transport Assessment is repeated in the table below⁶. It shows that the junction would operate with plenty of spare capacity and small queues, although the delay for vehicles turning right out of Corkscrew Lane would be 41 and 102 seconds in the morning and evening peak hours respectively.

A511/Corkscrew Lane 2025 With G-Park	queue (PCU)	delay (secs)	Ratio of Flow to Capacity	queue (PCU)	delay (secs)	Ratio of Flow to Capacity
Corkscrew Lane left	0.8	14.40	45%	0.9	22.82	48%
Corkscrew Lane right	0.6	40.84	38%	2.2	101.93	73%
A511 right	0.3	9.83	23%	0.4	11.20	28%

40. With the additional traffic from the proposed development, the operation of the junction would deteriorate. Nevertheless, it would still have sufficient capacity and small queues. The delays would increase, and could give rise to road safety concerns with vehicles seeking gaps in the passing traffic that are too small. Nevertheless, ultimately there should not be an unacceptable impact on highway safety or a severe traffic impact and changes to the junction should not be necessary.

⁵ Table 7.5 of Transport Assessment

⁶ Appendix L (pdf p141) of Transport Assessment

41. The capacity analysis of A42 J13 from the G-Park Transport Assessment is repeated in the table below⁷. It shows that the operation of the junction would deteriorate with the additional development traffic. The developer argued that the increases in queues and delay would not be severe. Highways England did not accept that position, but agreed that a contribution towards the Coalville Transportation Infrastructure Fund would mitigate the impact.

A42 J13 - PRC*	AM peak hour	PM peak hour
2025 Without Development	-8.1%	-12.7%
2025 With Development	0.1%	-18.1%

* PRC = Practical Reserve Capacity over all lanes

42. The proposed development will deteriorate the performance of the junction further. However, in the same way as G-Park, a contribution towards the Coalville Transport Strategy would mitigate the impacts.

Coalville Transport Strategy

43. The Coalville Transport Strategy was devised to deal with the impacts arising from development in the South East Coalville Strategic Development Area, allocated for growth in North West Leicestershire District Council’s Local Plan. The Strategy was agreed at the 15 January 2013 NWLDC Cabinet meeting. A set of infrastructure improvements were derived, originally totalling £19m to £21m. They included improvements to junctions and improvements to bus services. They were to support 4,300 dwellings, hence a contribution of £4,419 to £4,884 per dwelling. Paragraph 4.7 of the report to Cabinet says, *“It is recommended that the proposed approach will be applied on a case by case basis to all major planning applications (more than 50 dwellings) in Coalville (as defined in this report). Major applications for non-residential/commercial development (e.g. employment, retail) (defined as above 10,000 sq m floorspace) will also be required to contribute and will be assessed on a case by case basis.”*
44. Since 2013, the contributions policy has been widely applied. It has been applied to numerous residential developments. It has also been applied to numerous commercial developments, both within the Strategic Development Area of South East Coalville and beyond, where those developments would have an impact on the A511.
45. The Leicestershire County Council Cabinet report of 23 June 2020 is in **Appendix E** and provides an update on the Coalville Transport Strategy. It describes how the policy has evolved since 2013, with extra works being added, more developments contributing, up to date costs being determined, updated traffic forecasts being assessed, public funding being accessed, etc. However, the basis is still the same – paras 46 to 48 reference the original £4,000 to £5,000 per dwelling and the gathering of c£20m.
46. As noted in Appendix A of the Cabinet report, the original list of junctions that formed part of the Coalville Transport Study has expanded and adjusted with further analysis. The list of junctions along the A511 has become the A511 Major Road Network (MRN) Scheme, and this scheme is now only a part of the revised Coalville Transport Strategy.
47. Focussing on the A511 MRN Scheme⁸, LCC are seeking public funds to deliver those works, shown below, so they can bring delivery forward, rather than waiting for a build-up of funds through contributions. LCC submitted a Strategic Business Case to the Department for Transport (DfT),

⁷ Appendix M (pdf p169) of Transport Assessment

⁸ <https://www.leicestershire.gov.uk/roads-and-travel/road-maintenance/a511-growth-corridor-scheme>

which was approved. They therefore submitted an Outline Business Case in January 2020. The funding being sought, and the delivery timeline, are summarised in the table below, extracted from the Outline Business Case.

Table 5-1 – Summary of Scheme Costs (factor costs, including inflation)

Year	Land	Construction	Preparation	Supervision	Total
2020	£-	£-	£1,639,449	£-	£1,639,449
2021	£957,199	£-	£1,647,405	£-	£2,604,604
2022	£269,685	£18,552,117	£-	£687,900	£19,509,702
2023	£-	£12,338,888	£-	£702,407	£13,041,295
2024	£-	£1,370,927	£-	£1,194,858	£2,565,785
2025	£-	£31,677	£-	£243,324	£275,001
Total	£1,226,884	£32,293,610	£3,286,854	£2,828,489	£39,635,837

48. Since the Outline Business Case was submitted in January 2020, the pandemic slowed down its approval. However, in August 2021 the project moved a further step forward when the DfT confirmed Programme Entry status, meaning funding has been allocated and the County Council can progress the scheme. Leicestershire County Council are expecting construction to begin in 2024 with completion in 2026.
49. Although it looks unlikely, should the bid for funds prove unsuccessful, as noted in paragraphs 46 to 48 of LCC’s Cabinet report, there would anyway be £20m of contributions gathered through the S106 Agreements of the numerous developments to deliver some of the overall works.
50. The above is a short summary of the Coalville Transport Strategy, provided to demonstrate the policy basis for seeking contributions, and the works they will deliver. It is on that basis that both Leicestershire County Council and Highways England justified requesting a contribution from G-Park of £756,963.58, secured in the Section 106 Agreement as a Coalville Transportation Infrastructure Fund Contribution.
51. The contributions sought from developments are determined based on site area, adjusted on a case by case basis depending on how much of the site area is developable. Nevertheless, on a pro-rata basis with G-Park’s 70,000sqm of floorspace, a development of 46,451sqm (500,000sqft) on the land east of Corkscrew Lane would be expected to contribute £502,310.

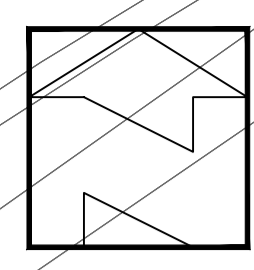
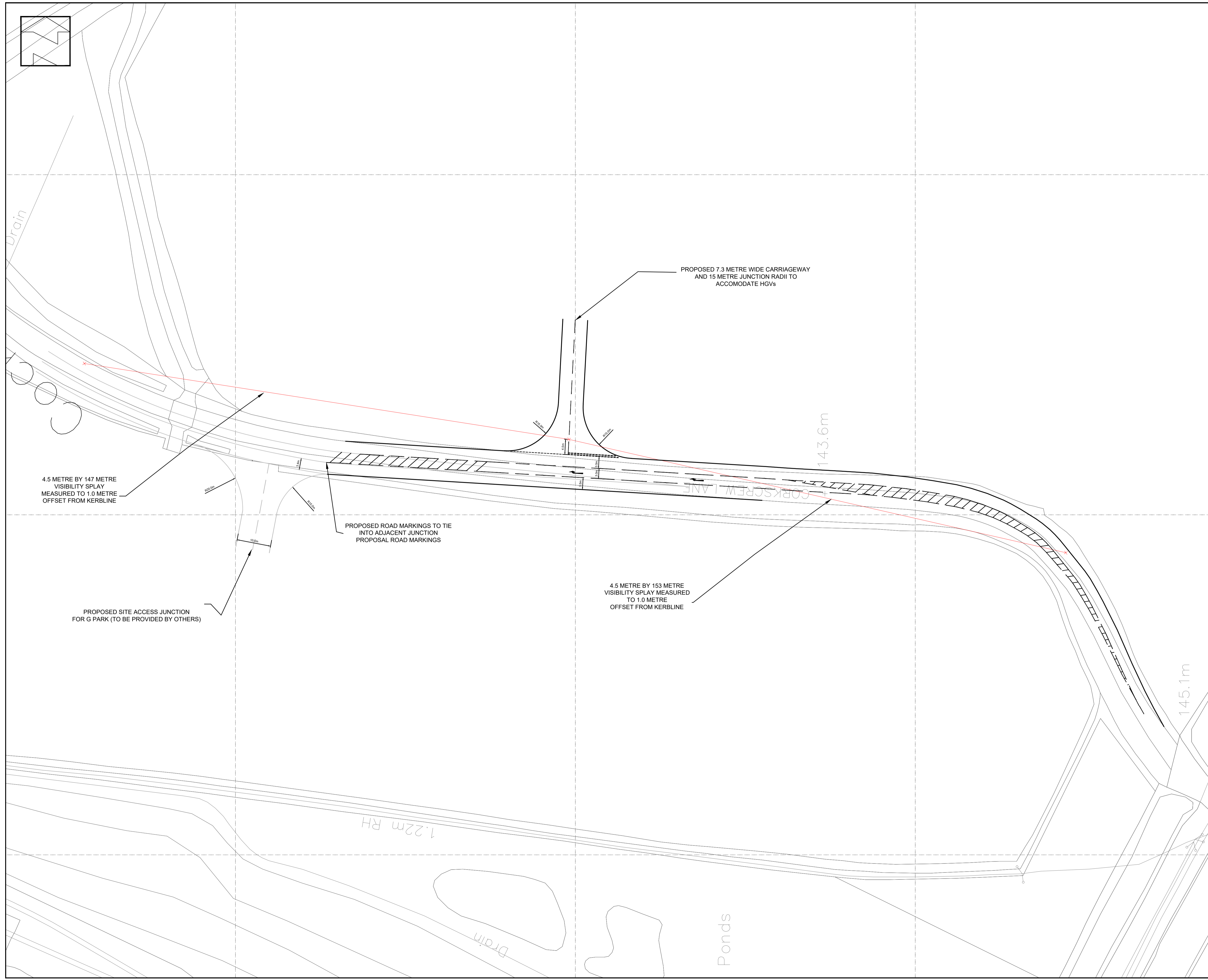
Summary and conclusions

52. The development site is opposite G-Park Ashby de la Zouch on Corkscrew Lane. In 2021, G-Park was granted outline consent for 70,000sqm of B8 floorspace. Given that precedent, it can be concluded with confidence that a development of up to 46,451sqm (500,000sqft) of B8 floorspace on the development site would be acceptable, subject to conditions and obligations.
53. An appropriate access design with standard dimensions can be provided on Corkscrew Lane, in the form of a single ghost island T-junction. It would not be possible to introduce two accesses. However, to achieve adequate visibility splays, the 85th percentile speed of traffic passing the access would need to be 50mph or less. At this stage, a speed survey has not been carried out and so the actual speeds are unknown. The conditions on Corkscrew Lane control speeds and

mean that they may be around 50mph, and if necessary measures could be introduced to control speeds, and therefore it is concluded that a suitable access can be provided.

54. Accessibility by sustainable modes of transport can be made acceptable by the provisions of a Travel Plan, including free bus passes and travel packs for employees, along with a public transport strategy that enables employees to travel by bus. Collaboration with the developer of G-Park would allow costs to be shared for a new shuttle bus, or diversion of an existing bus service.
55. Adverse traffic impacts on the off-site highway network will be confined to the A511 corridor. Thus, they will be mitigated by the payment of a contribution of around £502,310, with a policy justification under the Coalville Transport Strategy.

DRAWINGS



PROPOSED 7.3 METRE WIDE CARRIAGEWAY
AND 15 METRE JUNCTION RADII TO
ACCOMMODATE HGVs

4.5 METRE BY 147 METRE
VISIBILITY SPLAY
MEASURED TO 1.0 METRE
OFFSET FROM KERBLINE

PROPOSED ROAD MARKINGS TO TIE
INTO ADJACENT JUNCTION
PROPOSAL ROAD MARKINGS

PROPOSED SITE ACCESS JUNCTION
FOR G PARK (TO BE PROVIDED BY OTHERS)

4.5 METRE BY 153 METRE
VISIBILITY SPLAY MEASURED
TO 1.0 METRE
OFFSET FROM KERBLINE

Rev	Description	Date

Client:
Mather Jamie

Project:
Land East of Corkscrew Lane,
Ashby De La Zouch

Title:
Access Junction Layout











Drg Size: A1 | Scale: 1:500 | Date: 31/01/2022

Drg No: ADC2883-DR-001 | Rev: P2

APPENDIX A

PRELIMINARY DEVELOPMENT AND LANDSCAPE STRATEGY



- KEY**
-  Site boundary
 -  Preliminary development area
 -  Existing key green infrastructure
 -  Proposed structural planting
 -  Proposed linear planting
 -  Proposed landscape buffer to Corkscrew Lane
 -  Indicative access point
 -  Consented development north-west of the site

Land east of Corkscrew Lane
Ashby de la Zouch

Client: Mather Jamie

Fig 3: Preliminary Development and Landscape Strategy

Drawing no. : P20-0281-03
Date : 21 Feb 2022
Drawn by : AC
Checked by : JWA
Scale : 5000 @ A3

Pegasus
Group

APPENDIX B

G-PARK DECISION NOTICE

PLANNING PERMISSION

Town and Country Planning Act 1990

Hybrid planning application for redevelopment of the site comprising: Outline application (all matters reserved) for the erection of Class B8 distribution unit(s) and ancillary offices (B1a), service yards and HGV parking, fuel and wash facilities, vehicular and cycle parking, gatehouse(s) and security facilities, plant, hard and soft landscaping including boundary treatments and retaining walls, pedestrian and cycling infrastructure, internal roads, and foul and surface water drainage infrastructure. Full application for site clearance works (including removal of railway, existing trees/hedgerows and existing hardstanding), access from (and alterations to) Corkscrew Lane, brook diversion and crossings, earthworks and structural landscaping (including boundary treatments), associated utilities infrastructure, surface water drainage outfall, and construction access and compounds at Former Lounge Disposal Point Ashby Road Coleorton Leicestershire

In pursuance of its powers under the Town and Country Planning Act 1990 North West Leicestershire District Council hereby grants planning permission for the above development in accordance with the application and plans submitted subject to and as may be modified by the following conditions:

The following conditions relate to the full application, as defined by 'Development Applied for in Full' Drawing No. 00091 PL8 received by the Local Planning Authority on 29 May 2020:-

- 1 The parts of the development for which full planning permission is hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: In order to comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

- 2 The development hereby approved shall be implemented in accordance with the following details:

- Brook Diversion Drawing No. 00102 PL3; and

- Proposed Watercourse Diversion Drawing No. S-0503 P11

received by the Local Planning Authority on 19 December 2019 and

- Development Applied for in Full Drawing No. 00091 PL8;
- Fencing Layout Drawing No. 00098 PL9;
- Construction Compound Drawing No. 00099 PL6; and
- Full Application: Drainage Layout Drawing No. S-0300 P8

received by the Local Planning Authority on 29 May 2020.

Reason: For the avoidance of doubt and to determine the scope of the permission.

- 3 The site strategic earthworks are to be carried out in accordance with Full Application: Earthworks Volumes Drawing No. 10256-HYD-XX-XX-DR-S-0302 P9 and Full Application: Proposed Finished Levels Drawing No. 10256-HYD-XX-XX-DR-S-0301 P8 received by the Local Planning Authority on 29 May 2020.

Reason: To ensure the development takes the form envisaged by the Local Planning Authority.

- 4 The development hereby approved shall be carried out in accordance with the following:

- Soil Specification Plan Drawing No. 0069-07 Rev B received by the Local Planning Authority on 19 December 2019;
- Softworks Specification Plan Drawing No. 0069 Rev E received by the Local Planning Authority on 29 May 2020;

- Detailed Seeding Plan Access Road Drawing No. 0069-04 K;
 - Detailed Seeding Plan Brook Diversion Drawing No. 0069-05 L;
 - Detailed Infrastructure Planting Plan Drawing No. 0069-06 M; and
 - Detailed Brook Diversion Tree, Coir & Willow Locations Drawing No. 0069-11 J
- received by the Local Planning Authority on 26 June 2020.

The development shall be carried out in accordance with the approved scheme and thereafter maintained.

Reason: To ensure the development takes the form envisaged by the Local Planning Authority.

- 5 The development hereby approved shall be carried out in accordance with the external lighting Drawing No. 10004-PL-103 P1 received by the Local Planning Authority on 29 March 2019 and thereafter retained. All exterior lighting shall be capped at the horizontal to prevent upward light spill.

Reason: To ensure a high quality of external environment.

- 6 The development hereby approved shall be carried out in accordance with the Remediation Method Strategy and Environmental Action Plan (dated September 2014) received by the Local Planning Authority on 19 March 2019.

Reason: In the interests of ground conditions and to ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site.

7 All construction works shall be carried out in accordance with the Construction Environmental Management Plan (CEMP) (Rev G) received by the Local Planning Authority on 4 December 2020, or in accordance with any amended CEMP first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the interests of the amenities of the area, to reduce waste, in the interests of nature conservation, to minimise the risk of emissions / pollution, and to reduce the possibility of deleterious material (mud, stones etc.) being deposited in the highway and becoming a hazard for road users.

8 The development hereby approved shall be implemented in accordance with the mitigation and recommendations contained within:

- Habitat Creation and Management Plan (Issue 3) and
- Invertebrate Mitigation Report

received by the Local Planning Authority on 29 May 2020.

Reason: In the interest of nature conservation.

9 The development hereby approved shall be carried out in accordance with the submitted Flood Risk Assessment received by the Local Planning Authority on 29 May 2020 and Addendum to Flood Risk Assessment and Drainage Management Strategy received by the Local Planning Authority on 16 July 2020 and the following mitigation measures detailed therein including greenfield runoff rates, discharging into the watercourse, providing attenuation, oil interception and silt capture.

Reason: To ensure that the development is provided with a satisfactory means of drainage as well as to reduce the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution.

10 The development hereby approved shall be carried out in accordance with and including the mitigation and recommendations contained within the Brook Diversion Methodology (V14) received by the Local Planning Authority on 4 December 2020 and Watercourse Diversion Methodology Plan (ref. S-0504-P7) received by the Local Planning Authority on 29 May 2020. The development shall be carried out in accordance with the approved scheme and thereafter maintained, or in accordance with any amended scheme first submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure coverage of the coal seam along the brook diversion route and the development takes the form envisaged by the Local Planning Authority.

11 Notwithstanding the Construction Environmental Management Plan (CEMP) (Rev G) received by the Local Planning Authority on 4 December 2020, no waste water or contaminated waste water produced during the construction phase must discharge into the watercourse.

Reason: To ensure that contaminated water does not reach the watercourse.

12 The construction works, including earthworks, shall be limited to the following hours: 07:00 to 19:00.

Reason: In order to safeguard the amenities of occupiers of premises/dwellings in the vicinity.

13 No development hereby approved shall commence until:-

- a) a sediment control plan relating to the banks of and the areas adjacent to the watercourse;
- b) a bank fortification scheme (with stone material);
- c) a scheme to treat and remove suspended solids from surface water run off during construction works; and
- d) implementation period for criteria a-c

have first been submitted to and approved in writing by the Local Planning Authority.

The development must be implemented in accordance with the approved details, including timetable for implementation, or in accordance with any amended strategy first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the absence of submitted details and to ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution.

- 14 No development hereby approved shall commence until a construction dust assessment and any necessary mitigation measures have first been submitted to and approved by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details and any agreed mitigation measures must be implemented in accordance with the approved details.

Reason: In order to safeguard the amenities of occupiers of premises/dwellings in the vicinity.

- 15 No development hereby approved shall commence until a fish refuge creation method statement and implementation period has first been submitted to and approved in writing by the Local Planning Authority. The development must be implemented in accordance with the approved details, including timetable for implementation, or in accordance with any amended strategy first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the interests of nature conservation.

- 16 No development hereby approved shall commence until a fish rescue strategy for fish occupying the existing Gilwiskaw Brook to be diverted and implementation period has first been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details, including timetable for implementation or in accordance with any amended strategy first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the interests of nature conservation.

- 17 No development hereby approved shall commence until a botanical survey, method statement, translocation plan and translocation management plan and implementation period of turf and filago has first been submitted to and approved by the Local Planning Authority. The translocation management plan shall include a commitment to botanical survey to record abundance and species present at 1, 5 and 10 years after translocation, with results submitted to the Local Planning Authority. The development must be implemented in accordance with the approved details, including timetable for implementation and management or in accordance with any amended strategy first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the interests of nature conservation.

- 18 No development hereby approved shall commence until an orchid colonies translocation strategy (as identified in Appendix 9.8 of the Environmental Statement) and any necessary mitigation and period for implementation of mitigation has first been submitted to and approved in writing by the Local Planning Authority. The development including any approved mitigation measures and implementation period must be implemented in accordance with the approved details or in accordance with any amended strategy first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the interests of nature conservation.

- 19 No development hereby approved shall commence until an invertebrate survey (including Dingy Skipper) and invertebrate mitigation plan and future surveys and monitoring for the northern receptor area and periods for implementation have first been submitted to and approved by the Local Planning Authority. The Dingy Skipper colony should be monitored through surveys after 1, 2 and 5 years after translocation. The development must be implemented in accordance with the approved details and approved mitigation or in accordance with any amended strategy first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the interests of nature conservation.

- 20 No development hereby approved shall commence until a badger survey and any necessary mitigation and period for implementation for mitigation have first been submitted to and approved in writing by the Local Planning Authority. The development including any approved mitigation measures and implementation period must be undertaken in accordance with the approved details or in accordance with any amended strategy first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the interests of nature conservation.

- 21 No development hereby approved (with the exception of remediation works approved by Condition 6 and earthworks approved by Condition 3) shall commence until the brook diversion, including the brook diversion on land within the site and diversion that lies outside the red line boundary (granted planning permission under ref: 07/01372/FUL), has been delivered in accordance with approved Brook Diversion Drawing No. 00102 PL3 received by the Local Planning Authority on 19 December 2019 (from Point A to Point C).

Reason: To ensure that the brook diversion is delivered comprehensively across the site and the site to the north.

- 22 Notwithstanding the submitted plans nor conditions 2 and 10 no development hereby approved shall commence unless and until a detailed scheme for the design of the culverts associated with the watercourse diversion and crossings (including newt crossing) has first been submitted to and agreed in writing by the Local Planning Authority. The scheme for the culverts shall include inter alia full details of levels (bed and bank), scour prevention and bed reinforcement (where needed), wing walls, modelled flood levels to Above Ordnance Datum, exceedance flows for full or partial blockage scenarios, and access arrangements including for maintenance. The works shall be implemented in accordance with the approved details and thereafter retained, or in accordance with any amended scheme first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the absence of submitted details, to ensure that the brook diversion is delivered comprehensively across the site and the site to the north and to ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site.

- 23 Notwithstanding condition 9 no development hereby approved shall commence (with the exception of the approved brook diversion works) until such time as a surface water drainage scheme and long term maintenance of the surface water drainage scheme has first been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details and thereafter maintained.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site and to establish a suitable maintenance regime that may be monitored over time; that will ensure the long-term performance, both in terms of flood risk and water quality, of the surface water drainage system (including sustainable drainage systems) within the proposed development.

- 24 No development hereby approved shall commence until such time as details in relation to the management of surface water on site during construction of the development has first been submitted to, and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details and thereafter retained for the lifetime of the construction.

Reason: To prevent an increase in flood risk, maintain the existing surface water runoff quality, and to prevent damage to the final surface water management systems though the entire development construction phase.

- 25 Within 6 months of the date of the first planting as approved under Condition 4 being undertaken, a landscape management plan shall first be submitted to the Local Planning Authority and approved thereafter by the Local Planning Authority. The details shall include the period of replacement planting should any tree, shrub, hedgerow planting die, be removed or become seriously damaged. The development shall be carried out in accordance with the approved scheme agreed in writing by the Local Planning Authority and thereafter maintained, or in accordance with any amended scheme first submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure satisfactory landscaping is managed and to provide a reasonable period for the replacement of the planting.

- 26 Within 6 months of the day commencement of development, a biodiversity aftercare and management plan to cover management of retained, enhanced and created habitats, shall first be submitted to and approved in writing by the Local Planning Authority. The plan shall include commitments to future post-completion surveys (1/5/10 years) and commitments to management reviews at agreed years. The northern receptor area and the stream bank habitats will require a commitment to management for 30 years. The development must be implemented in accordance with the approved details, and approved timetable of works.

Reason: In the interests of nature conservation.

- 27 No development hereby approved shall be occupied until such time as:

a) the access arrangements and off-site highway works shown on shown on Development Access General Arrangement Drawing No. 10256-HYD-XX-XX-DR-S-0230 P3, received by the Local Planning Authority on 29 May 2020 have been implemented in full and thereafter retained or otherwise in accordance with precise details first submitted to and agreed in writing by the Local Planning Authority and

b) vehicular visibility splays of 4.5 metres by 215 metres have been provided at the site access. These shall thereafter be permanently maintained with nothing within those splays higher than 0.6 metres above the level of the adjacent footway/verge/highway.

Reason: To ensure that vehicles entering and leaving the site may pass each other clear of the highway, in a slow and controlled manner, in the interests of general highway safety and to afford adequate visibility at the access to cater for the expected volume of traffic joining the existing highway network, in the interests of general highway safety.

28 Within one month of the new vehicular access on Corkscrew Lane hereby approved being first brought into use, the existing redundant access on Corkscrew Lane shall have been permanently closed and reinstated in accordance with details first submitted to and agreed in writing by the Local Planning Authority.

Reason: In the interests of highway and pedestrian safety.

29 Notwithstanding the approved Construction Environmental Management Plan (Rev G) received by the Local Planning Authority on the 4 December 2020, should excavations / pilings be located within 10 metres of the railway boundary, no development within this zone hereby approved shall commence until a construction method statement has first been submitted and approved by the Local Planning Authority. The method statement should include an outline of the proposed method of construction, risk assessment in relation to the railway and construction traffic management plan. The scheme shall be implemented in accordance with the approved details.

Reason: In the interests of the safety, operational needs and integrity of the railway.

30 The hoardings to be used along the perimeter of the site as shown on Fencing Layout Boundary Treatment Drawing No. 2107-CA-00-00-DR-A-00098-PL9 received by the Local Planning Authority on xxx shall be erected for the period of construction only. Once construction ceases the site hoardings will be removed in their entirety.

Reason: In the interests of the visual amenities of the area.

31 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by, the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site.

The following conditions relate to the outline application, as defined by 'Areas applied for in Outline' within the Parameter Plan for Outline Development Drawing No. 00092 PL10 received by the Local Planning Authority on 29 May 2020:-

All applications for approval of reserved matters must be made before the expiration of five years from the date of this permission. The development for which permission is granted must be begun before the expiration of two years from the date of the approval of the reserved matters or, in the case of approval on different dates, the final approval of the last matter to be approved.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990 (as amended).

33 Approval of the details of the access (save for the details of vehicular access into the site from Corkscrew Lane), appearance, landscaping, layout and scale for each plot within each Development Zone (hereinafter called the "reserved matters") shall be obtained in writing before any development is commenced (excluding earthworks approved by Condition 43 and remediation works approved by Conditions 37 and 46).

Reason: This permission is in outline only.

34 All reserved matters submissions shall comply with the Parameter Plan for Outline Development Drawing No. 00092 PL10 received by the Local Planning Authority on 29 May 2020.

Reason: To determine the scope of the permission.

35 With the exception of the car park(s), substation(s), gas governor(s), gatehouse(s) or other ancillary development there will be no built floorspace within Development Zone Plot 2 as defined with the Parameter Plan for Outline Development Drawing No. 00092 PL10 received by the Local Planning Authority on 29 May 2020.

Reason: To determine the scope of the permission.

36 The maximum gross (Internal) floorspace of the industrial units approved through reserved matters applications shall not exceed 70,000sqm (GIA) and the uses shall be limited to the following use classes (Class B8 distribution unit(s) and ancillary offices (B1a)).

Reason: In order to define the permission and secure the satisfactory development of the application site.

37 The development hereby approved shall be carried out in accordance with the Remediation Method Strategy and Environmental Action Plan dated September 2014 received by the Local Planning Authority on 19 March 2019.

Reason: In the interests of ground conditions and to ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site.

38 Notwithstanding the Construction Environmental Management Plan (CEMP) (Rev G) received by the Local Planning Authority on 4 December 2020, no waste water or contaminated waste water produced during the construction phase must discharge into the watercourse.

Reason: To ensure that contaminated water does not reach the watercourse.

39 The construction works, including earthworks, shall be limited to the following hours: 07:00 to 19:00.

Reason: In order to safeguard the amenities of occupiers of premises/dwellings in the vicinity.

40 The development shall be carried out in accordance with the submitted Flood Risk Assessment received by the Local Planning Authority on 29 May 2020 and Addendum to Flood Risk Assessment and Drainage Management Strategy received by the Local Planning Authority on 16 July 2020 and the following mitigation measures detailed therein including greenfield runoff rates, discharging into the watercourse, providing attenuation, and silt capture or in accordance with an alternative scheme first submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure that the development is provided with a satisfactory means of drainage as well as to reduce the risk of creating or exacerbating a flooding problem and to minimise the risk of pollution.

- 41 If, during development, contamination not previously identified is found to be present at the site then no further development (unless otherwise agreed in writing with the Local Planning Authority) shall be carried out until a remediation strategy detailing how this contamination will be dealt with has been submitted to, and approved in writing by the Local Planning Authority. The remediation strategy shall be implemented as approved.

Reason: To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site.

- 42 The first reserved matters application for layout of any plot within a Development Zone shall include details of:-

- a) finished site and ground floor levels in relation to the existing site levels, adjoining land and buildings;
- b) parking and turning areas for vehicles and HGVs and details of the provision for the secure, and where appropriate, covered storage for cycles and motorcycles for each plot; and
- c) a detailed lighting scheme for that plot.

Reason: To ensure a satisfactory relationship within its surroundings as insufficient details have been provided, in order to secure the satisfactory development of the application site in the interests of highway safety and in the interests of sustainable travel options and to ensure a high quality of external environment.

- 43 No development for any plot within a Development Zone hereby approved (excluding remediation works approved by Conditions 37 and 46) shall commence until details of earthworks have been submitted to and approved by the Local Planning Authority. The details shall include the proposed grading and mounding of land areas, cross sections through the site and relationship with the adjoining landform and buildings. The development shall be implemented in accordance with the approved details.

Reason: To ensure a satisfactory relationship within its surroundings as insufficient details have been provided.

- 44 No development of any plot within a Development Zone hereby approved (excluding earthworks approved by Condition 43 and remediation works approved by Conditions 37 and 46) shall commence until a landscape management plan has first been submitted to and approved in writing by the Local Planning Authority. The details shall include the period of replacement planting should any tree, shrub, hedgerow planting die, be removed or become seriously damaged. The development shall be carried out in accordance with the approved scheme agreed in writing by the Local Planning Authority and thereafter maintained, or in accordance with any amended scheme first submitted to and agreed in writing by the Local Planning Authority.

Reason: To ensure satisfactory landscaping is managed and to provide a reasonable period for the replacement of the planting.

45 No development for any plot within a Development Zone hereby approved (excluding earthworks approved by Condition 43 and ground remediation works approved by Condition 37) shall commence until a report comprising the findings arising from the intrusive site investigations (including the results of any gas monitoring), a layout plan identifying any necessary 'no-build' zones for the highwall, and a scheme of remedial works for the shallow coal workings for approval has first been submitted to and approved in writing by the Local Planning Authority. The development shall be implemented in accordance with the approved details.

Reason: To ensure the stability of the development, having regard to the comments of the Coal Authority and good engineering practice.

46 No development for any plot within a Development Zone hereby approved (excluding earthworks approved by Condition 43 and ground remediation works approved by Condition 37) shall commence until details for undertaking an appropriate scheme of intrusive site investigations for the highwall of the former surface extraction and the shallow coal workings and any identified coal remedial works and implementation period for coal remedial works has first been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details. Should any remedial works identified from site investigation be required, these works shall be implemented in accordance with the approved implementation period.

Reason: To ensure the stability of the development, having regard to the comments of the Coal Authority and good engineering practice.

47 No development of any plot within a Development Zone hereby approved shall commence until a Construction Environmental Management Plan (CEMP) in accordance with the CEMP Rev G received by the Local Planning Authority on 4 December 2020 has first been submitted to and approved in writing by the Local Planning Authority, or in accordance with any alternative CEMP first submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details.

Reason: In the interests of the amenities of the area, to reduce waste, in the interests of nature conservation, to minimise the risk of emissions / pollution, and to reduce the possibility of deleterious material (mud, stones etc.) being deposited in the highway and becoming a hazard for road users.

48 No development of any plot within a Development Zone hereby approved (excluding earthworks approved by Condition 43 and remediation works approved by Conditions 37 and 46) shall commence until a scheme to install oil and petrol separators has first been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details and timetable for implementation or in accordance with any alternative scheme first submitted to and approved in writing by the Local Planning Authority.

Reason: To ensure that the development does not contribute to, is not put at unacceptable risk from, or adversely affected by, unacceptable levels of water pollution from previously unidentified contamination sources at the development site.

49 No development of any plot within a Development Zone hereby approved (excluding earthworks approved by Condition 43 and remediation works approved by Conditions 37 and 46) shall commence until such time as infiltration testing has been carried out to confirm (or otherwise) the suitability of the site for the use of infiltration as a drainage element, has first been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details.

Reason: To demonstrate that the site is suitable (or otherwise) for the use of infiltration techniques as part of the drainage strategy.

- 50 Notwithstanding condition 39 no development for any plot within a Development Zone hereby approved (excluding earthworks approved by Condition 43 and ground remediation works approved by Conditions 37 and 46) shall commence until a surface water drainage scheme is first submitted to and approved in writing by the Local Planning Authority.

The drainage scheme shall be based on the recommendations contained in the Flood Risk Assessment & Drainage Management Strategy and the Full Application: Drainage Layout Drawing No. 10256-HYD-XX-XX-DR-S-0300 P8 received by the Local Planning Authority on 29 May 2020. The scheme shall be implemented in accordance with the approved details and thereafter maintained.

Reason: To prevent flooding by ensuring the satisfactory storage and disposal of surface water from the site.

- 51 No development of any plot within a Development Zone hereby approved shall commence until such time as details in relation to the management of surface water on site during construction of the development has first been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details for the lifetime of the construction.

Reason: To prevent an increase in flood risk, maintain the existing surface water runoff quality, and to prevent damage to the final surface water management systems through the entire development construction phase.

- 52 No development of any plot within a Development Zone hereby approved shall commence until such time as a scheme to treat and remove suspended solids from surface water run off during construction works has first been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details for the lifetime of the construction.

Reason: In the absence of submitted details and to ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution.

- 53 No development for any plot within any Development Zone shall be occupied or used until such time as details in relation to the long-term maintenance of the surface water drainage system approved under Condition 51 for that plot has first been submitted to and approved in writing by the Local Planning Authority. The scheme shall be implemented in accordance with the approved details and each plot is required to have details of long-term maintenance of the surface water drainage system agreed in writing by the Local Planning Authority prior to each respective occupation or first use.

Reason: To establish a suitable maintenance regime that may be monitored over time; that will ensure the long-term performance, both in terms of flood risk and water quality, of the surface water drainage system (including sustainable drainage systems) within the proposed development.

- 54 No development hereby approved within Development Zone Plot 1 shall be occupied until a Noise Impact Assessment (for each building, if applicable) has been submitted to and agreed in writing by the Local Planning Authority. The Noise Impact Assessment shall consider at any noise sensitive premises the noise and/or vibration from within any building; noise and/or vibration from any activity in external areas; noise and/or vibration from any fixed plant. The scheme shall be implemented in accordance with the approved details and each plot prior to first occupation shall be built and operated in full accordance with the approved Noise Impact Assessment and any noise control measures shall be implemented in full and retained in full working order thereafter.

Reason: In order to safeguard the amenities of occupiers of premises/ dwellings in the vicinity.

- 55 No development hereby approved shall be occupied until the internal access road and any crossings over the Brook (including any access spur roads for individual buildings) have been constructed in accordance with details which have first been submitted to and approved in writing by the Local Planning Authority.

Reason: In order to secure the satisfactory development of the application site in the interests of road safety.

- 56 No development of any plot within a Development Zone hereby approved shall be occupied until an amended Travel Plan (for each building if applicable) which sets out actions and measures with quantifiable outputs and outcome targets has first been submitted to and agreed in writing by the Local Planning Authority. Thereafter the agreed Travel Plan shall be implemented in accordance with the approved details.

Reason: To reduce the need to travel by single occupancy vehicle and to promote the use of sustainable modes of transport.

- 57 No development of any plot within a Development Zone hereby approved shall be occupied until a Public Transport Strategy (for each building if applicable) has first been submitted to and approved in writing by the Local Planning Authority. The agreed Public Transport Strategy will be implemented so that it is available for use by employees from the first day of the first building to be occupied and maintained in accordance with the agreed strategy.

Reason: To reduce the need to travel by single occupancy vehicle and to promote the use of sustainable modes of transport.

- 58 None of the unit(s) hereby permitted shall be occupied for a period of more than six month unless a Building Research Establishment Environmental Assessment Method (BREEAM 2014) post-construction certificate carried out by a registered BREEAM assessor has been issued for the relevant unit certifying that "Excellent" or better has been achieved in respect of water and energy efficiency.

Reason: To ensure that the environmental credentials of the proposed development are secured.

INFORMATIVES :-

- 1 Full and outline planning permission has been granted for this proposal. The Local Planning Authority acted proactively through positive engagement with the applicant during the determination process which led to improvements to the scheme. The Local Planning Authority has therefore acted pro-actively to secure a sustainable form of development in line with the requirements of the National Planning Policy Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

- 2 Planning Permission does not give you approval to work on the public highway. To carry out off-site works associated with this planning permission, separate approval must first be obtained from Leicestershire County Council as Local Highway Authority. This will take the form of a major section 184 permit/section 278 agreement. It is strongly recommended that you make contact with Leicestershire County Council at the earliest opportunity to allow time for the process to be completed. The Local Highway Authority reserve the right to charge commuted sums in respect of ongoing maintenance where the item in question is above and beyond what is required for the safe and satisfactory functioning of the highway. For further information please refer to the Leicestershire Highway Design Guide which is available at <https://resources.leicestershire.gov.uk/lhdg>

The Local Planning Authority would expect the Travel Plan to include a specific requirement for lorry routeing during the operation phase, which would include measures to discourage HGVs from turning right onto the A511 from Corkscrew Lane.

- 3 Severn Trent Water advise that although our statutory sewer records do not show any public sewers within the area you have specified, there may be sewers that have been recently adopted under The Transfer Of Sewer Regulations 2011. Public sewers have statutory protection and may not be built close to, directly over or be diverted without consent and you are advised to contact Severn Trent Water to discuss your proposals. Severn Trent will seek to assist you obtaining a solution which protects both the public sewer and the building.
- 4 The developer will facilitate access for the County Council's Ecology team to undertake natural history surveys. Prior to commencement of development an EPS licence must be secured from Natural England for Great Crested Newt translocation. Applicant to issue copy to the Local Planning Authority and to the County Ecologist.
- 5 The buildings materials must not be made of reflective materials that would produce an ocular glint / glare hazard to pilots.
- 6 Prior to construction, any changes to the existing boundary treatment currently separating the application site from the Public Right of Way, must be approved by the Local Planning Authority following consultation with the Highway Authority. No trees or shrubs should be planted within 1 metre of the edge of the Public Rights of Way. Any trees or shrubs planted alongside a Public Right of Way should be of a non-invasive species. Prior to construction, measures should be taken to ensure that users of the Public Right of Way are not exposed to any elements of danger associated with construction works.
- 7 The applicant's attention is drawn to the comments from Network Rail.
- 8 Future development of Development Plots will include lighting that should be designed in order to avoid illuminating surrounding receptors, including priority habitats, receptor areas, remaining areas of the LWS, nearby badger setts, the Gilwiskaw Brook tributary diversion corridor and even Dingy Skipper created habitat. Illumination should be limited to 2 lux for these areas, although there will be a preference for dark areas and zones especially those areas that are used by commuting and foraging bats. The lighting design should be guided by Leicestershire and Rutland Environmental Records Centre 2014. All exterior lighting must be capped at the horizontal to prevent upward light spill.
- 9 'Occupation': defined as the first use of the premises, excluding fitting out.

Your attention is drawn to the enclosed notes.

Signed: *J Mattley*

James Mattley
Planning & Development Team Manager
Proper Officer of the Council

NOTE TO APPLICANT

□ **THIS IS A PLANNING PERMISSION ONLY.** Separate approvals or consents may be required for the following:-

- **Building Regulations.** Approval is required for new buildings, extensions, some internal alterations and certain changes of use. Work must not commence until Building Regulation Approval has first been obtained. If in doubt contact the District Council offices.
- **Listed Buildings.** It is an offence to alter or demolish any part of a Listed Building without first having obtained Listed Building Consent. This includes fixtures, walls and structures within the curtilage. If in doubt contact the District Council offices.
- **Demolition of Buildings in Conservation Areas.** It is an offence to demolish a building or part of a building (with some minor exceptions within a Conservation Area) or to demolish any part of a wall which is over 1m in height which abuts a highway or which is over 2m in height in any other case.
- **Vehicular access and works within the highway**

Planning Permission does not give you approval to work on the public highway. To carry out off-site works associated with this planning permission, separate approval must first be obtained from Leicestershire County Council as Local Highway Authority. This will take the form of a minor/major section 184 permit or a section 278 agreement. It is strongly recommended that you make contact with Leicestershire County Council at the earliest opportunity to allow time for the process to be completed. The Local Highway Authority reserve the right to charge commuted sums in respect of ongoing maintenance where the item in question is above and beyond what is required for the safe and satisfactory functioning of the highway. For further information please refer to the Leicestershire Highway Design Guide which is available at <https://resources.leicestershire.gov.uk/lhdg>

Public Rights of Way

A Public Right of Way must not be re-routed, encroached upon or obstructed in any way without authorisation. To do so may constitute an offence under the Highways Act 1980. A separate application for a diversion of an existing Public Right of Way should be submitted under the Town and Country Planning Act 1990 to the Local Planning Authority. The applicant is not entitled to carry out any works directly affecting the legal line of Public Rights of Way until a Diversion Order has become operative. If the developer requires a Right of Way to be temporarily diverted, for a period of up to six months, to enable construction works to take place, an application should be made to networkmanagement@leics.gov.uk at least 12 weeks before the temporary diversion is required.

• APPEALS TO THE FIRST SECRETARY OF STATE.

- If you want to appeal against your local planning authority's decision to grant permission subject to conditions then you must do so within 6 months of the date of this notice.
- Appeals must be made using a form which you can get from the Secretary of State at Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN (Tel: 0303 444 5000) or online at <https://acp.planninginspectorate.gov.uk>
- **The First Secretary of State** can allow a longer period for giving notice of an appeal, but he will not normally be prepared to use this power unless there are special circumstances which excuse the delay in giving notice of appeal.
- **The First Secretary of State** need not consider an appeal if it seems to him that the local planning authority could not have granted planning permission for the proposed development or could not have granted it without conditions they imposed, having regard to the statutory requirements, to the provisions of any development order and to any directions given under a development order.
- **In practice**, the First Secretary of State does not refuse to consider appeals solely because the local planning authority based their decision on a direction given by him.

□ **PURCHASE NOTICES.** If either the local planning authority or the First Secretary of State refuses permission to develop land or grants subject to conditions, the owner may claim that he can neither put the land to a reasonably beneficial use in its existing state nor render the land capable of a reasonably beneficial use by the carrying out of any development which has been or would be permitted.

- **In these circumstances**, the owner may serve a purchase notice on the Council (District Council, London Borough Council or Common Council of the City of London) in whose area the land is situated. This notice will require the Council to purchase his interest in the land in accordance with the provisions of Part VI of the Town and Country Planning Act 1990.

• **SCREEN WALLS AND FENCES: SAFETY AND STABILITY.** The developer should ensure that any screen wall or fence proposed in the application, or required by planning condition, is designed and constructed to ensure structural stability, particularly in high winds. Felt damp-proof courses should not be used in free standing walls.

• **SHOPS, OFFICES, FACTORIES, EDUCATIONAL BUILDINGS AND BUILDINGS TO WHICH THE PUBLIC ARE ADMITTED: ACCESS AND PROVISION FOR DISABLED PERSONS.** The Local Planning Authority is required to bring your attention the requirement of the Chronically Sick and Disabled Act 1970 (Sections 4, 6, 7, 8 and 8A) requiring the provision of access facilities, car parking and toilets for the disabled and the provision of signing indicating what provision has been made for disabled persons within the building. Your attention is also drawn to the Code of Practice, BS5810 : 1979, "Access for the Disabled to Buildings" available from the British Standards Institution, 2 Park Street, London, W1A 2BS. (Tel: 020 7629 9000) and (in so far as educational buildings are concerned), to Design Note 18 "Access for the Physically Handicapped to Educational Buildings".

The buildings to which these requirements apply are:-

- a) Buildings to which the public are to be admitted to which Section 4 of the Chronically Sick and Disabled Persons Act 1970 applies.
- b) Office, Shops and Railway Premises as defined in the Offices, Shops and Railway Premises Act 1963 or premises deemed to fall within that Act.
- c) Factories as defined by Section 175 of the Factories Act 1961.

d) Educational buildings as defined by Section 29B of the Disabled Persons Act 1981.

□ **LIMITATIONS ON STORAGE BUILDINGS : LEICESTERSHIRE ACT 1985 - SECTION 53.** You are advised that if more than 7,000 cubic metres of space in any building is used for storage purposes, the requirements of Section 53 of the Leicestershire Act 1985 come into effect. This enables the District Council to require the subdivision of buildings or (as is more likely) to require fire detection/precaution/extinguishment measures to be incorporated. You are advised to seek advice from Building Control before proceeding with any such use.

APPENDIX C

G-PARK EXTRACT FROM COMMITTEE REPORT

Means of Access, Highways and Transportation

The relevant policies of the Local Plan are IF1 and IF4 and the relevant criteria within Policy Ec2, as well as Policies E3, T1, T2 and T4 of the Neighbourhood Plan.

The full application proposes the vehicular access into the site via a new access point off Corkscrew Lane in addition to amendments to the existing Corkscrew Lane carriageway to incorporate a ghost island right turn lane into the site. Access to the northern ecological receptor area would be via the existing site access from the A512.

The submitted documents, including Chapter 6 within the Environmental Statement (ES) and associated Transport Assessment (TA) and Framework Travel Plan (TP) have been assessed by both the County Highway Authority (CHA) and Highways England, and their conclusions are set out in more detail below.

During the course of the application, following concerns raised by the CHA, the applicant has submitted a Highways Technical Design Note, including a Road Safety Audit and confirmation of the potential for a dedicated shuttle bus service and revisions to the TA and TP. Further matters regarding the need to assess the impact of the development on junctions in and around Coalville, are also discussed in further detail below.

Site Access

As set out above, the proposed development which will occupy the main part of the site is to be served by one access from Corkscrew Lane, situated approximately 130 metres to the south of the junction with the A511.

Off-site works also include amendments to the existing Corkscrew Lane carriageway to incorporate a ghost island right turn lane into the site. Neighbouring letters of objection have referred to HGV traffic taking a short cut along Corkscrew lane to Packington and onto the M42 south of Ashby.

In response, officers have questioned the CHA on this matter, and they have confirmed that there is nothing to stop HGVs accessing the site from Corkscrew Lane (via Packington and New Packington), however the CHA confirmed that it is unlikely that a significant issues would arise given the close proximity of the site to the A511 and the A42. The CHA would consider signage via a corresponding Traffic Regulation Order, only in the future should a problem arise.

In terms of movements from the site along Corkscrew Lane, a traffic island has also been designed into the access junction to remove the ability for HGV vehicles to turn right out of the site onto Corkscrew Lane (although it would be possible for cars to turn right out of the access). The scheme proposes that foul waste be disposed of by way of a cesspit (which is discussed later in this report) and there will be requirement for other waste vehicles to enter the site, in addition to the HGVs. To demonstrate that the site access can be accessed safely and effectively a swept path analysis of a large car and a 16.5 metre long articulated vehicle has been undertaken.

The access has been considered by the CHA who have confirmed that a safe and suitable access can be achieved. Conditions requiring the access, associated vehicular visibility splays and off-site highway works would be imposed, in the event the application was approved.

Access to the northern ecological receptor area would be via the existing site access from the A512. Access for HS2 Ltd for both construction and maintenance purposes is currently being discussed with the applicant and may be provided via this route, from the A512 and via the road which currently exists

under the A511. For the avoidance of doubt no access would exist from the proposed building(s) via this route, under the A511.

Construction Site Access

Initially the construction access would be via the A512 and via the road which currently exists under the A511, until such a time as the access from Corkscrew Lane has been implemented and both accesses available for construction use. The applicant has agreed to a construction traffic routing agreement which would be secured within the S106 Agreement, ensuring that construction traffic is restricted to the routes as set out above. A construction logistics plan, forming part of the Construction Environmental Management Plan (CEMP) is also proposed to route construction traffic to the M42 and the CEMP confirms that road traffic directional signage will be erected to aid construction traffic.

In response to the neighbouring letters of objection questioning what cleaning facilities would be offered during the period of construction, the submitted CEMP confirms that wheel wash facilities will be in place, located on hard standing sufficiently sized to allow vehicles to carry out one full wheel revolution whilst within the wheel wash area - this is to allow washing of the entire circumference of the tyre.

Parking

The car parking is proposed to be located within Development Zones 2, with HGV parking proposed in both Zones 1 and 2. The scheme proposes up to 600 car parking spaces, including disabled spaces and up to 198 HGV spaces. The scheme also proposes secure cycle facilities for 57 cycle parking spaces and 18 motorcycle spaces.

This part of the proposal is in outline only, therefore the full number of and layout of the parking spaces is indicative only and will be presented as the relevant reserved matters stage.

Site Accessibility

A number of neighbouring letters of objection have referred to errors within, the inadequacy of the TA and TP and statements made within the document regarding cycling and walking being genuine, viable and safe modes of transport.

The TA Assessment incorrectly referenced destinations which could be travelled to within 60 minutes, and the TA has been updated, accordingly. The statements made within the documents relating to the other sustainable modes i.e. by walking, cycling and bus provision are below:

The TA incorrectly referenced destinations which could be travelled to within 60 minutes, and the TA has been updated, accordingly. The statements made within the documents relating to the other sustainable modes i.e. by walking, cycling and bus provision are the applicant's assessment. These have been reviewed by the CHA and officers as set out below:

Insofar as public transport is concerned, whilst Ashby is well served by buses, officers are of the opinion that the site itself is not currently well served, with the closest pair of bus stops being on Upper Packington Road, located 2.2 km to the west of the site. In terms of pedestrian and cycle connectivity, there is no pedestrian footway which exists along the length of Corkscrew Lane nor the A511. The local highway network provides a pedestrian footway along the northern side of Leicester Road, which terminates to the south of Corkscrew Lane.

The submitted TP identifies that, having regard to the 2011 Census Journey to Work data for North West Leicestershire 74% of people who work in the area travel by car/van as single occupancy journeys, with an additional 4% as passengers.

Whilst it is acknowledged that it is difficult to set targets for the site prior to any recruitment, the accompanying TP suggested a modal shift target of 10% so as to reduce single occupancy car journeys to 64%. The TP also proposes to make a significant modal shift target for passengers in a car (i.e. car sharing) to 20%.

This would equate to 84% of the employees still accessing the site by car, who would therefore not be accessing the site by sustainable modes of travel. However, this needs to be considered in the context of what levels would be likely to be achievable in other comparable locations in the areas considered for the purposes of the employment land need / demand / supply assessment, and a balanced approach needs to be taken to consideration of issues in respect of accessibility and employees' modes of travel.

Following concerns raised by the CHA, in respect of a lack of public transport strategy during the course of the application, the applicant has confirmed that they are prepared to identify the demand and need for a dedicated shuttle bus service or other form of bus provision. Accordingly, the CHA have confirmed that they raise no objection, subject to the imposition of a planning condition relating to a 'Public Transport Strategy' to reduce the need to travel by single occupancy vehicles and to promote the use of sustainable modes of transport. The condition would allow either an appropriate shuttle bus or service bus solution, providing it met with the requirements of the CHA.

Such measures were also proposed within the previous planning permission ref: 07/01372/FUL through a TP which was secured by a Section 106 Agreement.

In addition to the condition suggested for the Public Transport Strategy (to secure the shuttle bus/service bus solution), the CHA also seeks mitigation as follows:

- Travel Packs; to inform new employees from first occupation what sustainable travel choices are in the surrounding area (can be supplied by LCC at £52.85 per pack);
- Six-month bus passes per employee, to establish changes in travel behaviour from first occupation and promote usage of sustainable travel modes other than the car;
- A Framework Travel Plan monitoring fee of £11,337.50 for LCC's Travel Plan Monitoring System; and
- Appointment of a Travel Plan Coordinator.

It is also noted that, for the purposes of meeting the policy test set out in Policy Ec2 of the Local Plan, the requirement is in respect of what sustainable travel choices are *available* for employees. On this basis, it is accepted that, in terms of meeting the requirements of Policy Ec2(2)(a), subject to the imposition of a condition to secure an appropriate shuttle bus or service bus solution, the scheme would therefore provide for an acceptable degree of accessibility by a sustainable transport mode.

In respect of Policy Ec2 (b) of the Local Plan, which requires the site to have good access to the strategic highway network (M1, M42/A42 and A50) the site is well positioned immediately adjoining the A511 which leads to A42. On this basis, the scheme is in conformity of this element of Policy Ec2 (b) of the Local Plan.

Impact upon the Wider Highway Network

During the construction phase, the ES confirms that all construction traffic are to use the internal access road under the A511, until the new construction of the access road off Corkscrew Lane has been

implemented and the anticipated construction traffic would equate to less than 1% increase in daily 24-hour traffic flows, which is described as a 'negligible effect' on the local highway network.

In relation to the operation phase, the ES confirms that the study area for traffic and transport effects, as agreed by Highway England and the CHA is as follows:-

- 1) Proposed Site Access/A511 Ashby Road;
- 2) Corkscrew Lane/A511 Ashby Road; and
- 3) A42 Junction 13/A511 Ashby Road Roundabout Junction.

The ES confirms that the following studies and surveys have been undertaken; traffic surveys on local roads, 'Junctions 9' modelling and LINSIG modelling.

1) Proposed Site Access/A511 Ashby Road

The ES confirms that this junction will operate well below the theoretical capacity during the AM and PM peaks in both the 2020 and 2025 scenarios and as a consequence there will be no driver delay at this junction. The magnitude of change is therefore considered to be 'negligible'.

2) Corkscrew Lane/A511 Ashby Road

The ES states that this junction will operate well below the theoretical capacity during the AM and PM peaks in both the 2020 and 2025 scenarios across all arms.

Whilst the scenarios ran would increase delays in all instances (between 31-56 seconds in 2020 and 41-102 seconds in 2025) the ES confirms that given the low frequency of vehicles along Corkscrew Lane this is not considered to give rise to any large queues or capacity issues and therefore the magnitude of change is therefore considered to be 'negligible'.

Officers have queried whether any alterations would be required at the junction between Corkscrew Lane and the A511 to enable HGVs to turn right out of Corkscrew Lane and onto the A511, with the CHA. The CHA have confirmed that the existing A511 / Corkscrew Lane junction is forecast to operate within capacity for all movements, however should HGVs heading towards Coalville which wish to avoid the right turn movement, they would be able to do so by turning left out of Corkscrew Lane and then going around the Flagstaff Island roundabout. The CHA have confirmed that they raise no objection and that the impact on the junction is not such that improvements could be warranted in connection with the proposals.

3) A42 Junction 13/A511 Ashby Road Roundabout Junction

The ES confirms that in general all junctions will be operating below practical capacity operation, with the exception of two arms that will operate within practical capacity, but that both these same two arms based upon future scenarios without the proposed schemes exhibit similar circumstances.

As such, the ES contends that the vehicle impacts associated with the scheme does not explicitly result in these arms of the junctions operating beyond capacity and as such motorised users of the junction would not be able to determine any degree of comparison to the future baseline, and as such the long-term adverse effect is considered to be 'negligible'.

The ES concludes that even though the A42/A511 junction was found to be over capacity for two of its arms, in the absence of the proposed scheme the same two arms experienced the same outcome (and it is not as a result of the proposed scheme). Officers have queried this outcome with the CHA who have confirmed that whilst there is an impact, the CHA agrees with the modelling results that this would not be severe.

The ES concludes that in assessing the increased driver delay and congestion of the three key junction in close proximity to the site, taking into account future baselines of 2020 and 2025, and including Arla Dairies and Money Hill, all three junctions were considered to have a 'negligible effect'.

The CHA initially raised an objection to the application on the grounds that the application as submitted, did not fully assess the highway impact of the proposed development on related trips which are predicted along the A511 to and from the direction of Coalville.

The CHA confirmed that the TA needed to be updated to assess this, including detailed capacity assessments of relevant off-site junctions taking into account committed developments and proposal / costing of appropriate measures to mitigate any severe impacts which may be identified from the proposed development. Alternatively, the CHA confirmed that the updates to the TA would not be necessary, subject to the applicant being agreeable to a contribution to the continuation and implementation of improvements to the A511, which are considered necessary to mitigate the impact of the development.

The applicant has confirmed that they are agreeable to make the contribution towards the Coalville Transport Strategy Contribution (as part of the Coalville Growth Area Strategy) of £756,963.58 to mitigate the impacts of the development. Such improvements include the upgrading of lane layouts and junction improvements to improve the flow of traffic between Ashby (A42 Junction 13) to Markfield (Field Head roundabout near junction 22 of the M1). development when considered cumulatively with other developments, upon the road network would not be severe.

Policy Ec2 (b) of the Local Plan requires that the proposal has an acceptable impact on the capacity of that network, including any junctions. On the basis of the discussions above, the scheme is in conformity of this element of Policy Ec2 (b) of the Local Plan.

Summary - Means of Access, Highways and Transportation

The previous planning permission ref: 07/01372/FUL confirmed that the proposed development would not be detrimental to highway safety or adversely affect the local highway network.

North West Leicestershire Local Plan Policy Ec2(2) sets out a number of criteria against which proposals for employment development will be considered, including in respect of accessibility by a choice of transport modes, and good access to (and an acceptable impact upon the capacity of) the strategic highway network. Also relevant are Local Plan Policies IF1 and IF4 which seek to ensure the provision of suitable infrastructure (including transportation infrastructure) necessary to accommodate new development.

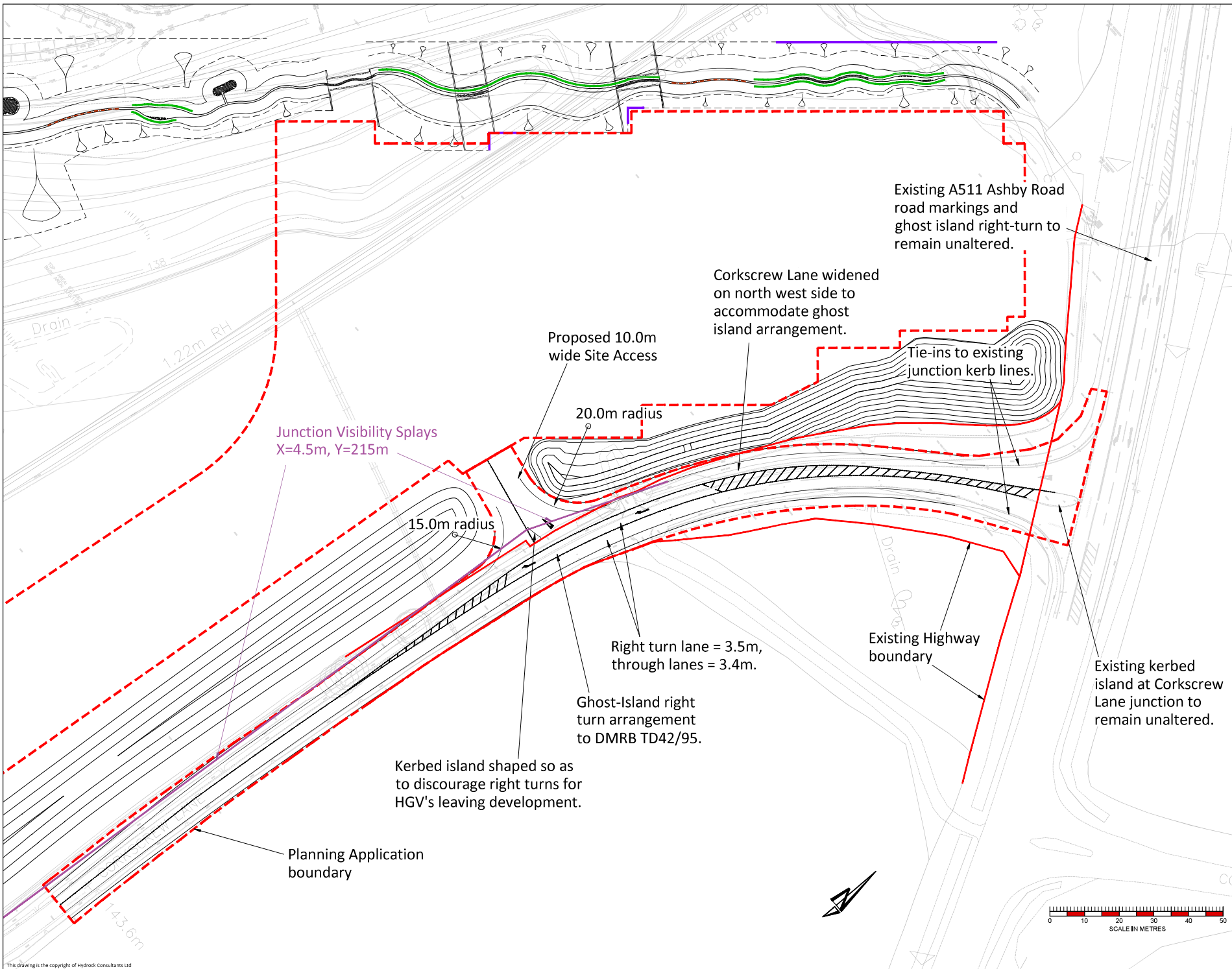
The site is considered to provide a safe and suitable access and whilst it is considered that the site is not currently well served by public transport, the CHA raise no objections, subject to the imposition of a Public Transport Strategy and other mitigating measures such as a Travel Plan, to be secured by way of a legal agreement.

By virtue of its location close to Junction 13 of the A42, the site would also be well related to the strategic highway network, and it has been demonstrated to the satisfaction of both the CHA and Highways England that the impacts on the operation of the network could be appropriately mitigated. Other impacts in terms of the local highway network are also considered acceptable, subject to the Coalville Transport Strategy Contribution, to be secured by way of a legal agreement.

In summary, it is therefore considered that the proposals meet the requirements of Policies IF1 and IF4 and the relevant criteria within Policy Ec2 of the Local Plan, as well as policies E3 and T2 of the Neighbourhood Plan.

APPENDIX D

G-PARK ACCESS DESIGN



- Notes:**
- All dimensions are to be checked on site before the commencement of works. Any discrepancies are to be reported to the Architect & Engineer for verification. Figured dimensions only are to be taken from this drawing.
 - This drawing is to be read in conjunction with all relevant Engineers' and Service Engineers' drawings and specifications.

Rev	Date	Description	By	Chk
P1	22.05.2020	Mound added	TF	NH
P2	12.12.2019	Brook Diversion Amended	TF	JW
P3	28.01.2019	First Issue	TF	PA



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Client: **Gazeley**
 a GLP company

Project Title:
 G Park, Ashby.

Drawing Title:
 Proposed Development Access S278 Works:
 General Arrangement

Drawing Status:
Preliminary

Drawn	Checked	Scale	Date	Issue Date
TF	PA	1:250	24-01-2019	24-01-2019
Drawing Number: 10256-HYD-XX-XX-DR-S-0230				Revision: P3

APPENDIX E

LCC CABINET REPORT 23 JUNE 2020

**CABINET – 23 JUNE 2020****COALVILLE TRANSPORT STRATEGY****REPORT OF THE DIRECTOR OF ENVIRONMENT AND TRANSPORT****PART A****Purpose of the Report**

1. The purpose of this report is to advise the Cabinet of the outcomes of recent refreshed transport study work and the implications that this has for:
 - taking forward the ongoing development and delivery of a Coalville Transport Strategy (CTS), of which the A511 Growth Corridor Major Road Network scheme is a significant element; and
 - North West Leicestershire District Council's 'Section 106 policy for the delivery of infrastructure in Coalville', which provides a basis for securing developer contributions towards projects covered by the CTS.

Recommendation

2. It is recommended:
 - (a) That the ongoing work to support North West Leicestershire District Council (NWLDC) to deliver the successful growth and evolution of Coalville and of Ashby-de-la-Zouch (Ashby) be noted;
 - (b) That it be noted the outcomes of the recent transport study work:
 - (i) further evidences the importance of achieving the delivery of the A511 Growth Corridor Major Road Network scheme, without which growth in the area is forecast to have severe residual cumulative highway impacts;
 - (ii) evidences that transport projects in addition to the Major Road Network scheme are still required in and around Coalville and Ashby in order to mitigate forecast severe residual cumulative highway impacts;
 - (c) That the revised list of projects covered by the Coalville Transport Strategy (CTS) as set out in paragraph 51 and in Appendix A to this report be approved;
 - (d) That no changes be sought to the general level of developer contributions requested towards delivery of the CTS through NWLDC's 'Section 106 policy for the delivery of infrastructure in Coalville';

- (e) That the County Council as the Local Highway Authority (LHA) uses the outcome of the recent study work to inform its advice to NWLDC on development proposals and developer contributions in and around Coalville and Ashby;
- (f) That it be noted that there may be circumstances where the County Council as Local Highway Authority (LHA) will advise NWLDC to refuse development proposals on highways grounds regardless of a suggested developer contribution towards delivery of the CTS; and
- (g) That the County Council works with NWLDC to produce a formal CTS document.

Reason for Recommendations

3. To ensure that the County Council as the LHA is using the most up-to-date evidence in seeking developer contributions from proposals in and around Coalville and Ashby and in providing highways advice to NWLDC, and to ensure that it continues to be in a strong position in circumstances where planning appeals are lodged by applicants in the light of the LHA's advice to NWLDC.
4. The total cost of the A511 Major Road Network project and additional junction mitigation measures now identified exceed that on which the level of developer contributions was originally based but in light of the many uncertainties arising from the Covid19 pandemic it is considered that it would be unwise to seek to increase the level of contributions requested.
5. The preparation of a formal CTS document will ensure that this information is available in the public domain in a clear and non-technical format.

Timetable for Decisions (including Scrutiny)

6. At the time of writing, NWLDC has yet to confirm the timetable for reporting this matter to its Members.

Policy Framework and Previous Decisions

7. The third Leicestershire Local Transport Plan (LTP3), approved by the County Council in March 2011, contains six strategic transport goals. Goal 1 is to have a transport system that supports a prosperous economy and provides successfully for population growth. The LTP3 sets out the County Council's approach to achieving this, namely to improve the management of the road network and continuing to address congestion issues.
8. The Enabling Growth Action Plan, approved by the Cabinet in March 2015, identifies the A511 Coalville Growth Corridor as a priority for the County Council. In September 2015 the Cabinet considered a report on the review of the Medium-Term Financial Strategy and Investment Proposals and agreed areas for investment, including £2 million to enable the modelling and advanced design of highways infrastructure schemes, including in and around Coalville. In November

2015 Cabinet prioritised development of a package of infrastructure to deliver growth in Coalville concentrating on the A511 and Bardon Link Road.

9. In November 2018 the Cabinet approved the Strategic Growth Plan (SGP), which provides an agreed local framework for considering the longer term needs of the area. Coalville has been identified as an 'Area of Managed Growth in Local Plans' where it is recognised as being under intense pressure for development and has made substantial provision within and on the edges of the existing town. Much of this has still to be built and is dependent upon new local infrastructure.
10. In March 2019, the Cabinet approved the development of a package of measures along the A511/A50 corridor ('A511 Growth Corridor') and that that package should be the Council's priority for bidding for Major Road Network (MRN) funding in the period 2020 to 2025. In November 2019, the Cabinet approved the commitment of further resources and actions to take forward delivery of the A511 Growth Corridor scheme.
11. In March 2020, the Cabinet approved the 2020/2021 Highways and Transport Capital and Works Programmes.

Resource Implications

12. Since its inception, it has always been envisaged that the CTS would be delivered through a mixture of public and private (developer) funding.
13. The total cost of the A511 Growth Corridor scheme alone is currently £49m including further development costs, of which £42m is expected to be met from MRN funding should the bid to Government be successful. The remaining £7m represents the local contribution requirement, e.g. found from developer contributions.
14. It was always envisaged that as part of the CTS additional interventions would be required to support the growth in the area. Based on the outcomes of the most recent transport study work (as discussed in Part B of this report), the total additional cost of these additional interventions is likely to run to several million pounds (i.e. above and beyond the total cost of the MRN project).
15. Whilst funding is available within the 2020/2021 Highways and Transport Programmes to take forward work to further develop the CTS, no funding is available to contribute towards scheme delivery. Thus, funding will continue to be sought from other sources, including via NWLDC's 'Section 106 policy for the delivery of infrastructure in Coalville'.
16. It is also likely that bids will be made for future Government funding to help to deliver CTS projects; this has already been the case with Growth Deal monies and National Productivity Investment Fund monies previously secured to deliver some improvements along the A511 Growth Corridor, and with the current MRN bid.
17. The Director of Corporate Resources and the Director of Law and Governance have been consulted on the content of this report.

Circulation under the Local Issues Alert Procedure

18. This report has been circulated to members representing divisions in North West Leicestershire: Mr. J. G. Coxon CC, Mr. T. Pendleton CC, Dr. T. Eynon CC, Mr. M. B. Wyatt CC, Mr. S. D. Sheahan CC, Mr. D. Harrison CC, Mr. N. J. Rushton CC, Mr. T. Gillard CC.

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PART B

Background

Strategic Growth Plan (SGP) Context

19. In the medium to longer-term the SGP places an emphasis on delivering growth in the Leicestershire International Gateway to the north of the North West Leicestershire District. In the more immediate term, i.e. around the end of this decade, the adopted North West Leicestershire Local Plan (Local Plan) has a very strong focus of delivering growth in and around Coalville and Ashby. In this respect, the CTS is primarily focused on dealing with that known, planned growth and not the longer-term SGP growth.
20. Under the auspices of the County Council's overall approach to growth delivery, led and managed by the Growth Unit in the Chief Executive's department, additional evidential work and strategies (including transport) will need to be jointly developed to deliver the necessary infrastructure required to delivery growth in the Gateway.
21. This matter has been discussed with the Growth Unit which agrees with the approach being taken.

Rail Considerations

22. The CTS does not as yet embrace rail, so the reopening of the Leicester to Burton railway line to passenger traffic has not been considered as part of the most recent work. However, the Campaign for the Reopening of the Ivanhoe Line (CRIL) has recently been awarded funding by Government to revisit the case for the line's reopening and continues to receive assistance from County Council officers. Short to medium term investment in highway infrastructure that removes potential barriers to housing growth in Coalville and Ashby may help to bolster the case to reopen the line; more houses equates to great levels of population thereby increasing potential levels of demand for a rail service between Leicester and Burton.

Coalville Transport Strategy

23. Congestion on the A511 Growth Corridor has been a longstanding issue recognised by both NWLDC and the County Council. In 2008 studies were commissioned jointly between the County Council and NWLDC to aid understanding of the causes of the traffic problems in and around Coalville and Ashby and identify measures required to enable the area's continued strategic growth.
24. As originally envisaged, the CTS included the following junctions:
 - A42 Junction 13
 - Swannington Road Roundabout ('Hoo Ash Roundabout')
 - Thornborough Road Roundabout
 - Whitwick Road Roundabout
 - Broom Leys Road Cross Roads

- Bardon Road Roundabout (eastern end of Stephenson Way)*
- Reg's Way Roundabout ('Birch Tree Roundabout')
- Beveridge Lane Roundabout
- Stanton Lane Roundabout ('Flying Horse Roundabout')
- M1 Junction 22
- Central Cross Roads ('Hugglescote Crossroads')

*Part of the Bardon Link Road - see paragraph 25

25. The CTS also originally referenced the Bardon Relief Road (BRR), a scheme which, in practice, would have paralleled the A511 between its junctions with Stephenson Way and Reg's Way. However, even before the most recent study work, other evidence had demonstrated that there was no likely business (funding) case for that project. Instead, a Bardon Link Road is being pursued in conjunction with housing development to the south east of Coalville that does provide some benefits in terms of mitigating the impacts of development traffic on Bardon Road (as described in the next section of this report).
26. Since the original CTS was developed, some improvements have been delivered in the A511 corridor, including at M1 J22 and A42 J13 (partly funded by Growth Deal monies). It should be noted that in respect of the latter junction, insufficient funding was available at the time to fund the full scheme necessary to provide for even the then planned levels of growth and only the 'bronze scheme' was delivered. It is also against the list above that developer contributions have hitherto been sought and successfully secured through NWLDC's 'Section 106 policy for the delivery of infrastructure in Coalville'.
27. Additionally, proposals for growth in North West Leicestershire have continued to evolve. For example, the Local Plan identifies the need for the area to provide for a minimum of 9620 dwellings in the period 2011 to 2031, with the bulk of that requirement being met in and around Coalville and Ashby. Likewise, the Local Plan has a focus of continuing to provide for employment land needs in and around these two settlements.
28. Finally, the A511 Growth Corridor MRN project has been developed, which whilst in many ways responding to the changed circumstances set out above, has implications for the CTS. Furthermore, whilst the MRN project overlaps with that list of junctions listed at paragraph 24 (see also appendix A), it is important to stress that:
 - it was developed in accordance with national and regional (Midlands Connect) criteria for MRN projects; and
 - to provide the best value for money / strongest business case when assessed against those criteria and the Government's normal business case requirements for transport projects; and
 - thus, was never meant to - or ever likely to - deliver all of the measures required along the A511 corridor to deal with growth in Coalville and Ashby, let alone embrace the entirety of the junctions listed above.

29. Accordingly, despite previous investments in highway improvements and the proposed MRN scheme, these alone will not be sufficient to address the impacts of planned growth in Coalville and Ashby. Thus, whilst there have been many changes in circumstance, it remains clear that alongside growth proposals, there is still a need to continue to provide a coherent, justified and evidenced transport strategy which links the delivery of new homes, jobs and services within the area to the provision of a package of transport measures.
30. As circumstances evolve, it is important to ensure that the County Council as the LHA continues to review its position to ensure that it is in the most robust position possible to seek developer contributions and to provide advice to NWLDC. Hence, the decision was taken to refresh the evidence base for the CTS and to revisit its content in the light of the key outcomes of the most recent studies are summarised below. Refreshing it now will ensure that the Authority continues to be in a strong position to seek developer contributions, particularly where there may now be greater risks of 'push back' from developers in a post Covid-19 world. (Resistance from some developers was becoming apparent even pre Covid-19.)

Key Outcomes of the Refreshed Traffic Studies

31. The latest work has been undertaken by the County Council using the Pan Regional Transport Model (PRTM). The principal objectives of this study have been to:
- Provide evidence to identify where infrastructure investment is needed to mitigate the cumulative impacts of (now) known growth and regeneration aspirations in the District;
 - Understand what the investment priorities should be in Coalville and Ashby areas to support growth; and
 - Identify opportunities to prepare bids to fund all, or part of, the identified gap between contributions expected and the cost of infrastructure.
32. A copy of the recent study work technical report is attached at Appendix B. Overall, the study provides evidence of the key linkages between planned growth, and the need to increase highway capacity to enable the continued strategic growth of Coalville and Ashby.
33. **Existing traffic conditions:** The A511 Corridor currently experiences notable levels of congestion and peak hour delay at several of its key junctions. This results in journey time delay upwards of forty seconds at each junction and leading to tailbacks that disrupt the flow of traffic along the approaching links, resulting in speeds of less than 10mph on sections of road designed for 60mph.
34. The existing traffic conditions have a number of other consequences, including:
- effects on the efficient performance of businesses along the corridor, including Amazon and Bardon Hill Quarry; and
 - increased fuel usage and greater production of emissions hazardous to human health, as well as the environment. (there is an Air Quality Management Area - AQMA - on a section of the corridor in Coalville).

35. These conditions will only worsen with natural growth in background traffic and additional traffic from planned developments for the area if nothing is done.
36. **Future traffic conditions:** There is a predicted 24% growth in traffic between 2014 and 2036. During an average peak hour this equates to a 42% increase in vehicle delay per Kilometre with the overall amount of traffic experiencing congestion rising from 2.4% to 3.8%. Significantly, the number of junctions in the area exceeding their design capacity is forecast to increase from 5 to 12 during this period. Many of these junctions are on key routes leading to the dispersion of traffic onto less desirable alternatives. This is forecast to increase local area congestion significantly with many minor routes, both urban and rural, being overtly exposed to 'rat-running'.
37. An overall conclusion that can be drawn from the recent study work is that without some form of interventions along and around the corridor, the LHA would consider the residual cumulative impacts of growth to be severe in respect of paragraph 109 of the National Planning Policy Framework. In turn, this could warrant it giving advice to NWLDC to refuse applications. It would also have potentially significant implications for the review of the Local Plan which NWLDC is currently working upon. Decisions about the likely location for future growth have yet to be made but it is not unreasonable to anticipate that some of this growth could be in Coalville and/or Ashby. If growth cannot be supported there it means that it will have to be redirected elsewhere in the District.
38. **Impacts of proposed A511 Growth Corridor MRN scheme:** The capacity improvements of the scheme are forecast to attract traffic away from less suitable roads whilst efficiently dispersing this additional demand. This is characterised by a significant reduction in local 'rat-running' and cross-country routeing. By 2036 its imposition is forecast to reduce the delay per Kilometre by 9% whilst reducing the overall amount of traffic experiencing congestion from 3.8 to 2.8%. Meanwhile, those junctions exceeding their design capacity are forecast to fall from 12 to 7.
39. In addition, the Bardon Link Road is shown to provide traffic relief (in terms of future forecast levels) to the A511, Bardon Road section and to the 'Hugglescote Crossroads'.
40. The outcomes of this recent study work corroborate the work done to develop the business case for the MRN project, demonstrating the scheme's necessity in dealing with the impacts of growth in the area. But, it also demonstrates that it does not deal with all of the impacts. Other measures are needed, as set out in paragraphs 42 to 45.
41. There is no guarantee that the MRN bid will ultimately prove to be successful, for example because nationally the total value of MRN projects being bid for may exceed the funding available. On that basis, the outcomes of the recent study work evidences why it continues to be appropriate for the LHA to seek developer contributions to improvements (mitigation) in the A511 Growth Corridor where the developments' residual cumulative highway impacts would otherwise be severe without such mitigation. Where no contribution / mitigation is forthcoming in such

circumstances, the LHA could advise NWLDC that applications should be refused in accordance with paragraphs 108 and 109 of the NPPF.

42. **Other junctions requiring mitigation to deal with the impacts of growth:** Beyond the A511 Growth Corridor MRN scheme, the CTS originally listed other junctions that would require mitigation, as listed at paragraph 24. As a result of the changed circumstances outlined earlier in this report, the results of the recent study work show a revised list of other, additional junctions where mitigation will be required else otherwise they would be severely congested. These are shown the table below (see also Appendix A).

Junction	Notes
A511 Ashby Bypass/Ashby Road (at Boundary)	Optioneering work for the MRN project led to the focus of that scheme being on Coalville and the A511 corridor to its east – that package of improvements represents the best business case when assessed against the MRN criteria.
A511 Ashby Bypass/Nottingham Road	
M1 J22/minor road from Stanton Under Bardon	These junctions are now identified due to the MRN scheme proposals for the 'Flying Horse' junction; an appropriate, deliverable scheme to mitigate the impacts of growth requires some existing turning movements to be banned, causing some traffic to be displaced onto other routes.
B591/Warren Hills Road, Copt Oak	
B591/Whitwick Road, Copt Oak	
A511/Broom Leys Road	Some improvements to this junction are included as part of the MRN scheme; its identification in the most recent work is marginal but highlights its capacity is likely to be breached at peak times towards the end of the modelled period.
High Street/Belvoir Road, Coalville	Not included in the original CTS list and not part of the MRN scheme.

Note: For the avoidance of doubt, the above list is based on modelling work including the MRN scheme.

43. Additionally, whilst the A42 Junction 13 is not modelled to exceed the severely congested threshold, it does come very close. This is an important junction, and its operation has not just localised impacts but wider regional and national impacts as part of the Strategic Road Network. It should not also be considered in isolation in the context of the performance of the Ashby Bypass. Lastly, improvements to the junctions listed above, particularly at Ashby, are likely to draw additional traffic into the junction. Given that only the 'bronze scheme' was delivered at this junction,

further improvements are likely to be required to satisfactorily accommodate growth.

44. No particular proposals or definitive costings have yet been developed for these locations, albeit a reasonable estimate is that the total additional cost will run to several millions of pounds. Nevertheless, and in the absence of such detail, where the LHA assesses that developments could have a severe residual impact on these junctions without appropriate mitigation, it will seek:
- for the developer to identify and to develop potential mitigation measures based on assessment work that is consistent with the assumptions used in the recent study work;
 - as is reasonable / appropriate, to either seek developers to deliver the mitigation measures themselves (e.g. under Section 278 of the Highways Act) or to make a proportionate contribution, based on costing of the measure agreed by the LHA.
45. Where no such mitigation / contribution is forthcoming, then the LHA could advise NWLDC that applications should be refused.

Implications for NWLDC's 'Section 106 policy for the delivery of infrastructure in Coalville'

46. The 'Section 106 policy for the delivery of infrastructure in Coalville' (the Policy) was established by resolutions of NWLDC's Cabinet in 2013.
47. Essentially, for residential sites of 50 or more dwellings the Policy prioritises developer contributions towards transport infrastructure in (full or partial) lieu of affordable housing provision where there would otherwise be an issue of site viability. The transport projects on which it was based are the junctions and the Bardon Link Road set out in paragraph 24 above.
48. The Policy has generally been successfully implemented over the years, with typical contributions of around £4000 to £5000 per dwelling being secured where it has been applied. Additionally, without the scope of the Policy but underpinned by policies in the Local Plan, contributions have also been secured from employment sites, for example, £1.9m from Amazon and from developments in other settlements, including Ashby. In total around £8m of developer contributions have been secured through Section 106 agreements, with £2.4m paid and not yet spent. Around a further £12m is expected to be secured giving a potential total in the order of £20m.
49. It was recognised that at the time of the Policy's adoption, it would unlikely be capable of funding the entirety of the transport infrastructure required to support growth in the area. That is because:
- considerations of sites' viability, i.e. the general level of contribution to be sought, needed to ensure that sites remained viable to deliver (notwithstanding any reductions in affordable housing)

- it only applied to a residential development or to any element of a mixed-use development of 50 or more dwellings, and therefore did not cover the transport mitigation of the impacts of sites of less than 50 dwellings
- its coverage did not include Ashby, where considerable growth has taken place and is set to do so going forward.

50. Thus, and as referred to elsewhere in this report, monies have been secured through bids to Government for funding to supplement that secured through the Policy and from other sites, including employment, and in other locations.

51. The outcomes of the recent study work have been discussed with NWLDC and the implications for the Policy considered. In the light of this it has been agreed by officers to recommend to their respective executive bodies that:

- a. The list of projects on which the Policy was originally based is replaced with a revised list including:
 - the projects identified as part of the A511 Growth Corridor scheme;
 - the additional junctions set out paragraph 42;
 - A42 Junction 13

(Appendix A provides a comparison table of the original and revised project lists).

- b. That no change be sought to the general level of developer contributions being sought. The total costs of the MRN project and of the additional junction mitigation measures identified by the recent study work are in excess of the total cost of the projects on which the level of Policy contribution was originally based. Thus, it could be suggested that as the total costs have increased, so should the level of contributions. But, the impact of Covid-19 on the development market going forward is unclear at this time and overall it was considered unwise to be suggesting any increases in the level in the current circumstances. Such a position would align with paragraph 108 of the NPPF, which states that “...*In assessing [development proposals], it should be ensured that: ...any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be **cost effectively** mitigated to an acceptable degree.*”

52. Thus, there will likely remain a shortfall in the sums raised through the Policy and the total costs of transport infrastructure required to enable growth. For this reason, going forward the LHA will continue to seek to pursue opportunities for Government funding (where it is able to afford to do so); seek developers to deliver improvements (e.g. through Section 278 Agreements) where it is possible and appropriate to do so under planning law and regulations; and to continue to seek to secure other developer contributions that are beyond the scope of the Policy, based on the evidence from the recent study work and backed by Local Plan policies.

53. The levels of funding secured (from Government or developers) will continue to be monitored and kept under review so that a clear understanding of any funding shortfall is maintained. Likewise, officers will continue to work closely with NWLDC

to understand the viability of development sites going forward post Covid-19. Such variables will inform future reviews of the level of contributions to be sought under the Policy.

Developing a CTS Document

54. Whilst technical reports, such as the one attached, provide a sound evidence base on which the LHA can engage with developers, they are not especially easy to understand for non-transport or non-planning professionals, and certainly do not provide the type of clarity, say, as the Market Harborough Transport Strategy.
55. To address this issue, it is proposed to work jointly with NWLDC to prepare a clear and concise CTS document which, once published, would be reviewed in alignment with the review of the Policy. Its contents will also be considered in the light of the outcomes of work by CRIL to reinvestigate the case for the reopening of the Leicester to Burton railway line to passenger traffic.

Equality and Human Rights Implications

56. Proposals are aimed at tackling congestion both now and in the future and helping to provide more reliable journey times. In turn, this will facilitate strategic growth that should help to meet the social and economic needs of Coalville's current and future residents. No detailed assessment has been done at this early stage but if CTS scheme were to be taken forward an Equality and Human Rights Impact Assessment will be completed at an appropriate point.

Environmental Impact

57. There are no environmental implications arising from this report. As CTS projects are taken forward a relevant impact assessment will be completed at an appropriate point.

Background Papers

Local Transport Plan

<https://www.leicestershire.gov.uk/roads-and-travel/road-maintenance/local-transport-plan>

Report to the Cabinet on 16 March 2015: Enabling Growth Plan

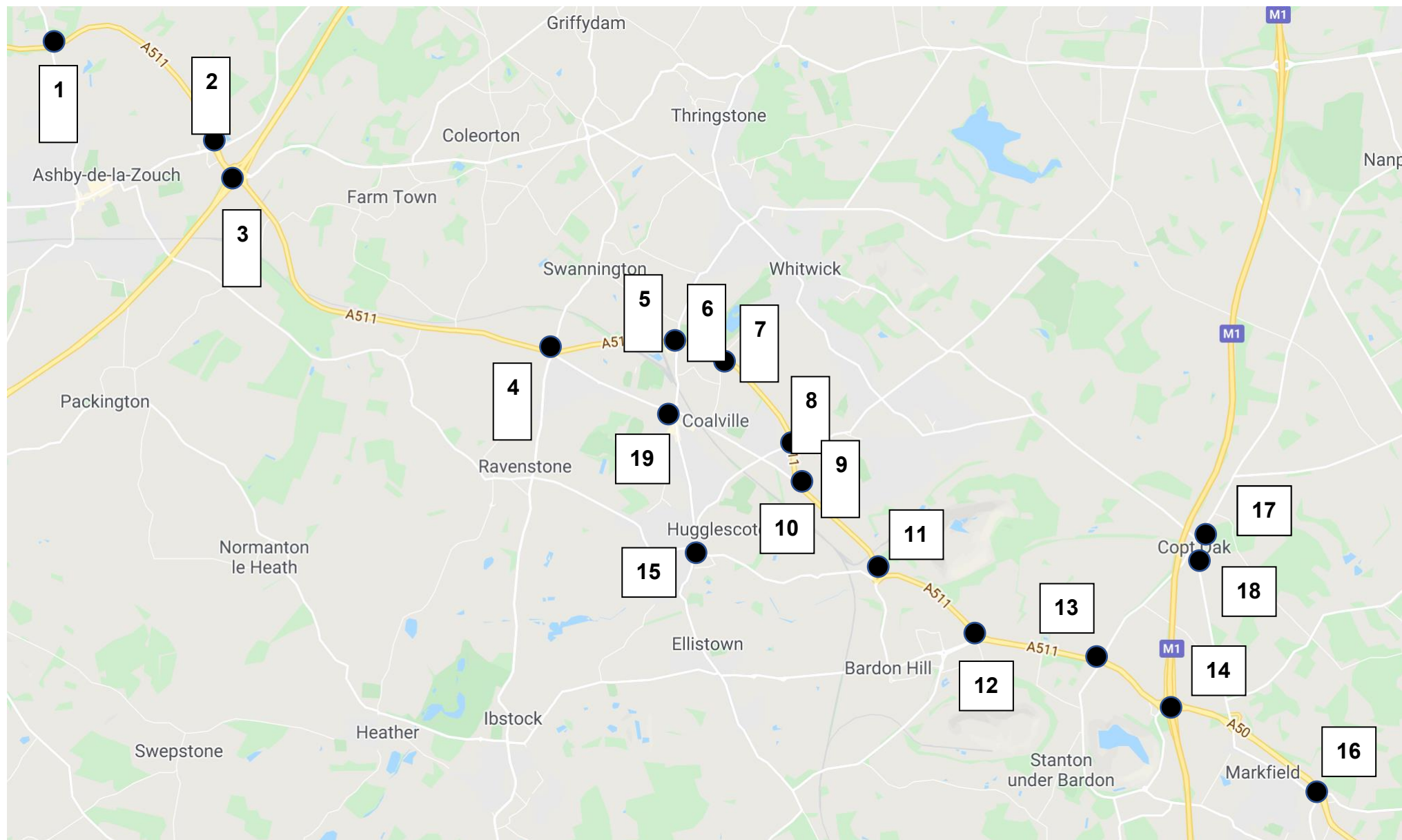
<http://politics.leics.gov.uk/ieListDocuments.aspx?CId=135&MId=4360>

Report to the Cabinet on 29 March 2019: Environment and Transport 2019/20 Highways Capital Programme and Highways Transportation Work Programme

<http://politics.leics.gov.uk/ieListDocuments.aspx?CId=135&MId=5601>

Appendices

- Appendix A - Coalville Transport Strategy Plan and Project List
- Appendix B - Technical Report



Junction No. and Name	Included in		
	Original CTS	Revised CTS	
		MRN Scheme	Additional junctions
1. A511 Ashby Bypass/Ashby Road			X
2. A511 Ashby Bypass/Nottingham Road			X
3. A42 Junction 13	X		X
4. Swannington Road Roundabout ('Hoo Ash Roundabout')	X	X	
5. Thornborough Road Roundabout	X	X	
6. Stephenson Way dualling		X	
7. Whitwick Road Roundabout	X	X	
8. Broom Leys Road Cross Roads	X	X	X (see para' 39)
9. Bardon Road Roundabout	X	X (part of Bardon Link Road	
10. Bardon Link Road		X	
11. Reg's Way Roundabout ('Birch Tree Roundabout')	X	X	
12. Beveridge Lane Roundabout	X		
13. Stanton Lane Roundabout ('Flying Horse Roundabout')	X	X	
14. M1 Junction 22	X		X Minor arm from Stanton
15. Central Cross Roads ('Hugglescote Crossroads')	X		
16. Field Head Roundabout		X	
17. B591/Warren Hills Road, Copt Oak			X
18. B591/Whitwick Road, Copt Oak			X
19. High Street/Belvoir Road, Coalville			X

Appendix E - Land East of Corkscrew Lane, Ashby de la Zouch. Preliminary Landscape and Visual Analysis.

LAND EAST OF CORKSCREW LANE, ASHBY DE LA ZOUCH, LEICESTERSHIRE

PRELIMINARY LANDSCAPE AND VISUAL ANALYSIS

ON BEHALF OF MATHER JAMIE

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PLANNING | **DESIGN** | **ENVIRONMENT** | **ECONOMICS**

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FIGURES

Figure 1:	Viewpoint Locations
Figure 2:	Viewpoint Photographs
Figure 3:	Preliminary Development and Landscape Strategy

1. INTRODUCTION

Terms of reference

- 1.1. Pegasus Group have been instructed by Mather Jamie to undertake a preliminary appraisal of landscape and visual matters in relation to an area of land located to the east of Corkscrew Lane, at Ashby de La Zouch, Leicestershire in support of representations being made to the North West Leicestershire Development Strategy Options and Policy Options (Regulation 18) Consultation.
- 1.2. The site area being considered comprises approximately a single parcel of agricultural land, located to the east of Corkscrew Lane and directly south of the A511 (the site). The site is situated to the east of the A42 with the market town of Ashby-de-la-Zouch (Ashby) located immediately to the west of the A42. Ashby itself is located approximately 22km from the north-western edge of Leicester, and approximately 15km to the south of Derby. The immediate context comprises extensive areas of agricultural land but these are strongly influenced by transport infrastructure.
- 1.3. This report sets out a brief preliminary appraisal of landscape and visual matters (PLVA) which has been undertaken to determine the various landscape and visual constraints and opportunities regarding the site and its context.
- 1.4. The PLVA considers existing landscape and visual receptors in the study area, including physical landscape resources; landscape character; and, views/visual amenity experienced by residents, recreational users (including visitors and tourists) and road users.
- 1.5. Having determined the various constraints and opportunities, the PLVA proceeds to consider how these might serve to influence the 'development potential' of the site area and the nature and extent of appropriate measures that would help to avoid or minimise potential impacts of development.
- 1.6. Principles and good practice for undertaking landscape and visual impact assessment are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013)¹.

¹ Landscape Institute and Institute of Environmental Management and Assessment, Guidelines for Landscape and Visual Impact Assessment 3rd Edition (April, 2013)

The concepts and procedures set out in this guidance have been adopted where appropriate.

2. APPROACH

Overview

2.1. The approach and methodology used for this LVA considers best practice guidance, as set out in the following documents:

- Landscape Institute and Institute of Environmental Management and Assessment (2013) Guidelines for Landscape and Visual Impact Assessment, 3rd Edition;
- Natural England (2014) An Approach to Landscape Character Assessment;
- Landscape Institute Technical Guidance Note 06/19: Visual Representation of Development Proposals (September 2019); and
- Landscape Institute Technical Guidance Note 02/21: Assessing Landscape Value Outside National Designations.

2.2. Reference has also been made to additional sources of data and information; these are referred to in the relevant sections of the baseline information.

Level of assessment

2.3. Principles and good practice for undertaking landscape and visual impact assessment are set out in the Landscape Institute (LI) and the Institute of Environmental Management (IEMA) Guidelines for Landscape and Visual Impact Assessment, Third Edition (2013).

2.4. The third edition of the Guidelines for Visual Impact Assessment (GLVIA3) acknowledges that landscape and visual impact assessment (LVIA) can be carried out either as a standalone assessment or as part of a broader EIA. The GLVIA3 note that the overall principles and core steps in the process are the same but that there are specific procedures in EIA with which an LVIA must comply.

2.5. This report has been prepared as a preliminary appraisal of landscape and visual constraints and opportunities. Although Green Belt is primarily a planning matter, there are some overlaps with landscape and visual matters (in respect of physical landscape attributes and perception of countryside), consequently this report considers the current Green Belt evidence for the emerging local plan.

2.6. Landscape features and elements provide the physical environment for flora and fauna and the associated importance of biodiversity assets. This PLVA does not consider the value, susceptibility or importance on ecology and biodiversity, nor does it consider impacts from an ecological stance.

- 2.7. Heritage assets such as Scheduled Monuments, Listed Buildings and Conservation Areas all contribute to the overall present-day landscape character, context and setting of an area. These aspects have been given consideration in the PLVA in terms of physical landscape resources (for example trees and hedgerows) and landscape character. However, this PLVA does not address the historic significance, importance or potential impacts on heritage assets and designations; these assets are assessed in the context of landscape and visual matters only.

Collating baseline information

- 2.8. To capture a comprehensive description of the baseline position for landscape and visual receptors, information has been collated using a process of desk study and field survey work. The desk study includes reference to published landscape character studies. Preliminary field survey work was completed February 2022.

Consideration of effects

- 2.9. Having established the relevant baseline position, the LVA process then considers the sensitivity of the landscape receptors and visual receptors, specifically in response to the nature of the proposed development; the nature of potential impacts; and consequently, how these can inform an iterative approach to design.

3. LANDSCAPE AND VISUAL BASELINE

Site Location and Context

- 3.1. The site is located on the eastern edge of Ashby de la Zouch and approximately 3km from the western edge of Coalville. The site area is broadly defined by an existing railway to the south, by Corkscrew Lane to the west and by the alignment of the A511 to the north and north-east.
- 3.2. The site comprises an existing area of arable land, defined by established field boundary hedgerows and linear woodland and tree belts. The field pattern is medium to large scale and irregular in plan form; the enclosure appears to have formerly been part of a larger, more regular enclosure prior to being bisected by the route of the A511. Although there is no tree or woodland cover on the site (aside from along its boundaries), the surrounding context is characterised by several larger stands of trees and woodland which contribute to a mixed character between the agricultural land and woodland areas.
- 3.3. The topography of the site is broadly uniform across its extent, but slopes gradually from east to west; the high point of the site being located close to the north-eastern boundary, with a gradual fall down to the alignment of Corkscrew Lane.
- 3.4. There is no formal access to the site in the form of public rights of way. Due to the nature of the transport corridors of the A511 and railway, access into the field enclosure is currently limited to the route of Corkscrew Lane. There are very few opportunities for formal access to the countryside, as the rights of way network is limited in the locality, with the closest routes being located further to the north between Farm Town and the Ashby Road (A512).
- 3.5. Immediately to the west of the site, between Corkscrew Lane and the A42, is a 'brownfield' parcel of land that was part of the former UK Coal Lounge disposal point. The area is now characterised by the redundant infrastructure (including hard standings and internal roads and drainage lagoons), with large areas of natural regeneration; parts of the site have been restored with planting and seeding, now established (largely drainage features and bunding). This parcel of land, immediately to the west of the site, is subject to an extant planning permission for Class B8 distribution unit(s) and ancillary offices (B1a) (along with other supporting components of that application).
- 3.6. The wider landscape context to the site is characterised by a complex mosaic of small scale undulating hills and valleys, characterised predominantly by agricultural land, and with more extensive tree and woodland cover.

Landscape Character

3.7. Reference has been made to published guidance on landscape character for the area. The site is located in the following landscape character areas/types:

- National level – NCA 71: Leicestershire and South Derbyshire Coalfield;
- County level – Leicester, Leicestershire and Rutland Landscape and Woodland Strategy 'The Coalfield' landscape character area (LCA); and
- District level – National Forest LCA 'Enclosed Farmlands' LT.

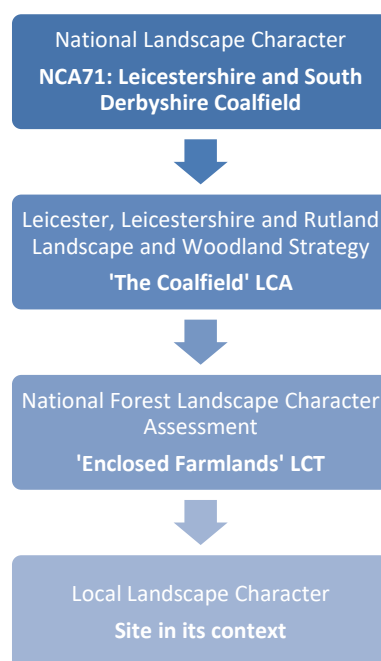


Plate 1: Summary of landscape character hierarchy

3.8. The following sections set out a summary of the characteristics relevant to the site.

National landscape character

3.9. At a national level, the site is situated within the National Character Area (NCA) 71, Leicestershire and South Derbyshire Coalfield². Where relevant to the site and its landscape context, the key characteristics of NCA 71 are summarised as follows:

- The landscape is unenclosed with shallow valleys, subdued sandstone ridges and a gently undulating plateau;

² Natural England, National Character Area 71: Leicestershire and South Derbyshire Coalfields (NE535) (March 2014)

- There are heavy, poorly draining soils over the Coal Measures and mudstones of the Mercia Mudstone Group, and free-draining soils on the sandstone ridges;
- The area forms part of a regional watershed between the River Mease to the south and the River Soar to the east and has many minor, swift flowing streams draining the area...;
- The area has a developing woodland character that is heavily influenced by the work of The National Forest initiative, which augments locally dense riparian woodland and prominent amenity trees around settlements with developing woodland on former colliery sites;
- Small- to medium-sized fields occur with a wide variation in field pattern, including some narrow, curved fields that preserve the strips of the open field system. Where arable production predominates, fields have been enlarged. Hedgerows are low with a few scattered hedgerow trees and in places show the effects of former open cast workings;
- Agriculture comprises a mixture of arable and mixed sheep and beef units and, to a lesser extent, dairy. Combinable crops are grown on the freer-draining soils. Potatoes are grown in rotation on the heavier soils around Measham and Packington;
- There is remnant acid grassland over sandstone with neutral grassland in the valleys, and acid heathland on open mosaic habitats on previously developed land, particularly colliery spoil...;
- ...Archaeological assets include a moated medieval village at Desford and the Roman town at Ravenstone;
- Traditional vernacular is predominately locally manufactured red brick with tile or slate roofs. Some older buildings are of stone. Locally characteristic around Measham is a double-sized brick of the late 18th century known as the 'Measham gob'. There are many three-storey brickbuilt farmhouses;
- The settlement pattern is dominated by mining settlements. Isolated hamlets along the roadsides and small villages centred on a church contrast with extensive areas of 20th-century housing and prominent industrial and commercial distribution warehouses at the edge of larger centres, notably Ashby-de-la-Zouch, Measham and Coalville;
- Around Coleorton, a more dispersed pattern of settlement associated with small-scale bell pit mining of the 13th century, spoil heaps, small fields, a dense network of footpaths and a fine example of historic parkland landscape contribute to the distinctiveness of this part of the coalfield landscape; and

- The area is easily accessible by major roads and rail and is close to East Midlands Airport. Long-distance recreational routes include the Ivanhoe Way, the Leicestershire Round, and a wide network of local trails and footpaths associated with the recreational assets of The National Forest. The Ashby Canal also provides a link to the wider area.

3.10. The character guidance is considered in the analysis of landscape and visual constraints and opportunities.

Leicester, Leicestershire and Rutland Landscape and Woodland Strategy

3.11. The Leicester, Leicestershire and Rutland Landscape and Woodland Strategy (referred to hereafter as the LWS)³ provides a more detailed and refined scale assessment of landscape character across the area.

3.12. The site is located in a landscape character area (LCA) defined by the LWS as 'The Coalfield'. The guidance sets out a series of 'distinctive features' for the LCA, including:

- gently undulating landform;
- effects of past and present coal and clay working;
- relatively dense settlement pattern of former mining towns and villages;
- mixed farmland with generally low woodland cover;
- most of area within the National Forest; and
- distinctive landscape character around Coleorton.

3.13. Guidelines were set for the LCA in relation to an overall objective of 'creating a new wooded landscape as part of the National Forest, whilst conserving existing areas of special value'. The guidelines included:

- Increase woodland cover in blocks of all sizes (except in the Coleorton historic mining area where only small scale planting works are appropriate);
- Conserve and enhance the hedgerow network and hedge trees through improved management and new planting;
- Obtain high quality restoration schemes for mineral workings with a high proportion of land restored to woodland wherever feasible;
- Encourage creation of new areas of heathland on derelict land, and as part of restoration schemes for mineral workings;

³ Leicester, Leicestershire and Rutland Landscape and Woodland Strategy, Leicestershire County Council, 2001

- Enhance the appearance of the local landscape through well designed and adequately mitigated schemes wherever further infrastructure or extractive development is necessary;
- Ensure that post-industrial sites of ecological value are conserved; and
- Conserve the special character of the Coleorton historic mining area.

3.14. The guidelines were prepared and published in 2001 and there has been considerable change in terms of the woodland cover across the National Forest, with some planting schemes now forming notable features in the landscape having established over 15 years or more. Notwithstanding this change, the guidelines are useful in informing the analysis of constraints and opportunities and also for informing any emerging design proposals and masterplan for the site.

National Forest Landscape Character Assessment

3.15. At a district level the site is located in an area defined by the National Forest Landscape Character Assessment⁴ as the 'Enclosed Farmlands'. The key characteristics of this LCT are defined by the guidance as:

- Predominantly open, sparsely wooded mixed farmland;
- Strong rural character with few urban intrusions;
- Field pattern is generally defined by hedgerows or stone field walls (in Charnwood);
- In areas of intensive cropping fields are large in scale with an 'open' pattern and occasional, poorly defined hedges;
- Most widespread are areas of mixed farming, with medium to large fields, low cut gappy hedgerows, scattered hedgerow trees and some woodlands;
- Pockets of permanent pasture remain along watercourses and around villages, with a traditional character of small fields with thick hedges and many hedgerow trees;
- Watercourse trees and clusters of small estate woodlands give a quite well wooded feel in places; and
- Settlement is characterised by scattered farmsteads and villages.

3.16. The guidance notes that 'indicative planting areas' for the 'enclosed farmlands' LCT include 'Mainly woodland expansion areas; some well wooded landscapes and woodland linkage areas; Ancient woodland priority areas (in part); floodplain landscapes (in part)'. To achieve this the character assessment sets out guidance on appropriate planting scale, type and design that would be appropriate for each landscape character type, as follows:

⁴ Appendix 3, National Forest Strategy 2004-2014, The National Forest Company

Planting scale

- Varied opportunities but generally large scale to reflect medium to largescale, open landscape character;
- Influence of country estates with game coverts evident;
- Smaller-scale planting appropriate, linked to estates;
- Small-scale planting in remnant pastoral landscapes around villages; and
- Small areas of parkland associated with country houses. Single trees and parkland clumps appropriate.

Planting type

- Large commercial plantations, estate forestry and farm woodlands;
- Short rotation coppice - could suit extensively cropped landscape character;
- Hedgerow trees - in pastoral landscapes, around villages, along roadsides;
- Replanting parkland trees;
- Reinstating areas of former parkland or new parkland planting associated with country estates;
- Linear waterside trees/carr copses; and
- Replanting/gapping hedgerows where pattern remains strong.

Planting design

- Plant to subtle landform. Only follow hedgerow pattern where this is visibly dominant in flat landscapes, where woods could fit as discrete blocks within the field pattern;
- Design woodlands with an irregular shape to reflect subtle landforms. When planting over several fields, override geometric hedgerow pattern;
- Use hedgerows to create interlock between woodlands;
- Avoid continuous roadside planting to retain a balance of short and long views;
- Woodland margins very important in open, flat to gently rolling landscape. Shape to reflect subtle landform;
- Create irregular shaped woodland edges. Avoid uniform regularity by continuous lines/layers of shrubs, broadleaves or conifers. Create interest and diversity by indenting edges and overlapping different layers/groups of species; incorporate field hedgerows where appropriate; integrate hedgerow trees - mature trees provide coarser texture and rounded crowns provide a sense of continuity;

- Positioning of woods in relation to one another important in flat landscape. Avoid an even scatter of small woods, which may appear too small in scale. Also avoid creating solid wooded skylines;
- Plant to accentuate strong landscape features, e.g. scarp slope overlooking the Trent Valley;
- Identify and avoid masking views of prominent landscape features. Reveal and draw attention to them (e.g. church spires in Mease and Sence Lowlands);
- Retain vistas from prominent hilltops. Identify best examples;
- Retain open, rugged character of rocky knolls and open summits in Charnwood. The amount of space will depend upon the importance of the feature in the landscape and the steepness of slopes below;
- Retain small-scale pastoral character along watercourses - avoid continuous planting, keep one bankside clear, create dappled shade;
- Maintain a balance of open space to woodland around villages; and
- Reinstate historic parklands where appropriate by returning arable land to pasture and replanting to the original design intentions.

3.17. These considerations can influence the strategy for green infrastructure and open space for the site.

Visual Baseline

3.18. This analysis references a series of viewpoints that are representative of views in the area, including visual receptors using the local roads and 'higher sensitivity' receptors using the PROW network. These illustrate the nature of views towards the site in the context of the surrounding landscape (refer to **Figure 1, Viewpoint Location Plan and Figure 2, Representative Viewpoints 1 to 8**).

3.19. The different types of representative visual receptors include:

- Residential properties which are scattered through the wider landscape context, including the settlement edge of Farm Town to the east of the wider site area;
- The local road network around the wider site area, including users of the A511 and local users of Corkscrew Lane (sections both to the north and south of the A511); and
- Users of the public footpath which crosses the landscape.

3.20. The general visibility of the site from within, and across, the local landscape and the nature of existing baseline views is set out as follows:

- Views to the site from the north are generally screened by the alignment of the A511 and its associated tree and woodland belts. In the wider landscape variations in the landform and smaller scale woodland belts also contribute to screening, particularly the rising landform to the north. Notwithstanding the limited visibility of the site itself, proposals for built form on the site, particularly where these are more elevated, will potentially be visible above the tree lines;
- Views from the east are limited by the more substantial linear tree belts along the route of the A511 and, slightly more distant, larger blocks of woodland close to Little Alton Farm. Proposed built form on the site is likely to be screened in views from the wider landscape in the east, however nearby views from Farm Town and from the local road network are more likely;
- Views from the south are generally screened by the existing rail and road infrastructure and associated linear tree belts. Extensive woodland areas around Breach Farm also provide screening from the wider landscape. Proposed built form on the site would be largely screened in views from the wider landscape; and
- Views from the west are generally restricted by the alignment of the A42 and the associated built form to the west of the highway, this includes existing commercial areas. Closer to the site, existing trees and woodland on the adjacent land parcel (former Lounge Disposal site) also contribute to screening. Proposed built form on the site will be largely screened from the wider landscape, with only very localised views from Corkscrew Lane remaining.

3.21. The nature and extent of these views, including judgements on potential views of proposed built form, are considered as part of the landscape and visual analysis.

Future baseline

3.22. Typically, an LVA would not consider emerging or future proposals for an area due to a lack of certainty at the early stage of the appraisal process.

3.23. However, for this site the 'future baseline' related to the extant planning permission for commercial development to the west of the site which would substantially alter the baseline scenario and should be given due consideration at this early stage of the process.

The existing permission relates to the land to the west of the site, situated to the south of the A511, west of Corkscrew Lane, east of the A42 and north of the existing railway line. Permission was granted in 2021 for Class B8 distribution unit(s) and ancillary offices (application reference 19/00652/FULM). This would present a large scale commercial building at this location which would influence the baseline context.

4. LANDSCAPE AND VISUAL ANALYSIS

- 4.1. The following key constraints and opportunities have been identified during the landscape and visual analysis (including reference to field work and desk study of landscape character guidance). The analysis of these can be used to inform the design process and to avoid or minimise potential impacts.

Overview

- 4.2. The site is not subject to any statutory or non-statutory landscape designations and there is no formal public access to the site in the form of rights of way. Public access in the surrounding landscape is also relatively limited and includes only a small number of public footpaths to the north and south, with a more varied network of access further east and separate from the site and potential influence of proposed built form.
- 4.3. The site is located to the east of the A42 corridor and east of the consented development on the brownfield site. The existing settlement edge of Ashby at this point (i.e. close to the junction of the A423) is generally characterised by larger scale industrial and commercial uses). This will consolidated as and when the consented development on the adjacent brownfield land come forward to construction and completion.
- 4.4. Green infrastructure associated with the site is also strongly linked to the transport infrastructure network, including linear planting along the A511 and the railway. In both instances these offer strong green connections across the landscape and offer an opportunity to reinforce these. Furthermore, the existing boundary hedgerow along Corkscrew Lane is more reflective of the field patterns and boundary hedgerows which characterise much of the wider landscape. Together these contribute to containment and capacity of different parts of the site, particularly where combined with lower areas of landform and topography. Also in relation to green infrastructure, the site is located within the National Forest and as such, woodland cover in general is a consideration.
- 4.5. The site and its surrounding landscape retain some value based on the nature of the landscape components of the site (in terms of their condition and consistency with the wider landscape character) however the site is relatively ordinary in this context and, to a degree, sits slightly separate to the wider more rural landscape to the east.
- 4.6. In terms of susceptibility to commercial development, the landform, field pattern and hedgerow network are considered to have some susceptibility to commercial development due to the scale of built form required in terms of building footprints and the extent to which these can be manipulated to avoid disruption or losses. To the west

the susceptibility is far lower, due to the previous uses and also the influence of the highway corridor and other areas of emerging commercial/industrial uses which are present to the west.

4.7. The landscape and visual analysis includes the following summary points:

- The site is not subject to any statutory or non-statutory landscape designations and there is no formal public access to the site in the form of rights of way;
- The site is located close to the adjacent to the urban edge of Ashby and the highway corridor of the A42 (including the junction with the A511 and A512), this will be consolidated as the consented development comes forward and the site is consequently situated directly adjacent to this;
- The site is not widely visible from the immediate landscape context;
- The existing vegetation structure is limited to the boundaries of the site - these contribute to the capacity of the site to accommodate some development (due to physical and visual containment) however the network of field boundary hedgerows across the agricultural areas of the site create some constraints (in terms of their retention); and
- A practical development envelope for commercial development will need to consider topography and earthworks.

4.8. The landscape and visual analysis is considered further as constraints and opportunities within the site and study area.

Landscape and Visual Constraints and Opportunities

Constraints

4.9. The landscape and visual constraints are considered to be as follows:

- The existing landscape components which define the site, including the hedgerows, hedgerow trees and tree belts – including the scale and pattern of the field enclosure - which is reflective of the wider landscape character of the surrounding agricultural landscape – boundary vegetation also contributes to the capacity of the site. As such, the existing vegetation network should be retained and enhanced wherever possible;
- The eastern parts of the site are slightly more elevated and consequently built form in these parts of the site would potentially be more prominent in views from the wider landscape (including from the potentially more sensitive PROW network);

- Visual receptors with near and middle distance views into the site and of potential built form, noting however that these are largely limited to the immediate vicinity of the site (i.e. roads) with few views from the potentially more sensitive rights of way network.

Opportunities

4.10. The landscape and visual opportunities are considered to be as follows:

- The relatively enclosed nature of the site, partially contained topographically (to the north in particular), framed by vegetation and infrastructure, and located close to existing settlement edge and adjacent to the emerging edge of the consented commercial development;
- The lack of landscape designations and lack of formal public access;
- That local landscape character is well represented in the wider landscape and as such the site is relatively 'ordinary' and not considered unique or rare in comparison with its wider LCA context;
- The potential to retain, enhance and create a strong framework of green infrastructure across the site which is consistent with the existing pattern and scale of the landscape and which will mitigate potential impacts; and
- The potential to make a contribution to the National Forest through green infrastructure proposals.

Landscape and Visual Strategy for Development

4.11. On the basis of the landscape and visual analysis, and the constraints identified, it is considered that the site retains a good level of development potential.

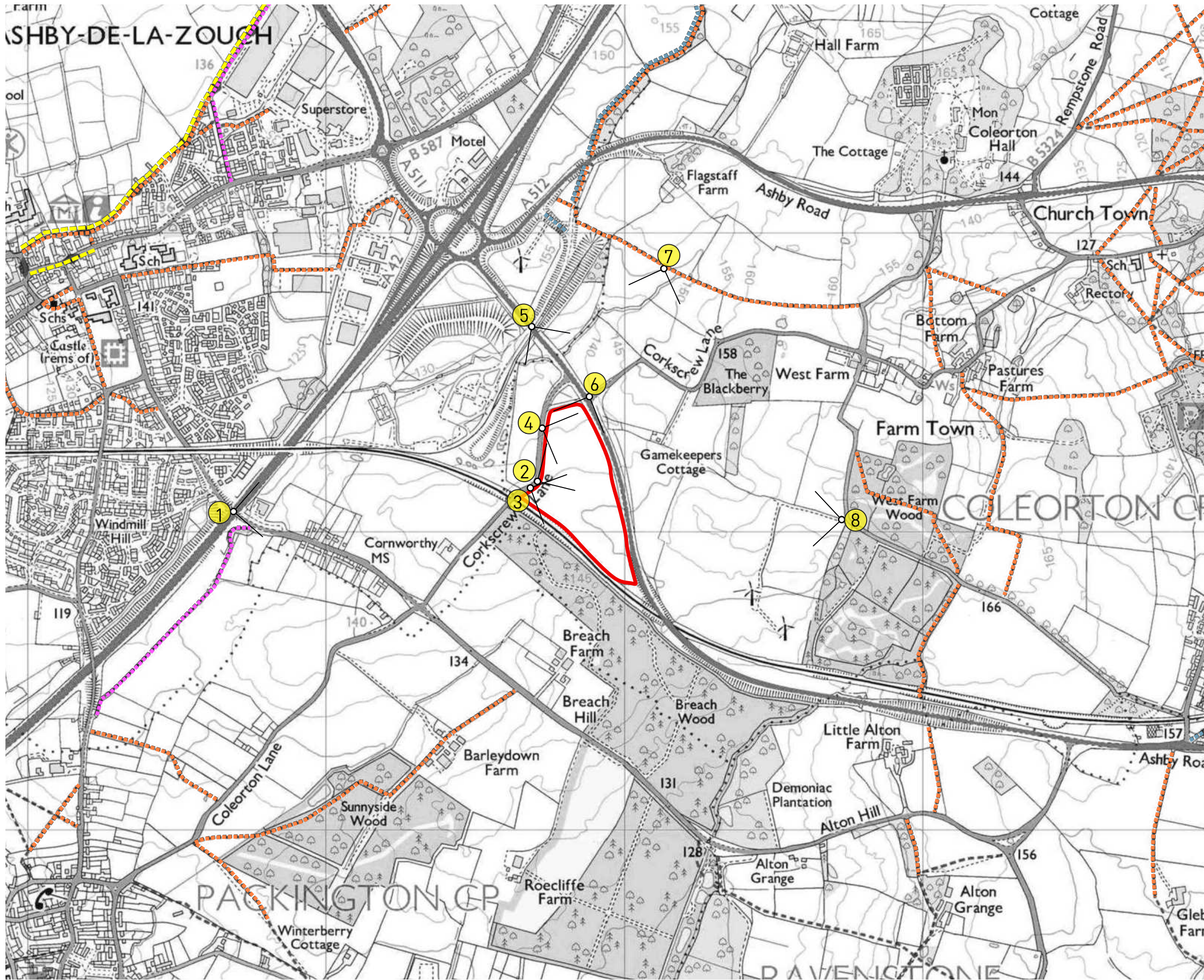
4.12. A preliminary framework for an emerging masterplan for the site should address the following key principles:







- Retain vegetation wherever possible on site so as to maintain the scale and pattern of the landscape character context to the area;
- Enhance the existing vegetation structure on site through appropriate management and new landscape planting so as to create a strong and enduring green infrastructure framework which can frame development proposals in the longer term – this can be undertaken adopting the principles and guidance of the National Forest;

- Potentially limit the proposed development envelope and/or proposed heights of built form in the more elevated parts of the site so as to ensure the prominence of built form is minimised; and
 - National Forest guidance requires that for sites over 10ha that c. 30% be used for forest green infrastructure. There are opportunities for National Forest planting on land outside of the site boundary, but on adjacent land.
- 4.13. This will enable a masterplan to come forward that represents a sensitive design solution with mitigation enshrined in the scheme from the outset. A proposed development and landscape strategy is illustrated on **Figure 3, Preliminary Development and Landscape Framework**.
- 4.14. This shows key components of the development envelope and mitigation in terms of green infrastructure that can come forward as part of the overall masterplan.
- 4.15. For additional land that can be brought forward for National Forest planting, the options for National Forest green infrastructure include:
- New woodland planting (ideally a minimum size of 0.25ha);
 - Creation of woodland belts (minimum of 15m wide);
 - Planting to form parkland-style landscapes;
 - Ecologically designed sustainable drainage systems;
 - Creation of new habitats (wetlands, reedbeds, meadows, heathlands);
 - Incorporation and management of existing woodland, hedgerows and other habitats;
 - Greenways - landscaped footpath and cycle routes;
 - Roadside trees;
 - Development landscaping with a strong tree emphasis; and
 - Incorporation of heritage features.
- 4.16. This would enable development on the site to come forward in a way which remains integrated with the local landscape, but for more extensive contributions to the National Forest to come forward also.

5. SUMMARY

- 5.1. Pegasus Group have been instructed by Mather Jamie to undertake a preliminary appraisal of landscape and visual matters in relation to an area of land located to the east of Corkscrew Lane, at Ashby de La Zouch, Leicestershire.
- 5.2. The site area being considered comprises approximately a single parcel of agricultural land, located to the east of Corkscrew Lane and directly south of the A511 (the site). The immediate context comprises extensive areas of agricultural land but these are strongly influenced by transport infrastructure. The land immediately to the west of the site is subject to an extant planning permission for Class B8 distribution unit(s) and ancillary offices (B1a) (along with other supporting components of that application).
- 5.3. This report sets out a brief preliminary appraisal of landscape and visual matters (PLVA) which has been undertaken to determine the various landscape and visual constraints and opportunities regarding the site and its context and how these might serve to influence the 'development potential' of the site and the nature and extent of appropriate measures that would help to avoid or minimise potential impacts of development.
- 5.4. This includes the definition of a development parcel which reflects the pattern and scale of the local landscape character and provides opportunities to enhance and create structural vegetation in and around the boundaries of the site, also contributing to the National Forest.
- 5.5. On this basis, and considering the containment of the site by transport infrastructure and location of adjacent emerging development of a similar nature, it is considered that a masterplan for commercial development can come forward on the site which incorporates mitigation as an integral part of the scheme and contribute to a development on this site that would be acceptable in landscape and visual terms.



- KEY**
-  Site boundary
 -  Representative viewpoints
 -  Public footpath
 -  Public bridleway
 -  Other routes with public access
 -  Recreational route

Land at Corkscrew Lane
 Ashby de la Zouch
 Client: Mather Jamie
 Fig 1: Viewpoint Location Plan

Drawing no. : P20-0281-01
 Date : 10 Feb 2022
 Drawn by : SRE
 Checked by : JWA
 Scale : 1:12500 @ A3





Viewpoint 1: View looking east from the Leicester Road, crossing the A42.



Viewpoint 2: View looking north-west from Corkscrew Lane just north of the railway line.

Land at Corkscrew lane
Ashby de la Zouch

Client : Mather Jamie

Fig. 2: Viewpoint Photographs

Drawing no. : P20-0281-02

Drawn by : JW

Checked by : JWA

Date : 10/02/2022



Existing wind turbines north of the A511 (south-west of West Farm Wood)

Site



Viewpoint 3: View looking north from Corkscrew Lane, just north of the railway line.

Site



Viewpoint 4: View looking south-east from Corkscrew Lane, on the southern approach to the A511.

Land at Corkscrew lane
Ashby de la Zouch

Client : Mather Jamie

Fig. 2: Viewpoint Photographs

Drawing no. : P20-0281-02

Drawn by : JW

Checked by : JWA

Date : 10/02/2022





Viewpoint 5: View looking south-east, from the A511 (layby) travelling east.



Viewpoint 6: View looking south from Corkscrew Lane, on the northern side of the A511.

Land at Corkscrew lane
Ashby de la Zouch

Client : Mather Jamie

Fig. 2: Viewpoint Photographs

Drawing no. : P20-0281-02

Drawn by : JW

Checked by : JWA

Date : 10/02/2022





Viewpoint 7: View looking south, from the public footpath, just south of Flagstaff Farm.



Viewpoint 8: View looking from the road to Farm Town, on the edge of West Farm Wood.

Land at Corkscrew lane
Ashby de la Zouch

Client : Mather Jamie

Fig. 2: Viewpoint Photographs

Drawing no. : P20-0281-02









Drawn by : JW

Checked by : JWA

Date : 10/02/2022





- KEY**
-  Site boundary
 -  Preliminary development area
 -  Existing key green infrastructure
 -  Proposed structural planting
 -  Proposed linear planting
 -  Proposed landscape buffer to Corkscrow Lane
 -  Indicative access point
 -  Consented development north-west of the site

Land east of Corkscrow Lane
 Ashby de la Zouch
 Client: Mather Jamie
Fig 3: Preliminary Development and Landscape Strategy

Drawing no. : P20-0281-03
 Date : 21 Feb 2022
 Drawn by : AC
 Checked by : JWA
 Scale : 5000 @ A3



North West Leicestershire
Local Plan Review:
Development Strategy and
Policy Options
Land off Measham
Road, Ashby

Prepared by Fisher German LLP on behalf of
Richborough Estates



Project Title:

Land off Measham Road, Appleby Magna

Author:

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01 Introduction

1.1 These representations have been prepared on behalf of Richborough Estates in respect of their land interests at Measham Road, Appleby Magna, as illustrated on Figure 1 below. Richborough Estates are a respected residential promoter who have a strong track record for developing high quality, new residential schemes across the country.

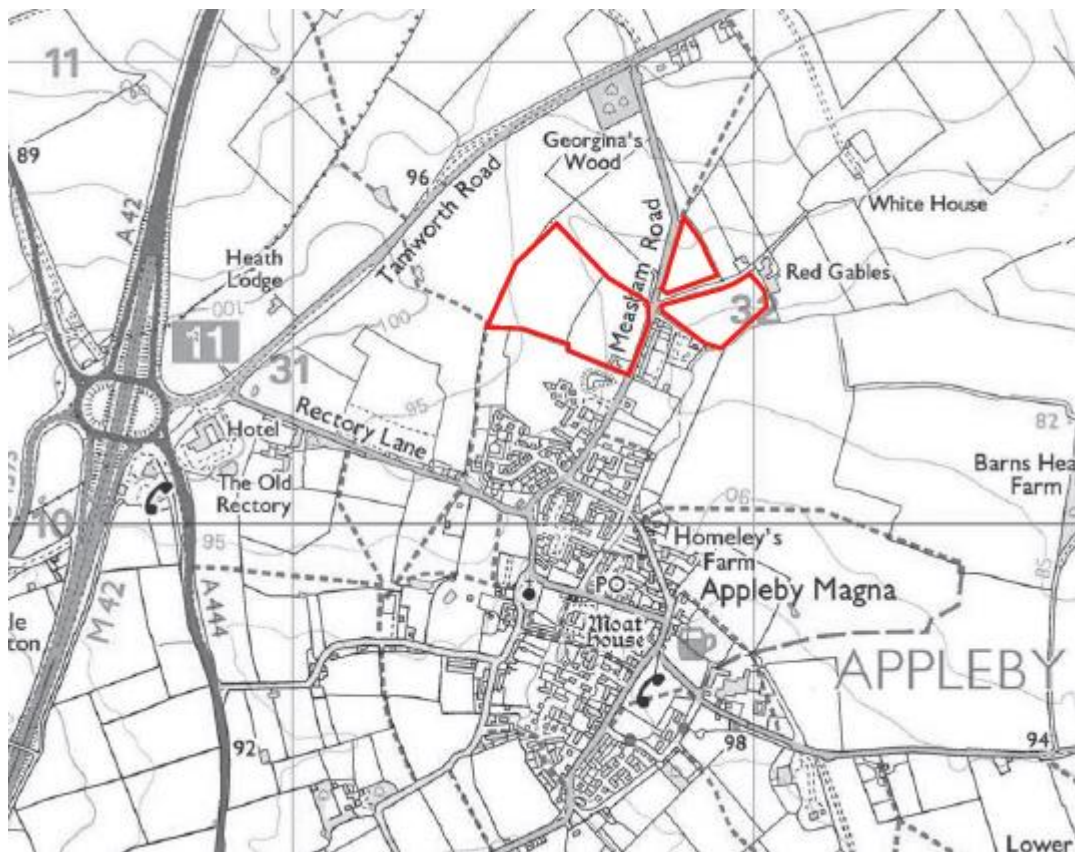


Figure 1: Site Location Plan

1.2 For ease of reference these representations follow the order of the questions in the Regulation 18 Consultation Document. Where we have not commented we have no specific comments at this stage.

02 Representations

Q1 - Do you agree with these Local Plan Review Objectives? If not, why not?

- 2.1 Richborough Estates broadly agree with the Local Plan Review Objectives. It is, however, considered that the scope of Objective 2, which relates to the delivery of new homes, should be extended to reflect the need for authorities within the Leicester and Leicestershire Housing Market Area (HMA) to assist Leicester City in meeting its unmet needs in full. Given Leicester City's functional relationship with Leicestershire, which predominantly forms the Leicester travel to work area, it is entirely likely that Leicester City's unmet needs will naturally need to be met in the wider county.
- 2.2 Failure to deliver the housing needs of the HMA as a whole will result in further increases in house prices due to the increases in demand. This will have significant economic and social impacts. It is therefore essential that sufficient housing is delivered so that the needs of the HMA are delivered, thus ensuring supply keeps up with demand. It is considered that the wording of Objective 2 should be amended to state:

*Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type. **Ensure the needs of the Housing Market Area can be met in full through the delivery of additional housing, above local demographic needs, to meet unmet needs from Leicester City.***

Q2 – Do you agree with the proposed settlement hierarchy? If not, why not?

- 2.3 The Settlement Hierarchy is generally supported however, it is considered that it should be amended to better reflect the relationship of settlements with existing and proposed employment. Appleby Magna is located close to extensive employment opportunities being developed at Mercia Park. Mercia Park is expected to create approximately 3,000 new jobs in the early years of the Plan period. Appleby Magna is the closest sustainable settlement to this strategic development, and thus is optimally located for future workers of Mercia Park. Whilst proximity to employment is afforded some weight in the settlement hierarchy, having regard for strategic developments such as Mercia Park and the Leicestershire International Gateway, it is considered that sustainable settlements such as Appleby Magna should be recognised for their latent ability to grow and provide accommodation close to such strategically important locations, enabling more sustainable modes of transport and encouraging a modal shift from

long distance, singly occupancy commuting. Paragraph 105 of the Framework sets out that the planning system should manage patterns of growth. Significant development should be “*focused on locations which are or can be made sustainable*”.



Figure 2: Appleby Magna Vision Document Page 4 extract

- 2.4 Appleby Magna is identified in the proposed settlement hierarchy as a ‘Sustainable Village’, the fourth tier of settlements on the Spatial Hierarchy. This position, however, does not reflect its location as the closest sustainable settlement to Mercia Park. Appleby Magna lies less than a mile east of Mercia Park, adjacent to junction 11 of the M1. New homes at Appleby Magna would support the services and facilities of the settlement itself as well as ensuring new homes are located within close proximity of jobs easily accessed by sustainable travel opportunities. The delivery of homes in settlements within the ‘Sustainable Villages’ would also ensure market choice in the delivery of homes across the authority.
- 2.5 The above becomes particularly relevant when considered against the likelihood of an increased housing requirement as a result of the future distribution of Leicester City’s unmet need. Proportionate developments in sustainable locations such as Appleby Magna will not only contribute to the wider

employment and economic strategies, but will also contribute positively to meeting the district's housing requirements in the initial years of the Plan period.

- 2.6 Having regard to the proximity of Appleby Magna to Mercia Park, and the services and facilities which already exist within the settlement, it is considered that Appleby Magna's role within the Spatial Hierarchy should reflect these factors. It's unique location as the closest sustainable settlement to Mercia Park should be recognised and thus the role it can play in delivering new homes realised.
- 2.7 New homes in Appleby Magna would likely serve a different market to new housing delivery in larger urban centres like Coalville, thus ensuring a range of housing is provided for the differing markets that will continue to arise from the economic developments planned within the district. Owing to its proximity to the Mercia Park, Appleby Magna will be attractive to those moving into the area to fill jobs provided at Mercia Park, and also those who already reside in North West Leicestershire and may want to move closer to their new jobs.
- 2.8 Without sufficient housing growth, the existing residents of Appleby Magna may find themselves priced out of the local housing market due to increasing house prices and rent arising from increased demand to live close to the Mercia Park. It is noted that Appleby Magna has an aging population of 24.5%. This is well above the North West Leicestershire average of 20%. This aging population will reduce the level of housing stock becoming available for younger people, likely raising house prices and forcing them out of the village, having a knock-on effect on the overall sustainability of the settlement. e.g. surplus school spaces over time. Furthermore, Appleby Magna has one of the lowest levels of social rent accommodation in North West Leicestershire, with only 11% of properties being for social rent. These factors point to further house growth being necessary in the village to ensure a suitable range of housing stock is available and to ensure sufficient affordable housing is available.
- 2.9 North West Leicestershire's Local Housing Needs Assessment - Report 3 (June 2020) confirms that Appleby Magna has an annual net affordable need of 1 dwelling per annum. This equates to a net need up to 2039 of 22 dwellings. Notwithstanding the potential for an exception site, this will require allocations or sites delivering circa 73 dwellings, assuming 30% affordable housing.
- 2.10 North West Leicestershire's Local Housing Needs Assessment - Report 2 (June 2020) sets out that the housing need for Appleby Magna, based on demographic, policy-off need, is likely to be in the region of 113-134 dwellings up to 2039, which would require further allocations and permissions to satisfy in its own right. When regard is had for policy-on interventions, such as the ensuring the working population is suitably located having regard for strategic employment growth and the impacts of migration

associated with significant employment growth in the locality, demand in Appleby Magna is likely to be far in excess of that. It is considered vital therefore that the Council ensure that Appleby Magna and other settlements in close proximity to strategic employment growth, such as those within the Leicestershire Internal Gateway (LIG), respond positively to increased housing needs and this should be reflected either within the Spatial Hierarchy or distribution of housing, preferably both for effectiveness and clarity.

- 2.11 As demonstrated by the Council's Settlement Study (2021) Appleby Magna contains a range of services and facilities and is thus considered to be a sustainable settlement entirely capable of serving an increase in population. Access to Mercia Park however is insufficiently weighted within the evidence document. As such the spatial role of Appleby Magna is unlikely to be commensurate with the need for housing in that locality. This approach therefore requires further refinement to ensure sustainable settlements located within an area of strategic regional importance are recognised for the vitally important role they can play in both meeting housing needs and ensuring new jobs have the requisite local labour force, without an over-reliance on long distance commuting. It is noted that North West Leicestershire is a net importer of labour, and without sufficient housing growth in settlements close to core job opportunities, this is a trend that is likely to continue and potentially worsen.

Q4 - Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 2.12 North West Leicestershire District Council's recognition that an increase from base Local Housing Need is required, is supported. It is recognised that it can be politically sensitive to pursue growth agendas and higher levels of growth. To deliver the lowest level of housing possible would be socially and economically damaging. It must be remembered that those who most require housing growth, including younger people and those on lower incomes, are less likely to engage in the development of a new Local Plan and thus the Council has a duty to ensure that these individuals needs are recognised and supported through the Plan preparation. Moreover, as demonstrated through the consultation document and supporting evidence, the arguments for an increase in housing requirement from Local Housing Need are significant.
- 2.13 The Local Housing Need for North West Leicestershire, derived using the Standard Method equates to 368 dwellings per annum. A Local Housing Need of 6,992 dwellings over the 2020-2039 Plan period (noting that Table 2 of the Reg.18 consultation shows a standard method of 359 and 17 years, rather than the 19-year plan-period).

- 2.14 The PPG is clear that when establishing a housing requirement *"the standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area... Therefore, there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates."* [our emphasis] (Paragraph: 010 Reference ID: 2a-010-20201216).
- 2.15 Examples of scenarios which may justify an increase of housing requirement include growth strategies, the delivery of strategic infrastructure improvements or the requirement of an authority to take on unmet need from a neighbouring authority. It is important to note that the PPG sets out that the consideration of whether uplifts to the housing requirement from local housing need are necessary should be undertaken prior to, and independently from, any consideration of the ability of an area to meet that need.
- 2.16 The Council set out the different reasons why it considers an uplift to be appropriate at page 13 of the Consultation Document. The reasons given include;
- **Demographic Trends** – These set out a range between 370 and 752 dwellings per annum.
 - **Build Rates (Market Signals)** – Show an annual delivery of 619 dwellings per annum since the adoption of the extant Local Plan, with recent years averaging 770 dwellings per annum.
 - **Unmet Needs** - Set out Leicester City's unmet needs of circa 18,000 dwellings which it is reasonable to assume will be met in part in North West Leicestershire.
 - **Deliverable Growth Strategy** – Refers to the SGP for Leicestershire which identifies a housing figure for North West Leicestershire of 512 dwellings per annum.
- 2.17 In addition to the above, it is considered that regard to the need for additional affordable housing should be had when reviewing whether any uplift to Local Housing Need is delivered. North West Leicestershire's Local Housing Needs Assessment - Report 3 (June 2020) sets out an annual net affordable housing need of 195 dwellings per annum, or 3,605 over the proposed Plan period to 2039. Notwithstanding the delivery of exception sites, to meet this need would require an annual delivery of 650 dwellings per annum, assuming 30% affordable housing delivery on all sites. Given it is considerably more likely that sites will on average deliver less than this (particularly given delivery in Coalville presently only needs to deliver 20%) and that these losses will likely not be remedied by additional supply through exception sites, to meet affordable housing need will require growth in excess of 650 dwellings per annum.
- 2.18 The Consultation document provides four growth scenarios which have been tested against various scenarios. These include how they perform against the four uplift reasons provided above; i.e. demographic trends, build rates (market signals), unmet needs and deliverable growth strategy.

- **Low** - 368 dwellings (standard method)
- **Medium** - 448 dwellings (Housing and Economic Development Needs Assessment 2017 (HEDNA))
- **High 1** - 512 dwellings (Leicester and Leicestershire Strategic Growth Plan)
- **High 2** - 730 dwellings (2018 household projections with an allowance for vacancy rates in dwellings)

2.19 Two of the options have already been ruled out by the Council, that being **low** and **medium**. The **low** option was considered to perform badly against all scenarios and thus is *“not be an appropriate basis on which to continue planning for future provision”*.

2.20 The same conclusion was reached in respect of **medium**, as the 1,500 dwellings that could be provided would not be appropriate in respect of seeking to meet some of the 18,000 dwelling unmet need from Leicester. The additional dwellings above the LHN would provide for only 8% of the overall level of unmet need and leave no flexibility to meeting NWLDC’s own needs. It is agreed that this contribution would be too low, having regard for the spatial relationship between Leicester and North West Leicestershire, particularly including the implications of the LIG, which further requires higher levels of growth in the north of the County, beyond simple demographic needs.

2.21 The **High 1** option is acknowledged to perform better than **low** and **medium**, albeit there is still some concern in that the exact quantum of unmet need from Leicester City distributed to North West Leicestershire remains unknown and thus the provision may remain insufficient and require further review. In addition, the level of growth proposed through the High option is less than some of the demographic led scenarios and current build rates within the district. If the higher demographic trends are realised, the level of housing that would functionally serve to respond to Leicester City’s unmet need will be reduced, as local demographic need will eat into this provision. The same is true if there are higher levels of migration due to strategic scale employment provision associated with the LIG and wider district. The proposed High 1 scenario would also not provide sufficient housing to ensure affordable needs are met in full.

2.22 The remaining option is **High 2**. This is acknowledged by the Council to perform best when considered against all scenarios. As a net importer of labour, with significant economic proposals in place, it is absolutely vital that sufficient housing growth is provided in accordance with, and to deliver, planned economic growth strategies. Whilst affordable housing need was not considered in uplifting housing figures, it is notable that **High 2** is the only growth option which would have the potential to meet the

affordable housing needs of North West Leicestershire in full. **High 2** would assist in making a substantial contribution to meeting identified unmet needs, whilst providing new housing for the labour market who may come from outside the HMA. **High 2** has substantial economic benefits to North West Leicestershire ensuring a suitable local labour force to meet the significant growth potential of the district, including that delivered through the LIG. It is also the only option that seeks to meet a realistically robust and commensurate level of unmet need from the city (circa 25%). Of the options proposed, **High 2** is considered to be the most justified approach and should be adopted as the minimum housing requirement. Having regard for the range of demographic scenarios, there is considerable justification for increases beyond High 2, as if a higher demographic trend is followed, or there are higher levels of inward migration in accordance with job growth, this will reduce the amount of housing which will cater for overspill from the city.

- 2.23 Whilst **High 2** should be adopted as a minimum requirement, an additional buffer should be applied to ensure that sufficient housing is brought forward and the local housing requirement can be met in full, without risks of losing the planned approach through the lack of an ability to demonstrate a 5-year housing land supply.

Q5 Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 2.24 The consultation document provides a range of options for the distribution of the housing requirement. Of the options proposed it is considered that a strategy reflecting something similar to Options 7 or 9 should be adopted.
- 2.25 Option 1 would deliver insufficient levels of growth, as acknowledged within the consultation document, and is thus clearly inappropriate and not suitable for further consideration.
- 2.26 Options 2 to 6 would unnecessarily restrict development in the sustainable settlements lower in settlement hierarchy. All settlements above the 'Local Housing Needs Villages' tier can make a valuable contribution towards the overall housing requirement, ensuring choice and competition in the market and supporting the vitality and viability of the existing services and facilities in the settlements.
- 2.27 In respect of Appleby Magna, a planning strategy which delivers no new positive allocations would not be justified or effective. It would not meet the established demographic need for the settlement, nor

would it deliver the necessary level of affordable housing. Moreover, it would fail to take advantage of Appleby Magna's spatial location adjacent to Mercia Park.

- 2.28 Option 8 is considered inappropriate as it is not possible for the entire need of the district to be delivered in one new settlement, within the Plan period. New settlements have significant lead in times to delivery. Experience in the area, and the evidence through Letwin Review, suggests it will take some time for such sites to come on stream. Very little preparatory work has been undertaken for the proposed New Settlement and as such it is considered very unlikely that the site would be able to deliver the District's housing need within the Plan period. This could be explored in future iterations of the Plan, where a new settlement is sufficiently advanced in the planning process. To rely on a single site in this Plan would be unduly at risks where failure of the site to deliver, or deliver as expected, would leave significant issues in housing land supply and delivery. Moreover, this approach would not provide a choice and competition in the land and would essentially monopolise the remaining land supply to a small amount of land owners/developers. The lack of a range of housing options would further not provide the choice and competition in the eventual for sale housing stock, which may encourage people to look elsewhere to find a property that meets their particular needs and ambitions. This approach would further restrict sensible growth to a range of settlements, exacerbating the aging profile of some settlements and impacting vitality of services, facilities and public transport routes.
- 2.29 Options 7 and 9 are broadly supported in that they offer some potential that Appleby Magna will deliver growth. These options could be improved as discussed below, to enable sensible growth, commensurate to the scale of the settlements. This approach will ensure there is a wide choice of housing in the market which will help to ensure both delivery and a range of house builders are able to enter the market and compete. It will also ensure that sustainable settlements will deliver much needed new housing over the next 19-year period.
- 2.30 In respect of the detailed High 2 growth options explored, it is considered that there are issues with all options assessed. Options 7b and 9b are considered to be the most reasonable of the options explored, in that they are the only two which afford any growth throughout the hierarchy of sustainable settlements and offer the greatest prospects of being delivered, however as discussed below they are still considered inappropriate in that insufficient growth is proposed in sustainable settlements. They are the only options which enable a range of sites to be brought forward as allocations and, as a consequence, a range of housebuilders who would then be able to build concurrently serving different parts of the market; a position acknowledged at paragraph 4.57 of the Reg.18 consultation.

- 2.31 Options 7b and 9b are further considered preferable within the consultation document (page 24) as *“both Options 7b and 9b would benefit local communities as they would provide opportunities for people to remain in their local community whilst moving on to or up the housing ladder”*. The level of growth directed to such settlements in options 7b and 9b however is insufficient to achieve this goal.
- 2.32 Option 7b is considered in the consultation document to be a continuation of the current strategy, with the inclusion of a new settlement, but meeting an updated housing need. This is acknowledged to be a strategy which has a current track record of deliverability (excluding the new settlement). Option 9b is acknowledged by the consultation document to provide sites which could benefit small and medium developers, of which the NPPF requires plans to support.
- 2.33 Through the consultation document the Council acknowledge the increases in demographic and affordable housing needs across the sustainable settlements (including the smaller sustainable settlements), and, recognise that the lack of delivery of suitable housing will have significant social and economic implications. All settlements grow and it is an outdated planning notion to seek to attempt to contain settlements existing limits, without proper justification. Modern practices of home working are likely to enable many working professionals to move further out of cities as they seek more rural surroundings, a trend expected to continue after the pandemic which will increase pressures on such settlements, which are already incredibly popular.
- 2.34 The consultation concludes that **Option 7b** is the preferred option if the **High 2** growth scenario is taken forward. We broadly support this in so far as it seeks to deliver across the spatial hierarchy, but object to the current proposed distribution offered by Option 7b, due to the level of housing directed towards sustainable settlements such as Appleby Magna, amounting to a dwelling per annum in each settlement (as set out below) and a significance over reliance on a as yet not identified strategic new settlement. Moreover, as set out throughout these representations the growth options do not factor in affordable and demographic housing need which will be far in excess of that proposed by this option, nor proximity to strategic employment sites such as the Mercia Park and the Leicestershire International Gateway, which logically must be considered spatially in the distribution of dwellings geographically.
- 2.35 Option 9b delivers more housing to settlements such as Appleby Magna, despite provision also proposed in the lowest tier. It does this by reducing the level of housing in the Principal Town. We consider that the 1,020 dwellings directed towards Coalville in Option 9 is likely to be more than sufficient, requiring an annual delivery of over 50 dwellings per annum consistently throughout the Plan period. This will ensure the localised market is not saturated and ensure a constant stream of housing to meet growing demographic needs. Coalville is less likely however to have some of the pressures of other settlements

in that house prices are already at a more reasonable level and there is a far larger existing stock of social housing.

- 2.36 Whilst we have no specific objections to the principal of the allocation of a new settlement, we reserve comment until full details of the site are identified to ensure a detailed discussion as to the merits or constraints of such an allocation. The Council should not however place an over reliance on a new settlement in terms of overall housing delivery. If a new settlement is allocated, significant lead in time must be afforded and sensible build out rates adopted. An allocation should not presume to begin delivery until 10-15 years into the Plan period. This approach will enable a critical view to be undertaken at the 5 year review of the Plan to assess the progress of the site and revise delivery timescales if required. For these reasons we consider the allocation of the new settlement should be provided in part as a buffer to the overall housing requirement and should not be relied on to deliver the overall housing requirement, to minimise risks of non-delivery as there will be sufficient, wider sites to cater for any shortfalls in delivery of the new settlement. If a new settlement is allocated and relied upon as part of the overall housing delivery, then reserve sites should be designated with release criteria relating to key milestones of the reserve site. i.e., reserve sites will be released if key milestones are not met by certain dates, e.g. outline planning permission for the new settlement, reserved matters consents and then a trajectory of delivery, to ensure the plan is responsive to a lack of delivery.
- 2.37 The risks associated with overreliance on strategic site delivery are well documented. Your attention is drawn to authorities such as neighbouring Rushcliffe, wherein a failure of 5 out of 6 allocated strategic sites in the Core Strategy to deliver as anticipated has caused a requirement to introduce a Part 2 Local Plan which allocates around 2,500 additional dwellings to compensate for the shortfall.
- 2.38 Moreover, we do not consider that the Plan has explored sufficient reasonable alternatives without a new settlement. Of the Council's 9 spatial distribution options, only three do not include a new settlement, including the adopted Local Plan option. No options have been explored which distribute growth to Sustainable Villages without a new settlement, except Option 1 which has only been assessed against the Low scenario.
- 2.39 As per the above, we have no specific objection to a new settlement subject to the caveats set out, but at the very minimum we would expect the Council to explore more comprehensively the benefits or weaknesses of an approach which simply sought to distribute additional growth (High 2) through the existing spatial hierarchy. The approach taken has pre-determined that a new settlement is needed to meet the Council's growth aspirations. This is not true as there is significant latent capacity within

settlements that the Council has confirmed as sustainable. Looking specifically at Sustainable Villages, the Council intends to designate 18 settlements within the spatial tier. Having regard for the 255 dwellings to be delivered through the 7b growth option, this would result in only 14 dwellings per settlement. Over the 19-year Plan period, this would result in the construction of less than a dwelling per annum. As set out above, this would not meet demographic or affordable needs for settlements such as Appleby Magna. The result of this strategy would be significant house price growth in these settlements and therefore pricing people out of their communities. This is entirely inappropriate and demonstrates the need for exploring further options. This should include an amended option 1 or 7 which delivers additional growth further down the spatial hierarchy.

- 2.40 We consider it is logical that Option 1 should be explored within the High 2 scenario (e.g. Option 1b) which is effectively a continuation of the adopted Local Plan distribution strategy, excluding delivery of a new settlement. We consider an Option 1b with the following growth distribution to be more appropriate than the options put forward:

Option 1b or 9c – Principal Town (1,000-1800 dwellings), KSC (1,000-1350 dwellings), LSC (850-1050 dwellings), Sustainable Villages (1000-2000 dwellings) and Small Villages (50-200 dwellings)

- 2.41 This would be significantly less risky, as the Plan would not need to demonstrate the delivery of a highly complex new settlement. It would be eminently deliverable, as proved by the most recent local plan which adopted such an approach and has thus far been delivered. It would result in the greatest social benefit as it would support existing communities and ensure suitable housing exists to enable people to buy a home, upsize or downsize within their own settlement, without being forced to move due to rising house prices and lack of options. It would ensure balanced vibrant communities, with affordable housing and new homes for first time buyers. It should not be a pre-requisite that this Plan will have to deliver a new settlement and suitable reasonable options excluding one should be fully explored before the Council weds itself to this approach.

- 2.42 We would object to any approach which would mean demographic and affordable housing needs for settlements such as Appleby Magna were unlikely to be met in full, when there are available and suitable sites and willing housebuilders to deliver those homes which the evidence suggest is needed. We urge the Council therefore to fully and correctly explore the options of locating suitable and commensurate growth in sustainable settlements to ensure the housing needs of the district are met in a suitable manner having regard for where people are likely to want to live and not forcing people to leave the settlements in which they grew up.

Q6 Do you agree with the proposed self-build and custom housebuilding policy?

If not, why not?

- 2.43 Richborough Estates raise concern in respect of the proposed self-build and custom housebuilding policy which seeks to enforce the delivery of self/custom build housing as part of new residential developments. It is well established that such criteria could add unnecessary difficulty on modern housing developments and may not serve to provide additional units. In reality, such requirements may impede development unnecessarily, adding to developer burden without even delivering additional housing units. While some housebuilders provide a custom build option as part of their product, this cannot be expected across all sites and the entire sector as it simply not within the business model of many housebuilders. Such requirements could therefore dissuade housebuilders from operating within the District and delay development while policy requirements are negotiated.
- 2.44 It is our continued view that the Local Plan, in line with the revised NPPF, should enable the delivery of appropriate self-build plots without overly prescriptive policies and requirements.

Q26 What additional comments do you have about the Local Plan Review not covered by the preceding questions?

- 2.45 Having regard to the need to increase the housing growth to settlements such as Appleby Magna, to meet local housing needs, ensure a suitable local working population to serve Mercia Park and also to ensure the **High 2** growth option can be met in full to ensure the housing needs of North West Leicestershire and Leicester City can be delivered, positive allocations are required in areas such as Appleby Magna.
- 2.46 We consider in this regard that our client's land interests to the north of the village (Figure 1) is optimally located to deliver housing growth in Appleby Magna. It relates well to existing services and facilities within Appleby Magna. A vision document has been created and appended to these representations, which include an illustrative masterplan to show how a high-quality development can be delivered on the site, as informed by technical evidence and environmental studies which have been undertaken to support the promotion of the site and demonstrate the lack of technical constraints to the site's development. Work undertaken to date includes ecology, landscape and visual, transport, design and flood risk and drainage.

- 2.47 It is noted that the Council's adopted Landscape evidence (Landscape Sensitivity Study Part 2) assess the site as part of a larger parcel of land to the north of the village (08APP-A). This sets out that parts of the 03APP-A parcel have a relationship with the Appleby Magna Conservation Area. The landscape sensitivity is however deemed to be affected by the scale of enclosure and presence of the M42 to the western edge of the parcel. This combined with the flat topography mean that the overall landscape sensitivity for residential development is Medium-Low. In terms of visual sensitivity, the parcel is acknowledged to provide some views of scenic quality towards the Conservation Area. There is however limited access across the parcel, constrained to minor roads and public right of ways. This, combined with the open and flat landscape resulted in the report concluding that the parcel had only a medium visual sensitivity in respect of residential development.
- 2.48 The promoted land has been assessed as part of the most recent SHELAA (2021), under reference Ap13 (parcels a,b and c). The SHELAA assessment for the site acknowledges that the site is outside the current defined limits to development as set out on the adopted Local Plan's policies map. All parcels are acknowledged to consist of Grade 2 agricultural land quality (natural England regional records), albeit this is true for many parcels in Appleby Magma. Part of Parcel b is acknowledged to be within a Coal Development Low Risk area. The site is also acknowledged to be located within the River Mease catchment area. In respect of highways, on the basis of an initial assessment it is confirmed that there is no known reason to preclude further consideration of the site on highways grounds, albeit more detailed assessments will be undertaken in the future. With regards to ecology, whilst the site has some potential for protected species, subject to further assessment and mitigation the site is considered acceptable.
- 2.49 In conclusion the SHELAA assessment considers the site as potentially suitable, subject to a redrawing of the limits to development and evidence to show the development would not unduly impact the River Mease. The site is acknowledged to be available, being promoted by a respected and experienced land promotor. There are no known viability issues and thus the site is considered potentially achievable. The capacity of the site is considered to be circa 180 dwellings.
- 2.50 We again confirm that the site is being actively promoted by a respected land promotor who consider the site to be available and achievable. As set out preliminary work has been undertaken on a number of matters and these have been brought together in the Vision Document. Whilst your attention is drawn to this document, a summary of the conclusions reached on the basis of work undertaken to date are provided below. It is of particular note that on the basis of work undertaken to date, there are no issues which would preclude the allocation or subsequent development of the site.

- 2.51 An initial preliminary ecological assessment has been undertaken. This concludes that the ecological value of the site is limited due to its current agricultural use, which results in limited habitat and species diversity. The higher value habitat, the hedgerow and the stream are to be retained and enhanced through the proposals for the site. The illustrative proposals, inclusive of the green infrastructure strategy, results in a BIA score of 65% gain in habitat units and 44% gain in hedgerow units. These benefits are significant. The ecological assessment sets out that there is some scope for protected species, and this will be explored through further specific surveys and set out any necessary mitigation. Regard has been had for the River Mease SAC, with special regard in the site design to avoid direct habitat impacts, and further assessment will be undertaken regarding the indirect impacts from sewage to ensure any scheme delivered does not result in unacceptable impacts.
- 2.52 The site has also been considered by landscape experts. Whilst further work will be undertaken, the initial work completed sets out that the key characteristics of the site are the hedgerows and hedgerow trees found chiefly along the site's boundaries. These can be readily retained, enhanced and incorporated into the design proposals. In visual terms the site is perceived as settlement edge and there is limited inter-visibility with the wider countryside to the east and west. It is noted that the site sits lower than the recently completed Mulberry Homes scheme, as such future development would seem to 'nestle' into the existing settlement edge and enhancing the existing landscape fabric. The scheme will be supported by landscaping proposals which will reinforce the boundaries of the site and enhance the visual enclosure. Regard will however be had to retain the existing field pattern of hedgerows and small coverts, to maintain the character of the site.
- 2.53 In conclusion there is no reason to suggest that the site couldn't be developed in a manner without undermining the overall character of the host landscape character, given the site's settlement edge location, limited contribution to the host landscape and limited inter-visibility with the wider countryside. As such, the site's development is not inherently reliant on the provision of landscaped mitigation measures. Such measures are however provided for arboricultural continuation, landscape amenity as well as ecological enhancements providing biodiversity net gains. Such provision is considered to provide betterment having regard for the Mulberry scheme to the south, which affords the settlement a relatively raw urban edge at its northern edge. Regard has also been had to maintain views to the church steeple of St Michael and All Angels church. The development of the site would not be seen as incongruous across the wider setting and can be delivered in accordance with current national and local landscape planning policies.

- 2.54 The site is not at significant flood risk and development can be made acceptable through usual on-site mitigation measures such as SuDS. The site can proceed without being subject to significant flood risk in accordance with the NPPF. Moreover, the development will not result in flood risks to the wider area subject to the usual management of surface water run off discharging from the site.
- 2.55 In terms of access, access to the proposed development is available from Measham Road through the provision of a priority T-junction. The access proposals will include the provision of a footway to the west of Measham Road to facilitate pedestrian access to/from the existing local facilities within Appleby Magna. The formalisation of the existing on-street parking is also proposed along Measham Road along the site frontage to enable more easy two-way movements in the vicinity of the site, resulting in significant betterment on the current position. Measham Road provides ready access to the M42 via Junction 11 and thus the wider highway network. The development proposed will generate modest level of vehicular trips and thus is unlikely to result in a material impact on the local highway network. A full transport assessment will be undertaken in due course to fully understand and assess any impacts on the highway network. A travel plan will also be undertaken to promote sustainable travel to and from the site. Whilst further work will be undertaken, it is evident on the basis of the work to date that safe and suitable access can be provided and the residual cumulative impacts would not be severe. The development therefore can be delivered in accordance with national policy requirements.
- 2.56 The site is within walking distance of services and facilities in the village, including a primary school and two public houses. An existing bus service passes the site and provides access to Measham and Atherstone. Further services such as supermarkets are located within Measham, only 2.5km from the site and are within easy cycling distance. As referred to within these representations, the site is located only 1.6km Mercia Park employment development, which when fully complete will deliver over 3,000 jobs to the area. As such spatially Appleby Magna is optimally located to deliver further housing growth to help meet growing labour demand and reduce the distance future employees will need to travel to reach such new jobs.
- 2.57 An initial illustrative masterplan has been provided below and sets out an early indication as to how the site may be developed. The proposals will continue to be developed, informed by the continued collation of evidence. The masterplan shows the provision of significant new areas of public open space providing significant amenity and biodiversity benefits. The masterplan shows how the site can deliver 70-85 dwellings on Parcel A west of Measham Road, with the remaining parcels providing public open space and biodiversity net gains. In total 70% of the site could be provided as publicly accessible open space comprising a LEAP, natural areas of play for young children, outdoor gym or fitness trail, circular

recreational walks, semi-natural green space with wildflower planting, community orchards, wildlife corridors, sustainable drainage, and a dedicated biodiversity offsetting and enhancement zone. Dwellings have been orientated to overlook open spaces, providing natural surveillance. A range of street designs have been provided which prioritise pedestrian movements, featuring street trees in accordance with latest government policy. A range of house types are provided, but with a bias towards 2-3 bedroom homes. It is also proposed that the scheme makes provision for 30% affordable housing.



Figure 3: Emerging Illustrative Masterplan

2.58 For the reasons set out in these representations, this site should be considered favourably as an allocation as part of the emerging North West Leicestershire Local Plan. We hope to work collaboratively with the Council to ensure the speedy development of the Local Plan and that a high-quality development can be brought forward in accordance with the above.



Oadby & Wigston

BOROUGH COUNCIL

Planning Policy and Land Charges Team
North West Leicestershire District Council
Council Offices, Whitwick Road
Coalville, LE67 3FJ

Please ask for: Ed Morgan

Email: [REDACTED]

Telephone: [REDACTED]

Ref:

Date: 11th March 2022

Dear Sir or Madam,

Consultation: North West Leicestershire Development Strategy and Policy Options Regulation 18 Consultation

Thank you for consulting the Council on the North West Leicestershire District Council Local Plan Regulation 18 Consultation.

Please find the Officer comments on behalf of Oadby and Wigston Borough Council set out below.

Duty to Cooperate

It is pleasing to see reference within the document to the long track record of effective joint working on strategic matters that all local authorities within Leicester and Leicestershire have had. Further, it is pleasing to see that North West Leicestershire District Council will continue to work collaboratively with all of the local authorities within Leicester & Leicestershire on strategic planning matters.

Leicester and Leicestershire Unmet Needs

Under the Duty to Cooperate all local authorities within the Leicester and Leicestershire HMA need to work collaboratively to seek an agreed way forward in relation to Leicester City's unmet need and apportionment / redistribution of the unmet need.

Chapter 4 of the consultation document discusses the District's '*development strategy options for housing*' and undertakes a scenario assessment of four potential options, concluding that one of two '*high growth scenarios*' are likely to be the most appropriate options to be taken forward, in accordance with either the Strategic Growth Plan or the 2018-based projections.

Any approach taken forward by North West Leicestershire must ensure that the housing needs of the District area are met in full. In addition, any housing growth scenario must take account of Leicester City's unmet need and any re-distribution of this un-met need once it has been agreed by local authorities in the Leicester and Leicestershire Housing Market Area.

Strategic Growth Plan

There are references to the Leicester and Leicestershire Strategic Growth Plan within the consultation document. The references to the Strategic Growth Plan and how it has shaped the development strategy of the consultation document are welcomed.

General comments

Going forward, North West Leicestershire District Council must ensure that all evidence base underpinning the Local Plan is up to date and accurate and takes account of the latest strategic level evidence base, for example the Housing and Economic Needs Assessment that is currently being produced by all Leicester and Leicestershire local authorities. Indeed, reference to this document, as well as the requirement to develop a range of evidence to inform the emerging new Local Plan in Chapter 10 of this consultation document is therefore noted and welcomed.

Yours faithfully,

Ed Morgan

Principal Planning Policy Officer

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response - Isley Walton and Diseworth Building Proposals
Date: 11 March 2022 17:42:05

Local Plan Review. Consultation Response

Name Katrina Paling.

Address [REDACTED].

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90]. My objections are based on the following:-

1. LP. 5.25. Policy S3. The NPPF states that planning needs to *"take account of the different roles and character of different areas,"* and that planning should recognise *"the intrinsic character and beauty of the countryside"*. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *"There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)"*. The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to *"focus significant development in locations which are or can be made sustainable"*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local lives, wellbeing and emotional stability as well as significant increases in traffic exhaust pollution, light pollution, noise pollution, air pollution, loss of green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *"The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy"*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - "Promote the health and wellbeing of the district's population"
Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because

of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - "*Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances*". Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

6. LP. 4.6. Objective 4 – "*Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care*". The IW1 development is non-compliant. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion, will generate sufficient demand to justify 4.7k homes. This new village will therefore become primarily a dormitory town, increasing, rather than reducing, travel. Shopping will be at local supermarkets [Ashby, Loughborough, etc,] as will recreation and entertainment.~10miles away. The principal transport used will be the car as no viable public transport system exists.

7. LP. 4.6. Objective 9 - "*New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)*." In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or it's partners undertake to achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

8. LP. 4.6. Objective 10 - "*Conserve and enhance the identity, character and diversity and*

local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets". Again, neither proposal is compliant. The distinctive elements of the district's character between the MOTO MSA and Ashby de la Zouch [south of the A453] are rolling countryside and farmland. Both these developments will totally destroy all aspects of local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. L.P. 4.6. Objective 11 - *"Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance".* Neither development can possibly protect any of the natural environment – nor the associated wildlife, plant life, etc. at present supported by this open countryside. In respect of IW1, even the SHELAA recognises this fact [SHELAA pages 362-3] and lists several exposed species, etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character since its entry in the Domesday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that *"In view of its scale, it is more likely that a change to policy/strategy would be required"*. So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states *"In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended"*. This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

10. LP Page 18. [Pollution]. This states that:- *"..new development is not itself detrimentally affected by noise."* Anyone purchasing a property on the IW1 site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect of the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechinons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

11. Traffic. The major access to/from both sites will be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, airport customer traffic and EMA further 4.7k houses will produce circa 16k car

freight lorries. The LW1 site, housing a movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even more problematic than already, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in transport movements. In respect of EMP90, this site has no viable access from the south or west [which would be through the village of Diseworth. The only access available is from the A453. As SHELAA concedes [Appendix 2. Page 170], this is not compatible with the Leicestershire Highways Design Guidance [Policy INS3] - unless the LHA can be persuaded to change their mind. Again, change the rules to fit the proposal, not change the proposal to fit the rules.

12. Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- *"What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations."* As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution

[see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as *"...Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development*. Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies *"...an immediate need for additional employment land"*. It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly *"...detrimental to the amenities of...nearby residential properties and the wider environment"* – vis. Diseworth.

18. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove it's own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully

Katina Paling



DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

January 2022

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-

Part A – Personal details

Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

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, 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	Mrs	Mr
First Name	Kate	David
Last Name	Bedson	Green
[Job Title]	Senior Director, National Logistics	Director
[Organisation]	SEGRO	Delta Planning
Address Line 1	c/o agent	██████████
Address Line 2		██████████
Address Line 3		██████████
Address Line 4		
Postcode		██████
Telephone		██████████
Email address		████████████████████

PART B – Your Representation

Please use a separate sheet for each question you wish to respond to.

Please state which consultation question your response relates...

Q1

Do you agree with these Local Plan Review Objectives? If not, why not?

Yes, we agree with the overall vision set out within the Consultation Document, notably the support for economic growth. Further to this point, we also believe that the Local Plan should direct and focus growth in sustainable locations with a targeted approach taking advantage of North West Leicestershire's well-placed location, strategic transport network including that of East Midlands Airport and its surrounds. We also agree that the Plan period should run to 2039. At Paragraph 22 of the National Planning Policy Framework (NPPF), it is clear that strategic policies should be prepared over a minimum 15-year period to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure.

We also consider that the Local Plan Review Objectives should take in to account the recently announced Freeport status of the East Midlands Airport and its surrounds and the significant benefits this will bring to North West Leicestershire and the wider East Midlands region. The Freeport status area (confirmed by the Government on 1st March 2022) covers the airport and supporting land including Land South of East Midlands Airport (Call for Sites Ref. EMP90). It will encourage businesses to relocate to the area to take advantage of the financial incentives whilst making best use of the nearby strategic road network and air and rail freight infrastructure which is provided by East Midlands Airport and East Midlands Gateway Logistics Park (EMG) with its rail freight interchange. It should be noted that there are only 8 Freeports in the Country and the East Midlands Airport designation is the only in-land freeport. This status is of local, regional and national significance and it is therefore important that the economic growth strategy takes this into consideration.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q2

Do you agree with the proposed settlement hierarchy? If not, why not?

Yes, we agree with the proposed settlement hierarchy which is broadly in accordance with the adopted Local Plan. We have no further comment on this.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q4

**Do you agree with our proposed approach to the amount of housing growth at this time?
If not please explain why, including any specific evidence you think is relevant**

We strongly support the high housing growth approach in order to ensure adequate housing is provided in the District and to align with the significant economic growth that has occurred over the current plan period and that is expected to continue into the next.

In recent years, the District has seen significant economic growth, with a key focus on and around East Midlands Airport and SEGRO's EMG Logistics Park. This has created significant jobs growth with EMG itself generating in excess of 6,000 jobs over the last 4 years. The recently announced Freeport status of this area will serve to generate significant further investment and job growth.

If the District does not support high housing growth, the District's economic strategy would not be sustainable as it would not promote jobs for local people; rather it would encourage inward commuting to the District.

The higher housing growth approach would also be in keeping with recent build rates. Since the start of the adopted Local Plan (2011) build rates have averaged 619 dwellings per annum (2011-21), although a higher figure (770 dwellings) has been achieved since 2016/17.

Of the two high growth options we agree that the High 2 Scenario is likely to perform the best to help address likely need.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q5

Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant

We have no specific comments to make on the spatial options for housing growth at this stage other than to re-state that the high growth options are supported and that it would be appropriate to focus housing growth in locations that are accessible to existing and new employment.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q10

Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?

It is considered that the best method to ensure a continuity of employment land supply in the district is a combination of Options 2 (increase the requirement figures by an additional factor) and Option 4 (rely on existing Policy Ec2(2) or its equivalent). Option 2 would ensure that the District increases the total quantity of employment land, whilst Option 4 would ensure that additional suitable sites can also be put forward on a case by case basis where necessary.

That said, we consider that the evidence base studies which currently underpin the options for providing employment land needs (i.e. the HEDNA 2017, the Stantec Study 2020 and the GL Hearn Strategic Logistics Study 2021) are not sufficiently robust. These studies have a number of methodological issues resulting in a significant underestimation of future demand.

SEGRO has commissioned Savills to assess the methodology and outcomes of the above reports and provide a more robust evidence-based overview of the market potential for new employment land, and this report is submitted alongside these representations. The Savills report concludes that:

- The HEDNA 2017 (GL Hearn) uses past completions as its preferred employment needs methodology. However, completions are a supply measure, not a demand measure, and are dependant on local plans allocating land for development. The Savills report evidences that supply has lagged behind demand by a considerable margin indicating this methodology is flawed. We note the HEDNA is under review and it is hoped that the revised version addresses this flaw and we would ask that the appointed consultant takes into account the attached Savills report as part of the new HEDNA work.
- The Stantec Study (2020) looks at non-strategic industrial land only and uses GVA outputs to estimate future demand. The study itself recognises the limitation of this approach which does not take account of historic supply constraints. Again, the Savills report demonstrates that the area has been market-constrained since 2013/2014 indicating this methodology is flawed.
- The GL Hearn Strategic Study (2021) looks at strategic logistics land only omits consideration of strategic B2 floorspace or the impact of air freight and LGV traffic. It also uses different plot ratios for different demand models and the unrealistic apportionment of rail-served demand. Combined these issues lead to the study showing less demand than even past completion trends which is totally out step with market reality.

The Savills report seeks to address these methodological shortcomings and undertakes a more realistic NPPF compliant demand assessment methodology, taking into account historic demand but then adjusting it to reflect suppressed demand and the expected increases in on-line retailing. It concludes that the Functional Economic Market Area (FEMA) wide demand for all industrial and logistics space is in the region of 2,479 ha of land over the proposed 22-year plan period.

What this means at a District level for the local plan is that if the Council follow its initial policy options, North West Leicestershire should be planning for up to 1,240 ha of employment land over this period. This amounts to almost double what the GL Hearn study is suggesting is needed.

It should also be noted that 'The Levelling Up White Paper', which was published February 2022, states that national policy should set a more positive approach to employment land to support the provision of jobs. If the Government's approach to employment land materialises within the NPPF, this should be pre-empted and incorporated in to the NWL Local Plan to continue the District's economic growth trajectory.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q11

Which general employment land strategy option do you prefer? Is there a different option which should be considered?

It is considered that in terms of the North West Leicestershire's general employment land spatial strategy, this should focus on Option 1.

Option 1 would secure a continuation of the adopted Local Plan distribution which places the focus on expanding the portfolio of existing sites and its surrounds. These existing locations have, over time, been assessed to be sustainable and the Local Plan should seek to prioritise sustainability when allocating sites and promoting economic growth. As set out within the Development Strategy and Policy Options Consultation Document, the Castle Donnington area (which includes East Midlands Airport, EMG and its surrounds), should remain a focus when meeting employment land needs. Linked to the strategy should be a recognition of the new Freeport status of the area around East Midlands Airport which includes EMG and Land South of the Airport (Call for Sites Ref. EMP90).

a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q12

Do you agree with the initial policy option for strategic warehousing? If not, why not?

We agree with the initial policy option for strategic warehousing which aims to accommodate 50% of the outstanding road-served strategic warehousing requirement of the FEMA to be met in North West Leicestershire. However, as set out under our answer to Question 10, we strongly disagree with the quantum of land that is suggested as being needed.

The evidence base behind this policy option derives from an assessment of this sector's needs for the period 2020-41 provided in the 'Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change' (April 2021) study which was jointly commissioned by the Leicester and Leicestershire authorities and authored by GL Hearn.

SEGRO has commissioned Savills to test the outcome of this report. The Savills report, which is submitted in support of these representations, concludes that the demand side of the 2021 GL Hearn study has a number of methodological issues, in particular that the outcome is that preferred demand estimation is lower than past completion trends. This is totally out step with market reality. Other issues highlighted by Savills report include the lack of consideration of strategic B2 floorspace or the impact of air freight and LGV traffic, the use of different plot ratios for different demand models and the unrealistic apportionment of rail-served demand. As a result of these shortcomings the 2021 GL Hearn Study significantly underestimates future demand, even suggesting a lower demand than past completion trends.

The Savills report seeks to address these methodological shortcomings and undertakes a more realistic NPPF compliant demand assessment methodology, taking into account historic demand but then adjusting it to reflect suppressed demand and the expected increases in on-line retailing. It concludes that the Functional Economic Market Area (FEMA) wide demand for industrial and logistics is in the region of 2,479 ha of land over the proposed 22-year plan period. At a District level, and based on the 50% initial policy option, North West Leicestershire should be planning for up to 1,240 ha of employment land over this period. This amounts to almost double what the GL Hearn study is suggesting is needed.

Of course, the GL Study does also not account for the very recently announced Freeport status of the East Midlands Airport and its surrounds and the significant growth this will bring to North West Leicestershire and the wider East Midlands region. The Freeport status area (confirmed by the Government on 1st March 2022) covers the airport and supporting land including Land South of East Midlands Airport (Call for Sites Ref. EMP90). It will encourage businesses to relocate to the area to take advantage of the financial incentives whilst making best use of the nearby strategic road network and air and rail freight infrastructure which is provided by East Midlands Airport and East Midlands Gateway Logistics Park (EMG) with its rail freight interchange. It should be noted that there are only 8 Freeports in the Country and the East Midlands Airport designation is the only in-land freeport. This status is of local, regional and national significance and it is therefore important that the economic growth strategy takes this into consideration.

Please state which consultation question your response relates...

Q13

Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?

We feel that Option 2 should be pursued and that Policy Ec2(2) in its current form should be retained as it is. This would ensure that any windfall sites which come forward are properly assessed against the need for additional employment land in needed and generally against the relevant policies of the Local Plan. Paragraph 82 of the NPPF states that planning policies should be flexible enough to accommodate needs not anticipated in the plan and to enable a rapid response to changes in economic circumstances. By deleting or restricting this policy further, this would remove any flexibility and could potentially not accord with the NPPF. Furthermore, by restricting Policy Ec2(2), this could dissuade significant investment opportunities which would have benefitted the local economy.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q19

Do you agree with the proposed renewable energy policy? If not, why not?

Yes, we fully agree with the proposed renewable energy policy. SEGRO recognises that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. It has made it its priority to eliminate as far as possible the carbon emissions from the development of new buildings and the operation of existing buildings and to ensure that any residual carbon is offset or absorbed meaningfully and effectively. SEGRO's aims in championing low-carbon growth as well as its wider commitments to be a force for societal and environmental good are set out in its framework report 'Responsible SEGRO'. One aspect to raise however in setting planning policy on sustainable design is that given the rapidly changing technologies and approaches to sustainable design it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q20

Do you agree with the preferred policy approach for energy efficiency? If not, why not?

Yes, we fully agree with the proposed policy approach for energy efficiency. SEGRO recognises that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. It has made it its priority to eliminate as far as possible the carbon emissions from the development of new buildings and the operation of existing buildings and to ensure that any residual carbon is offset or absorbed meaningfully and effectively. SEGRO's aims in championing low-carbon growth as well as its wider commitments to be a force for societal and environmental good are set out in its framework report 'Responsible SEGRO'. One aspect to raise however in setting planning policy on sustainable design is that given the rapidly changing technologies and approaches to sustainable design it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q21

Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?

Yes, we fully agree with the proposed policy approach for Lifestyle Carbon Assessment. SEGRO recognises that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. It has made it its priority to eliminate as far as possible the carbon emissions from the development of new buildings and the operation of existing buildings and to ensure that any residual carbon is offset or absorbed meaningfully and effectively. SEGRO's aims in championing low-carbon growth as well as its wider commitments to be a force for societal and environmental good are set out in its framework report 'Responsible SEGRO'. One aspect to raise however in setting planning policy on sustainable design is that given the rapidly changing technologies and approaches to sustainable design it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q22

Do you agree with the preferred policy approach for overheating? If not, why not?

Yes, we fully agree with the proposed policy approach for overheating. SEGRO recognises that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. It has made it its priority to eliminate as far as possible the carbon emissions from the development of new buildings and the operation of existing buildings and to ensure that any residual carbon is offset or absorbed meaningfully and effectively. SEGRO's aims in championing low-carbon growth as well as its wider commitments to be a force for societal and environmental good are set out in its framework report 'Responsible SEGRO'. One aspect to raise however in setting planning policy on sustainable design is that given the rapidly changing technologies and approaches to sustainable design it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q23

Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?

Yes, we agree with the preferred policy approach for the climate change assessment of development. SEGRO recognises that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. It has made it its priority to eliminate as far as possible the carbon emissions from the development of new buildings and the operation of existing buildings and to ensure that any residual carbon is offset or absorbed meaningfully and effectively. SEGRO's aims in championing low-carbon growth as well as its wider commitments to be a force for societal and environmental good are set out in its framework report 'Responsible SEGRO'. One aspect to raise however in setting planning policy on sustainable design is that given the rapidly changing technologies and approaches to sustainable design it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q24

Do you agree with the proposed policy for reducing carbon emissions? If not, why not?

Yes, we agree with the proposed policy for reducing carbon emissions. SEGRO recognises that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. It has made it its priority to eliminate as far as possible the carbon emissions from the development of new buildings and the operation of existing buildings and to ensure that any residual carbon is offset or absorbed meaningfully and effectively. SEGRO's aims in championing low-carbon growth as well as its wider commitments to be a force for societal and environmental good are set out in its framework report 'Responsible SEGRO'. One aspect to raise however in setting planning policy on sustainable design is that given the rapidly changing technologies and approaches to sustainable design it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.

Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q25

Do you agree with the proposed policy for water efficiency standards? If not, why not?

Yes, we agree with the proposed policy for water efficiency standards. SEGRO recognises that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. It has made it its priority to eliminate as far as possible the carbon emissions from the development of new buildings and the operation of existing buildings and to ensure that any residual carbon is offset or absorbed meaningfully and effectively. SEGRO's aims in championing low-carbon growth as well as its wider commitments to be a force for societal and environmental good are set out in its framework report 'Responsible SEGRO'. One aspect to raise however in setting planning policy on sustainable design is that given the rapidly changing technologies and approaches to sustainable design it is important to avoid policy wording that is too inflexible or could conflict with Government legislation and building regulations.

(Continue on a separate sheet /expand box if necessary)

If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes



No

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 understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

Signed

	David Green
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Date

11/03/2022

Please send completed forms to planning.policy@nwleicestershire.gov.uk or
Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Monday 28 February 2022

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. 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 publically 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 publically available.

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

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.

Future Industrial & Logistics Demand

North West Leicestershire and Wider Sub-Region

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Executive Summary

I&L Facilities are Critical National Infrastructure

The I&L sector is a **major contributor to the national economy**...



3.8 million jobs
in England

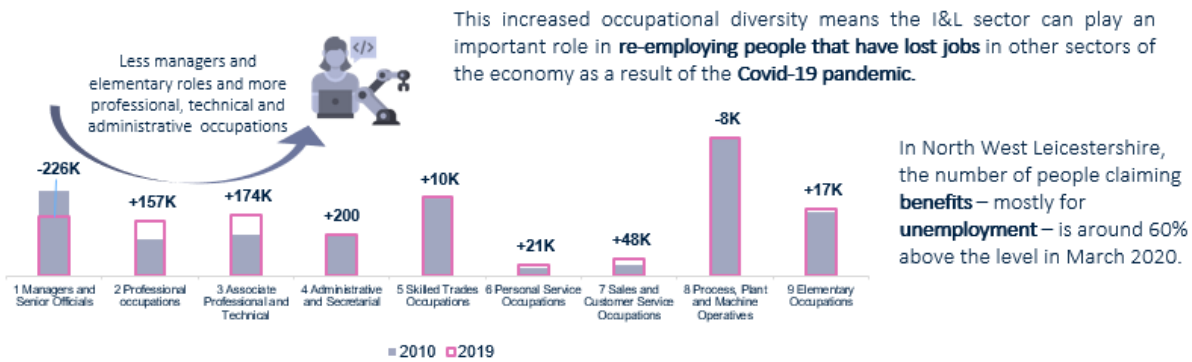


£232 billion of GVA p.a.

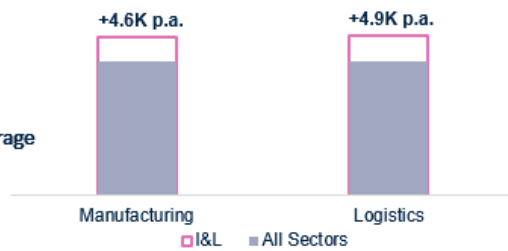


29% productivity increase
between 2025 and 2039

.....the **occupations it provides are becoming more diverse**...



.....and I&L jobs **pay more than the national average**



The I&L sector's growth is **multi-faceted and likely to remain in place for the foreseeable future**



North West Leicestershire's I&L market at a glance

22.9 million sqft of I&L floorspace

Very low availability at 2%

High rental growth (2011-21) at 67%

Leasing demand (net absorption) at 921,000 sqft p.a. exceeds the amount of new floorspace delivered at 891,000 sqft p.a. This explains the low availability and high rental growth.



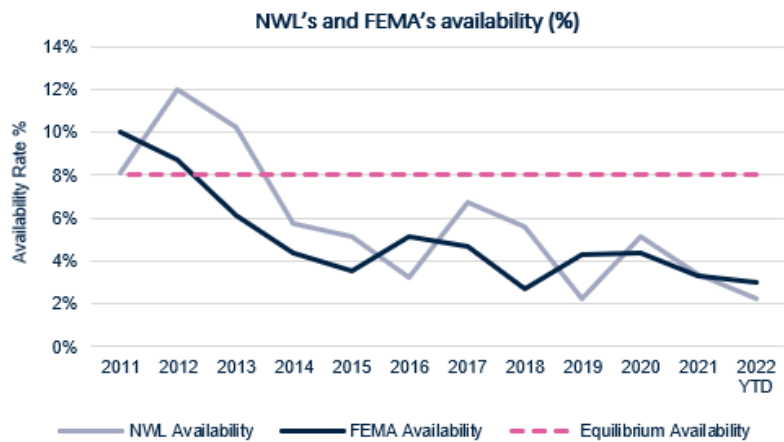
North West Leicestershire (NWL) falls within the Leicester and Leicestershire FEMA which also comprises Blaby, Charnwood, Harborough, Hinckley and Bosworth, Leicester City, Melton, and Oadby and Wigston.

The FEMA is located in the East Midlands, where take-up of I&L premises above 100,000 sqft in 2021 was 113% above the long-term average, the highest on record, accounting for 22.5% of national take-up.

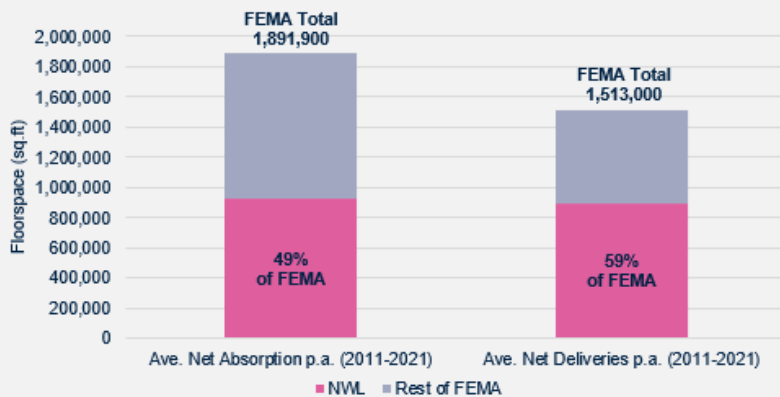
NWL accounts for nearly a quarter of the FEMA's I&L stock and has the largest I&L stock in the FEMA at 22.9 million sqft (Leicester City has the second highest at 22.2 million sqft).

We consider a market to be **supply constrained** when floorspace availability is below 8%. The availability rate across the FEMA is extremely low at just 3%. It is even lower within NWL at only 2%.

The FEMA's availability rate has been below the 8% benchmark since 2013, and NWL's since 2014, indicating that the I&L market has been supply-constrained for most of the last decade.



I&L Demand vs. Supply



The lack of new floorspace (supply) has reduced availability and restricted demand (net absorption).

New I&L floorspace across the wider FEMA over the last decade (1.5 million sqft per annum) has lagged demand, as measured by net absorption (1.9 million sqft) between 2011 and 2021.

A similar situation is evident NWL.

Previous employment studies have significantly underestimated I&L demand for NWL and the FEMA

NWL’s Options Document (2022) relies on Stantec’s 2020 study covering NWL’s ‘non-strategic’ demand for I&L floorspace and GL Hearn’s 2021 study covering strategic B8 demand for the FEMA to inform its policy options for the new Local Plan.

Study	Geographic Scope	Uses Covered	Time Period	Demand Estimates
Stantec Study (2020)	NWL	Non-Strategic Industrial (B1c, B2 and B8 (<9,000 sqm))	2017-2039	71.6 ha (incl. losses and flexibility margin)
GL Hearn Study (2021)	Leicester and Leicestershire FEMA	Strategic B8 (9,000+ sqm)	2020-2041	861 ha (incl. 5-year flexibility margin)

These studies have a number of methodological issues, resulting in a significant underestimation of future I&L demand in NWL and the FEMA. Savills methodology seeks to address these shortcomings and provide a more accurate estimate of future demand.

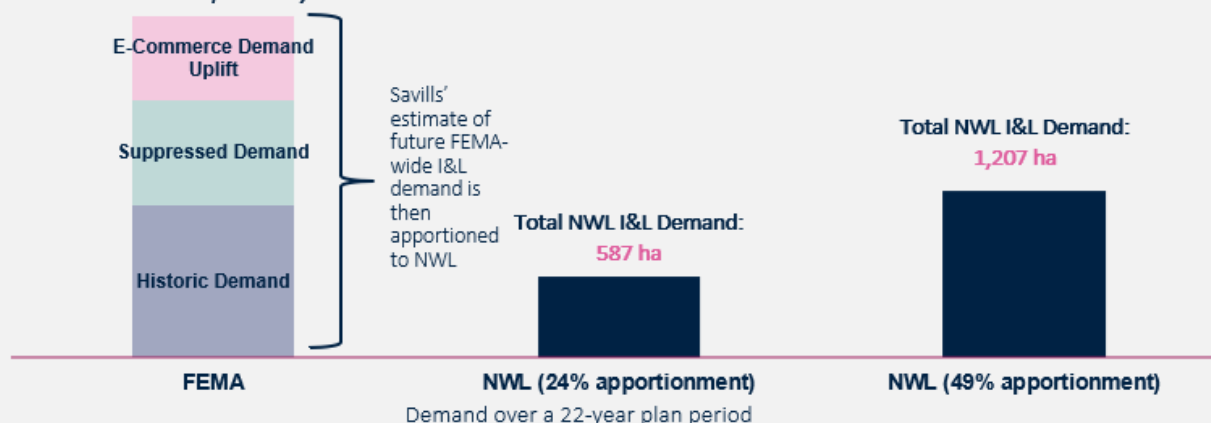
The Savills method first calculates demand at the FEMA-wide level, then apports it for NWL

Savills’ methodology is **NPPG-compliant** as it builds on **past trends**, adjusting for historic supply shortages and the subsequent loss in demand. We refer to this as ‘**suppressed demand**’ which is added to the historic demand trend as a top-up. We also factor in **future e-commerce growth**.

Several factors can be considered to apportion FEMA-wide demand to NWL including % of stock (NWL represents 24% of the FEMA’s total stock), net absorption (NWL represents 49% of the FEMA total) and net deliveries (NWL represents 59% of the FEMA total). We consider net absorption to be the most relevant given it is a key indicator of demand while the other two metrics are supply based. 49% also broadly aligns with NWL’s Options document’s commitment to meeting 50% of the FEMA’s road-served demand. However, we appreciate this generates a large number at 1,207ha vs 587ha based on NWL’s current proportion of the FEMA’s overall I&L stock. The final land amount that should be planned for within this range will depend on developable land capacity in NWL and ‘Duty to Cooperate’ discussions with the other local authorities in the FEMA.

Savills Total I&L Floorspace Demand: 93.4 million sqft

Savills Total I&L Land Demand: 2,479 ha (based on 35% plot ratio)



Comparing Savills demand estimate for Strategic B8 against GL Hearn estimate

Using Savills overall demand estimate for the FEMA, we have extrapolated demand for strategic B8 uses in order to compare it to the GL Hearn estimate (which only looks at strategic B8, and not strategic B2 needs).

We estimate demand for **strategic B8 across the FEMA to total 1,783 ha** which is **98% higher than the GL Hearn estimate** over a 22-year plan period.

Conclusion

The Stantec and GL Hearn studies do not take into account the FEMA’s and NWL’s supply-constrained I&L market and its impact on suppressing demand. Based on the Savills estimates, we believe the GL Hearn and Stantec studies combined have underestimated future I&L demand for NWL of between 302 to 696ha over the 22 year plan period depending on how much strategic B8 demand across the wider FEMA is apportioned to NWL.

1 Introduction

1.1 Purpose

- 1.1.1 Savills have been instructed by SEGRO and St Modwen to estimate future industrial and logistics (I&L) demand within North West Leicestershire (NWL) and its wider Functional Economic Market Area (FEMA). The FEMA consists of the following local authorities: Blaby, Charnwood, Harborough, Hinckley & Bosworth, Leicester City; Melton, North West Leicestershire and Oadby & Wigston.
- 1.1.2 We focus on market demand and supply factors as these are the key determinants of how much I&L floorspace and land is needed in the future. From our experience secondary factors such as labour supply, GVA outputs, development completions or similar methods routinely underestimate future demand, especially for strongly performing markets such as England's I&L sector.
- 1.1.3 North West Leicestershire District Council (NWLDC) is currently in the process of preparing a new Local Plan. The aim of Savills' report is to recommend overall I&L demand within the FEMA and then apportion this down to NWL specifically. As part of this process we make comparisons with the various local and regional employment studies which focus on different geographies (i.e. FEMA vs NWL) and different segments of the market (strategic vs non-strategic). This includes a review of the methodologies used to estimate future demand which we consider to have a number of methodological issues. As a result we consider them to have underestimated future I&L demand.
- 1.1.4 After building up a picture of current and historic market demand and supply, we detail Savills' methodology for estimating future I&L demand. Our approach is considered to address the methodological weaknesses of the employment evidence by quantifying the impact historic supply constraints have had on 'suppressing' demand. We also take account of current day growth drivers such as e-commerce.
- 1.1.5 The Savills approach is to consider overall I&L demand across the entire FEMA first and then apportion this down to individual local authorities via consideration of various demand and supply factors. As part of this we consider both industrial (inclusive of light industrial and manufacturing) and logistics (warehousing) uses together. This is because using a larger pool of data is generally considered more robust in modelling terms, and also because industrial and logistics occupiers desire similar locations and types of premises. Once overall I&L demand has been estimated, the contribution of different segments of the market, either by unit size, type of use or geography, can then be extrapolated.
- 1.1.6 Based on Savills demand methodology, over a 22 year plan period, we estimate FEMA wide I&L demand to be 2,479 ha of land. Depending on the level of apportionment we consider NWL should look to plan for between **587 ha to 1,240 ha** of I&L land over this period. We appreciate the upper band based on net absorption generates a large number at 1,207 ha. The final land amount NWL should plan for within this range will depend on developable land capacity in NWL and 'Duty to Cooperate' discussions with the other local authorities in the FEMA.
- 1.1.7 In terms of strategic B8 demand (i.e. excluding industrial) across the FEMA we estimate this to be 1,783 ha over the 22 year local plan period. This compares to 902 ha from GL Hearn's Warehousing and Logistics in Leicester and Leicestershire study (2021) once the 21 year period covered by its estimates is pro-rated to 22 years to be consistent with the NWL local plan period.
- 1.1.8 It is clear from these results that we consider the various employment evidence studies to have

underestimated future I&L demand to a significant degree. Therefore it is recommended that NWLDC seek to identify more quality sites for I&L uses. It is acknowledged that a new employment study is referenced in the Local Plan options document for publication in the Spring 2022. We hope this report is seen as constructive and acts as a platform for meaningful debate with the Council and its economic advisors.

1.2 Report Structure

1.2.1 The report is structured as follows:

- **Section 2** provides an overview of the I&L market nationally and in the East Midlands and Leicestershire;
- **Section 3** reviews previous employment land needs assessments commissioned for the FEMA and NWL;
- **Section 4** assesses I&L demand and supply factors in the Leicester and Leicestershire FEMA;
- **Section 5** provides Savills' estimate of future demand for I&L floorspace across the FEMA and in NWL;
- **Section 6** concludes and provides Savills' recommendations for future I&L floorspace need in NWL.

1.3 Reader Note

1.3.1 When we refer to the industrial and logistics (I&L) sector we mean Light Industrial (formerly B1c use class now part of Class E), General Industry (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require shed-type units (including ancillary offices) and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

2 I&L Facilities are Critical National Infrastructure

2.1 Introduction

- 2.1.1 In this section we discuss some of the key trends that have been driving growth in the I&L sector, drawing on Savills' recent publication for British Property Federation "*Levelling-up – The Logic of Logistics*"¹.
- 2.1.2 Not only has the sector been outperforming other commercial sectors in the UK for some time, but it is also critical national infrastructure that supports the functioning of our economy and the way we live our lives. The food we eat, the products and services we purchase, the materials used to build new homes and new infrastructure, even the vaccines that give us protection from Covid-19 are stored, manufactured and distributed from warehouses and factories to 'us' the end customer. Without these facilities and the increasingly efficient supply chains that link them with suppliers and end customers, the delivery of our purchases would be much slower, more expensive and we would have less choice.
- 2.1.3 For these reasons I&L premises should not be seen as separate from the infrastructure which enables goods to be moved around the UK, but should be considered critical national infrastructure itself.

2.2 National and regional context

- 2.2.1 Over the course of 2021, Savills Big Shed Briefing (which assesses I&L premises above 100,000 sqft) found that gross take-up had reached a new annual record of 5.12 million sq. m, **86% above the annual average**². The number of transactions nationally was 220, surpassing the previous record of 172 in 2020³.
- 2.2.2 Strong take-up has meant that the **supply of premises nationwide has fallen at its fastest pace ever recorded**. There is a particularly severe shortage of supply of the best quality Grade A space, which has fallen to 0.66 million sq. m, down from 1.83 million sq. m. prior to the onset of the Covid-19 pandemic in Q1 2020⁴. This is reflected in a national vacancy rate estimated to be 2.91%, the lowest level ever recorded and significantly below the level necessary for market equilibrium (commonly held to be around 8%)⁵.
- 2.2.3 Similarly to the national picture, take-up in the East Midlands was **113% above the long term average** in 2021 (1.15 million sqm); the highest on record⁶. Take-up in the East Midlands in 2021 accounted for around 22.5% of national take-up, highlighting the strategic importance of the region in the I&L market. Again the supply of premises is at an historically low level as evidenced by a regional **vacancy rate which stands at just 1.69%**⁷ - the lowest of any region nationally. Manufacturing occupiers in the East Midlands have accounted for c. 6% of take up of larger units over the last five years (2017-2021 inclusive) with the remaining 94% being occupiers within the logistics sector⁸.

¹ Savills and BPF (2022), *Levelling-up – The Logic of Logistics*

² Savills Research (2022) Big Shed Briefing (January 2022) Available at: https://www.savills.co.uk/research_articles/229130/323880-0

³ Ibid

⁴ Ibid

⁵ Ibid

⁶ Savills Research (2022) Big Shed Briefing – The Logistics Market in the East Midlands. Available at: https://www.savills.co.uk/research_articles/229130/323892-0

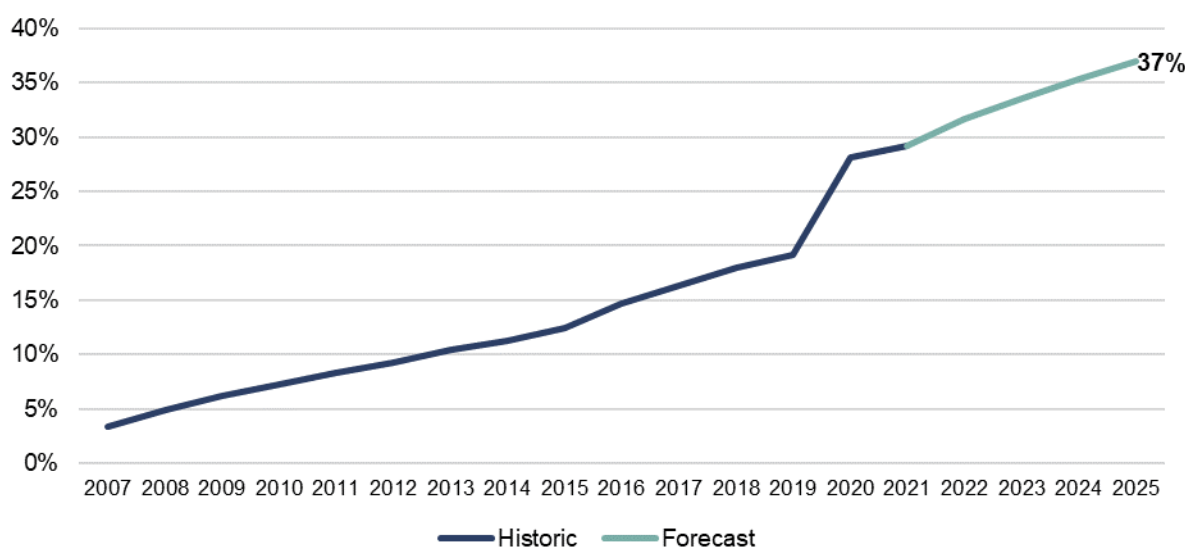
⁷ Ibid

⁸ Ibid

2.3 Current I&L Growth Drivers

- 2.3.1 The I&L sector is facing an era of unprecedented change. The past decade has seen the sector undergo a remarkable transformation, reshaping operating models and occupier requirements in ways that are only starting to become recognisable as an industry-wide phenomenon. Logistics uses in particular have shown strong performance for a number of years, but the Covid-19 pandemic has exacerbated existing trends. This has driven demand up even further for logistics floorspace while adversely impacting other commercial sectors such as retail and offices.
- 2.3.2 The shift in habits we have been witnessing – first of all the extraordinary growth in **online retailing** – is structural rather than temporary, meaning that as the country’s population continues to grow, so will I&L floorspace needs to support household consumption and other sectors of the economy. Statistics collected by the ONS from November 2006 show that the share of internet sales has consistently increased over time and it was at 19% before the onset of the Covid-19 pandemic. During the pandemic, due to lockdowns and restrictions this figure considerably increased and is around 27% as of January 2022⁹. The growth in online shopping has significant implications on future I&L demand given that e-commerce requires around 3 times the logistics space of traditional bricks-and-mortar retailers¹⁰.
- 2.3.3 While the proportion of online retailing may soften slightly as the UK economy opens up, most commentators agree that online retailing will continue to grow from a higher base than before the pandemic due to behavioural changes such as increased home working and continued demand for rapid parcel deliveries. Forrester Research, a respected source of future online retail projections, estimate that online retail will continue to grow but from a higher base reaching 37% by 2025 (**Figure 2.1**).

Figure 2.1 Internet Sales as a % of Retail Sales, 2006-2025



Source: ONS, Retail Sales Index Time Series, Forrester Research, Savills 2021

- 2.3.4 Freight flows are another key driver of I&L floorspace demand. Significant growth is forecast across all **freight** modes (**Figure 2.2**). Freight arriving and leaving the UK needs to be sorted, packaged and

⁹ ONS (2021), Internet sales as a percentage of total retail sales (ratio) (%)

¹⁰ Prologis (2016), Global E-Commerce Impact on Logistics Real Estate. Online Article: <https://www.prologis.com/about/logistics-industry-research/global-e-commerce-impact-logistics-real-estate>. Internet shopping relies on increased choice for the consumer and also increased delivery speeds to a location of people’s choosing. This means that more inventory is required to be located nearer to the general population. This in turn has meant that more and more warehouse space is required.

distributed via a network of freight handling infrastructure (i.e. ports, airports, rail freight interchanges and motorways) and conveniently located I&L premises in order to reach end customers.

Figure 2.2 Projected growth in freight by Mode



Source: DfT, MDS Transmodal, Boeing, Savills

2.3.5 Brexit and Covid-19 have highlighted the level of interconnectedness of international supply chains and their fragility when one or more links break. Companies have started building up greater resilience in their operating models by moving operations either back to the UK (**re-shoring**) or closer by (**near-shoring**) as a means to minimise future supply-chain-induced disruptions. According to a survey carried out in July 2020 by the Institute for Supply Management, 20% of firms are planning to or have already started to near-shore or re-shore. These findings are corroborated by a survey carried out by Savills¹¹ whereby over 80% of respondents expected the Covid pandemic to either ‘greatly increase’ or ‘somewhat increase’ on-shoring. This is likely to lead to higher domestic inventory requirements, further increasing demand for I&L space.

Near-shoring definition	Re-shoring definition
Transferring a business operation to a nearby country as opposed to a more distant one (i.e. off-shoring)	Moving a business that had gone overseas back to the country from which it had originally relocated

2.3.6 Increases in demand and occupancy could also arise due to higher levels of **stockpiling**. For example, businesses may find it too risky to have a single warehouse serving their customer base compared to a multiple stocking solution. Therefore, instead of concentrating in one location, some firms might seek to spread their inventory over different regions, but in smaller spaces.

2.3.7 The Government’s Freeport programme aims to play a role in the UK’s post-Covid economic recovery and contribute to realising the levelling up agenda. At a Freeport, imports can enter with simplified customs documentation and without paying tariffs¹². Businesses operating inside designated areas in and around the port can manufacture goods using the imports and add value before exporting again without ever facing the full tariffs or procedures¹³. Freeports are similar to enterprise zones, but are designed to specifically encourage businesses that import, process and then re-export goods¹⁴. Therefore, the programme could lead to increased trade through designated Freeport areas, such as the East Midlands Freeport (EMF), which is the UK’s only inland Freeport¹⁵.

2.3.8 EMF aims to drive economic regeneration across the East Midlands by playing to the region’s strengths in the advanced manufacturing, automotive and logistics sectors, proximity to East Midlands Airport and

¹¹ Savills (2020) The impact of Covid-19 on Real Estate. Online Article: <https://www.savills.com/impacts/market-trends/the-impact-of-covid-19-on-real-estate.html>

¹² <https://www.emfreeport.com/what-are-freeports>

¹³ <https://www.emfreeport.com/what-are-freeports>

¹⁴ Ibid

¹⁵ <https://www.emfreeport.com/#vision>

other multimodal transport connections¹⁶.

2.3.9 The image below, provides a visual representation of some of the major trends driving growth in the I&L sector. While e-commerce grabs most of the headlines for driving growth in the sector, there are several growth drivers at play leading to unprecedented levels of demand.

Figure 2.3 I&L Growth Drivers



Source: Savills

2.4 The I&L sector is a major contributor to the national economy

2.4.1 The I&L sector is a significant employer of at least 3.8 million people in England and produces £232 billion of GVA annually¹⁷. Over the last 10 years the logistics component of the I&L sector has grown by 26% compared to only 14% across the economy as a whole (**Figure 2.4**).

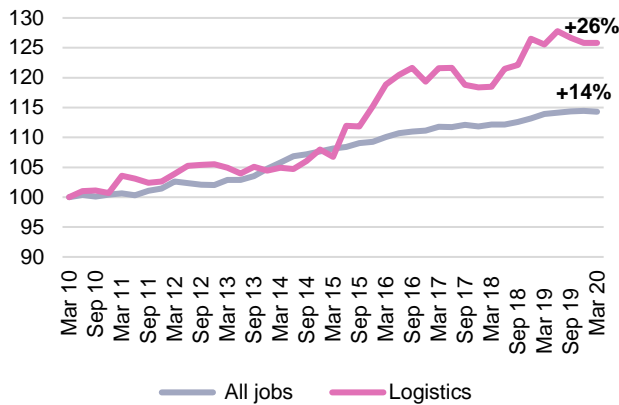
2.4.2 Notwithstanding its importance in terms of employment and GVA contribution, the sector is subject to a number of misconceptions about average pay levels, skills required and types of spaces provided.

2.4.3 Average pay is higher than the UK average. Data from the Office for National Statistics (ONS) show wages above average at +£4,600 for Manufacturing and +£4,900 for Logistics. Again, the logistics component of the sector is performing above average, with wages between 2019 and 2020 having increased more than in other sectors (+6% growth in logistics vs +4%).

¹⁶ Ibid

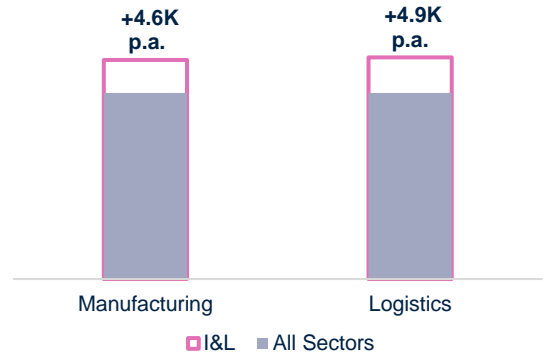
¹⁷ ONS (2021), Workforce Jobs by Region and Industry - Jobs in Manufacturing, Transportation and Storage for March 2020; ONS (2021) – England, Regional Gross Value Added (Balanced) by Industry – GVA for Manufacturing, Transportation and Storage in 2019 – England

Figure 2.4 Jobs Growth in England (2010-20)



Source: ONS, Workforce Jobs by Industry and Region

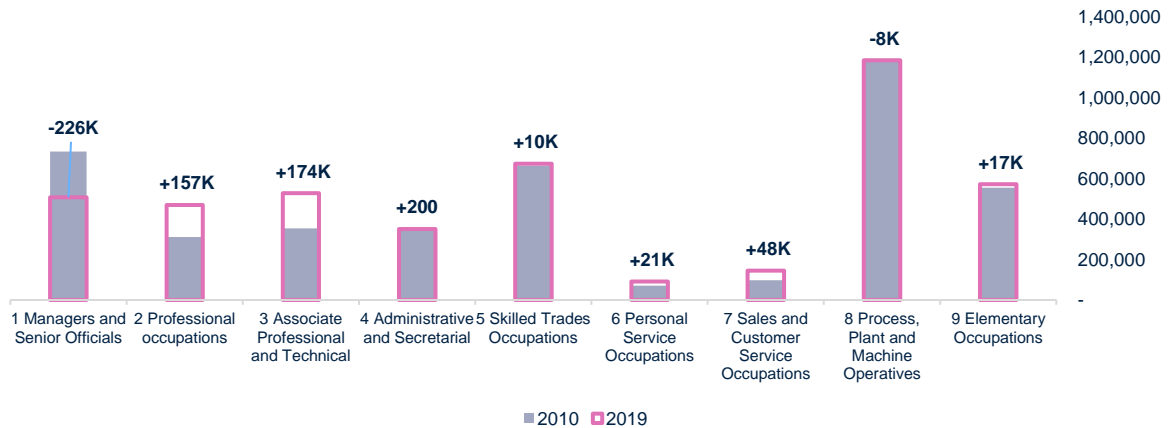
Figure 2.5 I&L jobs pay more (2020)



Source: ONS ASHE

2.4.4 I&L jobs have also become increasingly diverse over the last decade. **Figure 2.6** shows the change in the share of occupations in I&L in 2010 and 2019. While at the beginning of the decade we see a more polarised distribution, with a higher share of managers at one end of the spectrum and more routine occupations at the other end, today we see a higher share of Professional and Associate Professional and Technical roles. These roles are typically associated with higher-skilled engineering and technological professions in response to increased automation and robotics in the sector and more advanced supply chain processes. These office-based roles are increasingly co-locating alongside production and logistics uses as it is convenient for these people to be closer to the operations they control and analyse.

Figure 2.6 Occupational Distribution in Manufacturing, Transport & Storage



Source: ONS APS, Savills 2020

2.4.5 This increased occupational diversity means the I&L sector can play an important role in re-employing people that have lost jobs in other sectors of the economy as a result of the Covid-19 pandemic.

2.4.6 The Government’s Coronavirus Job Retention Scheme (CJRS) has helped cushion the impact of economic contraction on the job market, with the latest statistics released in December 2021¹⁸ reporting

¹⁸ Coronavirus Job Retention Scheme (CJRS) Statistics: 16 December 2021, Table 12

20,500 jobs furloughed across Leicester and Leicestershire¹⁹. However, in spite of this effort, data on the Claimant Count for the area remains high. The Claimant Count measures the number of people claiming benefit principally for the reason of being unemployed. While in the second half of 2021, the number of claimants started to decrease, as of January 2022 the Count still totalled 24,450 claimants in Leicester and Leicestershire and 1,640 in NWL, which is around 60% higher than the Count as of March 2020 (+9,300 claimants and +600 claimants respectively). The growing I&L sector can help to re-employ these local people.

2.5 Conclusions

- 2.5.1 I&L premises facilitate modern lives and therefore should be considered as 'Critical National Infrastructure,' similar to how major roads, ports, airports and rail freight interchanges are. The sector makes a significant contribution to the national economy and supports a diverse range of well paid jobs.
- 2.5.2 Current demand within the sector is at unprecedented levels being supported by a number of key growth drivers. There is a strong need to support and foster economic growth in order to support the post-COVID recovery. It is vital to support those sectors which are proving to be resilient (including logistics and manufacturing) and are therefore well-placed to provide new employment opportunities to mitigate job losses in other sectors and underpin the economic recovery locally and within the wider sub-region.

¹⁹ Leicester City and Leicestershire County

3 Review of Employment Evidence

3.1 Introduction

3.1.1 Several employment need reports have been commissioned within the last 5 years with the aim of understanding future I&L demand and available supply across the Leicester and Leicestershire FEMA (comprising Blaby, Charnwood, Harborough, Hinckley and Bosworth, Leicester, Melton, NWL, and Oadby and Wigston). However these reports, neither as a set or individually give a complete picture of demand and supply across the FEMA as a whole nor NWL specifically.

3.1.2 **Table 3.1** below summarises the different report scopes, the different estimation methods used, their future I&L demand recommendations and Savills view of each reports methodological weaknesses.

Table 3.1 Local and Sub-Regional Employment Studies

Study	Scope	Recommendations	Methodological Issues (Savills View)
Housing & Economic Development Needs Assessment prepared by GL Hearn (HEDNA 2017)	<ul style="list-style-type: none"> Geographic scope: Leicester City and Leicestershire Region Uses: B1, B2, small B8 (<9,000 sqm); Strategic B8 (9,000+ sqm) Time period: 2011-2031 and 2011-2036 	<ul style="list-style-type: none"> B1c/B2 NWL: 3.3 ha (2011-31); 4.1 ha (2011-36); FEMA: 131.7 ha (2011-31); 164.5 ha (2011-36); Small B8 (<9,000 sqm) NWL: 16.8 ha (2011-31); 21 ha (2011-36); FEMA: 93 ha (2011-31); 117 ha (2011-36); Strategic B8 (9,000+ sqm) (FEMA wide): 361 ha (2011-31); 472 ha (2011-36) 	<ul style="list-style-type: none"> Preferred employment needs methodology for B1a/b/c/B2/small B8 is based on past completions Completions is a supply measure not a demand measure mainly dependent on land being allocated in Local Plans. This is not an accurate measure of 'true' market demand Calculations for B1c/B2/small B8 land do not take into account expected losses of land, completions, or commitments The Reg 18 Local Plan notes that supply of sites for industrial and smaller warehousing premises in NWL has surpassed the estimated requirements of the HEDNA, clearly demonstrating its need methodology is not reflective of true demand Does not address strategic needs for B2 floorspace
North West Leicestershire The Need for Employment Land prepared by Stantec (Stantec Study 2020)	<ul style="list-style-type: none"> Geographic scope: North West Leicestershire Uses: Non-Strategic Industrial (B1c, B2 and B8 (<9,000 sqm)) Time period: 2017-2039 	<ul style="list-style-type: none"> Non-strategic industrial (<9,000 sqm): 47 ha 	<ul style="list-style-type: none"> Preferred demand estimation method based on GVA outputs does not take account of historic supply constraints which the study itself notes as a limitation Preferred demand estimation method is completely different to the methods used by GL Hearn Study, resulting in lack of consistency between local and regional demand forecasts Different time period used to GL Hearn (2021), again highlighting inconsistencies between local and regional demand forecasts
Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change (2021)	<ul style="list-style-type: none"> Geographic scope: Leicester City and Leicestershire Region Uses: Strategic B8 (9,000+ sqm) Time period: 2020-2041 	<ul style="list-style-type: none"> Strategic B8 (FEMA-wide): 861 ha (including 5 year safety margin) 	<ul style="list-style-type: none"> Preferred employment needs methodology results in less demand than historic trend in direct contrast with the strength of the I&L market Demand estimates per annum are lower than HEDNA's estimates for strategic B8 made in 2017, even with a 5 year safety

<p>prepared by GL Hearn, MDS Transmodal and Icen (GL Hearn Study 2021)</p>			<p>margin. Again in direct contrast with the strength of the I&L market</p> <ul style="list-style-type: none"> • Does not address strategic needs for B2 floorspace which is also not addressed in the Stantec Study 2020 • Unrealistic apportionment of demand to rail served sites vs road based sites • Does not recommend how the regional need / demand is apportioned amongst local authorities in the region. The Study has limited mention in the NWL Reg 18 Options document.
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Source: Savills (2022)

- 3.1.3 The above summary clearly demonstrates the various reports ‘do not talk to one another’ which is a by-product of them using different demand estimation methods, covering different time periods and focusing on different segments of the market (i.e. large warehouse units above 9,000 sqm versus smaller warehouse and industrial units). While the various reports note demand has outpaced supply historically, none have addressed the impact low availability has on ‘suppressing’ demand as tenants can’t find the space they want.
- 3.1.4 In terms of the estimation methods the various reports use a combination of labour demand forecasts, GVA outputs, past completions or freight flows to estimate future I&L demand. None of these methods have proved accurate in estimating future demand. If they did, availability wouldn’t have trended downwards across the FEMA and NWL for most of the last decade as a result of demand outpacing supply. As a result we have seen above inflation rental growth as occupiers vie for limited available stock.
- 3.1.5 As we discuss further in **Section 4** and **Section 5**, availability has been below the level we consider to represent a balance between supply and demand for most of the last decade. This equilibrium rate is around 8% nationally, a level the FEMA and NWL have been below since 2013 and 2014 respectively. As a result, the FEMA has experienced I&L rental growth of 67%, more than twice the rate of inflation (25%) over the last decade²⁰.
- 3.1.6 Below we review in detail the two most recent studies being the Stantec Study (2020), focused on demand for industrial/small warehousing at the NWL level and the GL Hearn Study (2021) focused on the demand for large warehousing at the FEMA level.
- 3.1.7 As we discuss in detail both studies have a number of methodological flaws. The Stantec Study uses GVA Outputs to estimate future demand which the study itself notes as flawed because it does not address historic supply constraints. The GL Hearn Study uses a completely different set of demand estimation methods; its preferred method based on replacement floorspace and road and rail freight flows. While this is an interesting approach, its final recommendations are not sensible given its future floorspace demand estimates are below historic completions. This is completely contrary to market realities whereby demand is currently 86% above long terms trends and vacancy is at the lowest levels since reliable records began (as discussed in **Section 2**).

3.2 The Stantec Study (2020) North West Leicestershire - The Need for Employment Land

²⁰ According to the Bank of England inflation calculator between 2011 and 2021 (<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>)

- 3.2.1 The Stantec Study was commissioned by NWLDC to assess the district's need for employment land in the period to 2039. Even though the Local Plan had been recently adopted at the time, the Council felt it had not identified enough employment land to meet its needs – as measured by the previous employment need assessment, the 2017 HEDNA. For example, the HEDNA expected office development to take up twice as much land as industrial but in practice more land had been developed for industry, suggesting that the HEDNA had misread the market.
- 3.2.2 With regard to industrial land, the Stantec study covers **non-strategic industrial space**, namely:
- **Core industrial space:** factories and workshops
 - **Non-strategic warehousing space:** small and mid-sized distribution / logistics units up to 9,000 sqm
- 3.2.3 It **excludes strategic warehousing**, a category comprising B8 units over 9,000 sqm which are instead covered by the GL Hearn study (2021) discussed further below.
- 3.2.4 The study starts off by exploring two types of forecasts for estimating future industrial floorspace needs: one based on jobs and one based on output (GVA per sqm).
- 3.2.5 The **output forecasts** are then taken forward given growth in industrial output in NWL has historically more closely mirrored growth in floorspace than using growth in jobs. Experian (July 2020) and Oxford Economics (August 2020) forecasts are used as part of this analysis.
- 3.2.6 The GVA output forecasts are translated into employment floorspace using densities based on “*economic data and the Valuation Office Agency (VOA) floorspace statistics for 2017*”²¹ in terms of £ million of GVA per sqm. This results in an estimated 26,126 sqm per annum (p.a.) from Experian and 27,566 sqm p.a. from Oxford Economics. Using this density effectively assumes that industrial activities on strategic and non-strategic sites contribute in equal measure to GVA on a £ per sqm basis. This assumption seems unlikely to hold true in reality and does not appear to be validated in the study, which we consider a major flaw that can easily lead to over-estimation or under-estimation.
- 3.2.7 In order to isolate future demand for non-strategic land, the Study considers historical evidence on the mix of industrial development in NWL based on annual monitoring data and VOA. Over the short-term, the share of non-strategic demand averages 5.5% over the last 10 years – leading to the ‘low scenario’, increasing to an average of 21.6% if a longer 19 year period is used – leading to the ‘main scenario’.
- 3.2.8 A **vacancy rate of 7.5% is applied** to both scenarios, to allow for units that are empty between tenancies and generally for choice and competition. This broadly corresponds with Savills’ 8% equilibrium availability rate (ie: when supply and demand are in balance). This is discussed in more detail in **Section 3.3** below and in **Section 5**.
- 3.2.9 Finally, floorspace estimates are translated into **land requirements applying a 40% plot ratio**. This yields an estimate of 0.9 ha p.a. under the low scenario, and between 2 to 2.1 ha p.a. under the main scenario.
- 3.2.10 The Study considers the low scenario as not suitable due to historic supply constraints impacting the non-strategic land segment of the market. Therefore the main scenario is taken forward, estimating

²¹ Para 3.12 p.16

demand for circa 187,000 sqm of net additional floorspace, or circa **47 ha of land** over the **22-years plan period**.

- 3.2.11 While Savills considered the use of GVA outputs better than jobs, it is still a flawed metric for estimating future floorspace, and by extension, land demand. The I&L sector, like all property markets, is driven by the relationship between the supply of floorspace / land and how much demand there is for this supply. When demand exceeds supply, availability reduces and rents typically rise as occupiers vie for limited available stock. The strong demand and rising rents make building new floorspace attractive for investors. However the delivery of new floorspace primarily relies upon new sites coming forward via the planning process (notwithstanding some net uplift in floorspace can be achieved via the intensification of existing sites).
- 3.2.12 In England, market demand and supply data is readily available via industrial agents, planning application information, Authority Monitoring Reports and commercial databases such as CoStar and EGi which record transactional information (demand), properties available to the market (availability) as well as data on rents, yields and tenant sectors. Given the wealth of market information available it is unclear as to why the Stantec Study has relied primarily on third party statistical models to try and understand future market demand rather than market data itself.
- 3.2.13 The Stantec study does appear to recognise its own limitations: *“The industrial forecast should be treated as a minimum, because historical evidence from the VOA suggests that the true demand could be much higher. **Unfortunately we cannot estimate that higher number, because land supply has been constrained for so long that we do not have solid evidence of what happened in a relatively unconstrained market**”* [emphasis added].²²
- 3.2.14 The Savills demand estimation method, discussed in **Section 5**, addresses the major flaw of the Stantec Study by being able to estimate demand that has been lost due to historic supply shortages. We refer to this as ‘suppressed demand’.
- 3.2.15 The recommendations from the Stantec Study have been taken forward in the NWL Reg 18 Options document. The overall demand for industrial/small warehousing is estimated at **71.57 ha**²³. This includes the Stantec requirement of 47 ha, an allowance for losses of 18.2 ha and a flexibility margin of 6.37 ha equivalent to 5 years annual average completions. This breakdown is set out in **Table 3.2** below.

Table 3.2 Total Demand in the NWL Reg 18 Options document

	Sqm	Ha
Stantec Requirement (2017 – 39)	187,000	47
Losses allowance (2023 – 39)	72,800	18.2
Flexibility Margin	25,484	6.37
Total Requirement	285,284	71.57

Source: North West Leicestershire Development Strategy Options and Policy Options (Regulation 18) Consultation (2022)

- 3.2.16 It is noted that overall estimates of need will be updated ‘in due course’ as NWL will need to account for additional large warehousing demand. This will draw on a new study due to be completed in Spring

²² Para 6.4., p.64

²³ Discussed in Section 6, p. 37-38 of the Options document

2022, which breaks down for each local authority area the large warehouse need identified in the GL Hearn study at FEMA level.

3.3 The GL Hearn Study (2021), Warehousing and Logistics in Leicester and Leicestershire

3.3.1 The study was prepared by GL Hearn with MDS Transmodal for a consortium comprising Blaby, Charnwood, Harborough, Hinckley & Bosworth, Melton, North West Leicestershire, Leicester City, Leicestershire County Council, Oadby & Wigston and the Leicester and Leicestershire Local Enterprise Partnership.

3.3.2 The study focuses on large scale logistics warehouse facilities (B8) greater than 9,000 sqm²⁴, and estimates demand across the FEMA over a 21-year period to 2041. **The need for large B2 units of 9,000 sq. m plus across the FEMA is not covered by the study** despite this representing a small but significant component of occupier demand, as we discuss below.

3.3.3 The GL Hearn study uses a completely different set of estimation methods compared to the Stantec Study, undermining any synergy between both. The estimation methods it explores include:

- Labour demand: based on Oxford Economics jobs forecasts which are then translated into floorspace using employment densities and then into a land requirement using a 40% plot ratio;
- Historic trends: based on historic completions data; and
- Replacement + Traffic Growth: based on the need to replace obsolete stock and need to handle freight traffic growth. Traffic growth is translated into floorspace demand, which is then split between road-based and rail-based. Floorspace estimates are translated into a land requirements using a 35% plot ratio for road-based and 25% plot ratio for rail-based.

3.3.4 A summary of the floorspace demand estimates from these methods is tabulated below in **Table 3.3**. The estimates cover the period between 2020 and 2041.

Table 3.3 GL Hearn Estimated Need by Model Type (2020 to 2041)

Type	Model Name	Description	2041 Needs ('000 sqm)
Labour Demand	Labour demand	Assumes the baseline model for all sectors	-50
	Labour demand sensitivity	Assumes baseline model for warehouse and related sectors for growth-only districts	161
Historic Trends	Completions trend	Reflects large warehouse floorspace delivery over the 2012-19 period, projected forwards	2,702
	VOA trend	Models growth-only districts 2011-18 projected forwards, all warehouse and industrial stock including losses	1,941
Replacement + Traffic Growth	High replacement, central traffic growth	30 year stock longevity and baseline traffic growth	2,466

	Low replacement, central traffic growth	40 year stock longevity and baseline traffic growth	2,061
	High replacement, sensitivity test traffic growth	30 year stock longevity and higher traffic growth from heightened e-commerce trading as a result of Covid-19	2,571
	Low replacement, sensitivity test traffic growth	40 year stock longevity and higher traffic growth from heightened e-commerce trading as a result of Covid-19	2,166

Source: GL Hearn, Savills

3.3.5 The preferred model is the “**High replacement, sensitivity test traffic growth**” which estimates 2,571,000 sqm of floorspace demand by 2041. This model relies on two factors driving future demand:

- **Replacement Build:** requiring new large-scale warehousing to replace existing obsolete buildings.
 1. This assumes the life of a modern warehouse building is 30 years.
 2. Over a 21-year period this corresponds to 70% of existing stock (21 years / 30 years = 70%).
 3. This leads to an estimated demand of **1,620,000 sqm** by 2041.
- **Growth Build:** future demand driven by the need to handle growth in volume of consumer goods handled.
 1. This is derived from growth in annual freight volumes delivered directly to large scale distribution centres.
 2. The chosen model variant assumes higher growth in traffic induced by heightened e-commerce trading occurring since the onset of the Covid-19 pandemic.
 3. The traffic forecasts are then converted into floorspace need “using generally accepted 'conversion factors' which relate annual tonnage throughput and floor space at large scale 'high bay' type warehouses”²⁵.
 4. This leads to an estimated demand of **308,000 sqm** by 2041.

3.3.6 The **Replacement Build and Growth Build** components are then combined as follows:

1. Floorspace demand from the two components leads to a combined demand of **1,928,000 sqm**.
2. A 5 year margin for flexibility is then applied, leading to an overall requirement of **2,571,000 sqm**.

3.3.7 Floorspace demand from the above step is apportioned to rail-served and road-served sites at a 43% and 57% share respectively. Floorspace is then converted to land requirements assuming a 35% plot ratio for road-based and 25% plot ratio for rail-based sites. This equates to demand for **861 ha**.

²⁵ Para 8.25, p.109

3.3.8 Below we summarise our views on the methodology adopted in this study.

The preferred model underestimates true demand

3.3.9 A major concern with the preferred model is that its total demand estimate of **2,571,000 sqm** is lower than the historic trend model based on completions at **2,702,000 sqm**. This does not reflect reality given I&L demand for large units, as we discussed in **Section 2**, is the strongest its even been, both nationally and across the region. As a result available stock is nearly completely exhausted with vacancy at just 2.91% nationally and 1.69% in the East Midlands, the lowest levels ever on record.

3.3.10 The lack of available supply within the I&L sector is not a recent occurrence but is historic. When supply, as signalled by floorspace availability, is low, demand is 'suppressed' as prospective tenants can't find space in a market. 8% availability is typically referred to as the equilibrium level at a national level when supply and demand are broadly in balance (as sourced in publications such as the GLA's Land for Industry and Transport SPG 2012). **We discuss this further in Section 5.**

3.3.11 Below this level, available supply becomes tight and rents increase as occupiers compete for limited available stock. NWL's I&L market has been below the 8% benchmark since 2013, so nearly a decade. The GL Hearn Study notes the lack of supply in several instances (i.e. Sections 3 and 6), however instead of trying to address this issue, and its impact on demand, it appears to further accentuate the issue by recommending less demand than the historic 'supply constrained' (i.e. completions) trend.

3.3.12 Not only are historic trends not reflective of the current and future strength of demand in the sector, the Study's use of completions as a demand measure is fundamentally flawed. Development completions is a supply measure, not a demand measure. While new floorspace can be delivered on existing sites through redevelopment and intensification, it mainly depends on new employment sites being made available (allocated) for development via the planning system. The length of time and complexities involved in delivering sites, particularly those of a strategic scale, is why supply measures (completions) typically lag actual demand (net absorption). Therefore the use of a lagging supply measure, and the projection of this forward into the future, results in an underestimate of 'true' market demand.

3.3.13 The failing of past completions methods is evident in the NWL's Reg 18 Options Document which states at para 6.4 that there *"has been considerable market demand for industrial and smaller warehousing premises in NWL over recent years and the supply of sites for these uses has been quite strong, already surpassing the estimated requirements in the Housing and Economic Development Needs Assessment 2017 (HEDNA)"*. Effectively GL Hearn's previous HEDNA Study, based on past completions, has been proven to underestimate market demand. **Their response, within this more recent study, appears to be to select an alternative method (replacement plus traffic growth) that estimates even less future floorspace demand than the failed past completions method.**

3.3.14 We address these issues as part of the Savills estimation method in **Section 5.**

The Study uses different plot ratios

3.3.15 Plot ratios are used to convert floorspace demand to land requirements. The GL Hearn study applies different plot ratios across the different demand models. Such inconsistency is not considered justified. For instance the historic trend model uses a plot ratio of 40% based on historic evidence but the preferred Replacement + Traffic Growth model uses 35% for road and 25% for rail sites.

3.3.16 While we agree these lower plot ratios are more representative of larger unit development, the primary

output of each model is their future floorspace demand estimations not plot ratios. By using different plot ratios to translate floorspace to land, the study has removed the ability to compare results from the different models on a 'like for like' basis. For instance the past completions method (including a 5-year margin)²⁶ has a much higher future floorspace demand requirement but only a slightly higher land requirement (3.3 million sqm gives 869 ha) compared to the preferred method (2.6 million sqm gives 861 ha). This is due to the past completions trend being based on a more land efficient plot ratio of circa 40% (which, it should be noted, is too high and does not reflect market realities for many large unit schemes).

- 3.3.17 If the same road and rail plot ratios were also used for the past completions method (including a 5-year margin)²⁷, its land requirement would increase to 1,120 ha (made up of 575 ha (road) and 545 ha (rail)). This is **259 ha higher** than the preferred method (861 ha).

Demand for B2 strategic floorspace is not taken into account

- 3.3.18 In line with national trends, and as a result of the region's location and accessibility, the vast majority of take-up of larger units is by companies within the logistics sector. However, the East Midlands also continues to account for a significant and above average proportion of UK manufacturing output. Manufacturing accounts for 16% of economic output in the region and 11.1% of jobs, compared to the national average of 10% and 7.4% respectively²⁸.

- 3.3.19 Leasing activity for strategic I&L floorspace (above 9,000 sqm) between 2012 and 2021 for the East Midlands, shows that B2 floorspace accounted for 21.5% of all deals (or 8% by floorspace)²⁹.

- 3.3.20 Examples of large scale manufacturing investment in Leicestershire include:

- Countryside Properties took a 359,305 sq. ft build to suit unit at Mountpark, Bardon in March 2020 for the manufacture of its advanced modular panel system that will deliver around 3,250 new homes a year for the company's three Midlands regions when the factory is fully operational. The facility created over 100 jobs, including apprenticeships for the local area.
- Power Towers took a speculative unit of 100,000 sq. ft at Leicester Distribution Park in December 2019. Power Towers are a UK manufacturer founded in 2007.
- Mattel Toys took a new speculative unit of 205,760 sq. ft at Optimus Point, Leicestershire in December 2017.

- 3.3.21 Given the important role that the manufacturing sector plays in the East Midlands, and that B2 uses occupy similar types of units to B8, their needs should be considered.

Several key assumptions are not substantiated

- 3.3.22 Based on an assessment of trends within the I&L sector, the study separately quantifies the need for rail-served and non-rail (road-based) floorspace and land.

- 3.3.23 The Study notes that new warehouses are constructed partly to accommodate growing traffic volumes over the long term – this forms the 'growth build' element of the Study's preferred demand forecasts.

²⁶ A five year margin of flexibility of 643,000 sqm is added to the past completions estimation of 2.7 million in order to compare the preferred method on a like for like basis

²⁷ Ibid

²⁸ Future of the East Midlands Economy, 3rd September 2021 (House of Commons Library CDP-2021-2033)

²⁹ CoStar (2022)

The focus is commodities which pass through large scale distribution centres (excluding bulk and semi-bulk cargoes such as aggregates and forest products) – in 2019 and forecast to 2041. These specific commodities are not identified in the Study, but are set out in the Leicester and Leicestershire Strategic Distribution Sector (SDS) Study Part A Interim Report, published in 2014. They include Beverages, Food (fresh, perishable and non-perishable), Furniture, Clothing, Manufactured Articles, Paper and Card (including packaging), Parcels and Wood/Cork Manufactures³⁰.

- 3.3.24 The current and forecast freight volumes are produced using the MDS Transmodal GB Freight Model. For those commodities which pass through large scale distribution centres, it estimates the total volume of cargo currently destined for Leicestershire, and the proportion estimated to be delivered directly to large scale distribution centres.
- 3.3.25 As discussed in **Section 2**, significant growth is forecast across all freight modes, with LGV traffic estimated to grow between +25% and +108% by 2050 and rail traffic by +74% by 2043/44. However, in spite of this strong forecast growth, the preferred model, based on freight traffic forecasts, predicts future floorspace demand below past completions. If freight is forecast to grow, and we know freight growth is linked to demand for I&L floorspace, it is therefore not reasonable to expect lower demand for I&L floorspace than past completions – as the preferred model suggests.
- 3.3.26 The Study estimates that 45% of road freight traffic destined for the East Midlands will be delivered to a distribution centre (assumed to be a unit of 9,000 sq. m plus). This is based upon research undertaken as part of the East Midlands Strategic Distribution Study prepared by Savills and MDS Transmodal which was published in 2006. As noted at **Section 2**, there have been significant changes in the sector since this time including the significant growth of e-commerce. The accuracy of this figure now (and even more so in 2041) is therefore questionable.
- 3.3.27 The main issue is likely to be around the assumption for converting freight traffic to floorspace. This key assumption is not explained in the document, its only reference at paragraph 8.25 is to say “*generally accepted conversion factors.*” This is a fundamental assumption in the model and should have been presented with more transparency. In contrast, more detail was provided for the alternative methods not taken forward in the Study. For instance, for the labour demand method, the conversion factor when relating labour demand (jobs) to floorspace was clearly stated as based on densities from the HCA’s 2015 guide, which we recognise as industry standard.

The targets for rail served sites appear unrealistic

- 3.3.28 The Study considers three scenarios in relation to the proportion of new build warehousing required at rail-served sites (i.e. 26%, 43% and 60% rail). 26% is already an ambitious figure while 60% is not justified as being realistic, neither is the 43% mid-point.
- 3.3.29 The lower scenario (26%) is based on forecasts by Network Rail undertaken in 2018³¹ and the highest scenario is on the assumption that all demand for units of 25,000 sq. m is met at rail served sites,³² with the final scenario of 43% representing a middle ground. The Study asserts that the proportion of new floorspace to be rail-served should be in excess of the Network Rail forecasts as a result of changes in national planning policy, high growth rates in intermodal rail freight, the cost competitiveness of rail

³⁰ MDS Transmodal & Savills (2014) Leicester and Leicestershire Strategic Distribution Sector Study: Part A Interim Report, para 3.2, footnote 6

³¹ National Rail Freight Demand Forecasts

³² Ibid, paragraph 9.8

freight services over road, and the decarbonisation agenda.

- 3.3.30 It is clearly unrealistic to assume that all units in excess of 25,000 sq. m will be located at a rail-served site. The number of SRFI within the FEMA are limited. While new ones are planned they can take a considerable amount of time to come forward. Furthermore, many occupiers don't need to be located on a SRFI given their supplies don't come in via a port or they need more regular supplies or lower volumes that rail freight routes typically support. Whilst the rail agenda is important and should be fully supported due to the wide ranging benefits it can bring, there is a danger of downplaying the continuing and necessary reliance on road freight for the majority of distributors.
- 3.3.31 According to Savills' analysis, between 2015 and 2021, delivery of SRFI floorspace (at Prologis RFI DIRFT and East Midlands Gateway) made up only 14% of total new floorspace delivered over 9,000 sqm in the East Midlands region. This rises to 20% between 2015 and 2023 (accounting for current and future deliveries at EMG, DIRFT and Northampton Gateway). This is well below the mid-point of 43%, assumed by the Study.
- 3.3.32 Furthermore, future supply of rail-served sites is unlikely to increase the proportion to these high levels either. Hinckley NRFI is expected to receive DCO consent by 2023, with a build out period of 10 years meaning its delivery is some way off. East Midlands Intermodal Park (EMIP) is still in its pre-planning stage. It aims to engage on its initial masterplan in Spring 2023 and to progress its DCO in 2023³³. Rail Central Northampton's DCO application was withdrawn in 2019, and the project is currently on hold³⁴.

Air freight and LGV freight flows appear to be ignored

- 3.3.33 The growth build element of the preferred model does not appear to take into account the role of air freight and associated I&L demand. This is despite East Midlands Airport (EMA) handling the second-highest volume of air freight in the UK³⁵, after Heathrow, and being the UK's largest dedicated air cargo operation, making it the country's most important airport for express freight³⁶. EMA was one of the top 10 airports in Europe by air traffic movements during the middle of the Covid-19 pandemic³⁷. The Study also fails to account for the Airport's ambition to treble its cargo activity to 1 million tonnes a year over the next 20 years³⁸, which will likely lead to increased demand for I&L premises located near the airport.
- 3.3.34 Similarly freight moved by LGV appears to have been ignored with only HGV movements considered. Paragraph 8.21 in the Study notes the road freight data is derived from the Department for Transport's Continuing Survey of Road Goods Transport (CSRGT) which obtains details of domestic activity of GB-registered HGVs³⁹. Therefore LGV traffic, which is estimated to grow between +25% and +108% by 2050, as discussed in **Section 3**, is not taken into account. While we appreciate that HGV movements are more linked to larger sheds, to infer LGV traffic has zero relationship is not correct. This omission has likely led to underestimates in future floorspace demand.

Supply Review

- 3.3.35 As at April 2020, the study found that there was 338,000 sq. m of consented rail-served floorspace,

³³ <https://uk.goodman.com/east-midlands-intermodal-park/>

³⁴ <https://railcentral.com/news/ashfield-land-and-glp-pause-rail-central/>

³⁵ Civil Aviation Authority (2021) UK Airport Data; Table 14 International and Domestic Freight

³⁶ <https://www.eastmidlandsairport.com/about-us/cargo/>

³⁷ Manchester Airports Holdings Limited Unaudited Interim Report and Condensed Consolidated Financial Statements for the Six Months Ended 30 September 2020

³⁸ https://www.magproperty.co.uk/app/uploads/2018/10/EMA_2018_Brochure_FinalProof2.pdf

³⁹ <https://www.gov.uk/government/statistics/continuing-survey-of-road-goods-transport-gb-respondents-section>

together with 1,073,000 sq. m of consented road-based floorspace⁴⁰.

3.3.36 The supply of land across both categories has fallen significantly since the publication of the Study, as illustrated by **Table 3.4** below. Supply of rail-served floorspace has fallen to 96,000 sq. m. This includes one plot at East Midlands Gateway and one plot at East Midlands Distribution Centre (please note that whilst this is included as rail-served to allow comparison with the Study’s conclusions, the only unit which is rail-served at EMDC is Marks & Spencer, so the remaining supply should technically be included within the road-based figures). The supply at road-based sites has fallen to 676,000 sq. m. **In total, supply has fallen from 1,411,000 sq. m to 772,000 sq. m (a 45% reduction) in less than two years.**⁴¹

Table 3.4 Supply Update

Scheme	Study Supply (Vacant units & Consented Plots)	Update Supply Position (000's sq. m)	Difference	Comment
EMDC (Rail)	102	32	-70	EMDC 525 let to Buy it Direct
EMG (Rail)	236	64	-172	Plot 5 remaining for strategic B8
Hinckley & Bosworth				
Unit 1 Mountpark Phase II	62	0	-62	Let to VF Corporation
Bardon, Hinckley & Bosworth	0	89	89	Consent on Appeal
Blaby				
Land West of St Johns, Enderby	99	107	8	Application awaiting determination
Charnwood				
Rothley Lodge, Loughborough Rd	11	11	0	Cross Link 646
Former Artform International premises, Loughborough	14	0	-14	U/O
Harborough				
Tornado 186, Magna Park	16	0	-16	Let to Bleckmann
Magna Park South	279	110	-169	MPS5 and MPS7
Magna Park North	320	244	-76	MPN2 (spec), MPN 5, 6 & 7
M1 Access, Lutterworth	11	11	0	Available - 129,012 sq. ft spec
X Dock 377, Magna Park	35	0	-35	Let to Armstrong Logistics
Quantum, Magna Park	38	0	-38	Let to Amazon
Hurricane Warehouse (4400), Magna Park	24	0	-24	Let to Clipper
Leicester				
Leicester Distribution Park	9	14	5	Unit 2 - 150,000 sq. ft spec
North West Leicestershire				
225 @ Interlink, Bardon	21	0	-21	Let to Oakland
Zorro, Ashby-De-La-Zouch	22	0	-22	Let to EV Cargo
Former Coal Lounge	62	70	8	G Park, Ashby - planning 2021
Unit 2 Mountpark Phase II	50	0	-50	Countryside Pre-let
Bardon Hill, Coalville	0	20	20	Under construction
Non-Rail Total	1073	676	-397	
Rail Total	338	96	-242	
Total Supply	1411	772	-639	

Source: Savills

3.3.37 It is clear that the rate of take-up experienced over the course of 2020 and 2021 has far exceeded the historic trend and consequently, supply has been eroded at a much faster rate than anticipated by the

⁴⁰ Ibid, Tables 41 and 43, pages 121 and 124

⁴¹ Based on study supply date of April 2020

GL Hearn Study. As we evidence in **Section 4** below, both the wider FEMA and NWL are supply constrained and have been for most of the last decade. This lack of available supply has resulted in high levels of pent up demand, which coupled with current day growth drivers means available space in prime locations has been taken up quickly.

3.3.38 The speed at which strategic sites are being taken up is further illustrated by a review of take-up at key schemes within the FEMA:

- **East Midlands Gateway**

A timeline of 10 years was originally envisaged for completion of the scheme but after 4 years there is now only one plot remaining which is capable of accommodating a unit in excess of 9,000 sq. m. Plot 5 can accommodate a unit of 64,000 sq. m. Take up at the scheme has been far quicker than envisaged and has averaged **113,746 sq. m per annum** since serviced plots became available.

- **Magna Park**

Take up across Magna Park North and South has averaged 115,467 sq. m per annum since 2018, increasing to **244,993 sq. m per annum** on average over 2020 and 2021. If this rate of take up continues then the remaining capacity of c. 354,000 sq. m could be exhausted in less than 18 months, considerably less time than envisaged when the planning permission was granted for these schemes.

3.4 Conclusions

3.4.1 This chapter has reviewed the three employment reports commissioned within the last 5 years which address supply and demand issues within the wider FEMA and NWL.

3.4.2 The HEDNA, prepared by GL Hearn in 2017 for the FEMA, uses past completions as its preferred employment needs methodology for I&L premises below 9,000 sqm. Past completions is a supply measure, rather than a demand measure, and is thus not an accurate measure of 'true' market demand. This is illustrated by NWL's Reg 18 Options document noting that the supply of sites for industrial and smaller warehousing premises has surpassed the estimated requirements in the HEDNA.

3.4.3 The Stantec study (2020), prepared for NWL in 2020, looks only at non-strategic industrial floorspace (B1c, B2 and B8 space below 9,000 sqm). The preferred demand estimation method based on GVA outputs does not take account of historic supply constraints. The Study itself notes this as a limitation, and states that its estimates should be treated as a minimum as future demand has likely been underestimated.

3.4.4 The GL Hearn and MDS Study, prepared for the FEMA in 2021, assesses demand for strategic B8 floorspace (above 9,000 sqm). We consider the Study to present a number of methodological issues, the most concerning of which is that its preferred demand estimation is lower than the past completions trends. Other issues include:

- the use of different plot ratios for different demand models;
- no consideration of strategic B2 floorspace;
- the proportion of rail-served demand is too aspirational and unrealistic, while demand for road-served sites is underestimated; and

- air freight and LGV traffic are not taken into account.

3.4.5 As a result of the continued strength of the I&L market, supply continues to be depleted at a much faster rate than anticipated (for example, around 45% less floorspace is now available in comparison to GL Hearn's figures). This has a direct implications for the amount of land which is necessary to meet identified needs over the plan period.

3.4.6 Savills addresses these methodological shortcomings and seeks to provide a more accurate estimate of I&L demand for NWL in **Section 5**.

4 I&L Market Assessment

4.1 Introduction

- 4.1.1 This section compares NWL's I&L market and that of the wider Functional Economic Market Area (FEMA), across a number of supply and demand indicators.
- 4.1.2 The sub-regional (or FEMA-wide) context is important given that future I&L investors and occupiers will consider the attractiveness of locations within NWL against other competing locations within the wider FEMA. New I&L investment and occupier demand will naturally flow to the strongest locations in terms of road, rail and airport freight connectivity and access to population centres. Furthermore, I&L companies typically have supply chains that span 1 to 4 hours travel time, sometimes longer, connecting themselves with their suppliers and end use customers. This again indicates that a sub-regional approach, beyond the individual local authority level, is appropriate for understanding market supply and demand dynamics.
- 4.1.3 NWL is part of a wider FEMA that includes neighbouring local authorities. FEMAs are essentially a group of local authorities that share similar characteristics in terms of key economic drivers, housing markets and workforce and consumer flows. The FEMA was defined in the HEDNA 2017⁴² and It covers the seven local authorities of Leicestershire plus Leicester City District, as shown in **Figure 4.1**.

⁴² GL Hearn (2017), Housing and Economic Development Needs Assessment - Leicester and Leicestershire Authorities and the Leicester and Leicestershire Enterprise Partnership

Figure 4.1 Functional Economic Market Area



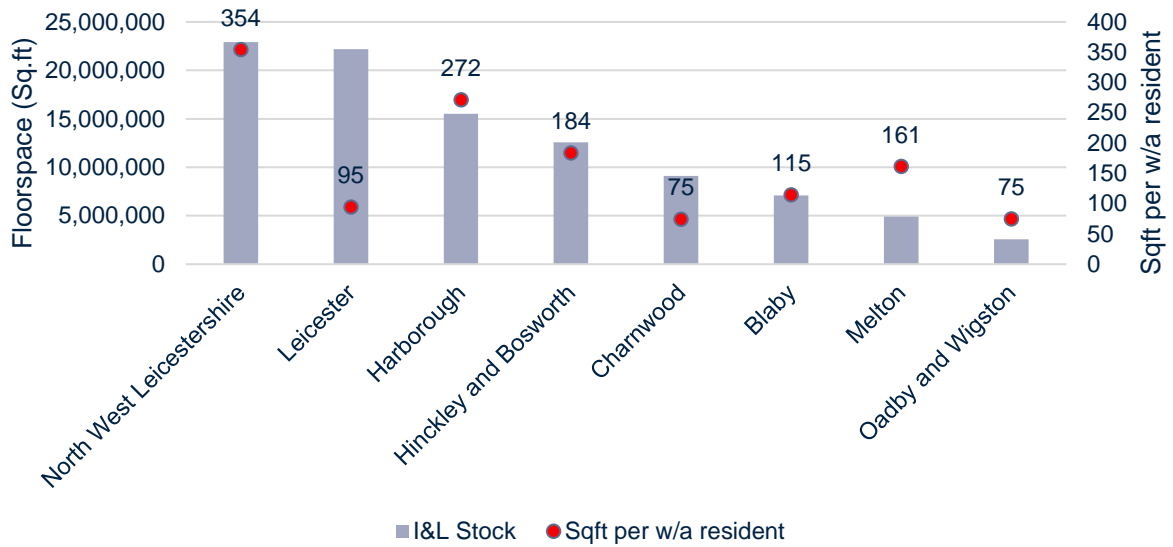
Source: Savills

4.2 Market Supply & Demand Factors

Existing Stock

- 4.2.1 There are 96.9 million sqft of I&L floorspace across the FEMA – nearly a quarter of which (24%, 22.9 million sqft) is located within NWL.
- 4.2.2 **Figure 4.2** shows how much I&L floorspace each local authority in the FEMA has per working age (w/a) resident. In effect it shows how large, and by extension, how important the I&L sector is relative to the size of the local working age population.
- 4.2.3 NWL has 354 sqft of I&L floorspace per working aged resident, which is the highest ratio across the FEMA. This demonstrates that NWL is the main I&L employment location in the sub-region. It also indicates how critical the sector is to its local economy and jobs market.

Figure 4.2 I&L sqft per working age residents – FEMA local authorities

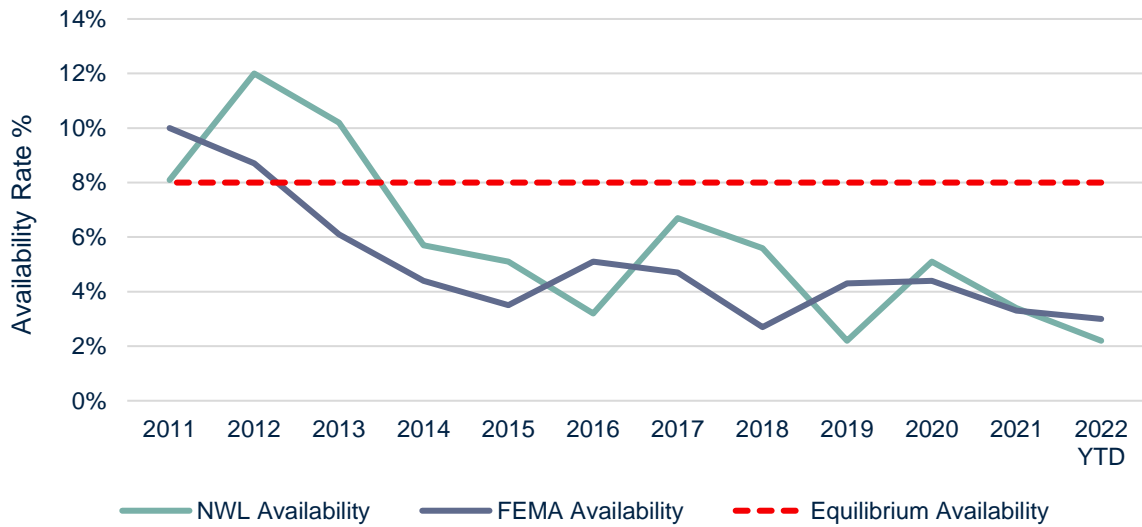


Source: Costar, Savills

Availability

- 4.2.4 The availability rate across the FEMA is extremely low at just 3%. It is even lower within NWL at only 2%. At the national level, 8% availability is commonly referred to as the level where a market is broadly in balance (i.e. frictional capacity) in terms of supply and demand (as sourced in publications such as the GLA’s Land for Industry and Transport SPG, 2012). Below this level available supply becomes tight and rents increase as strong occupier demand compete for limited available stock.
- 4.2.5 As shown in **Figure 4.3**, availability across the FEMA has been below the 8% equilibrium level since 2013, for over 9 years. This means that the FEMA’s I&L market has been supply constrained for a considerable period of time which in turn suppresses demand as not all occupiers can find space to meet their needs. As a result they are either forced to remain in their existing premises, even if not ideal for their operational requirements, or alternatively have to leave the FEMA to find suitable premises elsewhere, taking the jobs and investment they generate with them. A similar pattern of tight and falling availability has occurred also within NWL. Savills can provide a long list of unmet enquiries as evidence of this supply-constrained market, if the Council requires.
- 4.2.6 The Stantec report, as discussed in **Section 3**, recognises that a major flaw of its findings is the inability to estimate the impact historic supply constraints has had on demand and how to address this as part of its future demand estimates. The Savills methodology explained in **Section 5** is able to address this issue by accounting for ‘suppressed demand’ i.e. demand lost historically due to the lack of available supply.

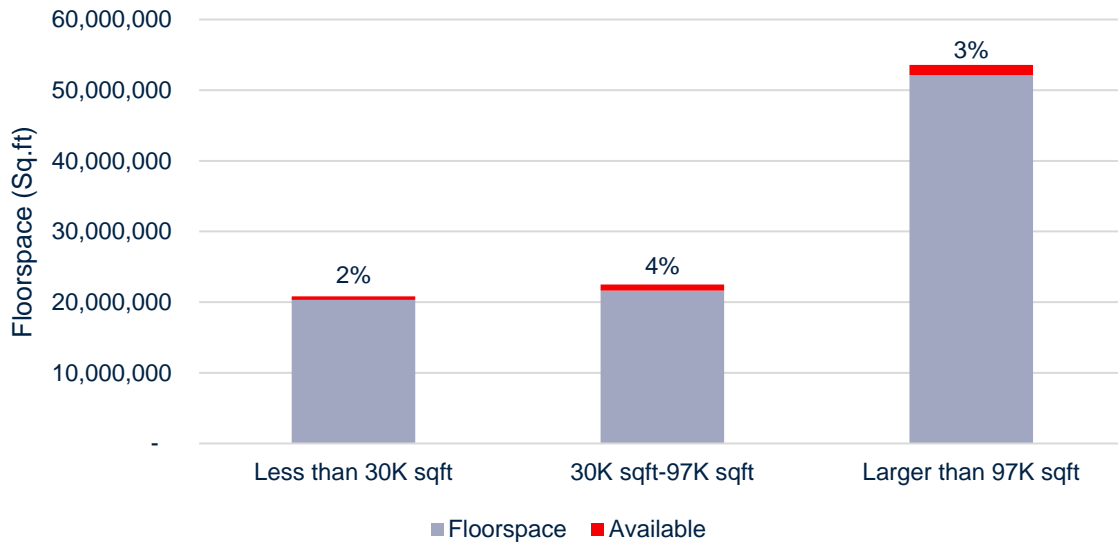
Figure 4.3 FEMA Availability Rate since 2011



Source: Costar, Savills

4.2.7 Given the low availability rates discussed above it is not surprising all segments of the I&L market are supply constrained. With reference to **Figure 4.4**, it can be seen smaller units of up to 30,000 sqft, medium sized of 30,000 to 97,000 sqft⁴³ all suffer from very low levels of availability, well below the 8% equilibrium benchmark. The 3% availability for larger units over 97,000 sqft is particularly stark given this size band accounts for over half (55%) of total I&L stock across the FEMA.

Figure 4.4 FEMA Availability by Size Band



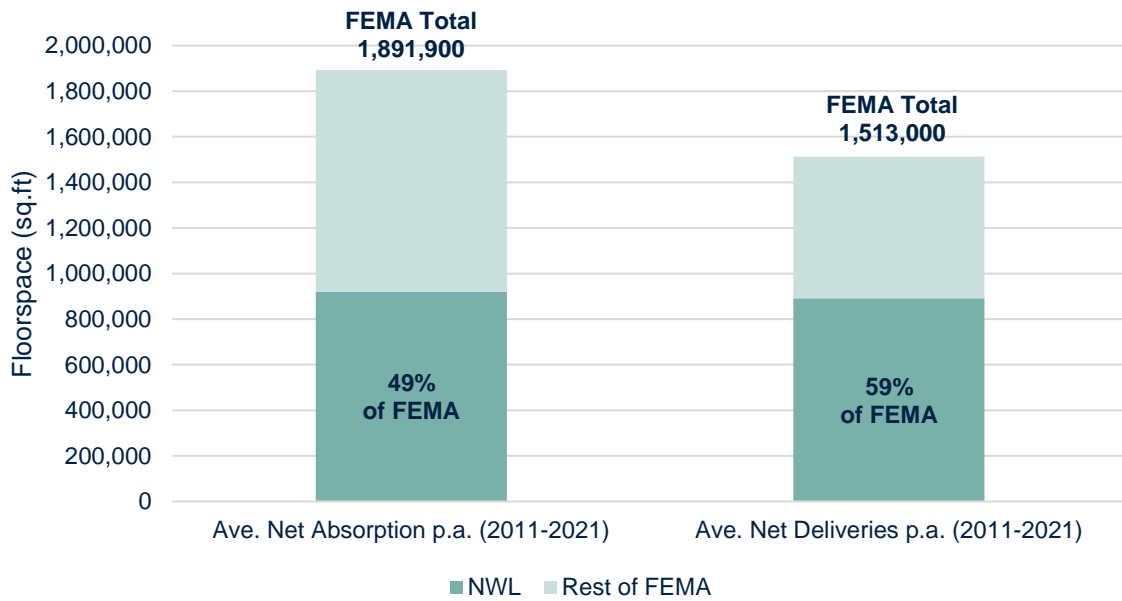
Source: Costar, Savills

⁴³ We have used the 97,000 sqft threshold rather than a more intuitive 100,000 sqft, as the former is equivalent to circa 9,000 sqm, which is the size threshold used in the GL Hearn study for large strategic warehouses which we reviewed in **Section 3**.

Demand vs Supply

4.2.8 Over the last decade net absorption has averaged 1.9 million sq. ft p.a. while net deliveries of stock have averaged 1.5 million sq. ft p.a. since 2011 across the FEMA. Net absorption is a leading measure of demand, comparing occupied space (move-ins) versus vacated space (move-outs). On the other hand net deliveries is a measure of supply and registers the change in inventory. Net deliveries being lower than net absorption within the FEMA indicates that supply has not kept pace with demand over the last decade. The chart in **Figure 4.5** shows that over the last decade NWL has been playing a critical role in the FEMA’s I&L market, accounting for 49% of the FEMA’s average net absorption and 59% of the FEMA’s average net deliveries.

Figure 4.5 FEMA Average Net Absorption and Net Deliveries p.a. (2011 to 2021)



Source: Costar, Savills

4.2.9 In **Figure 4.6** we assessed the share of average net absorption accounted for by each size band. It shows that the largest size band is driving demand for floorspace across the FEMA – accounting for 76% of average net absorption over the last decade. Given that properties in this size band account for 55% of total stock, a demand level at 76% indicates that demand for large properties is growing above historic levels across the FEMA.

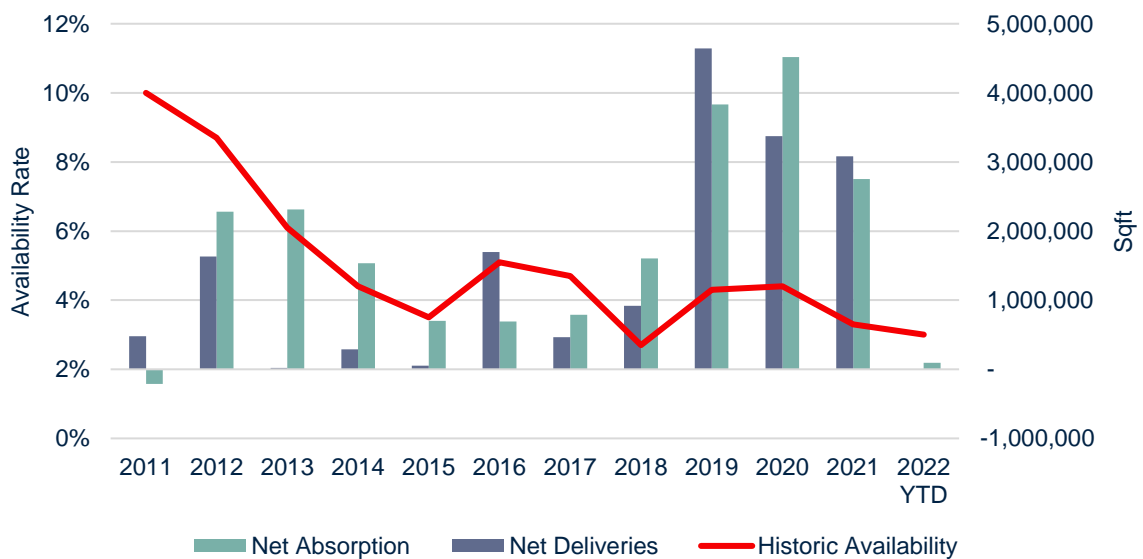
Figure 4.6 FEMA Average Net Absorption by Size Band (2011-2021)



Source: CoStar, Savills

4.2.10 **Figure 4.7** shows net absorption and net deliveries on an annual basis since 2011 across the FEMA. It clearly shows that the lack of new floorspace has progressively reduced the availability rate. Over the last three years net deliveries increased but the new floorspace has been quickly absorbed by the market, as shown by the availability remaining well below the 8% equilibrium level. As outlined in **Section 2**, the I&L sector is the strongest commercial sector in the UK and has been for some time. It generates a diverse range of well-paid occupations and given its continued growth profile, and the troubles being faced by the office and retail sectors, it is likely to drive future jobs growth within the FEMA. However for this job growth to happen, demand within the sector will need to be accommodated via new land being allocated as part of the Local Plan process.

Figure 4.7 FEMA Net Absorption and Net Deliveries p.a. vs Availability Rate since 2011



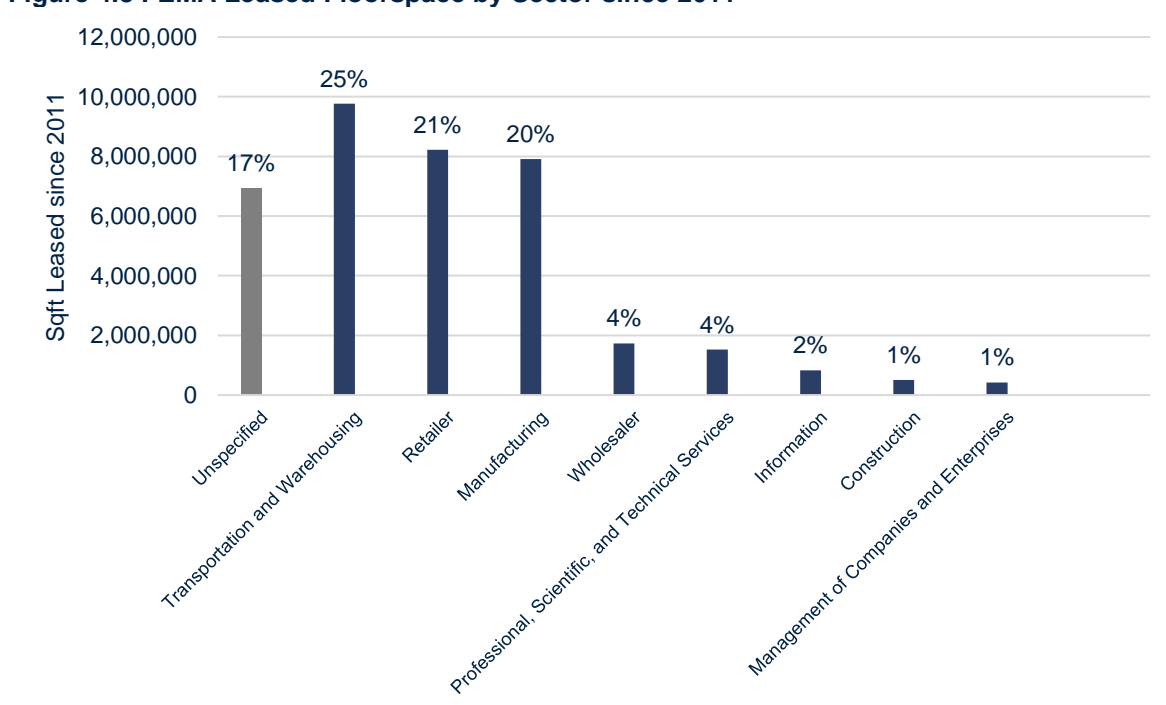
Source: Costar, Savills

Demand by Sector

4.2.11 To better understand the nature of demand across the FEMA over the last decade, we look at lease transactions by sector since 2011 – illustrated in **Figure 4.8**. The chart shows that the Transport & Warehousing sector contributed at least a quarter of floorspace leased (25%), followed by Retail (21%) and Manufacturing (20%).

4.2.12 The sectors which are typically linked to e-commerce are Retail, Transport and Warehousing and Wholesale. In markets that have managed to take advantage of the increase in e-commerce related activities, the combined take-up of these sector tends to be in the region of at least 40%-50%. Across the FEMA these sectors account for 49% of leasing demand, suggesting that e-commerce is a strong driving force for demand across the FEMA.

Figure 4.8 FEMA Leased Floorspace by Sector since 2011



Source: Costar, Savills

Rental Growth

4.2.13 Finally, another key market indicator for understanding the relationship between supply and demand is rental growth. When demand outstrips supply, rental growth is typically higher as occupiers compete for limited available stock. This in turn drives up rents. Conversely, when there is sufficient supply to accommodate demand rental growth is lower, typically tracking inflation more closely.

4.2.14 Rents across the FEMA have grown by 67% between 2011 and 2021, more than twice the rate of inflation over the same period at 25%⁴⁴, and higher than the national rate of 61%. As seen in **Table 4.1** rental growth has been much stronger post 2014, with an average year-on-year (YoY) rate of 6.2% vs only 1.5% between 2011 and 2021 (nationally, average YoY rental growth was 5.8% post 2014). This broadly corresponds to when I&L availability across the FEMA dropped below the 8% equilibrium rate

⁴⁴ According to the Bank of England inflation calculator between 2011 and 2021 (<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>)

indicating a supply constrained market (see **Figure 4.3** above). This further evidences that the FEMA's I&L market has become increasingly supply constrained in recent times, a situation that will only worsen further given the strength of the sector.

Table 4.1 Annual Rental Growth – FEMA

Period	Market Rent	Year-on-Year Growth	Average YoY
2021	£6.76	8%	2014 to 2021 = 6.2%
2020	£6.25	4%	
2019	£6.01	6%	
2018	£5.66	8%	
2017	£5.25	7%	
2016	£4.92	7%	
2015	£4.61	6%	
2014	£4.33	4%	2011 to 2013 = 1.5%
2013	£4.17	2%	
2012	£4.08	1%	
2011	£4.04	1%	

Source: Costar, Savills

5 Savills Future Demand Estimates

5.1 Introduction

- 5.1.1 The purpose of this chapter is to estimate I&L land demand across the FEMA. This is then compared against the estimated demand from the local (Stantec Study) and regional (GL Hearn Study) employment evidence.
- 5.1.2 Based on Savills demand methodology, over a 22 year plan period, we estimate FEMA wide I&L demand to be 2,479 ha of land. Depending on the level of apportionment we consider NWL should look to plan for between **587 ha to 1,240 ha** of I&L land over this period. We appreciate the upper band based on net absorption generates a large number at 1,207 ha. The final land amount NWL should plan for within this range will depend on developable land capacity in NWL and 'Duty to Cooperate' discussions with the other local authorities in the FEMA.
- 5.1.3 Based on the Savills estimates, we believe the GL Hearn and Stantec studies combined have underestimated future I&L demand for NWL of between 302 to 696ha over the 22 year plan period depending on how much strategic B8 demand across the wider FEMA is apportioned to NWL.

5.2 Savills Estimate of Future I&L Demand

- 5.2.1 We present below Savills full methodology for estimating future I&L demand. Our methodology is considered to address the issues we raised against the Stantec and GL Hearn studies in **Section 3**. Our methodology is NPPG-compliant as it builds upon historic take-up (demand), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up. We also factor in future e-commerce growth which is a key growth driver for the sector.
- 5.2.2 Our overarching approach to demand estimation considers the full market for I&L units, estimating demand for all unit sizes and relevant planning uses classes. This is considered a more robust approach as it relies on a larger pool of data and based on the fact that industrial and logistics occupiers desire similar types of premises in terms of location and design. After running our model for the full I&L market, it is then possible to segment that demand for different size categories or for industrial versus logistics uses, based on the analysis of market data such as leasing activity.
- 5.2.3 We also take a sub-regional approach to estimating future I&L demand. NWL like all local areas is part of a wider sub-regional market, or FEMA, and therefore is subject to supply and demand forces which need to be assessed beyond its local authority boundaries. This is true for many commercial sectors, but it is particularly important for I&L occupiers which typically have distribution networks linking their customers and suppliers of between 1 to 4 hours travel time, sometimes longer, depending on their size i.e. up to 4 hours plus is more typical of very large companies with a national reach, while 1 hour drive time is ideal for the majority of companies.

Step 1: Estimating demand over the Local Plan period

- 5.2.4 We assume a 22-year plan period which is consistent with the NWL Reg 18 Options document.

Step 2: Estimation of historic demand

- 5.2.5 This is based on the average annualised net absorption for the FEMA (from **Section 4**) at 1.9 million sqft per annum between 2011 and 2021. Savills considers net-absorption to be the leading measure of

demand for floorspace as it indicates the quantum of net floorspace occupied over a period of time (i.e. move-ins minus move-outs) based on leasing deals.

- 5.2.6 As discussed in **Section 3**, we do not consider take-up / completions (considered in the GL Hearn study, albeit eventually disregarded) as an accurate measure of demand. Completions is a supply measure which primarily depends on new land being allocated as part of the Local Plan process followed by the grant of planning permission before new development is constructed. This is a lengthy process which explains why completions (new supply) typically lags demand (net absorption) as it has been the case in NWL and the wider FEMA. Using net absorption rather than completions results in a higher historic demand profile. For example, as we discussed in **Section 4**, completions in the wider FEMA averaged 1.5 million sq. ft per annum since 2011, which is lower than average net absorption over the same period at 1.9 million sq. ft per annum.

Step 3: Estimation of suppressed demand

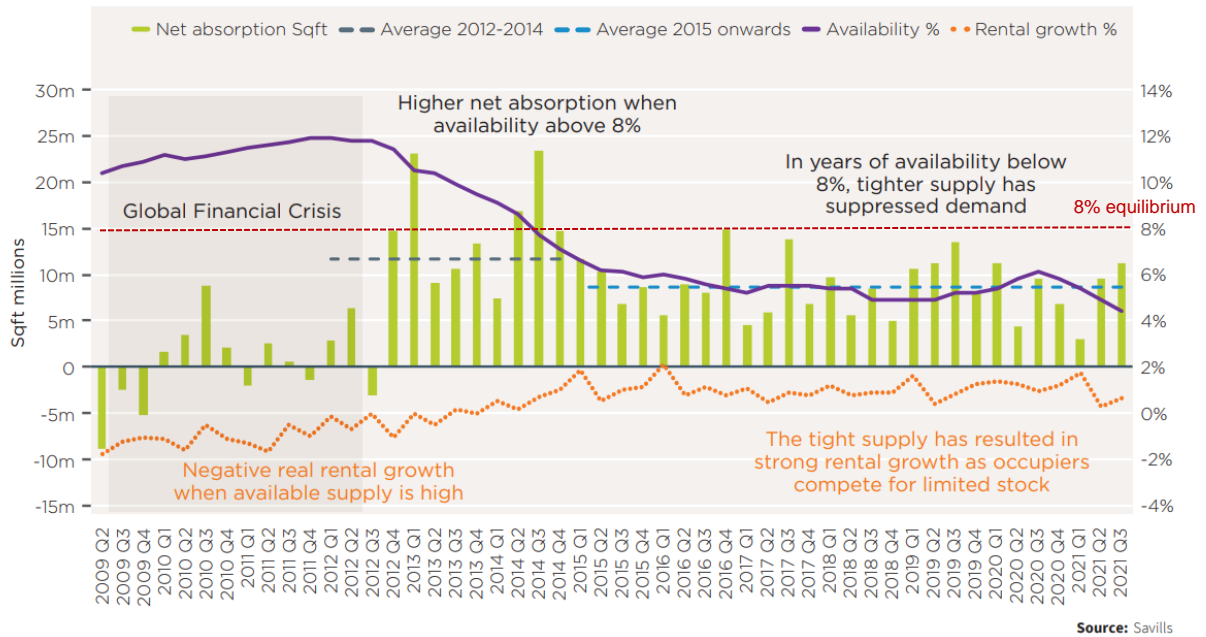
- 5.2.7 The rationale for accounting for suppressed demand is that when sufficient supply isn't available, demand cannot be accommodated. This is the top-up figure to be added to the historic demand trend to account for years when the market was supply constrained.
- 5.2.8 Supply and demand are inextricably linked across all commercial property sectors. Put simply if demand exceeds supply rents typically rise more quickly as occupiers vie for limited available stock. This can have a number of wider implications. For example, new companies aren't able to move into a market area, nor are existing companies able to find new space if their floorspace needs change, for instance due to expansion. It may also happen that some existing local companies get priced out of the market as they can't afford the increasing rents. As a result, companies have to locate to areas that are not ideal in terms of serving their customer base, thereby increasing travel times and the costs of doing business, not to mention environmental impacts. The lack of supply may also mean companies are forced to occupy space that is not entirely suitable for their operational needs impacting productivity.
- 5.2.9 We describe a market where supply doesn't keep up with demand as being 'supply-constrained'. Limited supply in a strongly performing market, such as NWL and the wider-FEMA's I&L sector, means that demand cannot be fully satisfied, typically resulting in strong rental growth. As demonstrated in **Section 4**, the wider FEMA's I&L rents have increased by 67% since 2011, indicating new supply has struggled historically to keep pace with the strong demand. This is more than double the rate of inflation over the same period⁴⁵.
- 5.2.10 At the national level the market equilibrium level, where supply and demand are broadly in balance and rents are more stable, is around 8% availability. This benchmark rate is found in a number of prominent publications such as the GLA's Land for Industry and Transport Supplementary Planning Guidance (SPG).
- 5.2.11 If one studies real rental growth (i.e. rental growth adjusted for inflation) over the past decade at the national level and observes its relationship to availability, it becomes clear that I&L rents begin to grow strongly when availability is below 8%. This relationship is clearly illustrated in **Figure 5.1** below. When availability was above 8% between 2009 and 2014 real rental growth (net of inflation) was either negative or only slightly positive. This enabled demand to be accommodated as sufficient supply was

⁴⁵ According to the Bank of England inflation calculator between 2011 and 2021 (<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>)

available.

5.2.12 However since 2014, as availability dipped below 8% and has stayed below this level ever since at the national level, real rents have grown strongly year-on-year. During this period net absorption has been lower than the 2009-2014 period despite the I&L sector going from strength to strength. This clearly shows the suppressing nature tight availability (below 8%) has had on I&L demand nationally.

Figure 5.1 Historic Net Absorption (Sq.ft.), Availability (%) and Real Rental Growth (%) in England



Source: CoStar, OBR, Savills

5.2.13 The 8% benchmark is also applicable to NWL’s wider FEMA, which is established by looking at real rental changes at regional level. In **Appendix A** we report the quarterly rental change for the East Midlands and the availability rate in each quarter over the last decade. The data presented shows that the transition between negative rental growth and sustained positive rental growth is around 8% availability. When above and below the 8% level rents growth is typically either strongly negative or positive.

5.2.14 The individual steps for calculating the FEMA’s suppressed demand are as follows:

- **Step 3a:** For years where availability has been below the 8% equilibrium threshold, we calculate the quantum of floorspace necessary to achieve 8% availability (Column “Av. To EQ (sqft)” in **Table 5.1**, calculation F);
- **Step 3b:** We then take the average of the ratio between net absorption and available floorspace for every year over the past decade (Calculation E averages 49% based on Column “Net Absorption / Availability”);
- **Step 3c:** We apply this average to the estimated floorspace required to reach 8% availability in each year where the market is below the 8% availability threshold to estimate each period’s suppressed demand (Calculation F*E in Column “Suppressed Net Absorption (sqft)”);

- **Step 3d:** We calculate average suppressed net absorption over the past decade. This give the annualised suppressed demand figure to be used as a top-up to the historic trend. The estimated average suppressed demand figure for the FEMA is 1.3 million sqft per annum since 2011.

Table 5.1 shows the relevant calculations.

Table 5.1 Suppressed Demand Calculations within the FEMA

	A	B	C=(A*B)	D	D/C	F=(8%-B)*A	F*E
Years	Inventory (sqft)	Availability (%)	Availability (sqft)	Net Absorption (sqft)	Net Absorption / Availability	Av. To EQ (sqft)	Suppressed Net Absorption (sqft)
2021	96,881,425	3.3%	3,197,087	2,751,447	86.1%	4,553,427	2,239,737
2020	93,797,587	4.4%	4,127,094	4,519,058	109.5%	3,376,713	1,660,935
2019	90,423,901	4.3%	3,888,228	3,833,563	98.6%	3,345,684	1,645,673
2018	85,782,604	2.7%	2,316,130	1,605,057	69.3%	4,546,478	2,236,319
2017	84,864,640	4.7%	3,988,638	788,696	19.8%	2,800,533	1,377,524
2016	84,400,990	5.1%	4,304,450	691,654	16.1%	2,447,629	1,203,938
2015	82,706,378	3.5%	2,894,723	701,944	24.2%	3,721,787	1,830,670
2014	82,654,564	4.4%	3,636,801	1,536,863	42.3%	2,975,564	1,463,619
2013	82,368,129	6.1%	5,024,456	2,313,631	46.0%	1,564,994	769,788
2012	82,348,268	8.7%	7,164,299	2,281,447	31.8%	- 576,438	-
2011	80,716,564	10.0%	8,071,656	-211,964	-2.6%	- 1,614,331	-

E=Average

Suppressed Demand=Average

Source: Savills, CoStar

- **Step 3e:** The final step requires adding the combined annualised historic (1.9 million sqft per annum) and suppressed demand (1.3 million sqft per annum) figures totalling 3.2 million sqft per annum, and multiplying this by the number of years in the plan period (3.2 million sqft x 22 years). This gives a total floorspace demand of **70.5 million sqft** over a 22-year period.

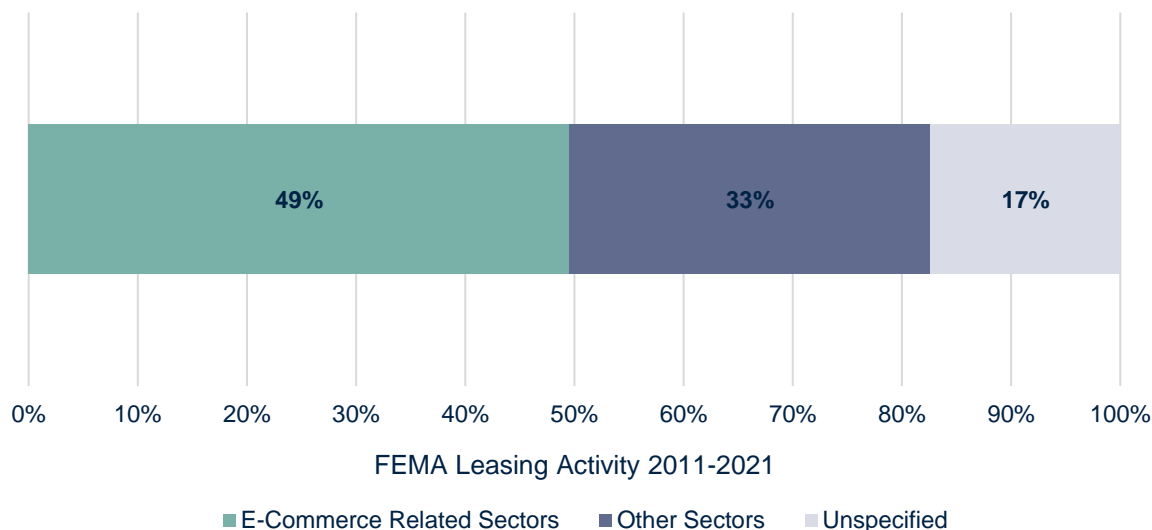
Step 4: Adjusting for increases in online retail

5.2.15 As discussed in **Section 2**, there are a number of factors driving future growth in demand for I&L uses which are not captured by historic trend based projections. Attempting to factor them all in is a challenging exercise prone to errors and overestimation due to the uncertainty around major events such as Brexit and the risk of double counting the impacts of different growth factors. The strongest growth drivers are population growth and the move to online shopping, which the Covid-19 pandemic has accelerated. We consider demand arising from population growth to be largely captured by increases in online sales which are a function of household spending and household growth. For this reason, in our work we focus on the move to online shopping.

5.2.16 In order to estimate future increases in I&L demand linked to e-commerce growth, we first need to establish the share of demand that has historically been linked to e-commerce and then determine how much higher this is likely going to be in the future. As discussed in **Section 4** above, the sectors which are typically linked to e-commerce are Retail, Transport and Warehousing and Wholesale. In markets that have managed to take advantage of the increase in e-commerce related activities, the combined take-up of these sector tends to be in the region of at least 40%-50%. Across the FEMA these sectors account for 49% of leasing demand, as shown in **Figure 5.2**. If we assume that this share remains the

same to the end of the plan period, 49% of projected future demand corresponds to 34.9 million sqft (49% * 70.5 million sqft) over the plan period.

Figure 5.2 FEMA Leasing Activity by Sector, 2011-2021



Source: Savills (2022); CoStar (2022)

5.2.17 We have considered Forrester’s⁴⁶ online retail forecasts for the UK to 2025 and compared the annual increase in online spending over this period to that seen over the last 10 years. As shown in **Table 5.2**, between 2011 and 2019 online retail sales increased at an average rate of £5.95 billion per annum. 2020 marked a departure from the historic trend, bringing total online sales above £100 billion, up from £79 billion in 2019 (a £26 billion annual increase). If we accept that 2020 and 2021 were exceptional years due to the Covid-19 pandemic and exclude them from our calculations, and focus on the period between 2022 and 2025, online sales growth is predicted to average £9.86 billion per annum. This suggests a 66% uplift from the 2011-2019 trend.

Table 5.2 UK Online Sales Forecasts (£ million)

Year	Online Sales (£m)	Annual Increase (£m)	
2011	£29,946	+£4,337	2011-2019 Average Annual Increase +£5,950 million
2012	£34,417	+£4,471	
2013	£38,908	+£4,491	
2014	£43,905	+£4,997	
2015	£49,212	+£5,307	
2016	£56,549	+£7,338	
2017	£64,505	+£7,955	
2018	£72,014	+£7,509	
2019	£79,157	+£7,143	
2020	£104,827	+£25,670	Excluded from calculations as these were atypical years due to the Covid-19 pandemic
2021	£122,831	+£18,003	
2022	£134,005	+£11,174	2022-2025 Average Annual Increase +£9,860 million
2023	£143,267	+£9,262	

⁴⁶ A prominent retail forecasting house

2024	£152,722	+£9,455	<i>(+66% uplifted compared to 2011-2019)</i>
2025	£162,271	+£9,549	

Source: Forrester, Savills

- 5.2.18 Applying this 66% uplift to the historic and suppressed demand from e-commerce sectors yields a future demand of 57.8 million sqft over the plan period. This equates to an uplift of 22.9 million sqft (**Table 5.3**).

Table 5.3 Adjusting for Current and Future Increases in Online Retail within the FEMA

Demand	Annual (sq. ft)	Over Plan Period (sq. ft)
E-commerce related (49% of historic + suppressed)	1,585,700	34,885,650
E-commerce related after 66% uplift	2,627,900	57,812,900
E-commerce demand uplift	+ 1,042,100	+ 22,927,200

Source: Savills

Step 5: Savills Estimate of Future I&L Demand across the FEMA

- 5.2.19 Adding the e-commerce uplift to the combined historic and suppressed demand estimates yields a total demand of **93.4 million sqft** over the plan period, as summarised in **Table 5.4**.

Table 5.4 Summary of Future Demand (over Plan Period) within the FEMA

Adjustment Type	Adjustment (sqft) (over plan period)	Total (over plan period)
Historic Demand (Net Absorption) Over 22 years		41,622,800
Suppressed Demand Over 22 years	+ 28,856,400	70,479,200
Ecommerce Uplift	+ 22,927,200	93,406,400

Source: CoStar, Savills

- 5.2.20 The above floorspace figures are translated into land requirements using a plot ratio of 35%. The Stantec study used a 40% plot ratio while the GL Hearn study adopted a 35% for road-based sites and a 25% ratio for rail-based sites. Based on our professional experience and examples of recent developments from across the country, we consider a 40% plot ratio to be too high and not reflective of modern I&L occupier requirements which typically command a ratio in the region of 30-40%. Therefore we consider a 35% ratio as appropriate. Savills can provide evidence of lower plot ratios for recent developments across the country if the Council requires.

- 5.2.21 Applying a 35% plot ratio to the estimated floorspace demand of 93.4 million sqft translates into a future land requirement of **2,479 ha across the FEMA**.

5.3 Comparing Savills Future Demand Estimate with the GL Hearn & Stantec Studies

Future strategic B8 demand

- 5.3.1 We first compare our demand estimate to the GL Hearn study, which we consider to have a number of methodological issues as discussed in **Section 3**.
- 5.3.2 The GL Hearn study covers the market for large warehousing (9,000 sqm and above). It excludes B2 uses above 9,000 sqm and smaller I&L premises (which are covered in the Stantec study). We consider

the exclusion of larger B2 premises to be a significant omission given that, based on Savills analysis, they still represent circa 5% take-up for large sites over the last five years across the FEMA.

5.3.3 As discussed at the beginning of this chapter, our approach is to consider overall I&L demand across all segments of the market. This is because using a larger pool of data allows for a more accurate assessment of market trends, plus industrial and logistics occupiers, while having very different operations, have similar preferences in terms of location and the sorts of premises they desire. For these reasons, investigating overall market demand in the first instance and then interrogating the results by market segment or unit size is considered a preferable approach.

5.3.4 In order to compare ‘like for like’ with the GL Hearn study we need to determine what proportion of our overall demand figure relates to large B8 premises over 9,000 sqm. We follow three steps to do this –

- **Step 1, determine proportion of overall FEMA demand to large units over 9,000 sqm:** Over the last decade 1.4 million sqft per annum, or 76% ($1.4\text{m sqft} / 1.9\text{m sqft} * 100$)⁴⁷ of historic demand (net absorption) in the wider FEMA was for units above 9,000 sqm. This equates to **70.7 million sqft** or **1,877 ha of land for the 9,000 sqm plus category**.
- **Step 2, remove demand from B2 occupiers from Step 1 result:** According to Savills take up data, B2 occupiers have leased circa 5% of large unit space over 9,000 sqm across the FEMA since 2017. Removing this demand from the Step 1 result equates to **1,783 ha**.
- **Step 3, match the future time periods:** The GL Hearn study provides future demand estimates for a 21-year period while the NWL Reg 18 Options document covers a 22-year plan period. To ensure consistency we have annualised the GL Hearn estimates and then multiplied by 22 years to marry up with the Options document. From our review of the GL Hearn study in **Section 3**, we reported that their estimated demand from their preferred model amounted to 2,571,000 sqm or 861 ha over a 21-year period. These figures correspond respectively to 122,429 sqm p.a. (1.3 million sqft p.a.) and 41 ha p.a. Multiplied over a 22-year period these equate to **2.7 million sqm (29 million sqft) and 902 ha of land** at a plot ratio of 25% for rail-based demand and 35% for road-based. **Table 5.5** shows how this compares to the Savills estimate from **Step 2**.

Table 5.5 Comparing Demand Estimates over 22-year plan period

	Sqft	Ha
Savills (B8 9k sqm+)	67,161,100	1,783
GL Hearn (B8 9k sqm+)	28,992,100	902

Source: CoStar, GL Hearn, Savills

5.3.5 In summary, a direct comparison using the Savills methodology results in future demand estimates for strategic B8 land across the FEMA being almost double that estimated by GL Hearn.

Future I&L demand within NWL

5.3.6 As we discussed in **Section 3**, the numerous regional and local employment studies do not operate as a consolidated set and therefore it is difficult to understand what is being recommended for each local authority in the FEMA including NWL.

5.3.7 Within this section we seek to apportion the Savills FEMA wide demand estimate to NWL. This can be

⁴⁷ Differences due to rounding

done in a number of different ways as follows:

- Based on NWL’s current proportion of I&L inventory across the FEMA;
- Based on NWL’s historic proportion of average demand (net absorption) between 2011 and 2021; or
- Based on NWL’s historic proportion of average net deliveries of new I&L floorspace between 2011 and 2021.

5.3.8 The results of this comparison are detailed in **Table 5.6** below. Inventory gives the lowest metric at a 24% share while demand (net absorption) and new supply (net deliveries) are higher at 49% and 59% respectively. Net absorption is considered the most representative of current day trends around NWL being a core I&L market. This metric also broadly aligns with NWL Reg 18 Options document to take 50% of the FEMA’s road-served demand over the plan period (Para 6.31, p.44).

Table 5.6 NWL I&L market share of FEMA

	NWL % of FEMA	NWL Floorspace Demand (sqft)	NWL Land Requirements
Inventory (2022)	24%	22,100,600	587
Avg. Net Absorption (2011-2021)	49%	45,459,300	1,207
Avg. Net Deliveries (2011-2021)	59%	55,028,400	1,461

Source: CoStar, Savills

5.3.9 Based on the above it is useful to consider a range between 24% based on inventory and 49% based on net absorption. This translates to a floorspace requirement for NWL of between 22.1 million sqft (1 million sqft p.a.) and 45.5 million sqft (2.1 million sqft p.a) and a land requirement of between 587 ha and 1,207 ha over a 22-year plan period as summarised below.

5.3.10 However, we appreciate the upper band based on net absorption generates a large number at 1,207 ha. The final land amount NWL should plan for within this range will depend on developable land capacity in NWL and ‘Duty to Cooperate’ discussions with the other local authorities in the FEMA.

Table 5.7 Apportioning Savills Demand to NWL over 22-year plan period

	NWL %	Sqft	HA
Lower Bound	24%	22,100,600	587
Upper Bound	49%	45,459,300	1,207

Source: CoStar, Savills

Savills Estimate vs Stantec & GL Hearn Combined

5.3.11 Finally we consider it useful to compare the Savills estimate for NWL to what the Stantec and GL Hearn studies combined could potentially estimate for NWL under the same apportionment assumptions we have used above (ie 24% and 49% share for NWL).

5.3.12 As discussed in **Section 3**, a major failing of the various employment evidence studies is that they use different timeframes, different estimation methodologies, focus on different segments of the market and ultimately don’t provide a future demand estimate for the FEMA’s I&L market overall or for each respective local authority. We also note yet another study for the FEMA is due to be published in the Spring which many address some of these issues. We hope this report can inform this study and aid meaningful discussions with the Council and their economic advisor.

5.3.13 **Table 5.8** below compares Savills I&L demand estimate with the Stantec (taken forward in the Options document) and GL Hearn studies combined. The Options document, which covered non-strategic land, estimated a total land demand of 71.6 ha over the plan period. We know that the GL Hearn study, which covered strategic B8, only provides a FEMA wide estimate not specific to individual local authorities. To address this we apply the 24% and 49% apportionment assumption we used for the Savills estimates above. The results of this comparison indicate NWL's current evidence base underestimates demand by between 302 to 696ha over the 22 year plan period depending on how much strategic B8 demand across the wider FEMA is apportioned to NWL. Obviously the final strategic B8 apportionment to NWL will be the result of 'Duty to Cooperate' discussions between the FEMA authorities.

Table 5.8 Evidence Base Difference from Savills Estimates (ha)

Assumed NWL %	Strategic B8 (GL Hearn)	Non-strategic (Options)	Total Evidence Base	Savills Estimate	Difference from Savills
24%	213	71.6	285	587	- 302
49%	439	71.6	511	1,207	- 696

Source: CoStar, GL Hearn, Savills

6 Summary & Recommendations

- 6.1.1 The I&L sector is booming nationally. Even before the pandemic the I&L market had been growing strongly with demand outstripping supply. The Covid Pandemic has merely accelerated a number of growth drivers that were already in place such as online shopping and the desire for quick deliveries. Brexit too is increasing I&L demand as companies consider bringing part of their operations back to the UK to guard against future supply chain shocks, as well as increasing their inventory levels. Significant growth is also forecast across all freight modes (which could be increased further by the Government's Freeport programme, which includes East Midlands Freeport).
- 6.1.2 The latest figures from Savills Big Shed Briefing indicate demand (gross) is currently **86% above the long term average**⁴⁸, while vacancy is the lowest on record at only 2.91%. Similar to the national picture, demand in East Midlands was **113% above the long term average** in 2021, the highest on record⁴⁹, with vacancy at an historical low of 1.69% (the lowest rate nationally). Take-up in the East Midlands is driven by NWL and its wider FEMA clearly cementing it as one the most important I&L markets in the country.
- 6.1.3 Despite this strength of demand, the local and regional employment studies that inform the NWL emerging local plan have underestimated future floorspace and land needs. While these studies acknowledge demand has been outstripping supply, their future estimation methods fail to take into account demand that has been lost due to the lack of available supply. The GL Hearn study applies an interesting methodology looking at freight flows, however this approach estimates a lower future floorspace need than historic completion trends. This appears completely at odds with the above market realities of the highest demand on record.
- 6.1.4 Given the struggles being faced by the office and retail sectors, I&L is likely to be the major generator of jobs for many local economies. As we have evidenced average pay levels within the sector are nearly £5k per annum higher than the UK average. The diversity of occupations has also been increasing which will enable the sector to play a key role in re-employing people that have lost jobs in other sectors as a result of the Covid pandemic. This is highly relevant for NWL and its wider FEMA where the claimant count⁵⁰ is around 60% higher than the level recorded before the pandemic as of January 2022. Should not enough I&L land be allocated into the future, and subsequently the historic supply constraints continue, I&L demand will remain 'suppressed' as will the jobs and wider economic contribution the sector can make to local and regional economies.
- 6.1.5 As a collective, the current local and regional evidence base studies that support the emerging local plan are disjointed in that they use different estimation methodologies, cover different segments of the market and fail to recommend future I&L demand at the local authority level across both strategic and non-strategic-scale units. In addition the various studies present a number of methodological issues, which in our view, has led them to underestimate future I&L demand. For instance:
- The HEDNA prepared by GL Hearn in 2017 for the FEMA uses past completions as its preferred employment needs methodology for I&L premises below 9,000 sqm. Completions are a supply measure, not a demand measure, dependent on local plans to allocate new land for I&L

⁴⁸ Savills Research (2022) Big Shed Briefing (January 2022) Available at: https://www.savills.co.uk/research_articles/229130/323880-0

⁴⁹ Savills Research (2022) Big Shed Briefing – The Logistics Market in the East Midlands. Available at: https://www.savills.co.uk/research_articles/229130/323892-0

⁵⁰ The number of people claiming benefit principally for the reason of being unemployed

development. As we have evidenced supply (net deliveries) has lagged demand (net absorption) by a considerable margin throughout the FEMA indicating this methodology as flawed.

- The Stantec study for non-strategic industrial land within NWL uses GVA outputs to estimate future demand. However the study notes the limitation of this approach given that it does not take account of historic supply constraints. As we have evidenced, the wider FEMA and NWL especially, have been supply constrained since 2013 and 2014 respectively.
- The GL Hearn study focuses on larger scale B8 demand at the FEMA level and in doing so, doesn't account for strategic B2 demand. While B8 occupiers are undoubtedly driving demand for larger sheds, B2 occupiers still represent around 5% based on take-up⁵¹. Given they desire the same sorts of locations and shed specifications as logistics occupiers, to ignore their future needs is a key omission. Another methodological issue is the estimates for rail-served demand are considered too aspirational and unrealistic, while demand for road-served sites is underestimated and air freight and LGV traffic appear to be ignored. Combined, these methodological issues have led to the Study's preferred estimation method showing less floorspace demand compared to the past completions trends. As we have discussed, the past completions trends is not a true measure of demand given this a supply measure and supply has lagged demand historically.

6.1.6 The Savills approach to estimate future demand is aimed at addressing the above methodological issues by focusing directly on market trends rather than secondary factors. Our methodology is NPPG-compliant as it builds upon historic demand (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up. We also factor in future e-commerce growth which is a key growth driver for the sector.

6.1.7 Based on Savills demand methodology, over a 22 year plan period, we estimate FEMA wide I&L demand to be 2,479 ha of land. Savills' FEMA-wide demand estimate can be apportioned to NWL in a number of different ways:

- Based on NWL's current proportion of I&L inventory across the FEMA;
- Based on NWL's historic proportion of average demand (net absorption) between 2011 and 2021; or
- Based on NWL's historic proportion of average net deliveries of new I&L floorspace between 2011 and 2021

6.1.8 Inventory gives the lowest metric at a 24% share while demand (net absorption) and new supply (net deliveries) are higher at 49% and 59% respectively. Net absorption is considered the most representative of current day trends around NWL being a core I&L market. This metric also broadly aligns with NWL's Options document to take 50% of the FEMA's road-served demand over the plan period (Para 6.31, p.44).

6.1.9 It is useful to consider a range between 24% based on inventory and 49% based on net absorption. Therefore, NWL should look to plan for between **587 ha to 1,207 ha** of I&L land over this period. We appreciate the upper band based net absorption generates a large number at 1,207 ha. The final land amount NWL should plan for within this range will depend on developable land capacity in NWL and

⁵¹ 2017-2021

'Duty to Cooperate' discussions with the other local authorities in the FEMA.

- 6.1.10 Based on the Savills estimates, we believe the GL Hearn and Stantec studies combined have underestimated future I&L demand for NWL of between 302 to 696ha over the 22 year plan period depending on how much strategic B8 demand across the wider FEMA is apportioned to NWL.

Appendix A – East Midlands Market Equilibrium

Year & Quarter	Real Rent £/sq.ft	Rental Growth Q-o-Q	Availability Rate
2021 Q4	£6.47	0.9%	3.1%
2021 Q3	£6.41	0.8%	3.4%
2021 Q2	£6.36	0.5%	4.2%
2021 Q1	£6.33	1.8%	4.7%
2020 Q4	£6.22	1.3%	5.2%
2020 Q3	£6.14	0.8%	5.4%
2020 Q2	£6.09	1.2%	5.4%
2020 Q1	£6.02	1.3%	4.9%
2019 Q4	£5.94	1.4%	4.3%
2019 Q3	£5.86	1.0%	3.7%
2019 Q2	£5.80	0.5%	3.5%
2019 Q1	£5.77	1.8%	3.8%
2018 Q4	£5.67	0.9%	3.8%
2018 Q3	£5.62	0.5%	3.8%
2018 Q2	£5.59	1.1%	4.3%
2018 Q1	£5.53	1.5%	4.4%
2017 Q4	£5.45	1.1%	4.7%
2017 Q3	£5.39	0.7%	4.4%
2017 Q2	£5.35	0.4%	4.5%
2017 Q1	£5.33	1.1%	3.9%
2016 Q4	£5.27	0.6%	4.2%
2016 Q3	£5.24	0.6%	5.0%
2016 Q2	£5.21	0.8%	4.9%
2016 Q1	£5.17	1.6%	4.4%
2015 Q4	£5.09	1.2%	4.3%
2015 Q3	£5.03	0.8%	4.4%
2015 Q2	£4.99	0.2%	4.4%
2015 Q1	£4.98	2.0%	4.9%
2014 Q4	£4.88	0.6%	5.0%
2014 Q3	£4.85	0.4%	5.7%
2014 Q2	£4.83	0.2%	7.1%
2014 Q1	£4.82	0.6%	7.8%
2013 Q4	£4.79	0.0%	8.0%
2013 Q3	£4.79	0.4%	8.5%
2013 Q2	£4.77	-1.0%	9.0%
2013 Q1	£4.82	0.2%	9.3%
2012 Q4	£4.81	-1.2%	9.9%
2012 Q3	£4.87	-0.2%	10.4%
2012 Q2	£4.88	-0.6%	10.8%
2012 Q1	£4.91	-0.2%	10.9%
2011 Q4	£4.92	-1.4%	10.6%
2011 Q3	£4.99	-0.6%	10.1%
2011 Q2	£5.02	-1.4%	9.9%
2011 Q1	£5.09	-1.4%	9.9%

Source: Costar, Savills

North West Leicestershire Local Plan Representation on Development Strategy Options & Policy Options

On behalf of Western Range.

Date: 11 March 2022 | Pegasus Ref: EMS.2774

Author: Guy Longley





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1. Introduction

- 1.1. These representations have been submitted by Pegasus Group on behalf of Western Range, in response to the Development Strategy and Policy Options consultation.
- 1.2. Our clients wish to make a number of comments on the emerging development strategy, particularly in relation to the options for the future scale and location of housing development. We also comment on the proposed approach to policies relating to housing matters and renewables and low carbon.
- 1.3. These representations are made in relation to our clients' interests at Land at Church Lane, Whitwick.
- 1.4. Our clients have previously engaged in the preparation of the plan including a submission to the Call for Sites. For completeness we have included at Appendix 2 details of our client's land interests that could deliver 36 homes as part of a suitable and sustainable development to help meet the Council's future housing requirements.
- 1.5. The following sections respond to the relevant questions in the Options consultation.

2. Representations

- 2.1. The following sections set out our representations in relation to specific topic areas and proposed policies set out in the consultation document.

3. Settlement Hierarchy

Q2 – Do you agree with the proposed settlement hierarchy? If not, why not?

Q3 – Do you agree with the approach to Local Housing Needs Villages? If not, why not

- 3.1. The Options Paper sets out a revised settlement hierarchy, proposing amendments to the current hierarchy to rename Small Villages as Local Housing Needs Villages and Hamlets as Other Villages/Settlements and some adjustments to villages falling within the lower levels of the hierarchy.
- 3.2. Coalville Urban Area including Whitwick continues to be identified as the Principal Town and most sustainable location in the District and this is supported.
- 3.3. The Settlement Study, 2021 sets out the findings of the review of the proposed settlement hierarchy. This shows that the Coalville Urban Area performs best against the assessment criteria set out relating to the availability of convenience stores, access to education, employment, public transport accessibility and services and facilities scores.

4. Development Strategy Options for Housing

How Much Housing Should be Provided For?

Q4 –Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 4.1. The Options Paper explains that a number of options in relation to the scale of housing provision have been developed including;
- 368 dwellings a year as a 'low scenario' based on the standard method;
 - 448 dwellings a year based on HEDNA, 2017 as a 'medium scenario';
 - 512 dwellings a year taken from the Leicester and Leicestershire Strategy Growth Plan as a 'high 1 scenario';
 - 730 dwellings a year based on the 2018 household projections as a 'high 2 scenario'.
- 4.2. The Paper sets out an assessment of these options and concludes that the high 1 and high 2 scenarios cover the most likely future requirement until such time as the issue of Leicester's unmet needs and its distribution is resolved. The 'high 1 scenario' would require some additional 1,000 dwellings to be allocated and the 'high 2 scenario' and additional 5,100 dwellings.
- 4.3. The key issue for North West Leicestershire and other authorities within the HMA is the issue of Leicester's unmet needs and reaching an agreement on its distribution. The anticipated scale of

the unmet need at some 18,000 dwellings is significant and will have serious implications for authorities in preparing sound Local Plans. There remains an urgent need for the constituent authorities to reach an agreement on the distribution of unmet needs.

- 4.4. In addition to the issue of Leicester's unmet needs, the Council should also plan for a degree of flexibility in the plan to allow for changes in circumstances and the failure of components of supply to deliver the expected numbers of homes. The Local Plans Expert Group report, 2016 continues to provide a useful and relevant baseline in identifying the level of flexibility local planning authorities should look to build into their plans. The Report recommended a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. Locally an example of flexibility provision in a plan is the Harborough Local Plan where a 15% contingency over and above their minimum housing requirement was included. The Local Plan Inspector specifically commented that this was to provide resilience and was not to be regarded as the Council's contribution to meeting Leicester's unmet needs.
- 4.5. On this basis the 'high1 scenario' is not likely to make sufficient provision to provide for a component of Leicester's unmet needs and provide sufficient flexibility to deal with uncertainty. In taking forward the plan the Council should plan for a minimum provision of 11,700 dwellings or 615 dwellings a year, requiring a residual provision of at least 2,900 dwellings. The 'high 2 scenario' is considered to represent a much more robust basis for taking the plan forward pending the HMA authorities agreement on the distribution of Leicester's unmet needs.

Where Should New Housing be Located?

Q5 Do you agree with the proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 4.6. In terms of the spatial options for the distribution of housing growth, the Options Paper considers 9 spatial options reflecting the proposed settlement hierarchy and also including a New Settlement option reflecting landowner promotion of land to the south of East Midlands Airport to provide a 4,740 home new settlement.
- 4.7. The nine options are combined with the alternative scales of growth to provide 16 options that have been assessed through the Sustainability Appraisal.
- 4.8. The overall conclusion of the Options Paper is that the following two options should be taken forward for further consideration.
- 4.9. Extract from Options Paper

Table 6 - options to be taken forward

Option	Description
High 1 scenario (1,000 dwellings)	
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
High 2 scenario (5,100 dwellings)	
Option7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

- 4.10. In preparing plans local planning authorities are required to ensure that their plans are sound, including that they are justified, with an appropriate strategy taking into account reasonable alternatives based on proportionate evidence (para 35 b). The range of options selected appear to present a range of alternative development scenarios that reflect range of reasonable alternatives.
- 4.11. To ensure the delivery of the identified housing requirement, it is important that the plan provides for a suitable mix of sites in terms of both location and size to support the effective delivery of housing, particularly if the strategy is likely to include a new settlement option. Experience in Leicestershire in relation to the delivery of strategic sites is that they tend to have long lead in times and this needs to be considered in preparing a robust housing trajectory for the plan. The proposed strategy therefore needs to consider the provision of a range and mix of sites to ensure delivery in the early part of the plan period.
- 4.12. Under the 'high 1 scenario' the Options Paper discounts options 4a to 9a as they involve a new settlement option but at a scale too small to be likely to be viable. Paragraph 4.35 of the Options Paper concludes that given the greater opportunity afforded by Option 3a for growth in villages, only this option should be taken forward.
- 4.13. For the 'high 2 scenario', which provides for a more appropriate scale of housing growth, Option 7b is proposed to be taken forward. Along with development directed towards the Coalville area as the Principal Town and a New Settlement, this option provides for new housing in Key Service Centres, Local Service Centres and Sustainable Villages. This approach to the spatial distribution of housing is supported as it allows for the allocation of a range of sites of different sizes in a range of locations, helping to provide a strategy that should ensure the delivery of housing in the early part of the plan period.
- 4.14. In terms of Western Range's land interests at the Land at Church Lane, Whitwick, this site provides a suitable site for allocation as part of this spatial strategy to help deliver housing over the plan period. Details of the site are included at Appendix 2.
- 4.15. The site lies to the south of Whitwick forming part of the Coalville Urban Area and is well related to the existing settlement form and within walking distance of the range of services and facilities available in the settlement.
- 4.16. The site offers the opportunity to provide approximately 36 high quality homes, including affordable homes. The site is well located to offer sustainable development on a site which can be delivered without any significant adverse impacts.

5. Housing

Self-Build and Custom Housing

Q6 Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?

- 5.1. The suggested policy for self-build and custom housing is to seek the provision of land for self-build and custom housing on sites capable of providing 50 or more dwellings, where there is evidence of demand and where servicing and site arrangements can be made suitable and

attractive.

- 5.2. The proposed policy to seek self-build and custom-build plots on developments of 50 units or more where there is a proven need, is not supported. Inspectors have rejected proposed policies in other plans that sought to require a specific percentage of self-build on allocated sites (see Blaby Part 2 Local Plan Inspector's report). That approach ignores the clear issues over the delivery of self-build plots as part of larger market housing sites.
- 5.3. This policy approach will not boost the housing supply and creates practical issues that should be given careful consideration. It is essential that consideration is given to health and safety implications, working hours, length of build programme and therefore associated long-term gaps in the street-scene caused by stalled projects. There is the potential for unsold plots and the timescale for reversion of these plots to the original housebuilder creates practical difficulties in terms of co-ordinating construction activity on the wider site.
- 5.4. The Plan should support the delivery of self-build housing and encourage provision on strategic sites, recognising the potential difficulties and the need for robust evidence of need.

Space Standards

Q7 Do you agree with the proposed policy for Space Standards? If not why not?

- 5.5. The Options Paper sets out an assessment of options for including a policy relating to Nationally Described Space Standards in the plan, concluding that it would be appropriate to include a policy requiring all new residential developments to meet Nationally Described Space Standards as a minimum. The Paper notes that the impact of the standards on viability will need to be assessed through the Local Plan Viability Assessment before publication of the Regulation 19 plan.
- 5.6. The Planning Practice Guidance is clear that local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting policies in their local plans and that local planning authorities should consider the impact of using the standards as part of the Local Plan viability assessment, considering need, viability and timing.
- 5.7. The Council's limited evidence to date, an assessment of a sample of residential applications since 2015, would suggest that the majority of developments exceed the Nationally Described Space Standards. The Options Paper recognises that further evidence and testing will be required, including the Local Plan Viability Assessment to be prepared prior to the publication of the Regulation 19 version of the plan.
- 5.8. There is a clear risk that the proposed inflexible policy approach to this issue will impact on affordability and affect customer choice. Smaller dwellings have always played a valuable role in meeting specific needs for both market and affordable housing.
- 5.9. If sufficient evidence is presented to justify the proposed policy approach, the Council will need to include transitional arrangements so that the provisions are not applied to any outline, detailed or reserved matters applications or approvals prior to a specified date.

Accessible and Adaptable Housing

Q8 – Do you agree with the proposed policy on accessible and adaptable housing? If not why not?

Q9 – Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?

- 5.10. The Options Paper presents the preferred policy approach to accessible and adaptable housing, proposing that all new build residential developments will be required to meet at least part M4(2) standards of the Building Regulations, regardless of the size of the site. In addition, the proposed policy would require 5% of all new affordable dwellings to meet Part M4(3)(b).
- 5.11. Paragraph 16f of the NPPF advises that Local Plans should avoid unnecessary duplication. If the Government implements proposed changes to Part M of the Building Regulations, the Council's proposed approach would represent an unnecessary duplication of Building Regulations and is not supported.
- 5.12. If the Council wishes to adopt the optional standards for accessible and adaptable dwellings, sufficient robust evidence would need to be presented to justify this approach in accordance with paragraphs 31 and 130f of the NPPF, and the Planning Practice Guidance which outlines the evidence necessary to justify a policy requirement for optional standards.
- 5.13. It should be noted that many older people living in the district are unlikely to move home. The HBF in its submission points to research by Savills that shows that over 60s households are less inclined to buy a new home than a second-hand one. Given the size of the Council's existing stock, the Council should recognise that adaptation of existing stock is a key issue that would result in more positive outcomes than solely focusing on new build.
- 5.14. Any proposed policy should be considered as part of the Local Plan Viability Assessment to ensure that any proposed approach does not compromise viability of development.
- 5.15. It is important to note that the Planning Practice Guidance is clear that site specific factors that may make a site less suitable for M4(2) and M4(3) dwellings should be taken into account, and where step-free access is not viable, neither optional requirements in Part M should be applied.
- 5.16. In terms of Part M4(3) (a), this requirement should not be applied to market housing. The requirement for Part M4(3) should only be required for dwellings over which the Council has housing nomination rights, as outlined in the Planning Practice Guidance.

Health Impact Assessment Policy Options

Q17 – Do you agree with the proposed Health Impact Assessment policy? If not, why not?

Q18 – Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?

- 5.17. The Options Paper sets out a proposed policy on Health Impact Assessments where Health Impact Screening Statements must be undertaken on various development types, including residential development proposals of 30 dwellings or more, or residential sites with an area of 1 ha or more. Paragraph 8.21 of the Options Paper explains the proposed threshold for residential development on the basis that it does not apply to small and medium sized builders, defined as having a turnover of up to £45m, although the latter criteria is not referenced in the suggested policy.
- 5.18. The evidence to support the suggested threshold of 30 dwellings is not clear. If the intention is

to not place a burden on medium housebuilders, this low threshold is likely to catch a number of developments medium housebuilders are involved in. In the absence of clear evidence to justify a lower threshold, it is considered that a threshold of 100 dwellings or 2.5 hectares would be reasonable.

- 5.19. It is not appropriate that, having set a threshold, the policy should introduce an arbitrary category allowing the Council to require Screening Statements in other unspecified instances. The policy should clearly set out the criteria and thresholds where Screening Statements would be required so that there is clarity and transparency for all parties.

Energy Efficiency

Q20 – Do you agree with the preferred policy approach for energy efficiency? If not, why not?

- 5.20. The Options Paper sets out one proposed policy covering a number of aspects relating to the reduction of carbon emissions to contribute to the Council's aim for a carbon neutral district by 2050. Bullet 1 of the policy requires all development to follow a sequential energy hierarchy prioritising fabric first and achieving 31% reduction in regulated CO2 emissions.
- 5.21. The proposed policy is not support. The policy is not necessary as it repeats the Building Regulations 2021 Part L Interim Uplift. The Government's intention is clear to set standards for energy efficiency through Building Regulations. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal due to the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.

Overheating

Q22 – Do you agree with the preferred policy approach for overheating? If not, why not?

- 5.22. The Options Paper Option sets out a preferred option for a policy to require major developments to address overheating through an industry recognised assessment and minor developments to use a simple checklist to demonstrate that the risk of overheating has been considered.
- 5.23. This approach of having a simple checklist in place to demonstrate that risk of overheating has been considered as part of the house design appears reasonable and is supported.

Water Efficiency

Q25 – Do you agree with the proposed policy for water efficiency standards? If not, why not?

- 5.24. The proposed policy for water efficiency standards requires all proposals for new residential development to achieve the national water efficiency standard of a maximum of 110 litres of water per person per day.
- 5.25. The proposed policy for water efficiency standards is supported. Davidsons already design our homes to achieve a maximum of 110 litres of water per person per day.

Appendix 1 – Consultation Form Details



DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

January 2022

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-

Part A – Personal details

Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

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, 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	Guy
Last Name	Longley
[Job Title]	Executive Director
[Organisation]	Western Range
Address Line 1	██████████
Address Line 2	██████████
Address Line 3	██████████
Address Line 4	██████████
Postcode	██████████
Telephone	██████████
Email address	██



If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?	Yes	<input type="checkbox"/>
	No	<input type="checkbox"/>

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 understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

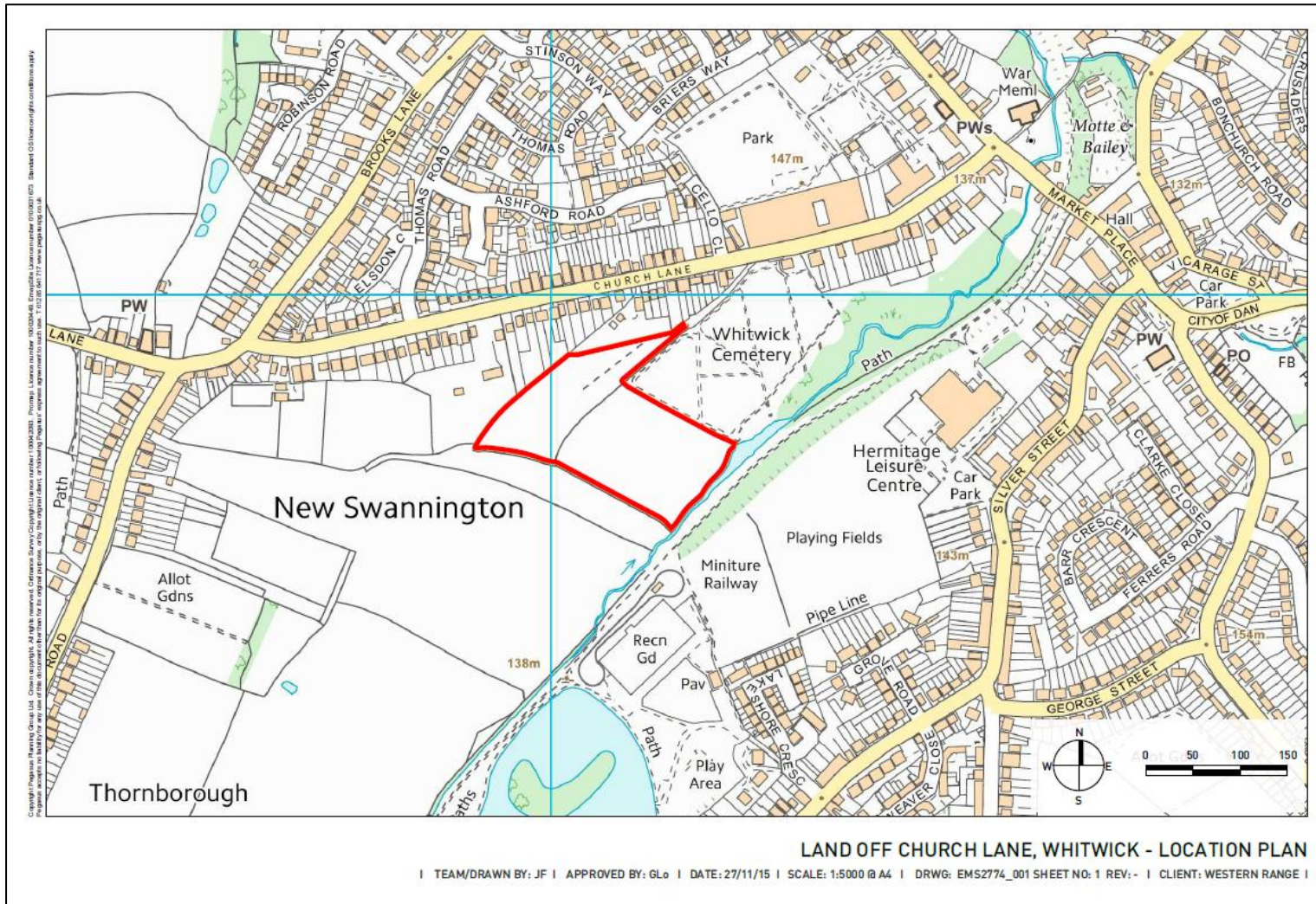
Signed	<input type="text" value="p.p. [Redacted]"/>	Date	<input type="text" value="11/03/22"/>
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Please send completed forms to planning.policy@nwleicestershire.gov.uk or
Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Monday 28 February 2022 (updated to 14/03/22)

<p>DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT</p> <p>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 publically 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 publically available.</p> <p>You should not include any personal information in your comments that you would not wish to be made publically available.</p> <p>Further information about the Council's privacy policy and how we collect, store and use your personal data can be found here.</p> <p>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.</p>
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Appendix 2 – Land at Church Lane, Whitwick Site Location Plan



North West Leicestershire Local Plan Representation on Development Strategy Options & Policy Options

On behalf of Western Range.

Date: 11 March 2022 | Pegasus Ref: EMS.2774

Author: Guy Longley





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1. Introduction

- 1.1. These representations have been submitted by Pegasus Group on behalf of Western Range, in response to the Development Strategy and Policy Options consultation.
- 1.2. Our clients wish to make a number of comments on the emerging development strategy, particularly in relation to the options for the future scale and location of housing development. We also comment on the proposed approach to policies relating to housing matters and renewables and low carbon.
- 1.3. These representations are made in relation to our clients' interests Land at Chapel Street, Donisthorpe.
- 1.4. Our clients have previously engaged in the preparation of the plan including a submission to the Call for Sites. For completeness we have included at Appendix 2 details of our client's land interests, SHLAA reference D2.
- 1.5. The following sections respond to the relevant questions in the Options consultation.

2. Representations

- 2.1. The following sections set out our representations in relation to specific topic areas and proposed policies set out in the consultation document.

3. Settlement Hierarchy

Q2 – Do you agree with the proposed settlement hierarchy? If not, why not?

Q3 – Do you agree with the approach to Local Housing Needs Villages? If not, why not

- 3.1. The Options Paper sets out a revised settlement hierarchy, proposing amendments to the current hierarchy to rename Small Villages as Local Housing Needs Villages and Hamlets as Other Villages/Settlements and some adjustments to villages falling within the lower levels of the hierarchy.
- 3.2. The Settlement Study, 2021 sets out the findings of the review of the proposed settlement hierarchy. Donisthorpe is proposed to continue to be identified as a Sustainable Village and the study identifies it as one of the more sustainable settlements within this level of the hierarchy. There are opportunities for small scale growth to help support services and facilities in the settlement.
 - 3.3. The continued identification of Donisthorpe as a Sustainable Village is supported.
 - 3.4. Donisthorpe benefits from a convenience shop, primary school, locally accessible employment, public transport provision and range of other services and facilities including a post office, pub, church, formal and informal recreational facilities. The relative sustainability of this settlement compared to other settlements within this level of the hierarchy should be recognised in the process of identifying the most sustainable locations for future development.
 - 3.5. The land in Western Range's control offers opportunities for sustainable development to help meet future housing needs through the provision of a range and choice of sites.

4. Development Strategy Options for Housing

How Much Housing Should be Provided For?

Q4 –Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 4.1. The Options Paper explains that a number of options in relation to the scale of housing provision have been developed including;
- 368 dwellings a year as a 'low scenario' based on the standard method;
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 - 730 dwellings a year based on the 2018 household projections as a 'high 2 scenario'.
- 4.2. The Paper sets out an assessment of these options and concludes that the high 1 and high 2 scenarios cover the most likely future requirement until such time as the issue of Leicester's unmet needs and its distribution is resolved. The 'high 1 scenario' would require some additional 1,000 dwellings to be allocated and the 'high 2 scenario' and additional 5,100 dwellings.
- 4.3. The key issue for North West Leicestershire and other authorities within the HMA is the issue of Leicester's unmet needs and reaching an agreement on its distribution. The anticipated scale of the unmet need at some 18,000 dwellings is significant and will have serious implications for authorities in preparing sound Local Plans. There remains an urgent need for the constituent authorities to reach an agreement on the distribution of unmet needs.
- 4.4. In addition to the issue of Leicester's unmet needs, the Council should also plan for a degree of flexibility in the plan to allow for changes in circumstances and the failure of components of supply to deliver the expected numbers of homes. The Local Plans Expert Group report, 2016 continues to provide a useful and relevant baseline in identifying the level of flexibility local planning authorities should look to build into their plans. The Report recommended a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. Locally an example of flexibility provision in a plan is the Harborough Local Plan where a 15% contingency over and above their minimum housing requirement was included. The Local Plan Inspector specifically commented that this was to provide resilience and was not to be regarded as the Council's contribution to meeting Leicester's unmet needs.
- 4.5. On this basis the 'high1 scenario' is not likely to make sufficient provision to provide for a component of Leicester's unmet needs and provide sufficient flexibility to deal with uncertainty. In taking forward the plan the Council should plan for a minimum provision of 11,700 dwellings or 615 dwellings a year, requiring a residual provision of at least 2,900 dwellings. The 'high 2 scenario' is considered to represent a much more robust basis for taking the plan forward pending the HMA authorities agreement on the distribution of Leicester's unmet needs.

Where Should New Housing be Located?

Q5 Do you agree with the proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 4.6. The proposed Option 7b for the high 2 growth strategy is supported, however this option should be adjusted to reduce the reliance on Coalville Urban Area and increase the scale of housing proposed in the other sustainable settlements, to take account of sustainable opportunities available that could support housing delivery over the plan period.
- 4.7. In terms of the spatial options for the distribution of housing growth, the Options Paper considers 9 spatial options reflecting the proposed settlement hierarchy and also including a New Settlement option reflecting landowner promotion of land to the south of East Midlands Airport to provide a 4,740 home new settlement.
- 4.8. The nine options are combined with the alternative scales of growth to provide 16 options that have been assessed through the Sustainability Appraisal.
- 4.9. The overall conclusion of the Options Paper is that the following two options should be taken forward for further consideration.
- 4.10. Extract from Options Paper

Table 6 - options to be taken forward

Option	Description
High 1 scenario (1,000 dwellings)	
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
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- 4.12. To ensure the delivery of the identified housing requirement, it is important that the plan provides for a suitable mix of sites in terms of both location and size to support the effective delivery of housing, particularly if the strategy is likely to include a new settlement option. Experience in Leicestershire in relation to the delivery of strategic sites is that they tend to have long lead in times and this needs to be considered in preparing a robust housing trajectory for the plan. The proposed strategy therefore needs to consider the provision of a range and mix of sites to ensure delivery in the early part of the plan period.
- 4.13. Under the 'high 1 scenario' the Options Paper discounts options 4a to 9a as they involve a new settlement option but at a scale too small to be likely to be viable. Paragraph 4.35 of the Options

Paper concludes that given the greater opportunity afforded by Option 3a for growth in villages, only this option should be taken forward. It is considered that directing growth to a range of settlements, including Sustainable Villages is a reasonable option that has not been explored under the high 1 scenario. This should be considered further as it provides for a more robust strategy, that would support delivery and ensure future housing needs in the Sustainable Villages are catered for.

- 4.14. For the 'high 2 scenario', which provides for a more appropriate scale of housing growth, Option 7b is proposed to be taken forward. Along with development directed towards the Coalville area as the Principal Town and a New Settlement, this option provides for new housing in Key Service Centres, Local Service Centres and Sustainable Villages. This approach to the spatial distribution of housing is supported as it allows for the allocation of a range of sites of different sizes in a range of locations, helping to provide a strategy that should ensure the delivery of housing in the early part of the plan period.
- 4.15. It is critical to the success of the Local Plan, that land availability, deliverability and opportunity to avoid significant negative impacts are also considered alongside the overall sustainability of individual settlements in distributing development.
- 4.16. The consultation document highlights significant doubts about the ability of the market to deliver a significant scale of growth in the Coalville Urban Area based on recent build rates and an understanding of the market interest there. Whilst development in the Coalville Urban Area will form an important part of the overall strategy, the constraints in this area will mean the scale of development proposed will need to be reduced and supported by a greater scale of development in the sustainable settlement like Donisthorpe to ensure the Council can maintain a five year supply.
- 4.17. Option 7b should be adjusted to reflect the evidence of land availability, suitability and achievability. The current figure of 1,785 homes should be reduced and the figure for the other sustainable settlements should be correspondingly increased. This would maintain the key aspects of Option 7b, which led to it being identified as the preferred option, whilst ensuring the Council can maintain a five year supply and meet housing needs.
- 4.18. It is also important that the relative sustainability of settlements within each tier of the hierarchy is considered, for example Donisthorpe should be considered in terms of sustainable locations ahead of other Sustainable Villages for the reasons set out under question 2.
- 4.19. In terms of Western Range's land interests at Land at Chapel Street, Donisthorpe, this site provides a suitable site for allocation as part of this spatial strategy to help deliver housing over the plan period. Details of the site are included at Appendix 2.
- 4.20. NPPF (paragraph 79) sets out that "Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services".
- 4.21. The site lies to the south east of Donisthorpe and provides the opportunity to deliver homes that are well related to the existing settlement form and within walking distance of the range of services and facilities available in the settlement including the village shop and primary school.
- 4.22. The site offers the opportunity to provide either a small extension of the village of 20 high quality homes, including affordable homes or there is the land available to deliver significantly more

homes. The latest SHLAA assessment of the site suggests a capacity of 205 homes, which has the potential to bring significant benefits to this community.

5. Housing

Self-Build and Custom Housing

Q6 Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?

- 5.1. The suggested policy for self-build and custom housing is to seek the provision of land for self-build and custom housing on sites capable of providing 50 or more dwellings, where there is evidence of demand and where servicing and site arrangements can be made suitable and attractive.
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Personal Details	Agent's Details (if applicable)
Title	Mr
First Name	Guy
Last Name	Longley
[Job Title]	Executive Director
[Organisation]	Western Range
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Address Line 2	██████████
Address Line 3	██████████
Address Line 4	██████████
Postcode	██████████
Telephone	██████████
Email address	██



If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

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 understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

Signed

 pp
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Date

11/03/22

Please send completed forms to planning.policy@nwleicestershire.gov.uk or Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Monday 28 February 2022 (updated to 14/03/22)

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

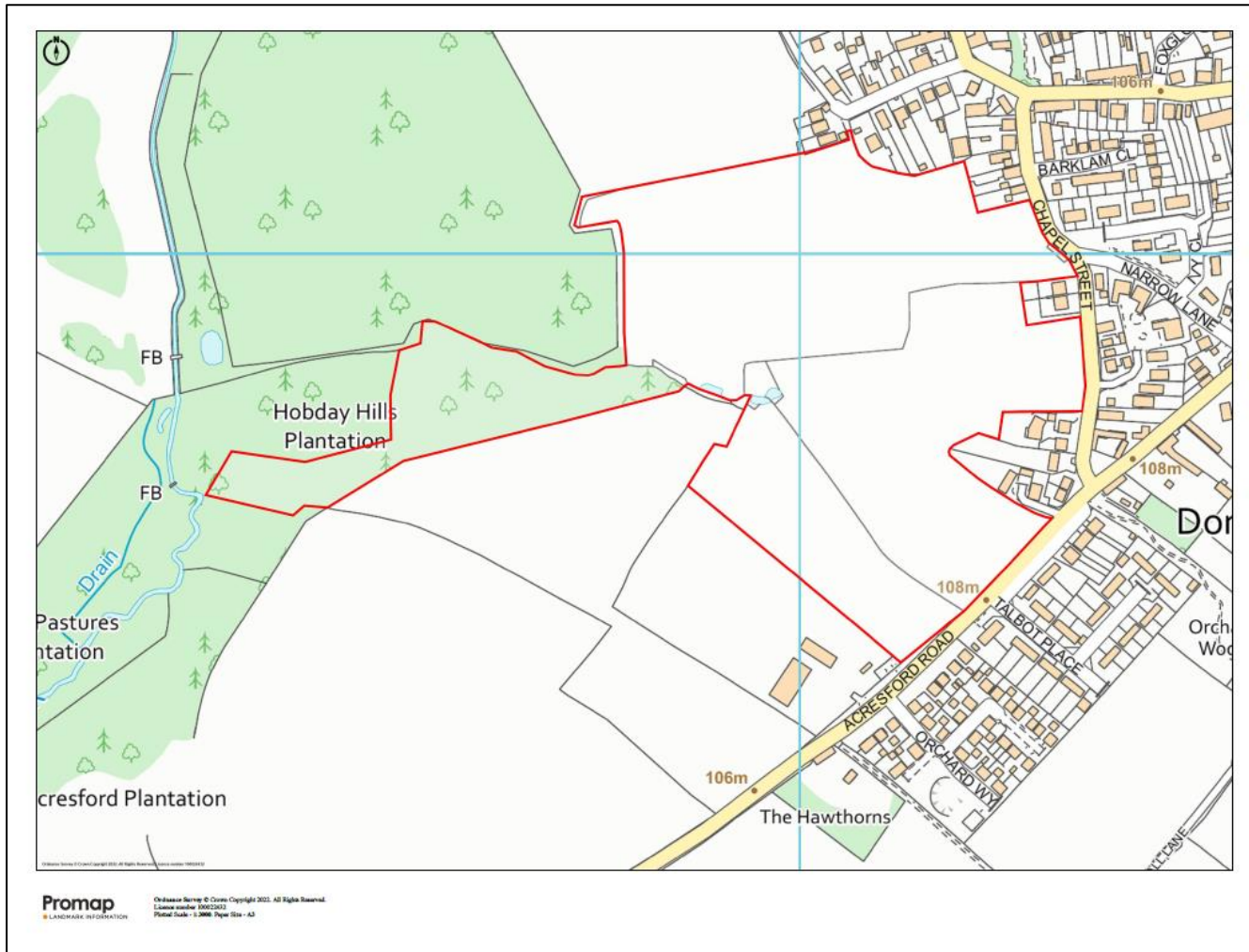
The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004, save for requests of such information required by way of enactment. Your name, organisation and representations will be made publically 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 publically available.

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

Further information about the Council's privacy policy and how we collect, store and use your personal data can be found [here](#).

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.

Appendix 2 – Land at Chapel Street, Donisthorpe Site Location Plan



Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

East Midlands

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North West Leicestershire Local Plan Representation on Development Strategy Options & Policy Options

On behalf of Davidsons.

Date: 11 March 2022 | Pegasus Ref: EMS.2774

Author: Guy Longley





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1. Introduction

- 1.1. These representations have been submitted by Pegasus Group on behalf of Davidsons Developments Limited, in response to the Development Strategy and Policy Options consultation.
- 1.2. Our clients wish to make a number of comments on the emerging development strategy, particularly in relation to the options for the future scale and location of housing development. We also comment on the proposed approach to policies relating to housing matters and renewables and low carbon.
- 1.3. These representations are made in relation to our clients' interests at Land off High Street, Ibstock.
- 1.4. Our clients have previously engaged in the preparation of the plan including a submission to the Call for Sites, SHLAA reference Ib20 Land to the rear of 111a High Street, Ibstock. For completeness we have included at Appendix 2 details of our client's land interests and a copy of the SHLAA proforma for the site at Appendix 3.
- 1.5. This site provides the opportunity to deliver 46 homes as part of a suitable and sustainable development to help meet the Council's future housing requirements. The site is technically unconstrained, achievable, and available for early delivery in the plan period as highlighted in the Council's SHLAA assessment (Appendix 3). It is located in the centre of one of the most sustainable settlements in the District with excellent accessibility to all the services and facilities in Ibstock. This site has already been identified as suitable location by the Council and allocated in the previous North West Leicestershire Local Plan (adopted 2002). The site didn't come forward due to issues with access, these issues have now been overcome with access secured by the landowner from the High Street.
- 1.6. The following sections respond to the relevant questions in the Options consultation.

2. Representations

- 2.1. The following sections set out our representations in relation to specific topic areas and proposed policies set out in the consultation document.

3. Settlement Hierarchy

Q2 – Do you agree with the proposed settlement hierarchy? If not, why not?

Q3 – Do you agree with the approach to Local Housing Needs Villages? If not, why not

- 3.1. The Options Paper sets out a revised settlement hierarchy, proposing amendments to the current hierarchy to rename Small Villages as Local Housing Needs Villages and Hamlets as Other Villages/Settlements and some adjustments to villages falling within the lower levels of the hierarchy.
- 3.2. Ibstock continues to be identified as one of three Local Service Centres, along with Kegworth and Measham, the third level of the hierarchy below the Principal Town of Coalville and the Key Service Centres of Ashby and Castle Donington.
- 3.3. The Settlement Study, 2021 sets out the findings of the review of the proposed settlement hierarchy. This shows that Ibstock performs well against the assessment criteria set out relating to the availability of convenience stores, access to education, employment, public transport accessibility and services and facilities scores. The settlement scores as well as the proposed Key Service Centres of Ashby de la Zouch and Castle Donington other than in relation to the numbers of convenience stores available. The settlement contrasts with the other Local Service Centres of Kegworth and Measham in having both primary schools and the Ibstock Academy.
- 3.4. Paragraph 5.6 refers to Ibstock not having full education provision but with Ibstock Community College catering for 11-14 years. However, under Project 24 – Age Range Changes, Ibstock Community College will transition to 11-16 years in August/September 2022. As a result, it will provide the same educational access as Castle Donington. With the provision of secondary education in the settlement, Ibstock is distinct from the other Local Service Centres of Kegworth and Measham.
- 3.5. The level of services in Ibstock, including educational provision, justify its inclusion as a Key Service Centre alongside Ashby de la Zouch and Castle Donington and the proposed settlement hierarchy should be amended accordingly.

4. Development Strategy Options for Housing

How Much Housing Should be Provided For?

Q4 –Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 4.1. The Options Paper explains that a number of options in relation to the scale of housing provision have been developed including:
 - 368 dwellings a year as a 'low scenario' based on the standard method;
 - 448 dwellings a year based on HEDNA, 2017 as a 'medium scenario';
 - 512 dwellings a year taken from the Leicester and Leicestershire Strategy Growth Plan as a 'high 1 scenario';
 - 730 dwellings a year based on the 2018 household projections as a 'high 2 scenario'.
- 4.2. The Paper sets out an assessment of these options and concludes that the high 1 and high 2 scenarios cover the most likely future requirement until such time as the issue of Leicester's unmet needs and its distribution is resolved. The 'high 1 scenario' would require some additional 1,000 dwellings to be allocated and the 'high 2 scenario' and additional 5,100 dwellings.
- 4.3. The key issue for North West Leicestershire and other authorities within the HMA is the issue of Leicester's unmet needs and reaching an agreement on its distribution. The anticipated scale of the unmet need at some 18,000 dwellings is significant and will have serious implications for authorities in preparing sound Local Plans. There remains an urgent need for the constituent authorities to reach an agreement on the distribution of unmet needs.
- 4.4. In addition to the issue of Leicester's unmet needs, the Council should also plan for a degree of flexibility in the plan to allow for changes in circumstances and the failure of components of supply to deliver the expected numbers of homes. The Local Plans Expert Group report, 2016 continues to provide a useful and relevant baseline in identifying the level of flexibility local planning authorities should look to build into their plans. The Report recommended a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. Locally an example of flexibility provision in a plan is the Harborough Local Plan where a 15% contingency over and above their minimum housing requirement was included. The Local Plan Inspector specifically commented that this was to provide resilience and was not to be regarded as the Council's contribution to meeting Leicester's unmet needs.
- 4.5. On this basis the 'high1 scenario' is not likely to make sufficient provision to provide for a component of Leicester's unmet needs and provide sufficient flexibility to deal with uncertainty. In taking forward the plan the Council should plan for a minimum provision of 11,700 dwellings or 615 dwellings a year, requiring a residual provision of at least 2,900 dwellings. The 'high 2 scenario' is considered to represent a much more robust basis for taking the plan forward pending the HMA authorities agreement on the distribution of Leicester's unmet needs.

Where Should New Housing be Located?

Q5 Do you agree with the proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

- 4.6. The proposed Option 7b for the high 2 growth strategy is supported, however this option should be adjusted to reduce the reliance on Coalville Urban Area and increase the scale of housing proposed in the other sustainable settlements, in particular Ibstock, to take account of sustainable opportunities which will support housing delivery over the plan period.
- 4.7. In terms of the spatial options for the distribution of housing growth, the Options Paper considers 9 spatial options reflecting the proposed settlement hierarchy and also including a New Settlement option reflecting landowner promotion of land to the south of East Midlands Airport to provide a 4,740 home new settlement.
- 4.8. The nine options are combined with the alternative scales of growth to provide 16 options that have been assessed through the Sustainability Appraisal.
- 4.9. The overall conclusion of the Options Paper is that the following two options should be taken forward for further consideration.
- 4.10. Extract from Options Paper

Table 6 - options to be taken forward

Option	Description
High 1 scenario (1,000 dwellings)	
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
High 2 scenario (5,100 dwellings)	
Option7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

- 4.11. In preparing plans local planning authorities are required to ensure that their plans are sound, including that they are justified, with an appropriate strategy taking into account reasonable alternatives based on proportionate evidence (para 35 b). The range of options selected appear to present a range of alternative development scenarios that reflect range of reasonable alternatives.
- 4.12. To ensure the delivery of the identified housing requirement, it is important that the plan provides for a suitable mix of sites in terms of both location and size to support the effective delivery of housing, particularly if the strategy is likely to include a new settlement option. Experience in Leicestershire in relation to the delivery of strategic sites is that they tend to have long lead in times and this needs to be considered in preparing a robust housing trajectory for the plan. The proposed strategy therefore needs to consider the provision of a range and mix of sites to ensure delivery in the early part of the plan period.
- 4.13. Under the 'high 1 scenario' the Options Paper discounts options 4a to 9a as they involve a new settlement option but at a scale too small to be likely to be viable. Paragraph 4.35 of the Options

Paper concludes that given the greater opportunity afforded by Option 3a for growth in villages, only this option should be taken forward.

- 4.14. For the 'high 2 scenario', which provides for a more appropriate scale of housing growth, Option 7b is proposed to be taken forward. Along with development directed towards the Coalville area as the Principal Town and a New Settlement, this option provides for new housing in Key Service Centres, Local Service Centres and Sustainable Villages. This approach to the spatial distribution of housing is supported as it allows for the allocation of a range of sites of different sizes in a range of locations, helping to provide a strategy that should ensure the delivery of housing in the early part of the plan period.
- 4.15. It is critical to the success of the Local Plan, that land availability, deliverability and opportunity to avoid significant negative impacts are also considered alongside the overall sustainability of individual settlements in distributing development.
- 4.16. The consultation document highlights significant doubts about the ability of the market to deliver a significant scale of growth in the Coalville Urban Area based on recent build rates and an understanding the market interest there. Whilst development in the Coalville Urban Area will form an important part of the overall strategy, the constraints in this area will mean the scale of development proposed here will need to be reduced and supported by greater scale of development in the sustainable service centres like Ibstock to ensure the Council can maintain a five year supply.
- 4.17. Option 7b should be adjusted to reflect the evidence of land availability, suitability and achievability. The current figure of 1,785 homes should be reduced and the figure for the other sustainable settlements should be correspondingly increased. This would maintain the key aspects of Option 7b, which led to it being identified as the preferred option, whilst ensuring the Council can maintain a five year supply and meet housing needs.
- 4.18. It is also important that the relative sustainability of settlements within each tier of the hierarchy is considered, for example Ibstock should be considered in terms of sustainable locations ahead of Measham and Kegworth for the reasons set out under question 2.
- 4.19. In terms of Davidsons land interests at the Land off High Street, Ibstock, this site provides a suitable site for allocation as part of this spatial strategy to help deliver housing over the plan period. Details of the site are included at Appendix 2.
- 4.20. The site lies to the south of Ibstock off the High Street, well related to the existing settlement form and within walking distance of the range of services and facilities available in the settlement. In our response to Question 2 we consider that Ibstock should be upgraded to a Key Service Centre, reflecting the range of key services and facilities available including both primary and secondary education.
- 4.21. The site offers the opportunity to provide 46 high quality homes, including affordable homes. The site is well located to deliver sustainable development on a site which can be delivered without any significant adverse impacts. Appendix 4 shows a concept masterplan for the site.

5. Housing

Self-Build and Custom Housing

Q6 Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?

- 5.1. The suggested policy for self-build and custom housing is to seek the provision of land for self-build and custom housing on sites capable of providing 50 or more dwellings, where there is evidence of demand and where servicing and site arrangements can be made suitable and attractive.
- 5.2. The proposed policy to seek self-build and custom-build plots on developments of 50 units or more where there is a proven need, is not supported. Inspectors have rejected proposed policies in other plans that sought to require a specific percentage of self-build on allocated sites (see Blaby Part 2 Local Plan Inspector's report). That approach ignores the clear issues over the delivery of self-build plots as part of larger market housing sites.
- 5.3. This policy approach will not boost the housing supply and creates practical issues that should be given careful consideration. It is essential that consideration is given to health and safety implications, working hours, length of build programme and therefore associated long-term gaps in the street-scene caused by stalled projects. There is the potential for unsold plots and the timescale for reversion of these plots to the original housebuilder creates practical difficulties in terms of co-ordinating construction activity on the wider site.
- 5.4. The Plan should support the delivery of self-build housing and encourage provision on strategic sites, recognising the potential difficulties and the need for robust evidence of need.

Space Standards

Q7 Do you agree with the proposed policy for Space Standards? If not why not?

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Last Name		Longley
[Job Title]		Executive Director
[Organisation]	Davidsons Development Limited	Pegasus Group
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Address Line 3	██████	██████
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Postcode	██████	██████
Telephone		██████████
Email address		██



If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

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 understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

Signed

p.p. 

Date

11/03/22

Please send completed forms to planning.policy@nwleicestershire.gov.uk or Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Monday 28 February 2022 (updated to 14/03/22)

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

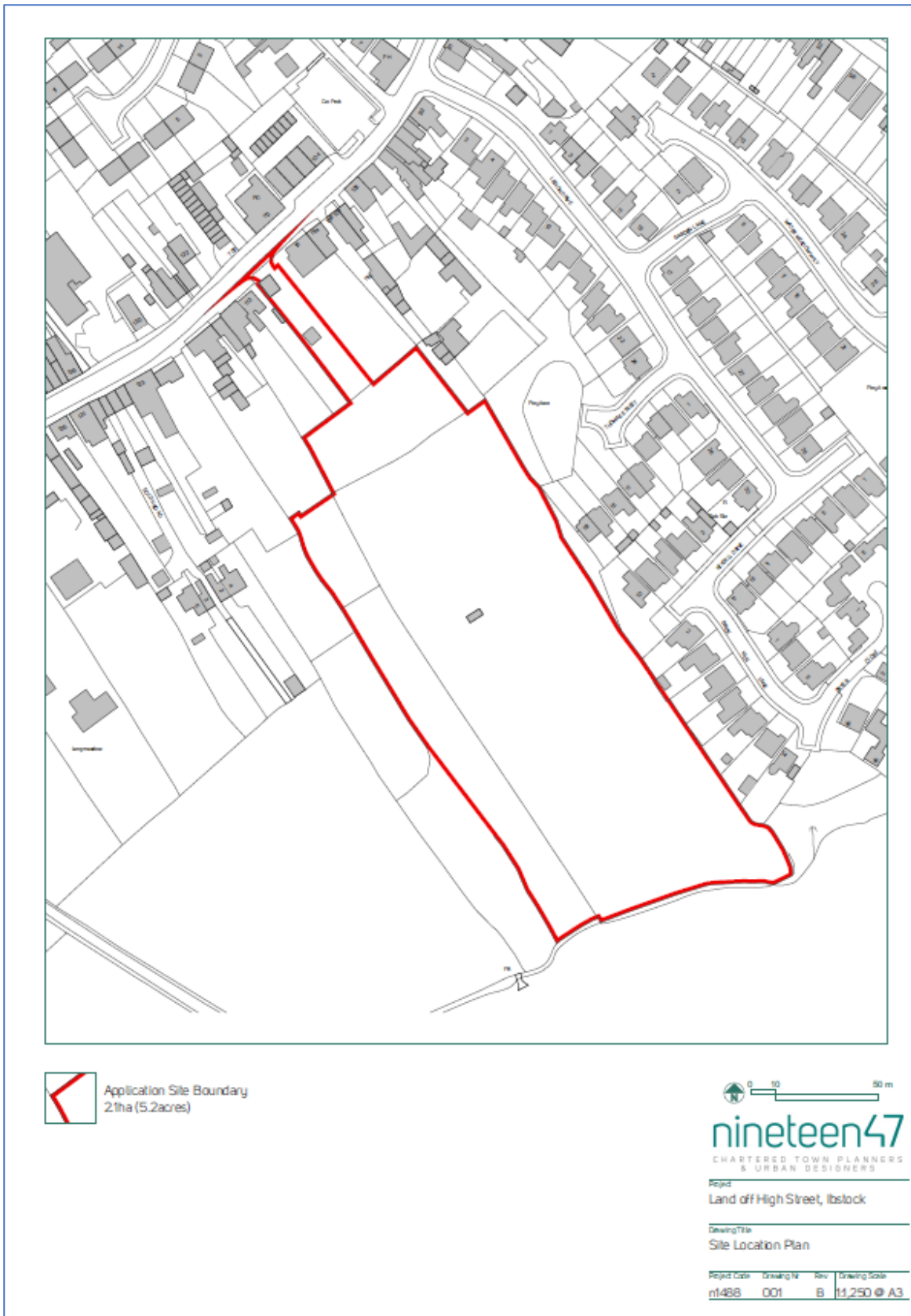
The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004, save for requests of such information required by way of enactment. Your name, organisation and representations will be made publically 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 publically available.

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Appendix 2 – Land off High Street, Ibstock Site Plan



Appendix 3 – SHLAA 2021 Proforma

Ib20 – Land to rear of 111a High Street, Ibstock

Site Description: The site is a greenfield site to the south east of High Street. The site is predominantly Grade 3 agricultural land (Natural England regional records) and is currently used for agricultural purposes. In order to gain access from High Street, the site incorporates garden land/outbuildings at 111 High Street. The site is bound by mature trees and hedgerows and also includes several trees within the main body of the site. There is a stream running along the site's southern boundary. There are residential properties to the north and east and further agricultural land to the south of the site. The site is located in the National Forest.

Suitability:

- **Planning Policy:** The site is outside the Limits to Development and identified as countryside (Policy S3) on the adopted Local Plan Policies Map (2017). The adopted Local Plan identifies Ibstock as a Local Service Centre (Policy S2). The affordable housing requirements are set out in Appendix One of this document.
- **Highways:** A safe and suitable site access may be achievable. However, due to the lack of off-street parking provision for existing dwellings, there is a proliferation of on-street parking within the visibility splay to the southwest. Speed surveys would need to be undertaken and in order to achieve suitable visibility splays it is anticipated that amendments to existing on-street parking controls would be necessary. Such amendments would be subject to public consultation and additional parking controls, without mitigation for existing residents, may well be met with objection. The nearest bus stop is located within 35m of the site and is served by half-hourly services to Ibstock. Additional bus stops are located within suitable walking distance of the site offering infrequent services to Hinckley. The site is located in the centre of Ibstock, therefore there are a number of local amenities within suitable walking distance, including a nursery school, post office and convenience stores. In addition, Ibstock Junior School and St Denys Infant School are both located within approximately 650m from the site.
- **Flooding:** Approximately 0.15ha of the site is within Flood Zone 3b (along the southern boundary). This part of the site has been excluded from the site capacity calculations below.
- **Minerals:** The northern half of the site is within the Minerals Consultation Area for the potential presence of sand and gravel resources. The County Council would need to be contacted regarding the potential sterilisation of this mineral resource. The whole of the site is in a Coal Development Low Risk Area and the area may contain unrecorded coal mining related hazards which will need to be reported if encountered during development
- **Heritage Assets:** The site access and the western part of the site is within the Ibstock Conservation Area. The site is adjacent to the curtilage of two Grade II Listed Buildings; No. 119 and No. 121 High Street. The impact of any development on the significance of these designated heritage assets requires further assessment.
- **Ecology:** There are no designated ecological sites within the site boundary but the hedgerows around the site represent potential Biodiversity Action Plan habitats. There is potential for badgers and Great Crested Newts (GCN) to inhabit the site. A GCN survey and on-site mitigation or entry into the GCN District Level Licensing Scheme would be required. The retention of a 5m buffer zone should be provided along significant hedges and managed as part of open space to ensure habitat continuity and retain connectivity.



The site is predominantly outside of, but adjoining, the Limits to Development. A change in the boundary of the Limits to Development would be required for the site to be considered suitable. It would also need to be demonstrated that issues regarding highways/access, minerals/geo-environmental factors, heritage assets and ecology could be satisfactorily addressed. The site is considered **potentially suitable**.

Availability: The site is promoted on behalf of a volume housebuilder who has an option agreement on the site. There are three landowners, all of whom support the development of the site. It is considered that the site is **available**.

Achievability: There are no known viability issues. A Phase 1 ground survey has been undertaken and no significant constraints to development have been identified. The site is considered potentially **achievable**.

Site Capacity:

Total Site Area Available for Development (hectares) 2.05

Total site area is 2.2ha, the site area has been reduced to reflect the 0.15Ha of the site which is in Flood Zone 3b.

Gross to net Development Ratio	62.5%
Density Applied (dwellings per hectare)	30
Estimated capacity	38
Timeframe for Development Years	6-10
Estimated Build Rate (dwellings per year)	n/a

Appendix 4 – Land off High Street, Ibstock Concept Masterplan



Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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North West Leicestershire Local Plan Representation on Development Strategy Options & Policy Options

On behalf of Hallam Land Management.

Date: 11 March 2022 | Pegasus Ref: PP19-0061

Author: Clare Clarke





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1. Introduction

- 1.1. This representation is submitted by Pegasus Group on behalf of Hallam Land Management, in response to the Local Plan Review – Development Strategy and Policy Options (Regulation 18) consultation.
- 1.2. This representation is made in relation to our client's land interests at Land east of Appleby Magna.
- 1.3. The response form below sets out our client's comments on the proposed settlement hierarchy, growth scenarios and emerging distribution strategy, as well as the detailed policy proposals.
- 1.4. Our clients have previously engaged in the preparation of the plan with submissions the Strategic Housing Land Availability (SHLAA) Call for Sites. Appendix 1 shows a site location plan for the site, SHLAA reference Ap16. A total of 25.16 hectares are available for residential-led development for between 100–500 dwellings, depending on how much of the site comes forward for development.
- 1.5. The site is located to the east of another large site, Land at Measham Road, Appleby Magna, which is being promoted by Richborough Estates. This means our client's land interests have the potential to contribute to a strategic approach to development at Appleby Magna, that would deliver new infrastructure, including a school and local centre, as well as significantly contributing to meeting housing needs and complementing the significant new employment in this area.



DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

January 2022

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-

Part A – Personal details

Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

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, 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	Mrs
First Name	Paul	Clare
Last Name	Burton	Clarke
[Job Title]	Director	Associate Planner
[Organisation]	Hallam Land Management Limited	Pegasus Group
Address Line 1	██████████	██████████
Address Line 2	██████	██████████
Address Line 3		██████████
Address Line 4		██████████
Postcode	██████	██████
Telephone		██████████
Email address		██

PART B – Your Representation

Please use a separate sheet for each question you wish to respond to.

Q2 Do you agree with the proposed settlement hierarchy? If not, why not?

The proposed settlement hierarchy identifies Appleby Magna as a Sustainable Village and this is supported. Through the review of the Local Plan, however, the opportunity for Appleby Magna to grow and for the sustainability of this village to further improve should be recognised.

The evidence underpinning the settlement hierarchy, the Settlement Study (2021), sets out that Appleby Magna can already be regarded as sustainable settlement with a range of community services and facilities including a primary school, employment sites in close proximity to the village including Jubilee Business Park and public transport access to a higher order settlement.

Appleby Magna has a total of three pubs, a cricket club, a hotel, church with church room. There is one butchers shop operating from the Jubilee Business Park and now significant employment nearby.

There is an opportunity for the role of Appleby Magna to be enhanced through this local plan review. The role of Appleby Magna as Sustainable Village has already been further consolidated since the Settlement Study was undertaken, by the recent Jaguar Land Rover (JLR) development to the west of the village at junction 11 of the A42. This provides significant employment provision in close proximity to the village and provides the context for a significant change in the approach to development in the village.

The local plan provides the opportunity to direct development to Appleby Magna in order to support the vitality and viability of the existing services and facilities in the village importantly to deliver new services such as a new school, local centre with space for a new doctor's surgery and enhanced accessibility to the new employment in the area. Appleby Magna is well positioned to deliver complimentary housing growth that would help balance the significant job growth at JLR site at Junction 11 and ensure there is an opportunity for sustainable journey's to work for employees at the site.

The NPPF (para 79) states that 'housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services'. Development at Appleby Magna would not only support the existing services, but a strategic approach here would also deliver tangible benefits to the community that would secure the future sustainability of this village.

Q4 - Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

Yes, in particular, the High 2 scenario is supported. As the consultation document sets out, this growth scenario preforms best having regard to all of the factors which need to be considered.

The Planning Practice Guidance sets out that standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. As the

consultation document sets out, it does not predict the impact of changing economic circumstances or other factors on demographic behaviour or take account of unmet needs (Ref: 2a-010-20201216). With this in mind there are three key reasons why the High 2 growth scenario is the most appropriate for North West Leicestershire and these are set out below.

Economic Needs

The first relates to economic needs for new homes over and above those required to meeting demographic needs. The Leicester and Leicestershire Housing and Economic Needs Assessment (HEDNA 2017) found that the economy will drive above-trend economic migration to North West Leicestershire. The study recommended an upward adjustment to housing provision to support workforce growth. The Council's Local Housing Needs Assessment (2019) supported this evidence and found an uplift for economic needs would be appropriate.

As a net importer of labour and with significant economic growth continuing in the District, it is essential the housing requirement in the local plan reflects this and the Local Housing Need figure generated by the standard method is adjusted upwards for economic needs as proposed.

Household Projections

The second is the latest 2018-based household projections, published in June 2020, which showed a significant increase in likely household growth for North West Leicestershire over the period to 2043 when compared to the 2014-based projections used to inform the standard method. The latest projections further support the High 2 scenario being used to inform the housing requirement in the local plan.

North West Leicestershire is one of the authorities with the largest increase in household projections, identified as one of the top 10 authorities in the country, indicating that a higher housing requirement above the standard method is appropriate and necessary to meet needs in the area.

Whilst the latest projections are not used in the standard method, they are important in understanding the likely number of households arising in an area. The current national policy directs the increased need arising nationally to the twenty largest cities and urban areas, including Leicester City, instead of those areas where the need arises. This increase for Leicester City will however only increase the level of unmet need for the city area.

Unmet Housing Needs from Leicester

The third reason the High 2 scenario is the most appropriate option to inform the housing requirement in the local plan, is the level of unmet need arising from Leicester City mentioned above. The NPPF sets out that strategic policies should be informed by a local housing need assessment and in addition any needs that cannot be met within neighbouring areas (para 61). Leicester City have declared an unmet need and the consultation document suggests this is in the region of 18,000 homes.

The Leicester and Leicestershire Statement of Common Ground published in March 2021 states that work to inform the apportionment of Leicester's unmet need was due to be complete in Winter 2021/2022. An update to the Charnwood Local Plan Inspectors suggests this now expected in May 2022. This will provide more clarity on the distribution of Leicester's unmet need. Planning for unmet need in the interim is supported particularly in the context of the joint vision in the Leicester and Leicestershire Strategic Growth Plan. The Strategic Growth Plan identifies the north west of the County as a growth location, described as the Leicestershire International Gateway and identified as a focus of strategic levels of development, further supporting the High 2 scenario and the potential for unmet need to be apportioned to North West Leicestershire.

Overall the evidence supports a housing requirement above the standard method Local Housing Need figure without meeting any unmet needs from Leicester and ahead of applying a percentage uplift for flexibility to ensure delivery. The scale of uplift needs to be informed by the economic growth in the area, the latest household projections, and the role of the District in meeting Leicester's unmet need. The 2018 based household projections provide the most up to date evidential basis for a housing requirement figure which achieves this and therefore High 2 scenario is supported as the most appropriate option.

North West Leicestershire has a strong market, with high build rates over the last ten years highlighting the level of market demand. The High 2 scenario is therefore entirely achievable in the District over the next 15 years.

Q5 - Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.

The preferred distribution for the High 2 Scenario (the scenario supported in question 3), Option 7b includes directing 1,785 homes to the Coalville Urban Area, 1,785 homes to a New Settlement, 765 homes to Key Service Centres (Ashby de la Zouch and Castle Donington), 510 homes to Local Service Centres (Measham, Ibstock and Kegworth) and 255 homes to the Sustainable Villages.

The proposed approach to the distribution of housing growth is not fully supported. The principle of the preferred option, 7b, to distribute homes to all the district's sustainable settlements is supported, however as currently proposed, the actual distribution places too much reliance on Coalville and significantly underestimates the role of settlements outside the Principal Town. It also fails to consider the opportunity to increase the sustainability of Appleby Magna to reflect the transforming context of this settlement. Option 7b should be adjusted to reflect the evidence of land availability, suitability and achievability including changes which has occurred since the settlement assessment was undertaken.

Land availability, suitability and achievability

It is critical to the success of the Local Plan, that land availability, deliverability and opportunity to avoid significant negative impacts are considered alongside the overall sustainability of individual settlements.

The consultation document highlights significant doubts about the ability of the market to deliver a significant scale of growth in the Coalville Urban Area based on recent build rates and an understanding the market interest there.

Whilst the Strategic Housing Land Availability Assessment highlights there is land available in the Coalville Urban Area, there are no options identified close to the town centre and many of the larger site opportunities require compromising important areas of separation. Whilst there are a small number of larger site options to the east and south of the town and adjoining the smaller linked settlements of the urban area, these options are limited.

Option 7b needs to be adjusted to reflect the land availability and market position at Coalville as well as the adverse impacts of further significant growth on the character of the villages that make up the Coalville Urban Area. This will ensure the developments in the Principal Town are complemented by developments in other sustainable settlements. The current figure of 1,785 homes should be reduced significantly and directed to other sustainable settlements. This would maintain the key aspects of Option 7b, which led to it being identified as the preferred option, whilst ensuring the Council can maintain a five year supply and meet housing needs.

Development outside the Principal Town is important in terms of maintaining good housing delivery rates as it provides flexibility and choice for the market, by having a greater number of sites in a greater number of locations, reducing the risk of the Council losing control of decision making due to a lack of five year supply. This approach has in the past ensured a robust record of housing delivery in the District.

The consultation acknowledges the benefit to local communities of planning for growth in all the district's sustainable settlements, highlighting that it supports the viability and growth of services and facilities and provides opportunities for people to remain in their local community as they move through different stages of their life.

There is a unique context for planning for growth at Appleby Magna which should be recognised. The changes in this area of the District mean there is an opportunity to plan for strategic scale growth that supports the improved sustainability of the village whilst making a substantial contribution to meeting housing needs and balancing homes and jobs in the area.

Land east of Appleby Magna

This representation is made on behalf of Hallam Land Management in relation to their land interests at Land east of Appleby Magna. Detailed SHLAA submissions have been made for this site for consideration as part of the site selection process and a site location plan is included at Appendix 1.

The area around Appleby Magna is changing considerably. In addition to the 3.75 million sq ft of floorspace and up to 3,000 jobs being delivered by the JLR site at Junction 11 of the A42/M42, HS2 will also run very close to the west of the village. This significant change in context means the future of

Appleby Magna is already set to be transformed. This suggests a different approach to development is needed here to ensure this village can keep up with the changes and benefits from them.

Appleby Magna is well positioned to deliver complimentary housing growth to balance the significant job growth at JLR site. The site Land east of Appleby Magna offers the flexibility to deliver between 100–500 homes over the plan period and be delivered in combination with a site being promoted on Land at Measham Road by Richborough Estates, to the north of the village as part of a comprehensive approach to development.

A strategic and comprehensive approach to development at Appleby Magna is an opportunity to improve the sustainability of the village for the long term. There is an opportunity to consolidate and improve the long term sustainability of Appleby Magna and deliver a new school, a new local centre including a new doctor's surgery and convenience shop, additional formal open spaces, locally needed affordable housing and improved accessibility to the new employment land to the west on the JLR site at Junction 11.

NPPF (paragraph 79) sets out that "Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services". Development at Appleby Magna, as part of the overall strategy for North West Leicestershire, will support the village's services and provide opportunities to deliver new services and facilities. A more significant scale of development has the potential to enhance services, creating the critical mass for new services such as convenience store, doctors surgery, school and sustainable links to the new JLR employment site including cycleways and improved bus services.

A comprehensive approach to development here has the potential to make Appleby Magna one of the most sustainable villages in this part of the hierarchy and ensure it moves forward with, and benefits from, the changing context of the village. Delivering homes on this site would result in no significant adverse impacts, with the majority of the site falling in Flood Zone 1 and no landscape, heritage or ecology designations.

Q6 - Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?

The proposed policy to seek self-build and custom-build plots on developments of 50 units or more where there is a proven need is not supported. This policy approach will not boost the housing supply and creates practical issues that should be given careful consideration. It is essential that consideration is given to health and safety implications, working hours, length of build programme and therefore associated long-term gaps in the street-scene caused by stalled projects. There is the potential for unsold plots and the timescale for reversion of these plots to the original housebuilder creates practical difficulties in terms of co-ordinating construction activity on the wider site.

The first part of the proposed policy which supports the provision of self-build/custom build housing is a more appropriate approach to this issue. The Plan should support the delivery of self-build housing.

--

Q7 Do you agree with the proposed policy for Space Standards? If not why not?

The proposed approach of requiring all new residential developments to meet Nationally Described Space Standards as a minimum is not supported based on the evidence collected to inform the consultation document.

The Planning Practice Guidance sets out that local planning authorities need to gather evidence to determine whether there is a need for additional standards in their area and justify setting policies in their local plans and that local planning authorities should consider the impact of using the standards as part of the Local Plan viability assessment, considering need, viability and timing.

The Council's evidence suggests that the majority of developments exceed the Nationally Described Space Standards. This suggests this policy is not necessary or justified.

Q8 – Do you agree with the proposed policy on accessible and adaptable housing? If not why not?

Q9 – Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?

The preferred policy approach, which proposes that all new build residential developments will be required to meet at least part M4(2) standards of the Building Regulations and 5% will be required to meet Part M4(3)(b) will duplicate the proposed national changes to Part M of the Building Regulations and is therefore unnecessary.

Due to the specific nature of Park M4 (3) homes, if introduced this policy requirement should be limited to affordable homes for which the Council has nomination rights.

Q16 - Do you agree with the proposed health and wellbeing policy? If not, why not?

This policy approach is supported and reflects the approach taken to development by Hallam Land Management including that promoted at Appleby Magna. This site provides an opportunity to improve accessibility to local employment.

Q17 - Do you agree with the proposed Health Impact Assessment policy? If not, why not?

Q18 - Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?

The proposed policy on Health Impact Assessments where Health Impact Screening Statements must be undertaken on various development types appears reasonable, but the evidence to support the threshold of 30 dwellings or 1 ha is not clear.

The consultation document suggests this threshold is set to avoid burdening small and medium sized builders, however this threshold has the potential to impacts medium sized housebuilders. A higher threshold should be considered and the opportunity for the Council to require Screening Statements in other unspecified instances should be replaced with clear criteria to create greater certainty for applicants.

Q20 - Do you agree with the preferred policy approach for energy efficiency? If not, why not?

The proposed policy requires all development to follow a sequential energy hierarchy prioritising fabric first and achieving 31% reduction in regulated CO2 emissions. This policy is not necessary as it repeats the Building Regulations. Planning policy does not need to set standards for energy efficiency, the government is making these requirements through Building Regulations.

Q25 - Do you agree with the proposed policy for water efficiency standards? If not, why not?

The proposed policy for water efficiency standards requires all proposals for new residential development to achieve the national water efficiency standard of a maximum of 110 litres of water per person per day. This policy is not necessary as a requirement is set out in the Building Regulations and there is insufficient evidence provided for a locally needed lower requirement.



If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes	<input type="checkbox"/>
No	<input type="checkbox"/>

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 understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

Signed

[Redacted signature box]

Date

11/03/22

Please send completed forms to planning.policy@nwleicestershire.gov.uk or Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Monday 28 February 2022 (updated to 14/03/22)

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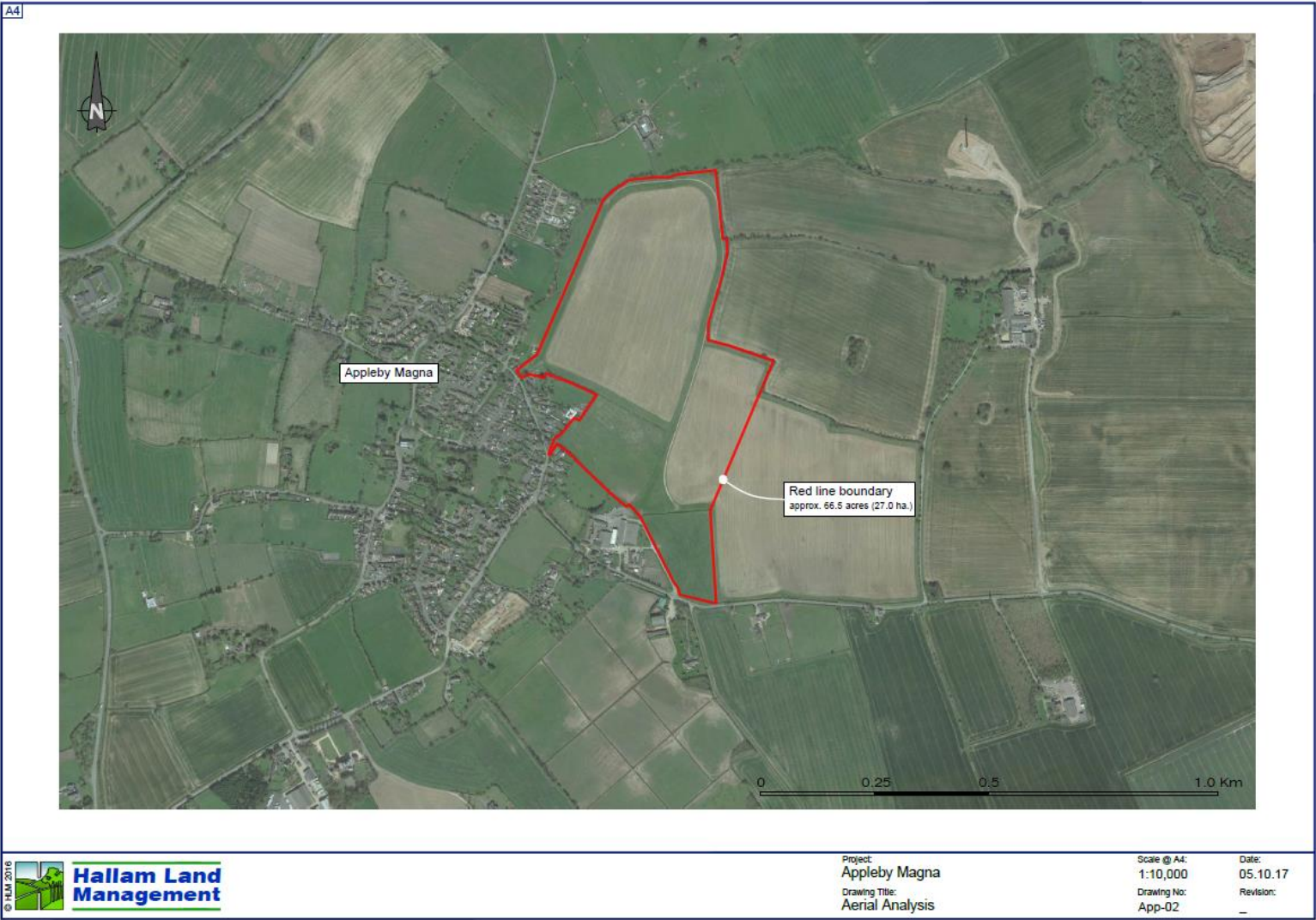
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Appendix 1 – Site Location Plan



Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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J Aust



12/3/2022

Dear Sirs,

I write in the strongest terms to object to the following proposals

To the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

In summary, the proposed developments fail a significant number of the local planning policies which are identified below. I see it impossible for the scheme to proceed with these policies in place, without a flagrant disregard for them.

Given the number of planning applications I have made for the above property, I am very aware of NWLDC view on the inflexibility of these policies irrespective of cost or any other argument put forward by myself or agent. Accordingly, I expect the same inflexibility to be applied to the proposed development irrespective.

Yours Faithfully

J Aust

1. LP. 5.25. Policy S3. The NPPF states that planning needs to *“take account of the different roles and character of different areas,”* and that planning should recognise *“the intrinsic character and beauty of the countryside”*. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *“There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)”*. The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to *“focus significant development in locations which are or can be made sustainable”*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to the local infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of both the Local Plan and the NPPF. Where lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development which will require wholesale change to the local infrastructure and will generate considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan and NPPF. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *“The site... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy”*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - *“Promote the health and wellbeing of the district’s population”* Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - *“Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances”*. Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes

100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

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7. LP. 4.6. Objective 9 - *“New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs).”* In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or it's partners undertake to achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

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heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

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11. Traffic. The major access to/from both sites will be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, airport customer traffic and EMA freight lorries. The LW1 site, housing a further 4.7k houses will produce circa 16k car movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even

more problematic than already, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in transport movements. In respect of EMP90, this site has no viable access from the south or west [which would be through the village of Diseworth. The only access available is from the A453. As SHELAA concedes [Appendix 2. Page 170], this is not compatible with the Leicestershire Highways Design Guidance [Policy INS3] - unless the LHA can be persuaded to change their mind. Again, change the rules to fit the proposal, not change the proposal to fit the rules.

12. Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- *"What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations."* As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are

planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as "*...Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development*". Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies "*...an immediate need for additional employment land*". It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly "*...detrimental to the amenities of...nearby residential properties and the wider environment*"

B Aust



12/3/2022

Dear Sirs,

I write in the strongest terms to object to the following proposals

To the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

In summary, the proposed developments fail a significant number of the local planning policies which are identified below. I see it impossible for the scheme to proceed with these policies in place, without a flagrant disregard for them.

Given the number of planning applications I have made for the above property, I am very aware of NWLDC view on the inflexibility of these policies irrespective of cost or any other argument put forward by myself or agent. Accordingly, I expect the same inflexibility to be applied to the proposed development irrespective.

Yours Faithfully

B Aust

1. LP. 5.25. Policy S3. The NPPF states that planning needs to *“take account of the different roles and character of different areas,”* and that planning should recognise *“the intrinsic character and beauty of the countryside”*. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *“There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)”*. The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to *“focus significant development in locations which are or can be made sustainable”*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to the local infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of both the Local Plan and the NPPF. Where lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development which will require wholesale change to the local infrastructure and will generate considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan and NPPF. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *“The site... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy”*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - *“Promote the health and wellbeing of the district’s population”* Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - *“Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances”*. Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes

100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

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[REDACTED]
[REDACTED]
[REDACTED]

12 March 2022

To whom it may concern,

Re: Local plan review

Thank you for initiating a consultation around proposed development plans in and around Diseworth. I have several concerns relating to these plans, as outlined below. In summary, my concerns relate to **environmental degradation, increased flooding, significant traffic/congestion issues, detrimental impacts on climate change, lack of suitable infrastructure to deal with such a development, significant noise and pollution issues, and concerns around the urbanization of our countryside** – an asset which warrants protection.

My response to the Local Plan [LP] Review is focused on the potential development of land [316 hectares] based around the Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth, where I live. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:

The NWLDC Local Plan [2017 – as amended in 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives, as outlined below.

1. **Objective 1.** Health and wellbeing. Both proposals fail this test.
2. **Objective 3.** High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.
3. **Objective 4.** Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.
4. **Objective 9.** Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth, is a recipe for disaster.
5. **Objective 10.** Preserve and enhance the district's natural and rural heritage. Again, both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.
6. **Objective 11.** Protect and enhance the natural environment. Again, both proposals fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.
7. **Countryside.** The National Planning Policy Framework [Local Plan Policy S3] states that the different roles and character of different areas, and the intrinsic character and beauty of the countryside, needs to be accounted for. Both proposals fall short of this requirement.
8. **Sustainability.** The National Planning Policy Framework has a core principle that planners should focus significant development in locations which are or can be made sustainable, as highlighted in

the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90, regulations will have to be changed to accommodate the site. This is unacceptable.

9. **Noise.** Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. It is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise **pollution**.

10. **Traffic.** IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, are likely to become a major rat run avenue for this new proposal.

11. **Non-Compliance.** EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *“immediate need for additional employment land”*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *“detrimental to ...nearby residential properties”*. Diseworth is only separated by 75 metres.

12. **The Settlement Hierarchy** in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. **Geographic Location.** The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate congestion, pollution, travel problems and will have an **adverse effect on climate change**.

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15. **Summary.** These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, which would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner(s) and an exploitative developer(s) who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. **Conclusion and Planning Integrity.** For this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not

be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

For all of these reasons, I object to the proposed plans. They do not seem appropriate in terms of scale or location, go against many of the commitments made to preserving the local area, and are likely to cause significant amounts of irreparable environmental damage.

I hope that after reading these, and others', concerns, these plans will be reviewed.

Yours faithfully,
Emma Haycraft

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name ...MrB. W. Smith

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

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Sign.....

PS. More should be done regarding not using farming land for building development to become more sustainable in this present climate as with the conflict in Ukraine and Russia being an example.

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Sign.....

PS. More should be done regarding not using farming land for building development to become more sustainable in this present climate as with the conflict in Ukraine and Russia being an example.



CHIEF EXECUTIVE & DIOCESAN SECRETARY

Email : [REDACTED]
Tel : [REDACTED]
Date : 12th March 2022

By email to: planning.policy@nwleicestershire.gov.uk

Dear Sirs,

Isley Walton New Town

I am writing with regard to the proposed developments to the west, south and east of the settlement of Isley Walton in your District.

The Church of England Diocese of Leicester, through the Leicester Diocesan Board of Finance, is the ultimate holder of the title to the Church and Church yard of the parish Church of All Saints, Isley Walton. As such, we have an interest in any developments which potentially affect the Church and the access to/from it, although day-to-day responsibility for the upkeep and activity of the Church rests with the Incumbent and Parochial Church Council (PCC), as managing trustees.

The Diocese, along with the PCC, recognizes the need for more housing in your District and the neighbouring areas more generally. However, if this proposal is to go ahead, we do have some concerns about the possible impact on the Church itself, particularly in safeguarding access routes, given that it is located away from the public highway.

You will doubtless be aware that All Saints Church is a building of great historical significance and has, through several restorations, stood there for many centuries. It is grade two listed and was until abolition in 1312 a Knights Templar Church and still has bells dating back to the 14th and 15th centuries. As such, the building is an important community heritage asset, quite apart from its continuing life as an active place of worship.

The development of the new town means that All Saints Church, especially because of its location, has the potential to play an even bigger role in serving the expanded community in years to come. Indeed, the current church community, supported by the diocese, look to play their part in helping the new town to become a thriving and supportive place to live.

However, for all this to be possible, it is essential that the plans for the development contain within them adequate access to and from the Church, and ideally sufficient car parking for what will undoubtedly be a much larger number of people wishing to go there. I therefore write to register this point for you to take on board as detailed plans come forward for approval.

Either I, or another representative of the Diocese, as well as of the PCC, will be very happy to have further conversation with you at any time if that would be of help.

Many thanks for your consideration.

Yours sincerely,

[REDACTED]
Jonathan Kerry
Chief Executive & Diocesan Secretary

Cc: Ven Claire Wood (Archdeacon of Loughborough); Mr John Shields (All Saints, Isley Walton)
The Leicester Diocesan Board of Finance is a company limited by
Guarantee, registered in England No 227087
Charity Registered No 249100. Registered Office St Martins House
7 Peacock Lane, Leicester, LE1 5PZ

St Martins House
7 Peacock Lane
Leicester
LE1 5PZ

t: 0116 261 5200
www.leicester.anglican.org

I am writing to **object strongly** to the proposals to build between 2000 and 5000 (near as dammit) new houses, with attendant businesses, roads, etc in this area.

Is this part of NWL to become a vast urban area, a wannabe metropolis, with this wanton destruction of green field sites? Please don't tell me it's called progress

...

Over the past 50 years we have experienced a massive expansion of the airport, Donington Park, the M1 traffic, new A6 routes, A42 and A50, railway, possibly/probably the HS2. Ashby is no longer a pleasant little market town, Donington no longer a village where 'everyone spoke to each other' and effectively a new town with a large and expanding industrial area. The railway has desecrated area around the once-pretty villages of Lockington & Hemington, and makes an ugly urban sprawl which perhaps doesn't finish until all the villages out to Kegworth are joined.

These villages have ancient origins - Iron & Bronze Ages, Anglo-Saxon, Viking, early Norman - are you really happy to see it all destroyed?

Naively, I had understood the National Forest was meant to help regenerate parts of NWL, along with parts of E Staffs & S Derbys, not to become a close neighbour to a new crowded (effectively) urban area, with virtually all wildlife destroyed.

Why choose the High Barns area? Because the previous farmers, Ann and John Bottomley, are now retired (and John turning in his grave) no longer farm there, and new owners happy to sell for more than they would get for farm land?

A resident of Wilson for over 50 years, I have been walking footpaths around this area for over 20 years, including routes via Tonge through High Barns to Diseworth, which includes the Cross Britain Way, a long-distance fp. These will be lost. Walkers (and there are many more since lockdowns) would be left with walking through umpteen streets and traffic. Developers are notorious for trying to get rid of PROWs or make them so difficult, unpleasant (dog pool alleys etc) as to be effectively extinguished - thanks a lot!

Naturally developers (and planners?) prefer green fields! They move out and don't have to live with the consequences of destruction of wildlife, peace, clean air. etc. Many villages (including Breedon & Wilson) don't have a gas supply - so you make a much larger area reliant on oil? Especially since Covid, office blocks, parts of high streets etc have been left dying, probably permanently.- surely better to use such possibilities and renew existing communities, using brown field sites?

We have precious little – I should emphasise precious – green space left between the urban sprawl caused by the developments of EMA, A42 & 50, M1,

A6 north of Donington, railway, Donington etc. For goodness sake, leave us this area around Isley Walton and nearby villages! That's why we live here – if we'd wanted an urban environment, we would have chosen a city or town.

The word on the street is that much of this housing is meant to provide overspill for Leicester. **Really?** we are about as far as you can go from the city - I live about 50m (four houses) from the Derbyshire border. So lots more commuting? Each house will probably have two cars, possibly more. Traffic is **already** heavy, with Breedon & especially Cloud Hill quarry traffic, the airport pulling in commuters from miles around including Derby, Nottingham etc - with all the 'rat-runs' through nearby villages.

NWLDC already anticipate traffic around these villages to grow – this is likely to be considerably worse with the recent approval of the Freeport. We already suffer massive traffic issues with EMA commuters (even with significant declines of travel passenger flights following Covid), **and** from events at Donington Park, where the track seems now in use **daily** – I suffer considerable noise, living just a couple of fields away in Wilson.

I wonder if NWLDC has considered the knock-on effect of traffic into S Derbyshire villages – Kings Newton already suffers from EMA rat-run traffic, Melbourne now has a **chronic** parking problem with old, narrow streets, the Hall attracting many visitors parking on the minor road connecting the two counties. Traffic from thence to Derby will affect the English Heritage Grade 1 listed Swarkestone Causeway which already suffers frequent damage from traffic hitting and damaging the walls (must cost a fortune to maintain). And S Derbys DC already has poorer quality maintenance of roads than NWLDC!

Did I mention traffic fumes from more commuters? All those small children, especially at push-chair height, elderly people with pre-existing respiratory issues ... Wasn't that part of a Council's obligations? And – correct me if I'm wrong – “protect (and enhance – ha!!) the natural environment and conserve (and enhance – as if!) the quality of the landscape character”?

Back to noise problems: all the villages, farms etc around here suffer from aircraft noise – Wilson is directly under one of the main flight paths, being near the end of the runway (we **often** have to stop conversations with neighbours, close doors & windows to have phone-calls etc). The site you propose would also suffer from ground EMA noise – I believe Diseworth already has this from reversing vehicles during the night-times. Depending on which way the wind blows, villagers around Breedon, Tonge, Wilson etc suffer from A42 noise, and **regularly (daily?)** from Donington Park race track - never mind larger events. .

I have often objected to EMA night-time flight noise, although it is – supposedly - government policy to reduce the number of people affected by aircraft noise. And you are proposing to put another 5-10,000 residents in that area! Farcical. The airport will be delighted with the increased number of complaints! All those

sleepless nights with babies and aeroplanes Perhaps NWLDC would be more concerned if it were not separated from the mental health issues which will affect local GPs etc.

OK, now the formal bit with measured tone:

Q4 & 5 Do you agree with our proposed approach to the amount of housing growth at this time?

No. Effectively two separate suggestions with very different effects. Which am I meant to comment on?

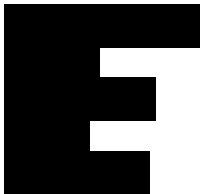
Suggestions for possible housing: there is no explanation of what you suggest are sustainable effects as positive or negative, nor how you propose to measure them, though they vary considerably.


Do you really expect local people with limited time (working f-t, bringing up families, looking after horses, livestock etc) to have time to read long, legally-worded documents without some less formal explanation. You are **not** being helpful to local residents – dare I suggest deliberately?

High 2 Option 7b - Isley Walton **New Town** (!):

No clear explanation of where this 'New Settlement' of nearly **2,000** (!) would be; cf: SHELAA mentions **2,370 - 4,740** houses! And cf: Diseworth public meeting held 14 February 2022 informed development of nearly **5,000** (!) houses. Just under 2,000 (**still No**), or **actually** just under **5,000**. Are you trying to prevent informed, realistic opposition?

Marie Kennedy





Dear Sir/Madam

Re: planning EMP 90 East Midlands Airport and south west of J23 M1

I strongly object to this planning appearing by stealth without giving any adequate notice to both current villagers and those buying into the village.

I understand this is a government edict and the local Leicester council were not involved and indeed not allowed to vote against the scheme because of "bias". Are the developers and those selling the land not biased?...is this the kind of democracy we are living in?

Diseworth was flooded badly 2 years ago and the small streams which run throughout our village are also at a higher height since the hub was built.

Hemington, where I previously lived, was also badly flooded a few years ago with the field behind Grange Farm Close becoming a lake. This land is protected as both a separation area and water table protection.

Has the water table been investigated for this development in Diseworth? Will the council be reducing our rates and or paying for the collateral damage to houses within the village? No, I thought not.

I understand warehousing up to 80 feet high are being feted and as near as 75 metres within housing on Hyams Lane Diseworth and no doubt they will be 24 hour operations. Is this even legal? Have you looked at this?

Funny old world when the builder who built 7 houses in Diseworth was hounded from start to finish with planning edicts regarding type of brick, type and size and colour of windows, type of finish for the courtyard etc. to bring the small development within both planning laws and in keeping with historic Diseworth?

I also thought this government were committing to a greener policy, if so why are we building on huge swathes of arable green land with concrete? There are a great many lands surrounding the hub which do not have housing near.

Hasn't the government learnt anything from our reliance on imports, from food to energy?

One only has to look back at WW2 to see the difficulties the UK had in sourcing food, thank goodness we at least had coal mining still for fuel. The government of the day were asking people to "grow your own" which for some was the only means of fresh food.

If we cover our "green and pleasant land" with factories what hope have we to be able to support ourselves?

I understand brown land is more expensive because it has to be treated, but can we have a long term plan so that developers looking to increase revenue have to look at unused “brown field sites” first, which are often in areas of low income, low employment and poverty? Developments such as these could help to regenerate these areas, also something in Boris s’ manifesto in last general election.

There are many areas within the development of the hub that are not anywhere near housing but would also have good access to freight transport and good access to the main roads surrounding.

Are you going to anything about this?

Sincerely

Mrs Rose Turner

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name P D Onyon

Address

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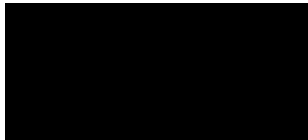
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By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Angela and Paul Shephard

Address [REDACTED]

Dear Sirs,

Our response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

We also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

Our objections are based on the following: -

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self-evident that both proposals fail this test. The Isley Walton and Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. It is noisy. EMP90 will generate unacceptable noise within Isley Walton and Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal. Brooklet Farm is situated on the A453 opposite DHL, the road has a steady flow of traffic 24/7. The noise level has increased dramatically since the expansion of DHL. Exiting Brooklet Farm and joining the traffic on the A453 now takes an average of 5 minutes due to the constant flow of traffic (DHL HGV's, DHL vehicles, Breedon Aggregate lorries, vans, and cars) using the road. How an earth a further 4,700 houses (average # of cars being 1.2 per household in 2021) can be added into the mix is unthinkable. We experience poor air pollution now due to the proximity of the road and the airport. When planes are taking off in an Easterly direction and landing from a Westerly direction the smell of jet fuel is putrid to say the least. Should the take off and landing direction be coupled with low cloud cover we cannot spend any time outside as the pollution is so bad. EMA may well state on their website the various things they do to manage the impact of noise and emissions:

If you live near to East Midlands Airport, it is likely you will see and hear aircraft. We have provided a range of fact sheets below that describe how the airport operates and how we manage the impacts of these operations.

- [Managing the Impact of Noise](#) and reporting noise disturbance with [Webtrak](#)
- [Our Carbon Neutral Commitments](#) and [Managing Emissions & Air Quality & AQ Results for 2020](#)
- [Managing our Surface Water](#)

When you live adjacent to the airport it's a very different story especially when an aircraft jettison's fuel into the fields around Isley Walton.... the very same fields highlighted for potential development of 4,700 homes.

11. Non-Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an "*immediate need for additional employment land*". Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being "*detrimental to ...nearby residential properties*". Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Isley Walton and Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local rat running than can be tolerated. There must be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developer who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. For this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,


Angela Shephard


Paul Shephard

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Christine Agar

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following: -

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test. As Diseworth sits in valley it already has air quality issues as all the fumes generated by the Airport, DHL, the M1 and the A42 seem to gather around the village. An industrial park on the hillside overlooking Diseworth will make this situation considerably worse.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self-evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement. Why build on what must surely be high quality farmland – there must be other locations which would not result in the loss of such a valuable asset.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non-Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *“immediate need for additional employment land”*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *“detrimental to ...nearby residential properties”*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent

history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and rat running than can be tolerated. There must be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours faithfully,

Christine Agar

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: DISEWORTH LOCAL OBJECTION
Date: 12 March 2022 20:16:04

Local Plan Review. Consultation Response

Tracey Handley
[REDACTED]

Dear Sirs,

My response to the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are as follows:-

L.P Policy S3... states that planning needs to “takes account of different roles and character of different areas” and that planning should recognise the character and beauty of the countryside - this proposal does not comply with this criteria.

The role and character of the proposed site consist solely and only of open countryside and farmland. This site is also outside the limits of the development and situated in designated countryside so is at variance with the planning policy in this regard.

In respect of the EMP90 site - this site is not sustainable, the site is not sustainably located, it would need to be supported by comprehensive sustainable access strategy. The only way to achieve this would be at the expense of the destruction of local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 meters from homes is inadequate and unsustainable.

The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

Diseworth natural heritage is open [designated] countryside and farmland. Most residents, including myself moved to this beautiful village because of the rural setting and the access afforded to open and unspoiled countryside, we had no fear that this countryside would be despoiled, not least because Diseworth is a designated conservation village. This proposed development with certainty devalue our properties massively.

To have our local environment so significantly undermined is not good for our health and wellbeing and emotions .

With the EMP90 site, There are many points to be considered here -
The increase in traffic, Light pollution, noise pollution - no doubt this will be 24 hours a day? Diesel engines, the sound of incessant and over loud reverser klaxons no more than 75 meters from our homes. The sound of the birdsong will become extinct.
Our countryside views will be gone, all that will be visible will be 80 foot monstrosities.

The landscape around Diseworth is ancient, as is the village, little has changed since it's entry in the Doomsday book. In respect of the EMP90 nothing will be protected or enhanced. Designated countryside of over a thousand years standing will be razed to the ground and covered in concrete. Our argument is that the proposal does not fit the rule! The 5m buffers will achieve nothing on a fully industrialised 100 hectare site.

It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. **This is unacceptable!**

There will obviously be an increase of freight flights, as the freight operators normally use old very large noisy aircraft, the noise certainly will increase, some days we are plagued with the smell of aviation fuel, this will also certainly increase.

In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an "immediate need for additional employment land".

Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being "detrimental to ...nearby residential properties". Diseworth is only separated by 75 metres.

This proposal is a ill conceived scheme in the wrong place on an unprecedented scale, it would not be benefit to the local environment. It is only promoted by the alliance of an opportunistic developer who clearly have no real knowledge or interest in the locality.

In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

Sign....Tracey Handley

Sent from my Galaxy

From: [REDACTED]
To: [PLANNING POLICY](#)
Cc: [REDACTED]
Subject: EXTERNAL: NO to Industrial zone plan
Date: 12 March 2022 22:21:03

Our objection to the Development Strategy Policy Options set out by NWL Council Planners concerning development around our village of Diseworth is essential to safeguard the well-being of not only Diseworth but villages for miles around and their residents. The identified industrial zone which comes right up to Diseworth's boundary is showing a blatant disregard for the needs of the villagers. No-one from the village was consulted and it seems that financial gain takes precedence over everything else.

We object on the grounds that there will be a loss of treasured rural life. We do not want the industrialisation of our countryside, especially so very very close to existing housing. We object to environmental degradation, loss of countryside walks, light pollution, so much extra noise and because of extra thousands of vehicles we will lose more of our clean air.

Just because someone in Whitehall has made a designated decision to use the land for industrial units without visiting or consulting smacks of 'Big Brother' tactics. This is deplorable and should stop!

From Ron and Kath Taylor

[REDACTED]

Local Plan Review. Consultation Response

NamePeter Gillatt.....

Address

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton and which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. My objections are based on the following:-

1. **LP. 5.25. The NPPF Policy S3** states that planning needs to *"take account of the different roles and character of different areas,"* and that planning should recognise *"the intrinsic character and beauty of the countryside"*. This proposal complies with neither of these criteria. The roles and character of the proposed site consist solely and only of open countryside and farmland. The site is also outside the Limits of Development and is in designated countryside so is again at variance with the National Planning Policy Framework [Policy S3].
1. **LP. 5.24.** In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *"There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)"*. This proposed development is not compliant with that requirement - see LP 25 comment above.
1. **LP. 5.17.** A core principle of the NPPF is to *"focus significant development in locations which are or can be made sustainable"*. At present this proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan.
1. **LP. 4.6. Objective 1 - "Promote the health and wellbeing of the district's population"** The proposal falls woefully short on this objective. It is immediately adjacent to the rural environment of Diseworth. Most residents have moved here because of the rural setting and access to open and unspoiled countryside, without any fear that this countryside would be despoiled, not least because Diseworth is a designated 'Conservation Village - with all that this implies. To have their local environment so significantly undermined cannot be good for their health and wellbeing. If it's Isley Walton today and it was the Rail/Freight interchange last week, Aldi and Amazon last year, and HS2 the year before that - what comes next? Where lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development.
1. **LP. 4.6. Objective 3 - "Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances"**. The proposal fails to meet these criteria. The proposal is that the site accommodates 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and some employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective.
1. **LP. 4.6. Objective 4 - Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care.** The development is non-compliant with this objective. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion will generate demand to fill 4.7k homes. This new village will therefore become primarily a dormitory town, thus increasing, rather than reducing,

travel. Domestic shopping will be at the prime supermarkets [ASHBY, Loughborough, etc, as will recreation and entertainment ~10miles away]. The principal mode of transport will be the car as no local viable public transport system exists.

1. **LP. 4.6. Objective 9** - "*New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs).*" Based on history, I am sceptical that there will be effective management of flood risk - whatever effort NWLDC and/or its partners make to do so. The proposed site will substitute a vast amount of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse additionally now also accommodates much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed, and properties are flooded. Further development will only make the situation worse.
1. **LP. 4.6. Objective 10** - "*Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets*". Again, non-compliant. The distinctive elements of the district's character between East Midlands Airport and Ashby de la Zouch are rolling countryside and farmland. This development will destroy that aspect of the area.
1. **L.P. 4.6. Objective 11** - "*Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance*". This development cannot possibly protect any of the natural environment - or associated wildlife, plant life, etc. Even the SHELAA recognises this [SHELAA pages 362-3] and lists several exposed species etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character from its Doomsday entry.
1. **Noise.** In the context of noise, anyone purchasing a property on the site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy through tourism. It is also a centre of high noise production. A new village on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off path and easterly landing path are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as noise and pollution. You can double glaze and insulate your house but that doesn't work when you have an open window in the bedroom or elsewhere in summer - and you can't double glaze your garden. Further, Breedon quarry lies close to the western edge of the proposed site and residents will be subjected to the sounding of regular [loud] warning sirens - shortly followed by the loud explosion of quarry blasting [maybe even with slight earth tremors.
1. **Traffic.** In the context of road traffic and infrastructure generally, the major access to/from the site will obviously be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, as well as airport customer traffic and EMA freight lorries. A further 4.7k houses will produce circa 16k car movements per day. Most households now have two cars, some more, and these will depart and return on every journey. Entry onto the A453 from Diseworth will be even more problematical than now, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much-increased accident rate. This area is simply not suitable for further large increases in car movements. There is already much on-road parking in Diseworth and Long Whatton, reducing flow and traffic, including grid lock when the M1 has problems. This causes problems for other road users such as walkers and horse riders. The addition of further traffic arising from HS2 development and operation will add further issues and burden.
1. **Cumulative Development.** There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or over development in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see above].

Certainly, in the case of development around Diseworth, historically a farm based village, there have been very substantial tracks of agricultural land that have been given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to NPPF Policy 3 and must be recognised along with provision to curtail this erosion. Long Whatton comprises substantially Estate land and farming land with long histories.

2. The proposal seems to be based on outdated retail needs that are no longer applicable given the downturn in retail and the shift to online resulting in retail locations with increasing rates of under occupancy. NWLDC should reassess and revise these assumptions.
 3. The proposal seems to be contrary to NWLDC own plan statements regarding the airport operation and safe zones.
 4. Unrealistically, the proposal is silent regarding considerations arising from, and the impact of, HS2 which is proposed to cut through Long Whatton and Diseworth increasing division and counter to LP objectives.
-
1. **Summary.** This proposal is an ill thought-out scheme, in the wrong place, is on an unprecedented scale, would not significantly reduce the demand for housing in Leicester, is promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developer who clearly have no real knowledge or interest in the locality. It exists only because no regard is given to the consequence of the development on either the local communities or on the environment. Further, it endeavours to ride roughshod over pretty much every relevant NPPF planning principle and the primary objectives and planning criteria presently put in place by NWLDC in the present Local Plan
-
1. **Conclusion and Planning Integrity.** In order for this proposal to progress it will be necessary for NWLDC to compromise, or ignore, its own guidance and primary objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless.

Local Plan Review. Consultation Response

Name Kathryn Gillatt.....

Address

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton and which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. My objections are based on the following:-

1. **LP. 5.25. The NPPF Policy S3** states that planning needs to *"take account of the different roles and character of different areas,"* and that planning should recognise *"the intrinsic character and beauty of the countryside"*. This proposal complies with neither of these criteria. The roles and character of the proposed site consist solely and only of open countryside and farmland. The site is also outside the Limits of Development and is in designated countryside so is again at variance with the National Planning Policy Framework [Policy S3].
1. **L.P. 5.24.** In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *"There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)"*. This proposed development is not compliant with that requirement - see LP 25 comment above.
1. **LP. 5.17.** A core principle of the NPPF is to *"focus significant development in locations which are or can be made sustainable"*. At present this proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan.
1. **LP. 4.6. Objective 1** - *"Promote the health and wellbeing of the district's population"* The proposal falls woefully short on this objective. It is immediately adjacent to the rural environment of Diseworth. Most residents have moved here because of the rural setting and access to open and unspoiled countryside, without any fear that this countryside would be despoiled, not least because Diseworth is a designated 'Conservation Village - with all that this implies. To have their local environment so significantly undermined cannot be good for their health and wellbeing. If it's Isley Walton today and it was the Rail/Freight interchange last week, Aldi and Amazon last year, and HS2 the year before that - what comes next? Where lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development.
1. **LP. 4.6. Objective 3** - *"Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances"*. The proposal fails to meet these criteria. The proposal is that the site accommodates 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and some employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective.
1. **LP. 4.6. Objective 4** - *Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care.* The development is non-compliant with this objective. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion will generate demand to fill 4.7k homes. This new village will therefore become primarily a dormitory town, thus increasing, rather than reducing,

travel. Domestic shopping will be at the prime supermarkets [ASHBY, Loughborough, etc, as will recreation and entertainment ~10miles away]. The principal mode of transport will be the car as no local viable public transport system exists.

1. **LP. 4.6. Objective 9** - "*New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs).*" Based on history, I am sceptical that there will be effective management of flood risk - whatever effort NWLDC and/or its partners make to do so. The proposed site will substitute a vast amount of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse additionally now also accommodates much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed, and properties are flooded. Further development will only make the situation worse.
1. **LP. 4.6. Objective 10** - "*Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets*". Again, non-compliant. The distinctive elements of the district's character between East Midlands Airport and Ashby de la Zouch are rolling countryside and farmland. This development will destroy that aspect of the area.
1. **L.P. 4.6. Objective 11** - "*Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance*". This development cannot possibly protect any of the natural environment - or associated wildlife, plant life, etc. Even the SHELAA recognises this [SHELAA pages 362-3] and lists several exposed species etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character from its Doomsday entry.
1. **Noise.** In the context of noise, anyone purchasing a property on the site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy through tourism. It is also a centre of high noise production. A new village on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off path and easterly landing path are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as noise and pollution. You can double glaze and insulate your house but that doesn't work when you have an open window in the bedroom or elsewhere in summer - and you can't double glaze your garden. Further, Breedon quarry lies close to the western edge of the proposed site and residents will be subjected to the sounding of regular [loud] warning sirens - shortly followed by the loud explosion of quarry blasting [maybe even with slight earth tremors.
1. **Traffic.** In the context of road traffic and infrastructure generally, the major access to/from the site will obviously be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, as well as airport customer traffic and EMA freight lorries. A further 4.7k houses will produce circa 16k car movements per day. Most households now have two cars, some more, and these will depart and return on every journey. Entry onto the A453 from Diseworth will be even more problematical than now, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much-increased accident rate. This area is simply not suitable for further large increases in car movements. There is already much on-road parking in Diseworth and Long Whatton, reducing flow and traffic, including grid lock when the M1 has problems. This causes problems for other road users such as walkers and horse riders. The addition of further traffic arising from HS2 development and operation will add further issues and burden.
1. **Cumulative Development.** There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or over development in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see above].

Certainly, in the case of development around Diseworth, historically a farm based village, there have been very substantial tracks of agricultural land that have been given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to NPPF Policy 3 and must be recognised along with provision to curtail this erosion. Long Whatton comprises substantially Estate land and farming land with long histories.

2. The proposal seems to be based on outdated retail needs that are no longer applicable given the downturn in retail and the shift to online resulting in retail locations with increasing rates of under occupancy. NWLDC should reassess and revise these assumptions.
 3. The proposal seems to be contrary to NWLDC own plan statements regarding the airport operation and safe zones.
 4. Unrealistically, the proposal is silent regarding considerations arising from, and the impact of, HS2 which is proposed to cut through Long Whatton and Diseworth increasing division and counter to LP objectives.
-
1. **Summary.** This proposal is an ill thought-out scheme, in the wrong place, is on an unprecedented scale, would not significantly reduce the demand for housing in Leicester, is promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developer who clearly have no real knowledge or interest in the locality. It exists only because no regard is given to the consequence of the development on either the local communities or on the environment. Further, it endeavours to ride roughshod over pretty much every relevant NPPF planning principle and the primary objectives and planning criteria presently put in place by NWLDC in the present Local Plan
-
1. **Conclusion and Planning Integrity.** In order for this proposal to progress it will be necessary for NWLDC to compromise, or ignore, its own guidance and primary objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless.

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Response to Local Plan Review
Date: 13 March 2022 10:48:00

Dear Sirs,

I would like you to take into consideration my concerns regarding sections of the Local Plan [LP] Review, in particular the potential development of land around Isley Walton [SHELAA 2021. IW1] and the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90]. The 2017/21 NWLDC Local Plan sets out 15 primary objectives and I feel the Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet, indeed conflict with several of these objectives.

Objective 1. Health and wellbeing. Both proposals fail this test.

Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth can only aggravate the problem.

Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open countryside and farmland.

Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an "immediate need for additional employment land". Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being "detrimental to ...nearby residential properties".

Diseworth is only separated by 75 metres.

Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce

immeasurable additional traffic exhaust and noise pollution.

Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1 immediately adjacent to the massive housing development in Castle Donington. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally,

the LHA Guidance Policy is compromised.

In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully

C Curling

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Prof Colin Waters

Address

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped. It will lead to a 32 times increase in the size of the village, which is a non-proportionate increase in development.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased significantly with the A453, which is already prone to traffic jams, being even more congested, particularly at peak times.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years, leading to significant flooding in the village. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster, greatly increasing the risk of further flooding in the future.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self-evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

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10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *"immediate need for additional employment land"*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *"detrimental to ...nearby residential properties"*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight

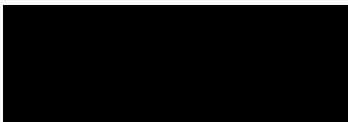
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15. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised. Surely, there must be brownfield sites where such large industrial and housing development is more suitable and can lead to regeneration rather than destruction.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit certain parties is not an acceptable practice.

Yours Faithfully,

Sign



By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Mrs Kerryn Waters

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

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Yours Faithfully,

Sign



From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: RE: Local Plan Proposals - Consultation Response
Date: 13 March 2022 15:51:16

Dear Sirs,

An additional point to my main response below is that I object to any inclusion of properties currently within the SHELAA for the Diseworth area being included for development within the amended plan. If 4500 houses are to be built within a few yards of the parish boundary, that should amply deal with any requirement for this village.

If the consultation actually is genuine and the New Town does not go ahead or goes ahead in a mitigated form, then the position can be dealt with in the next review.

Yours faithfully

From: [REDACTED]
Sent: 13 March 2022 12:08
To: 'PLANNING POLICY' <PLANNING.POLICY@NWLeicestershire.gov.uk>
Subject: Local Plan Proposals - Consultation Response
Please find letter and attachment

[REDACTED]
[REDACTED]
[REDACTED]
13/3/22

NWLDC Planning

(By email only)

Dear Sir,

Response to Consultation on NWLDC Local Plan Amendment.

This letter incorporates the objections set out in the standard letter attached (RB1”) which I am aware has been used by a number of people in this village. It relates to the Isley Walton/New Town proposals and those for the Industrial Land South of the A453.

What follows is an expression of my honestly held opinion. It does not purport to be an argued legal position at this stage.

Consultation

- My general point is that the process is being followed simply to give legitimacy to decisions which have already been made. Some evidence to support this view is already to hand. More may follow. If such an opinion is shown to be correct, the whole process is subject to challenge.
- The consultation document is opaque and understandable only to planning professionals. A layperson may practically be able to access information on a given topic but only when she/he has a specific aim. It self-evidently and a long and complex document. That aim will only be known when elements of the document already have been accessed by such a professional. That position is of course circular and, in my opinion, that opacity is deliberate in an attempt to hide oppressive proposals.
- Officers of NWLDC publicly said on 14.2.22 that a planning application was anticipated by the end of the year in relation to the Isley Walton/housing land. I know at least part has already been transferred to the prospective developers. Despite protestations that “nothing was decided,” it beggars belief to think national developers would make such an investment without the assurance the developments would go ahead. If any were needed, I suggest this is evidence of a “done deal” in principle, accepting details would still have to be worked out.
- In the same meeting, only as an aside, the officers said “it is only fair that you should know that SEGRO are promoting the (employment land.)” In my opinion, this was a completely disingenuous comment – at best. Only two weeks later, the Designation of the relevant land as part of the tax-free area of the Freeport was publicly announced. It is explicitly proposed for industrial purposes. It is now apparent that the inclusion had been planned for months.

Not to disclose this fact in the context of a meeting, the purpose of which was consultation, shows the complete lack of transparency in the process and a lack of good faith – particularly vital in public law matters. It reinforces my opinion that the process is a sham.

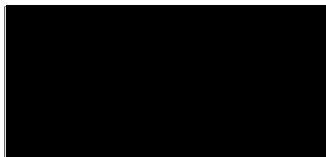
- As a more general point, I am a new resident of this village. Had I known of what is now clearly likely to happen, I would not have purchased a property here. Although the plans have clearly been in train for years, no reference to them appears anywhere in documents (i.e. local searches etc) accessed by prospective purchasers in the conveyancing process. This is wrong and oppressive. It is no answer to say that “these are only proposals” for the reasons set out elsewhere in this letter.

The Specific Proposals

- I refer again to “RB1.” That sets out my initial views. Some extra points follow
- No reasonable public authority could act in this way in taking the Industrial B8/development together with the adjacent “New Town.” The juxtaposition of the two “proposals” is oppressive, akin to the behaviour of an autocratic state. There is a potential breach of ECHR in this conduct
- The inclusion of the Industrial Land in the *Local Plan* is unjustified.
 - a) Documentary evidence exists that in June 21, that the airport had no intention of developing the land for its purposes. This is further evidenced by the fact it was not included in the original Freeport proposal and has only relatively recently been included.
 - b) Consequently, IF NWLDC’s position is truly independent for planning purposes, then there can be no reason for it to include this land in the amended Local Plan
 - c) If, as seems likely, the inclusion is simply as a result of the Radcliffe Power Station having to be kept online for longer than planned, my opinion is that EMA/ SEGRO are using the situation to “slip in” the land into the Freeport. At most, the power station will only remain open for a few years longer but this grade3 agricultural land will be lost forever.

I fundamentally oppose the proposals and challenge the process being used.

Yours faithfully,

A large black rectangular redaction box covering the signature area.

Richard Brackenbury

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Richard Brackenbury

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *“immediate need for additional employment land”*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *“detrimental to ...nearby residential properties”*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

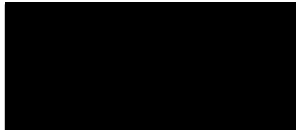
13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

A black rectangular redaction box covering the signature area.

Local Plan Review. Consultation Response

Name Emma Ward

Address

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90]. My objections are based on the following:-

1. LP. 5.25. Policy S3. The NPPF states that planning needs to “take account of the different roles and character of different areas,” and that planning should recognise “the intrinsic character and beauty of the countryside”. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that "There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)". The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to “focus significant development in locations which are or can be made sustainable”. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local

lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable “The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy”. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - "Promote the health and wellbeing of the district's population" Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - "Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances". Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this

makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

6. LP. 4.6. Objective 4 – “Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care”. The IW1 development is non-compliant. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion, will generate sufficient demand to justify 4.7k homes. This new village will therefore become primarily a dormitory town, increasing, rather than reducing, travel. Shopping will be at local supermarkets [Ashby, Loughborough, etc.] as will recreation and entertainment. ~10miles away. The principal transport used will be the car as no viable public transport system exists.

7. LP. 4.6. Objective 9 - "New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)." In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or it's partners undertake to achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

8. LP. 4.6. Objective 10 - "Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets". Again, neither proposal is compliant. The distinctive elements of the district's character between the MOTO MSA and Ashby de la Zouch [south of the a453] are rolling countryside and farmland. Both these developments will totally destroy all aspects of local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. L.P. 4.6. Objective 11 - "Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance". Neither development can possibly protect any of the natural environment – nor the associated wildlife, plant life, etc. at present supported by this open countryside. In respect of IW1, even the SHELAA recognises this fact [SHELAA pages 362-3] and lists several exposed species, etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character since its entry in the Domesday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that “In view of its scale, it is more likely that a change to policy/strategy would be required”. So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states “In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended”. This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

10. LP Page 18. [Pollution]. This states that:- “..new development is not itself detrimentally affected by noise.”. Anyone purchasing a property on the IW1 site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect of the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechnicons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

11. Traffic. The major access to/from both sites will be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, airport customer traffic and EMA freight lorries. The LW1 site, housing a further 4.7k houses will produce circa 16k car movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even more problematic than already, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in transport movements. In respect of EMP90, this site has no viable access from the south or west [which would be through the village of Diseworth. The only access available is from the A453. As SHELAA concedes [Appendix 2. Page 170], this is not compatible with the Leicestershire Highways Design Guidance [Policy INS3] - unless the LHA can be persuaded to change their mind. Again, change the rules to fit the proposal, not change the proposal to fit the rules.

12. Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- “What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations.” As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind

greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as "...Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development. Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

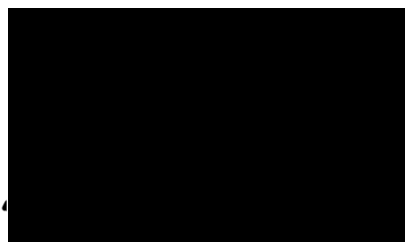
17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies "... an immediate need for additional employment land". It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly "...detrimental to the amenities of...nearby residential properties and the wider environment" – vis. Diseworth.

18. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove it's own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully

Ian Ward





13th March 2022

Planning Policy & Land Charges Team,
NWLDC Council Offices,
Whitwick Road,
Coalville
LE67 3FJ

Dear Sirs,

Please find below my reasonable objections to elements of the Local Plan.

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth and the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals **both** fail to meet several of these objectives.

- 1. Objective 1. Health and wellbeing.** - Both proposals fail this test.
- 2. Objective 3. High quality housing stock and reflection of local context.** - Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.
- 3. Objective 4. Reduce the need to travel.** - IW1 will fail this test. Both travel and car use will be increased.
- 4. Objective 9. Effective flood prevention.** - Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.
- 5. Objective 10. Preserve and enhance the district's natural and rural heritage.** - It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.
- 6. Objective 11. Protect and enhance the natural environment.** - Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.
- 7. Countryside.** - National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. - The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. - Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. - IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. - EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *"immediate need for additional employment land"*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *"detrimental to ...nearby residential properties"*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy - In the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. - The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. - In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe's last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they

endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

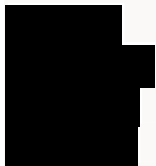
Yours Faithfully,

A solid black rectangular box used to redact the signature of Paul Bunyan.

Paul Bunyan

Local Plan Review. Consultation Response

Duncan Ross



Dear Sirs,

In response to the Local Plan Review on the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] adjacent to the village of Diseworth, and the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are as follows

2. Local Plan Review objectives

Q1 - Do you agree with these Local Plan Review Objectives? If not, why not?

The NWLDC Local Plan [2017 – As amended 2021] The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet the majority of these objectives.

Objective 1. Health and wellbeing. Both proposals will fail this test due to increase in traffic movements leading to air pollution and noise pollution

Objective 2. Delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type. Is this guaranteed at IW1, or will like most developments, the developer(s) will inevitably renege on any agreement to ensure the maximum return to themselves. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1.

Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped as the developers will ensure maximum return to themselves, in addition, Page 18 of the Local Plan [Pollution] states that new developments **should not** be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths, thus by definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

Objective 4. Reduce the need to travel. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover

their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. IW1 will fail this test as most homes will have one or more cars and inevitably both travel and car use will increase circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

Objective 6. Enhance the vitality and viability of the district's town and local centres which have an important role serving our local communities with a particular focus on the regeneration of Coalville. If the aim is to focus of the regeneration of Coalville in the district than how does the IW1 development contribute to this and any jobs created in industrial warehousing at EMP90 will be of no benefit to residents of Coalville without the need to travel, thus increasing air and noise pollution.

Objective 7. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years leading to flooded properties in both Diseworth and Long Whatton, IW1 will generate further issues, in addition, the creation of 100 hectares of warehouses and concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

Objective 9. Conserve and enhance the natural environment and biodiversity. Clearly both proposals fail this test. Government objectives under the Environmental Land Management Scheme are to increase biodiversity and enhance the environment, these developments will do neither. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside.

Objective 10. Ensure the efficient use of natural resources and brownfield land. The Diseworth natural heritage is open [designated] countryside and farmland and not brownfield land.

Objective 11 - Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way. Whilst this is an ambitious claim it is merely a "mission statement" that will not be delivered, as has been shown by numerous failings over many years by NWLDC. The only positive I have seen in recent times is the newly opened leisure facility at Coalville.

In Addition:

EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an "*immediate need for additional employment land*". Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement

of not being “*detrimental to ...nearby residential properties*”. Diseworth is only separated by 75 metres.

The Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There must be a point at which this cumulative development is considered enough and is halted.

These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of opportunistic landowners and exploitative developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised. For this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless.

Finally, I have massive concerns of the role Mr Nick Rushton has in this, both as leader of Leicestershire County Council and a director of East Midlands Freeport, his position is compromised with a foot in both camps.

Yours Faithfully,

Duncan Ross

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: EMP90
Date: 13 March 2022 13:34:59

Dear sirs,

I am writing to object to the proposed development of land for industrial use at Diseworth. This is prime agricultural land which we cannot afford to lose to concrete. With the situation in Ukraine, wheat supplies are going to be limited, and we should be aiming to be growing more of our own food. We cannot become self sufficient if we keep building on farm land. There should be no encroachment of industrial use this side of the A453.

The village of Diseworth will be completely swamped by this development. The noise and dirt during construction will affect a wide area, not to mention the traffic that will rat run through both Diseworth and Long Whatton. The industrial units will no doubt be working 24/7 causing both noise and light pollution to a rural area.

I hope that the Council will refuse this planning application.

Jill Morgan

[REDACTED]

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Isley Walton New Town
Date: 13 March 2022 13:50:31

Dear Sirs,

I wish to object to the proposal to build Isley Walton New Town. To build something of that scale in the countryside, taking 780 acres of farmland out of production is unbelievable. Where are the facilities to support this size of development? The A453 is congested already without adding that volume of traffic and it will push more vehicles onto the lanes through Diseworth, Belton and Long Whatton.

New homes are required but they should be built on the many brown field sites which already have the basics of electricity, gas, water and sewage systems available. They will also be closer to shops, pubs and recreational facilities.

It will not only remove the production of food from this land permanently, it will also affect those who farm adjacent to it with antisocial behaviour, trespassing and damage to crops and livestock.

I hope that the Council will refuse this plan.

Jill Morgan



Local Plan Review. Consultation Response

Jacqui Donaghy



Dear Sirs,

In response to the Local Plan Review on the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] adjacent to the village of Diseworth, and the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are as follows

2. Local Plan Review objectives

Q1 - Do you agree with these Local Plan Review Objectives? If not, why not?

No, I do not agree and my objections are listed below.

The NWLDC Local Plan [2017 – As amended 2021] The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet the majority of these objectives.

Objective 1. Health and wellbeing. Both proposals will fail this test due to increase in traffic movements leading to air pollution and noise pollution, resulting in medical illnesses and mental health issues accordingly.

Objective 2. Delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type. Is this guaranteed at IW1, or will like most developments, the developer(s) will inevitably renege on any agreement to build affordable housing, to ensure the maximum return to themselves. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1.

Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped as the developers will ensure maximum return to themselves, in addition, Page 18 of the Local Plan [Pollution] states that new developments **should not** be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths, thus by definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

Objective 4. Reduce the need to travel. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. IW1 will fail this test as most homes will have one or more cars and inevitably both travel and car use will increase circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal. There are already problems with motorists speeding through the village and increase in traffic will add to this problem.

Objective 6. Enhance the vitality and viability of the district's town and local centres which have an important role serving our local communities with a particular focus on the regeneration of Coalville. If the aim is to focus of the regeneration of Coalville in the district than how does the IW1 development contribute to this and any jobs created in industrial warehousing at EMP90 will be of no benefit to residents of Coalville without the need to travel, thus increasing air and noise pollution.

Objective 7. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years leading to flooded properties in both Diseworth and Long Whatton, IW1 will generate further issues, in addition, the creation of 100 hectares of warehouses and concrete on EMP90, on a downslope to Diseworth is a recipe for disaster, with the potential for more houses to be flooded.

Objective 9. Conserve and enhance the natural environment and biodiversity. Clearly both proposals fail this test. Government objectives under the Environmental Land Management Scheme are to increase biodiversity and enhance the environment, these developments will do neither. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside.

Objective 10. Ensure the efficient use of natural resources and brownfield land. The Diseworth natural heritage is open [designated] countryside and farmland and not brownfield land.

Objective 11 - Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way. Whilst this is an ambitious claim it is merely a "mission statement" that will not be delivered, as has been shown by numerous failings over many years by NWLDC. The only positive I have seen in recent times is the newly opened leisure facility at Coalville.

In Addition:

EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an “*immediate need for additional employment land*”. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being “*detrimental to ...nearby residential properties*”. Diseworth is only separated by 75 metres.

The Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There must be a point at which this cumulative development is considered enough and is halted.

These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of opportunistic landowners and exploitative developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised. For this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless.

Finally, I have massive concerns of the role Mr Nick Rushton has in this, both as leader of Leicestershire County Council and a director of East Midlands Freeport, his position is compromised with a foot in both camps. Mr Rushton must consider relinquishing one of these roles and deciding his stance and position regarding both proposed developments.

Yours faithfully,

Jacqui Donaghy

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name J M Onyon

Address

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self-evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the

intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *“immediate need for additional employment land”*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *“detrimental to ...nearby residential properties”*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

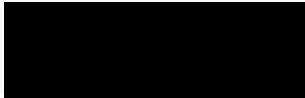
14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local rat running than can be tolerated.

There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, that would be of severe detriment to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

A solid black rectangular box redacting the signature of the sender.

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Thomas Onyon

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *“immediate need for additional employment land”*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *“detrimental to ...nearby residential properties”*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

Sign:

A black rectangular redaction box covering the signature area.

Local Plan Review. Consultation Response

Name Jo Bunyan

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90]. My objections are based on the following:-

1. LP. 5.25. Policy S3. The NPPF states that planning needs to *“take account of the different roles and character of different areas, “* and that planning should recognise *“the intrinsic character and beauty of the countryside”*. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].

2. L.P. 5.24. In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *“There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)”*. The IW1 development is not compliant with that requirement - see LP 25 comment above.

3. LP. 5.17. A core principle of the NPPF is to *“focus significant development in locations which are or can be made sustainable”*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to locals wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *“The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy”*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

4. LP. 4.6. Objective 1 - "*Promote the health and wellbeing of the district's population*" Both proposals fall woefully short of this objective. Both are set in designated countryside that forms the rural setting of Diseworth. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have had no fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment so significantly undermined cannot be good for health and wellbeing. If it's Isley Walton tomorrow, EMP90 next week, the Rail/Freight interchange last week, Amazon last year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

5. LP. 4.6. Objective 3 - "*Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances*". Both proposals fail to meet these criteria. The IW1 proposal is for 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective. In respect of EMP90, there is no way that 400,000 sq. metres of predominantly storage/warehousing can be considered as reflecting a local context that has been farmland for as long as historical records have existed.

6. LP. 4.6. Objective 4 - "*Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care*". The IW1 development is non-compliant. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally, the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion, will generate sufficient demand to justify 4.7k homes. This new village will therefore become primarily a dormitory town, increasing, rather than reducing, travel. Shopping will be at local supermarkets [Ashby, Loughborough, etc.] as will recreation and entertainment. ~10miles away. The principal transport used will be the car as no viable public transport system exists.

7. LP. 4.6. Objective 9 - "*New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)*." In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or it's partners undertake to achieve this objective. The proposed site will substitute a vast acreage of open grassland for concrete which, in itself, will be difficult enough to manage. Additionally, the site occupies a greater part of the catchment area feeding the natural stream that flows

through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

8. LP. 4.6. Objective 10 - "*Conserve and enhance the identity, character and diversity and local distinctiveness of the district's built, natural, cultural, industrial and rural heritage and heritage assets*". Again, neither proposal is compliant. The distinctive elements of the district's character between the MOTO MSA and Ashby de la Zouch [south of the a453] are rolling countryside and farmland. Both these developments will totally destroy all aspects of local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. L.P. 4.6. Objective 11 - "*Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance*". Neither development can possibly protect any of the natural environment – nor the associated wildlife, plant life, etc. at present supported by this open countryside. In respect of IW1, even the SHELAA recognises this fact [SHELAA pages 362-3] and lists several exposed species, etc. Some of the fields feature furrows dating from pre-industry. The landscape around Diseworth is ancient, as is the village, little changed in character since its entry in the Domesday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that "*In view of its scale, it is more likely that a change to policy/strategy would be required*". So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states "*In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended*". This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

10. LP Page 18. [Pollution]. This states that:- "*..new development is not itself detrimentally affected by noise.*". Anyone purchasing a property on the IW1 site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You

can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect of the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechonics and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

11. Traffic. The major access to/from both sites will be the A453. This is already a busy road carrying local traffic, including heavy quarry trucks, airport customer traffic and EMA freight lorries. The LW1 site, housing a further 4.7k houses will produce circa 16k car movements per day [most households now have two cars, some more, and these will depart and return on every journey]. Entry onto the A453 from Diseworth will be even more problematic than already, especially during busy times. There will also be a massive increase in cars 'rat running' through Diseworth and/or Long Whatton. This will render the local road system subject to both heavy congestion and a much increased accident rate. This area is simply not suitable for further large increases in transport movements. In respect of EMP90, this site has no viable access from the south or west [which would be through the village of Diseworth. The only access available is from the A453. As SHELAA concedes [Appendix 2. Page 170], this is not compatible with the Leicestershire Highways Design Guidance [Policy INS3] - unless the LHA can be persuaded to change their mind. Again, change the rules to fit the proposal, not change the proposal to fit the rules.

12. Cumulative Development. There is no direct policy in the Local Plan [or the Consultation Document] that addresses the effects of cumulative or 'over development' in any one area. This is a significant oversight and needs to be addressed. It can be reasonably argued that too much development in any one area amounts to a collective breach of most of the NWLDC primary objectives [see paras above]. Certainly, around Diseworth, historically a farm based community, there have been very substantial tracts of agricultural land given over to major industrial and infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to Policy S3 and must be recognised - along with provision to curtail this erosion [See also para.1 above].

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- *"What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations."* As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a

hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

14. LP 5.7 Geographical Mismatch. In respect of the IW1 proposal, LP 5.7 sets a target of 9,620 houses to be built across the district [up to 2039]. It is not logical to consider placing nearly half of them on this one site. To do so will increase travel, congestion and pollution [see also para. 6 above]. We already have the development of 860 houses in Castle Donington with a further 1,800 to follow. Construction has now started on 3,200 new builds on the Garendon site between Hathern and Loughborough. The addition of the IW1 proposal would cumulatively equate to a greater number of houses being built than are planned for over the entire next 17 years [for the whole district] - all of them to be built in the short term and all within a 5 mile radius of Diseworth? This is a nonsense.

15. Housing Demand and Effect of Covid. It is already accepted that the scale of real demand for additional properties is not accurately known. Recent history has shown that modelling and the subsequent extraction of statistics has proved to be wildly unreliable. There can therefore be no certainty that the proposal will be required at all, and certainly not on such a disproportionate scale. It is also uncertain what will evolve in the context of work practice in a post covid world. It is quite possible that the trend for 'work from home' will fundamentally change the requirements of both property provision and property design, as well as change infrastructure requirements, social amenity demands and the general provision of local facilities. The proposed site and any envisaged design could well prove to be made redundant before it starts.

16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as “...*Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development*”. Please provide assurance that any revised LP will not dilute this policy and that effective separation will be enforced.

17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies “...*an immediate need for additional employment land*”. It is merely a glint in the eyes of the landowners and the developers. There is little prospect of a sustainable transport mode being made available. It is likely that the site will operate a shift system and late night bus transport is not viable. Additionally, many of those employed will be HGV and/or van drivers keeping erratic working hours and to would be reliant on private car transport. As already discussed, the site is not accessible under current LHA regulation. There is no question other than that the site is exceedingly “...*detrimental to the amenities of...nearby residential properties and the wider environment*” – vis. Diseworth.

18. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an

exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove it's own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully

Jo Bunyan

Local Plan Review. Consultation Response

Name Jo Bunyan

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of Diseworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

The objections that have been formulated by the community and enclosed separately do cover the massive concerns that the villagers have with respect to the developments proposed in this area. I would also like to add some further points.

We own the land that is adjacent to the proposed development on Hyams Lane. We see on a daily basis the number of parents and children, dog walkers and horse riders who use the lane and appreciate the view and natural beauty and open spaces. The same is true of the lane running from the end of Clements Gate and the surrounding fields. During Covid where great emphasis has been placed on the mental well being of people these areas were a huge lifeline to the community and have subsequently continued to be massively used by the community.

As an owner of horses, dogs and a parent to four children the importance of spaces where people can exercise and enjoy leisure in safe places away from the roads and traffic cannot be over emphasised. You are proposing to remove all of those amenities and safe spaces from the villagers with the associated detriment to safety and health with the proposed industrial estate which will destroy a large area directly adjacent to the village. There are already a large number of accidents involving horse riders and drivers with horrific consequences. There are a large number of horse owners in the village and several livery yards in the village who use the off road riding to be safe from vehicles driving through the village. Removing safe areas, increasing the volume of traffic in the local area is only going to massively increase the risk to horses, riders and drivers.

There are then the issues of pollution – environmental including noise, lighting, carbon monoxide and litter. You only have to look around Junctions 23a and 24 to see the horrendous amount of litter that is dropped from vehicles using this area and this will only get worse. There will be deliveries at unsociable hours, large traffic movements and despite any platitudes that are made during planning applications that vehicular access and timings will be restricted, once planning is granted that is never the case as has been seen with DHL and other developments in the area.

And then we come onto flooding. We have seen increased flooding in the village over the last few years which while partly associated with climate change is also related to increases in development, loss of farmland and balancing ponds being opened at the airport sending water down into the village. We also see large amounts of run off down the hill on Hyams Lane into the village adding to the flooding problems. Building on these fields will only make that problem worse.

And then we have the natural habitats – the hedgerows and large numbers of birds that are seen in this area. Those will be destroyed and no amount of planting is going to replace the habitat that old hedgerows naturally provide to the environment.

There are numerous other reasons I could give for objecting to the proposals. You are fundamentally ignoring the local plans that have been drawn up in previous years allegedly looking after the welfare of the local communities and preserving the beauty of the area. All the proposals being made seem to blatantly disregard the communities, the environment and fundamentally the future of this village. Removal of more land which is currently being farmed around the village seems utter madness as the population needs to be more self-sustaining. I am sorry but building an industrial estate that depletes a natural resource plus ruins the local beauty of the area needs to be vigorously opposed. In the same way destroying a massive chunk of the countryside to build a ridiculous amount of houses on one massive site that again cannot sustain it is ludicrous.

I am hoping common sense prevails.

Yours faithfully

Jo Bunyan

PART B – Your Representation

Please use a separate sheet for each question you wish to respond to.

Please state which consultation question your response relates...

Q6

The assessment under self-building is totally blind to the impact of current council practices towards planning and the perceived inability of self-builders to obtain permission.

I speak from experience as a self-builder who was resigned to the renovation route due to a perception, maybe incorrectly, that there was zero possibility of obtaining an empty plot, as council support and policies were primarily supportive of larger housing developments on pre-allocated lots. To consider the current level of applications as being representative of the demand for such an option, is nothing other than a failure to understand the full picture and reasons for such a low level of interest.

I have seen nothing from NWLDC to suggest that they have a positive view towards self-build, or any promotion of the existence register and encouragement to those that are interested in taking such a route. Only once those that are interested are encouraged by NWLDC to come forward, will the true demand of this segment become clear.

The council should include in the plan a clear strategy and policies to encourage the self-build fraternity, ensuring that a sense of encouragement and support at all levels of the council is palpable.

Developers should be encouraged by policy to enable self-build via allocation of plots to the segment. Options for developers to offer multi plots sites, already provisioned with services and road access.

There is no doubt that the architectural assortment inherent from self-build and the resulting sense of organic growth, would lead to a more varied and higher quality housing stock. Self-build is the norm in much of Europe which is evident in the lack of copy & paste housing developments, leading to a much more pleasant environment.

(Continue on a separate sheet /expand box if necessary)

Please state which consultation question your response relates...

Q11

I am responding with particular regard to EMP90 – “Land south of East Midlands Airport and south west of M1 J23a” outlined in “SHELLA 2021 Part 2 – Assessment of Potential Employment Sites”

Diseworth shows all the signs of evolutionary growth from its Roman/Saxon/Viking beginnings to the present day. There are a number of different building styles and sizes, presenting a picture of constant habitation with agricultural foundations with developments constructed for the needs of the residents.

As per the Local Plan 2017, Policy Ec2(e) - “Design and layout of the proposed development should have due regard to the protection and enhancement of Heritage Assets”.

It’s is evident that the proximity and nature of the proposed development is detrimental to the character and history of Diseworth, which has been carefully protected by the council via its designation as a Conservation Area and the ongoing strict adherence of the policies there in.

Ec2(f) – “The provision of cycle and walking links to the adjoining housing development proposed under Policy H3a; and..”. There is a PROW through the EMP90 site, which will be lost, thereby going against the existing council policy.

For such a development, that is so disruptive to an historic village, there should be no favourable view attached to it by virtue of landowners and developer’s interests, as highlighted in SHELLA 2021 Pt 2 – “The site is being promoted by landowners and developers with interest in the land and is considered to be available for development.”. There are much more suitable locations in the vicinity for a development of such a scale, these should be considered in preference. The Local Plan should ensure that for large developments, there is a policy of identifying suitable locations and indicating that development support would be favourable. This will ensure the most appropriate optimal allocation of land to suitable development. The ownership and desire for development should hold no sway in consideration of such disruptive developments.

(Continue on a separate sheet /expand box if necessary)

If you're not already on our consultation database would you like your details added to ensure you are notified of subsequent stages of the Local Plan Review and other planning policy matters?

Yes

No

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 understand that an unredacted copy of all representations will be made available to the Planning Inspectorate and to the person appointed by the Secretary of State to conduct the examination.

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

Signed

Tim Burrage

Date

13 Mar 2021

Please send completed forms to planning.policy@nwleicestershire.gov.uk or
Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Monday 14 March 2022

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 publically 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 publically available.

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

Further information about the Council's privacy policy and how we collect, store and use your personal data can be found [here](#).

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.

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Jason Seja

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the

intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an *“immediate need for additional employment land”*. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being *“detrimental to ...nearby residential properties”*. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has

generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

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Yours Faithfully,

Sign 

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Chris Byrne.....

Address [REDACTED]

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6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

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Yours Faithfully,

Chris Byrne

From: [Ann Hawtin](#)
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response
Date: 13 March 2022 16:16:58

Local Plan Review. Consultation Response

Name Ann Hawtin

Address [REDACTED]

Dear Sirs,

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requirement.

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9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an “*immediate need for additional employment land*”. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being “*detrimental to ...nearby residential properties*”. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They

exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

Ann Hawtin

Local Plan Review. Consultation Response

NameSarah Page.....

Address [REDACTED]

Dear Sirs,

Our home has been in the family for over 50 years. We have recently spent our life savings renovating the property to ensure its survival for another 50 years as we were perfectly happy living here in Diseworth in the beautiful village and surrounding countryside. However we now feel that we will be forced to leave our family home if any of the proposed developments go ahead. Our house is situated on the brook. It runs through our garden. The brook simply cannot take another centimeter of run off water and we have grave fears that this will be the nail in the coffin for our family home. Let alone the fact that we chose to live in a village – we don't want to live in a town or an industrial estate!

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

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11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an “*immediate need for additional employment land*”. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being “*detrimental to ...nearby residential properties*”. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

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14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

Sarah Page

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response re. IW1 and EMP 90
Date: 13 March 2022 17:06:57

Local Plan Review. Consultation Response

Name Patricia A. Guy (Mrs)

Address [REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster. Already, heavy rain results in surface water flowing off the fields there and down Grimes Gate and Clements Gate, collecting at the lowest point near the bridge on Lady Gate and flooding the houses there and the Heritage Centre because it cannot escape into the Diseworth Brook. Large buildings and increased hard surfacing will immeasurably worsen the situation.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self-evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, and will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an “*immediate need for additional employment land*”. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being “*detrimental to ...nearby residential properties*”. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

The village of Diseworth has a very long history. Its very name indicates that it was a settlement in the Anglo-Saxon period, and the find of a Roman coin hoard suggests it may date from much earlier. During all this time, the footprint of the village has remained remarkably constant. The imposition of a ‘Limits to Development’ has helped to maintain this situation and ensure that the village retains its character as a truly rural settlement.

To even contemplate allowing a major industrial development such as EMP90 immediately adjacent to the village, within feet of the existing ‘Limits’ is an outrage.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local traffic and rat running than can be tolerated. There has to be a point at which this cumulative development is

considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, and would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Yours Faithfully,

Patricia A. Guy
Archivist, Diseworth Heritage Trust.

[REDACTED]
[REDACTED]
[REDACTED]
12th March 2022

Dear Sir/Madam,

I'd like to respond to the Local Plan [LP] about the potential development of land based around Isley Walton and the boundary adjacent to the village of Diseworth.

I'd like to include my comments on the potential industrial development of land south of the A453 and bordering the north and east of Diseworth.

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

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6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

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11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an “*immediate need for additional employment land*”. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being “*detrimental to ...nearby residential properties*”. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

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Yours Faithfully,

Jane Campbell-Ross

Georgina Heron

From: [REDACTED]
To: [PLANNING POLICY](#)
Cc: [REDACTED]
Subject: EXTERNAL: NO TO MORE HOUSING next to DISEWORTH
Date: 13 March 2022 17:31:34

Our email is to make a very clear objection to the plan to build thousands of houses next to Diseworth.

Diseworth is a very small special village in a conservation area. We are surrounded by the airport, many industrial units such as Amazon and Marks and Spencer, the M1, the A42, the planned HS2, the A50. All these affect our air quality and we want to preserve what we have. Our countryside is very precious to us and thousands of new-build housing will further damage that. Nearly 5,000 homes equates to nearly 10,000 extra vehicles in our area when the A453 is busy enough! The way to the nearest town will be straight through our village and already we have a rat run used by many vehicles in the mornings and early evenings.

Rural life is not to be underestimated and enhances so many lives. This will disappear along with our village. Please seriously re-consider the size of the proposed development.

Ron and Kath Taylor

[REDACTED]

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name

Finlay Betterworth

Address



Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

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13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

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Yours Faithfully,

Sign 

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: SHELAA 2021 IW1 and SHELAA 2021 EMP90
Date: 13 March 2022 17:51:52

[REDACTED] attached a document



[REDACTED] has attached the following document:

Please find attached my comments relating to the above potential developments.



wings-template-letter

Snapshot of the item below:

By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name Caroline and Philip Reffin

Address [REDACTED]

Dear Sirs,

I am writing to object to the proposed developments as follows:

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] and with its boundary adjacent to the village of Diseworth.

I also include the potential industrial development of land south of the A453 which borders the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

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1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context.

Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster. Likewise, flooding in Diseworth often travels down to Long Whatton where there has been flooding around the Crawshaw Close part of the village, as the stream entering the Long Whatton brook then backs up to the village itself.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland. The area around the Diseworth area is not an area of prairie farming but is made up of smaller fields with hedgerows which are many years old, if not centuries old and are fast disappearing in the countryside.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim. Loss of this farmland will affect both local foxes and badgers as well as birdlife, such as hedgerow birds as well as water birds such as kingfishers.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

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10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth and Long Whatton, already suffering from through traffic, will become a major rat run avenue for this new proposal. The traffic not only uses the villages as a rat run but there is no respect for the 30 mph speed limits given that the majority of the village roads are straight. The traffic calming bumps in Long Whatton only means that the cars slow down to go over bumps to then accelerate before the next speed bump, therefore increasing the traffic noise.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2.

There is no evidence that the site satisfies an “*immediate need for additional employment land*”. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being “*detrimental to ...nearby residential properties*”. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

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Yours Faithfully,

Caroline and Philip Reffin

Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043,
USA

You have received this email because [REDACTED]
shared a document with you from Google Docs.



From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: NWLDC LOCAL PLAN REVIEW - DISEWORTH RESIDENT'S FEEDBACK
Date: 13 March 2022 18:07:18
Attachments: [28BF6E9537DC4070B0E1B82D340E1703.jpg](#)

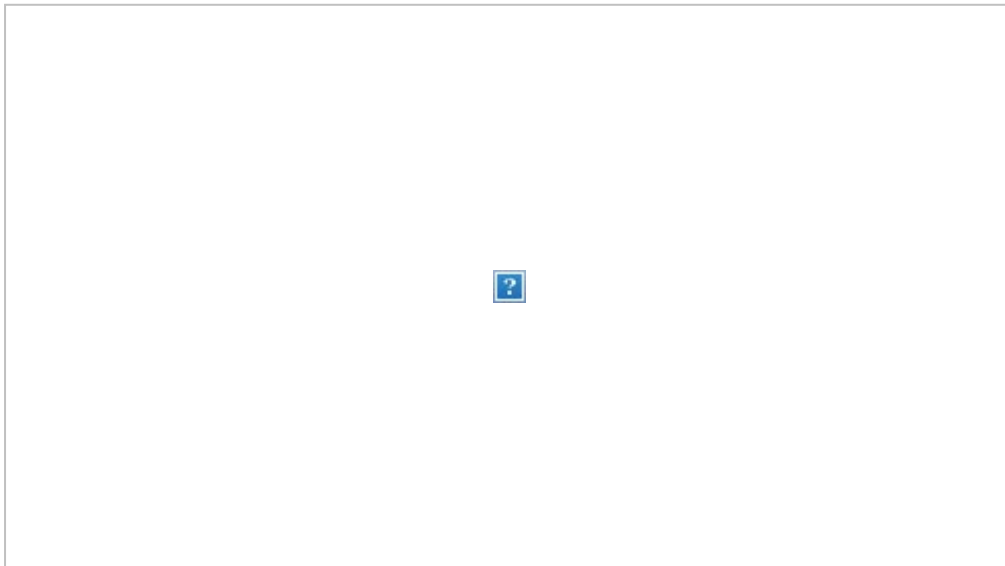
Dear NWLDC Planning Policy Team,

As a Diseworth resident of the Parish of Long Whatton & Diseworth since 1987, may I submit my feedback on two development proposals which I believe will significantly impact our parish, our environment and our future well-being?

The proposed two developments are:

1. The new settlement of about 4,700 houses to the west of Diseworth.
2. The EMAGIC industrial complex proposed **WITHIN our Parish** to the north and east of Diseworth.

Courtesy of our WINGS Group, the two proposed developments look like this:



It is clear that the shaded areas of these maps (representing sites 1 & 2) dwarf Diseworth from outside and within our parish.

I will not detail the ecological impact of gobbling up nearly 2,000 acres of farmland (losing miles of hedgerow habitat, trees and carbon sink capability), including the potential flooding implications. The proposal is that these developments will be carbon zero. How does that make sense when, in order to create them, they will take such a huge swathe of carbon sink capability out of the environment?

ONE MAJOR PLEA:

PLEASE INVOLVE THE RESIDENTS OF THE PARISH OF LONG WHATTON & DISEWORTH IN INFLUENCING THESE PLANS, WITH IMMEDIATE EFFECT.

Bring us on board.

Make us part of the decision making process.

Liaise with our Parish Council.

Don't just tell us what you have done at meetings - **BRING US INTO THOSE MEETINGS.**

A group of local residents from both Long Whatton & Diseworth are currently developing a Neighbourhood Plan for our Parish.

The proposed EMAGIC development will fall ENTIRELY within our Parish.

How can we formulate a Neighbourhood Plan without having EMAGIC / FREEPORT representatives working with us on that plan?

As far as I am aware, no representative of the Freeport Consortium has yet reached out to our Parish Community with an offer to work with us.

This has already got off to a bad start because of the piecemeal way in which local residents have learned about the proposals.

However, there may still be an opportunity to set a world-class example of involving local residents from the very outset.

Create synergy.

Call on our local knowledge and experience.

Grant us influence.

Resistance is, naturally, already high. Just one of these proposals would be a shock, but both within weeks of each other is a sledgehammer blow.

This has been exacerbated because many residents already feel that this is something that is "being done to them" instead of something which they are invited to influence.

Please, bring us on board ... **NOW.**

Finally – what co-ordination has there been between NWLDC and the Freeport Consortium in co-ordinating these announcements, and what consideration was given to how the residents of the Parish of Long Whatton & Diseworth might react?

Kind Regards

Mike Doyle

[REDACTED]
[REDACTED]
[REDACTED]

13th March 2022.

From: [REDACTED]
To: [PLANNING POLICY](#)
Cc: [REDACTED]
Subject: EXTERNAL: NET ZERO - HOW CAN WE ACHIEVE IT BY GOBBLING UP FARMLAND?
Date: 16 March 2022 14:05:16

LCC's Announcement on Net Zero:

The Council 'will aim to achieve carbon neutrality from its own operations by 2030' and 'commits to work with business and other public bodies across the county and region to deliver this ambitious goal through all relevant technologies, strategies and plans.'

I have a concern that recent announcements from both LCC and NWLDC fly in the face of that.

In particular, how does the earmarking of (in my estimate) about 2,000 acres of farmland in North-West Leicestershire for industrial (EMAGIC / Freeport) and residential (new settlement of 4,700 homes) development take us towards Net Zero?

Doesn't that actually take us in the opposite direction?

2,000 acres of current farmland is a huge carbon sink.

How does taking that much carbon sink land out of the environment, and then building on it and putting more people on it, head us towards Net Zero?

Kind Regards

- Mike Doyle

[REDACTED]

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Consultation Response
Date: 13 March 2022 18:40:44

Dear sir/Madam,

Re: Consultation Response

Nearly a month ago you took an email I had sent to Ian Nelson and informed me you would file it as a response to the consultation regarding the proposed development around Isley Walton. This was not a response to the consultation; it was merely to thank Mr Nelson for attending a meeting in Diseworth and to point out some deficiencies within the planning system. The following is my response to the consultation.

Thank you for extending the consultation period. After having the various documents 'hidden' within your website, it is only fair. When you are considering something as devastating as 780 acres of farmland ruined with 4700 houses you need to reach a wider audience.

Let me start by saying I am absolutely sickened that anyone could even consider the proposed development around Isley Walton and extending to the outskirts of Diseworth. Mr Nelson appeared to think that the idea of NWL ever being fully developed was somewhat unrealistic. Well, I have news for him, at the rate NWLDC Planning Department (PD) are covering our countryside, it will be sooner than he thinks. If the mood takes me, I may formally request from the PD the date that NWL will be 'full'. They should know the total land area, the area already developed, and the current rate of expansion- it's simple maths. The problem they will have is that they will be damned if they give me the year, and damned if they don't (can't) give me the figure. The NWLDC PD takes a very short-sighted view of planning matters. Where are the 100- and 1000-year plans? Who is looking at the cumulative effect of all the developments in the north-west corner of the district over the last few decades? No one so far as I can see. Is that the way a responsible, caring, planning department should conduct itself? Don't tell me that you have/must take industry's needs into consideration – it's them that are killing us. There is another way.

The PD also does a very poor job when it comes to noise generated by the airport or racing circuit. Lip service paid to any complainers while receiving generous business rates. The PD are not the people to be policing these matters. The proposed housing area is barely fit for human habitation due to aircraft, airport, and racing car noise as it is, and some uncaring developer wants to build 4700 houses there. The housing area is not within the EMA Public Safety Zone but do bear in mind that there has already been 3 air crashes on Donington Park and another within yards of Isley Walton. It is still a high-risk area for air accidents. There is also the matter of the airport's balancing ponds. Although the planning permission for DHL was granted on the belief that the ponds were for balancing purposes, the airport operates them as reservoirs, there is no balancing carried out. LCC Flooding Department know this but don't seem to be able to make the airport operate the ponds per the permission. Why does the airport always keep the discharge point valve fully open (Point 'C')? Well, if you ask them, they will tell you that it alleviates the risk of the ponds over-topping in an uncontrolled manner. This is true, but they don't mention the environmental havoc it consequently creates downstream. How many environmental assessments have been produced for developments on the airport regarding rainfall run-off? Not many. Is it two? NWLDC is guilty to a large extent due to the airport being able to develop their land under Permitted Development Rights for anything 'operational' with just a couple of exceptions – terminals, runways. You should have had a much tighter rein on them. So, what has happened over the last few decades is that tens if not hundreds of acres have been put under tarmac, steel and concrete without any regard to the water run-off, with little (insufficient) increase in capacity for balancing purposes. I suspect that the airport are not too confident regarding the structural integrity of the ponds. Before a spade is put in the ground, a request should be made to the airport to test the integrity of ponds by filling them to capacity, but please also warn the residents of Diseworth and long Whatton beforehand. You might be surprised by their response. In short, the proposed area is unsuitable for housing for several reasons.

I have written to Rishi Sunak and Andrew Bridgen recently asking which has the higher priority in government, global warming/climate change and the survival of the human race, or, supposed

economic growth and associated housing. Needless to say, the Chancellor has not responded, and Mr Bridgen dodged the question. Where does NWLDC PD stand on that question? If you think that that economic growth has a higher priority, then all I can say is that future historians will look at you and class you along with the despots of the past. If you think that the survival of the human race is a higher priority, then you should not even consider including the proposed housing development in any Local Plan.

While I write this, I'm listening to the war reports from Ukraine. They inform me that Russia and Ukraine are major food producers, Ukraine even being labelled as the 'breadbasket of Europe'. They tell of food shortages to come with rising bread prices. France has committed to become self-sufficient in food within 10 years. What is the developer's answer? Concrete, Tarmac and Steel over our good, productive farmland. The short-sightedness is unbelievable. The only consolation to be taken is that the developer's grandchildren's grandchildren will be just as hungry and gasping for oxygen as mine will be. The Intergovernmental Panel on Climate Change says that humans and nature are being pushed beyond their abilities to adapt. The UN says that many of the impacts of global warming are already 'irreversible'. Cambridge University reported in 2014 that there will be a 2-million-hectare shortfall in farming land by 2030. When will people wake up and smell the coffee?

I was informed that this housing requirement is due to Leicester City Council being unable to meet their housing needs. OK – so it's full. They should have taken more care with their past planning policies. It's just bad planning! Maybe if they had gone up (or down) instead of the easy (cheap) option – out, they would be in a different position today. Consequently, their requirement is dumped on the districts. Building around Isley Walton will not help Leicester – or even Leicestershire. Charnwood has the massive Garendon Park housing project, thousands of houses. Go to Rushcliffe and see another massive estate being prepared south of Clifton. It's sacrilege. The desecration of our beautiful countryside.

The consultation was due to end on 28th February but was extended by two weeks.

Coincidentally, the EMA Freeport plans were announced on March 1st. Well call me a cynic, but I don't like the smell of that. Do we need all these low skilled, low paid, warehouse jobs in an area with just 3% unemployment? NWL is already known as 'the warehouse district. Haven't we in Diseworth suffered enough? They plan to build on tens of more hectares of countryside at the other end of the village, designated by the previously mentioned Mr Sunak. I'm sure you are aware of this. It isn't just the building on green fields that is wrong, there are many consequences of the building that are unimaginable at the planning stages. For example, EMA introduced a charge for cars dropping off or collecting air passengers. Taxi drivers, rather than pay the parking charges, wait in our lay-bys and farm gateways and the consequence of that is defecation and urination wherever they park. Who could have imagined that when the airport gained planning permission?

Thank you for reading this far. As you perhaps guessed, I am very much against the Isley Walton or any other countryside developments being included in anyone's Local Plan. Please ensure that the proposal is rejected, if not for the sake of some old Diseworth resident, then for the sake of your descendants. We need another way forward!

Yours faithfully,

Michael Goy.

[REDACTED]

Local Plan Review. Consultation Response

Mair Bunyan
[REDACTED]

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] boundary adjacent to the village of Diseworth.

I also includes the potential industrial development of land south of the A453 and bordering the north and east of Diseworth [SHELAA 2021. EMP90].

My objections are based on the following:-

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals both fail to meet several of these objectives.

1. Objective 1. Health and wellbeing. Both proposals fail this test.

2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased.

4. Objective 9. Effective flood prevention. Both proposals will fail. Water management west of Diseworth has been mismanaged for many years. IW1 will generate further difficulties. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth is a recipe for disaster.

5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail this test. The Diseworth natural heritage is open [designated] countryside and farmland.

6. Objective 11. Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.

7. Countryside. National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

8. Sustainability. The NPPF has a core principle that planners should focus significant development in locations which are or can be made sustainable, as Highlighted in the Local Plan [5.17]. Both these proposals fail this test. Both will generate pollution, congestion and neither will ever recover their carbon footprint. It is not sustainable to overbuild on much

needed countryside and farmland. In the case of EMP90 regulations will have to be changed to accommodate the site. This is unacceptable.

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10. Traffic. IW1 will generate circa an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads cannot accommodate the traffic already generated, particularly when the M1/A42 corridors become congested. Loughborough will be one of the closest towns to the site. Diseworth [and Long Whatton], already suffering from through traffic, will become a major rat run avenue for this new proposal.

11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There is no evidence that the site satisfies an “*immediate need for additional employment land*”. Access to the site is not compliant with existing Highways Authority regulation. Further the site does not meet the requirement of not being “*detrimental to ...nearby residential properties*”. Diseworth is only separated by 75 metres.

12. The Settlement Hierarchy in the Local Plan lists Diseworth as being restricted to limited growth within the defined Limits of Development. This is a significant line in the sand for our conservation village and must be both respected and honoured. Further, effectively protective levels of separation between rural villages and prospective development should be provided.

13. Geographic Location. The Local Plan identifies a need for 9,620 houses over the whole district between now and 2039. If this is correct, it makes no sense to build nearly half of them in the single location of IW1. This will generate, congestion, pollution, travel and will have an adverse effect on climate change.

14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. We suffer unacceptable and increasing levels of noise from night flights at Europe’s last unregulated airport. In recent history we have had the A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a ‘smart’ motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and

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Yours Faithfully,
Mair Bunyan

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response Diseworth plan objection
Date: 13 March 2022 19:00:21

Local Plan Review. Consultation Response

Name Andrew Handley

Address [REDACTED]

Dear Sirs,

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To Build our house in Diseworth we had to build within the footprint of an old farm building in an old farm yard we could not build outside of this , we have also been restricted on the look of the building , the windows and the brickwork, the driveways and even the position of the windows in the brickwork how can you undo all this good to preserve the character and history of our village if you encourage this plan to go ahead.

Yours Faithfully

Andrew Handley