



**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...

**Q2**

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

The plan review proposes to classify the Lower Moor Road section of Coleorton as a 'small village'

This cannot be correct now, as the criteria used to justify that classification have changed drastically in the last few years, specifically in relation to the Post Office, Shop, Buses and Church (shown on plan as Methodist Chapel!) namely:

The Post Office has closed.

The shop has closed.

There is no Church, it was converted to private dwelling over five years ago.

The buses no longer run on a regular basis (apart from the twice daily school bus there is only the 125, which doesn't stop on Lower Moor Road but a considerable distance from the area - outside the Angel on The Moor and the other side of Newbold Coleorton and runs at 0940 earliest and 1420 latest, therefore unsuitable for commuting to work)

This area should now be 'Other villages / settlements' - 2 levels down from the proposed classification.

(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	<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

A rectangular box containing a solid black rectangle, indicating that the signature has been redacted.

Date

26/01/2022

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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**

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**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Cc:** [REDACTED]  
**Subject:** EXTERNAL: North West Leicestershire Local Plan Review: public consultation (Regulation 18)  
**Date:** 02 February 2022 14:56:43

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Dear Sir / Madam

Please see below our comments relating to the proposals contained within the review of the adopted Local Plan:

### Q2) Settlement Hierarchy

We disagree.

The Lower Moor Road area of Coleorton is now proposed to be incorrectly classified due to recent material changes to the Post Office, Shop, Buses and Church (shown on plan as Methodist Chapel)

Due to these changes the 'Lower Moor Road area of Coleorton' would score '2' and should now be classified as 'Other villages / settlements' as the area is NOT 'sustainable' due to significant and relevant changes since the previous classification, as follows:-

- A) The Post Office and Shop permanently closed in 2021
- B) There is no Church on Lower Moor Road, as indicated in the Local Plan map (converted to private dwelling over 5 years ago)
- C) The Bus services have been drastically curtailed (only the school bus twice a day and the '125' twice a day return, however this bus doesn't stop on Lower Moor Road but a considerable distance from the site (outside 'The Angel' on The Moor, and the far side of Newbold Coleorton (Timings are: 09.40 earliest & 14.20 latest, therefore unsuitable for commuting to work))
- D) The employment Company, cited no longer trades, regardless of which the entrance to the site from the identified Lower Moor Road area, is in excess of the statutory maximum recommended distance of 2km. It is exactly 2.79km from the area, plus the entrance drive to the site is approximately .5km long making the realistic distance considerably over 3km

Incidentally, we believe the criteria for classifying 'employment opportunities' should change to reflect the availability of a diversity of employment opportunities, not just a single employer being sufficient to contribute to the sustainability criteria.

### Q3 Local Needs Villages

We agree with the approach but not the classification of Lower Moor Road area of Coleorton - see Q2 above

### Q6) 'Self-build policy'

We agree that any 'Self-build' approvals must be granted in accordance with the adopted Plan.

We disagree that on larger developments, unsold lots after 12 months should be available for sale / build out by the developer. This leaves the prospect of a developer pricing such plots out of the market, then developing them at a later date, thereby defeating the object of

the scheme.

Thank you and regards

Simon & Paula Haggart



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

**Consultation Response Form**

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	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		James
Last Name		Mattley
[Job Title]		Planning Consultant
[Organisation]		JJM PLANNING LTD
Address Line 1		[REDACTED]
Address Line 2		[REDACTED]
Address Line 3		
Address Line 4		[REDACTED]
Postcode		[REDACTED]
Telephone		[REDACTED]
Email address		[REDACTED]



**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...

**Q3**

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

Agree in principle with the approach that some housing should be allowed outside of the limits to development where a demonstrable local connection is established. However, there are a number of concerns with the approach as currently set out at paragraph 3.10 and these are expanded on below:

- (1) The allowance of new residential development outside the limit to development where a demonstrable local connection is established needs to also apply to Principal Towns, Key Service Centres, Local Service Centres and Sustainable Villages. It would be illogical in planning terms to allow a local needs dwelling in the countryside in a more unsustainable settlement but then have no policy provision to support such a proposal within a more sustainable settlement. The way the policy is worded at the minute means that a proposal for a local needs dwelling within the countryside in Normanton Le Heath would gain support but a local needs dwelling within the countryside in Heather would not. This could easily be resolved by allowing local needs dwellings within the countryside (with the exception of Hamlets).
- (2) The proposed restrictions regarding the length of time that a resident needs to have lived in the parish are overly restrictive and will prevent some residents who have an established local connection from being able to benefit from the local connection policy. An example of this would be resident x who has been brought up within a sustainable village, attended the local school and then moved away to University at the age of 18. By the time resident x has the purchasing power to be able to move back to the area where they grew up they could easily be over the age of 38. The wording of the policy as it currently stands would prevent resident x from being able to benefit from the policy despite having a connection of 18 years whereas resident y who moved to the village when they were 38 and are now 48 would be able to benefit from the policy despite having a connection for only 10 years. This could easily be resolved by allowing local needs dwellings for anyone who is currently or has previously resided in the parish for a period of 10 years or more.
- (3) I have been unable to find a copy of a plan showing parish boundaries on the Council's website but consideration needs to be given to parish boundaries that run through settlements or whether the Policy would work better with a clause that required it to be occupied by a resident who has previously resided within x miles of the site for a period of 10 years or more.
- (4) Would the Policy require the local needs dwelling to be retained for a certain period of time or for perpetuity? If the requirement is for perpetuity then how does this relate to those dwellings where permission is granted on the basis of ill health/care and that situation no longer arises?

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

x

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

Signed

Date

February 2022

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

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**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**

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

Agree in principle with the approach that the local plan should include specific reference to self and custom build. However, there are a number of concerns with the approach as currently set out at paragraphs 5.1-5.18 and these are expanded on below:

1. Self-Build Registers only provide a short-term supply-led picture because they rely upon people knowing about the Self-Build Register and then registering their interest. It is clear that the numbers on the Self-Build Register therefore represent a significant under-representation of latent demand. The PPG (paragraph 011) states that local planning authorities should use the demand data from the registers in their area but should support this by additional data from secondary sources. This could be data from building plot websites, estate agent records or surveys of local residents. It is unclear at this stage whether any of these secondary sources has been explored but clear that once they are the level of demand for self build plots will be significantly more than the register currently shows.
2. Paragraph 5.17 states that 'It supports proposals for self-build and custom housebuilding plots in locations suitable for housing, including allocations, committed sites and windfall sites. The latter category essentially covers those sites which are not specifically identified for development but, for example, are within the Limits to Development. It would work alongside our proposed approach to the identification of Local Needs Villages as part of the proposed settlement hierarchy (see Section 3). It is unclear how this policy 'would work alongside' the proposed approach to Local Needs Housing as that Policy would provide support for new residential dwellings in the Countryside whereas the current approach towards self and custom build housing would not.
3. The policy should clarify what it means where it states 'or other evidence submitted as part of any planning application'.
4. The approach currently provided by the Council seems to suggest that proposals for self and custom build dwellings would be supported in any location considered to be suitable for housing. Such as approach fails to take into account how this would work in practice and previous experiences of self and custom house building within the district. For example, of all of the self and custom house building permissions that the council have granted, how many of these are on sites within the limits to development? In addition, why would any applicant want to go down the route of entering into a legal agreement (at considerable time and expense) when an application for housing within the limits to development would be acceptable in any case? The result of such an approach will be either (a) pressure for sites outside the limits to development or (b) large sites coming forward and providing a significant number of plots within one specific area of the district which is what previously happened when 30 self and custom build plots were granted planning permission in Woodville. The Council should seek to avoid such an approach and provide support for a suitable number of plots across the district that directly responds to the location of demand both on the register and that which is provided by secondary sources of information. An alternative approach is suggested below which would interact better with the Local Needs Housing policy:

# Housing Strategy Summary Diagram

## Local Centres

Ashburton, Buckfastleigh, Chagford, Horabridge, Moretonhampstead, Pincetown, South Brent, Yelverton



### Exception sites

For local needs which cannot be met within Settlement Boundary.

100% AH, up to 25% cross subsidy where essential for viability; or

45% AH where providing necessary infrastructure.

### Allocated sites

Identified in Chapter 7

45% AH

### Infill sites

≤ 5 dwellings: 45% AH on-site or commuted sum

≥ 6 dwellings: 45% AH on-site

Local Needs Custom- or Self-Build: no AH, restricted to occupation by local people

70

## Rural Settlements

Bittaford, Bridford, Buckfast, Chelton Cross / Bishop, Christow, Cornwood, Dousland, Dunstord, Harnock, Ilington, Iwerton, Mary Tavy, South Zed, Sticklepath, Walkhampton, Whiddon Down



### Exception sites

For local needs which cannot be met within Settlement Boundary.

100% AH, up to 25% cross subsidy where essential for viability; or

45% AH where providing necessary infrastructure.

### Infill sites

≤ 3 dwellings: 45% AH on-site or commuted sum

≥ 4 dwellings on Previously Developed Land: 45% AH on-site.

All other sites are exception sites  
Local Needs Custom- and Self-Build: No AH, restricted to occupation by local people.

## Villages and Hamlets

Belstone, Dean Prior, Drewsteignton, Holne, Lustleigh, Lydford, Manaton, Meavy, North Bovey, North Brinton, Peter Tavy, Postbridge, Scampton, Shaugh Prior, Sourton, South Tawton, Throwleigh, Wildcombe-in-the-Moor



### Exception sites

≥ 4 dwellings for local needs within or adjoining settlement.

100% AH, up to 25% cross subsidy where essential for viability.

### Infill sites

≤ 3 dwellings: 100% AH on-site.

All other sites are exception sites  
Local Needs Custom- and Self-Build: No AH, restricted to occupation by local people.

AH: Affordable Housing    ≤: Less than or equal to    ≥: More than or equal to  
Summary only, detailed policy wording will be relied upon for decision making.

Credit: Extract from final draft Dartmoor Local Plan

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"/>
No	<input type="checkbox"/>

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February 2022

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

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**PART B – Your Representation**

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Please state which consultation question your response relates...

**Q16/17/18**

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

No issues with an overarching policy regarding health and well-being but have concerns over the requirement to provide Health Impact Assessment (HIA's). Concerns include:

- Paragraph 8.21 refers to this not-applying to SMEs but this is not reflected in the suggested Policy;
- The majority of the bullet point list provided within the Policy will apply to SMEs and increase the costs and time associated with submitting and dealing with planning application submissions;
- Who in the Council has the expertise to assess HIA's once they are submitted?
- Both residential and non-residential development includes thresholds so that only large schemes are caught by the proposals but the remainder of the list contains no such provisions. This could easily be rectified by including a site area/floorspace threshold;
- Is there any evidence to suggest that Leisure facilities/cafes have a detrimental impact on health and well-being;
- Do not agree with Q18 that the Council could request a HIA on any proposal they consider necessary. This is imprecise and will lead to inconsistencies amongst planning officer requests.

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

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Yes

No

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**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Proposed development at Isley Walton  
**Date:** 09 February 2022 11:18:43

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Dear Sir/ Madam,

I have to say I am aghast that NWLEICS are even entertaining such a ridiculous idea as to the proposal to destroy the village of Isley Walton and it's surrounding countryside.

It is one of the most ill conceived idea and smacks of the easy option approach and little consideration given to anyone who lives in the area, which is an area that has been blighted by previous developments.

I see no case for it, no case to destroy the countryside further and the wildlife we have in abundance here, from barn owls to brown hares to the usual favourites of badgers and newts.

In fill and brownfield developments I can understand but eradicating nature in the area, the increase in carbon output are things that are not acceptable in this day and age.

Is the really a need for more housing and warehouses when more people work from home and robots are being used more and more in the warehouses.

The area suffers from flooding, pollution, noise and you are considering to make the situation worse, how can that be?

It appears the whole policy is driven by unrealistic targets and the easy option choice.

Put a stop to it now and concentrate on areas are far more suitable to the proposal otherwise we will end up with one large development from Donington Services to Ashby.

Yours faithfully,

Angus Shields  
[REDACTED]

Sent from my iPhone

Date: 08/02/2022

Twitter: @NHSPROPERTY  
[www.property.nhs.uk](http://www.property.nhs.uk)

## North West Leicestershire - Local Plan Substantive Review: Issues and Options

### Foreword

NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable, modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.

### Overview

In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHSPS, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively.

NHSPS support NHS commissioners to deliver a local health and public estate that can be put to better use. This includes identifying opportunities to reconfigure the estate to meet commissioning needs, as well as opportunities for delivering new homes (and other appropriate land uses) on surplus sites.

The ability to continually review the healthcare estate, optimise land use, and deliver health services from modern facilities is crucial. The health estate must be allowed to develop, modernise or be protected in line with integrated NHS strategies. Planning policies should support this and be prepared in consultation with the NHS to ensure they help deliver estate transformation.

Our comments on the policies set out within the Regulation 18 Issues and Options Plan are as follows.

#### **Policy XX – Health and Wellbeing**

Policy XX Health and Wellbeing states that new development will be required to improve and promote strong, vibrant and healthy communities through ensuring a high quality environment by:

- i. Creating an inclusive built and natural environment,
- ii. Promoting and facilitating active and healthy lifestyles,
- iii. Preventing negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality,



- iv. Providing good access for all to health and social care facilities,
- v. Promoting access for all to green spaces, sports facilities, play and recreation opportunities,

The Council will require:

- a. development to positively contribute to creating high quality, active, safe and accessible places;
- b. development proposals to assess their impact upon existing services and facilities, relating to health, social wellbeing, cultural and recreation; and
- c. proposals for development schemes to include a Health Impact Assessment (HIA) in accordance with Policy XX. Where significant adverse health impacts are identified, proposals for development will not be supported unless appropriate mitigation can be provided

NHSPS supports the policy.

### **Context**

There is a well-established connection between planning and health; in so far that the planning system has an important role in creating healthy communities. Planning can not only facilitate improvements to health services and infrastructure, thereby enabling the health providers to meet changing healthcare needs, but also by providing a mechanism to address the wider determinants of health.

The NPPF is clear in stating that “Planning policies and decisions should aim to achieve healthy, inclusive and safe places” (Paragraph 92).

Identifying and addressing the health requirements of existing and new development is a critical way of ensuring the delivery of healthy, safe, and inclusive communities. On this basis, we would welcome Policy XX, and would welcome further engagement with the Council on this matter.

### **Policy XX – Health Impact Assessment**

Policy XX Health Impact Assessment states:

A Health Impact Screening Statement will be required for certain development proposals, to demonstrate its impact on health and wellbeing, and how it will contribute towards building strong vibrant and healthy communities and help reduce health inequalities in the district. For developments where the screening assessment indicates more significant health impacts, a more comprehensive, in-depth Health Impact Assessment will be required. This will also be expected to demonstrate how any negative and cumulative impacts will be addressed. A Health Impact Screening Statement must be undertaken on the following:

- Residential development proposals of 30 dwellings or more, or residential sites with an area of 1 ha or more.
- Non-residential development for new or net additional floorspace of 1,000 sqm or more or non-residential development on sites of 1 ha or more.
- Restaurants and cafes (Use Class E)
- Drinking establishments (Sui Generis)
- Hot food takeaways (Sui Generis)
- Residential institutions (Use Class C2)
- Non-residential institutions (Use Class F 1)
- Leisure facilities (Use Class F2)

- Betting shops and pay-day loan shops (Sui Generis)

NHPS supports the policy in principle, but would welcome further engagement with the Council on the recommended thresholds.

**Context**

As above, there is a well-established connection between planning and health. NHS PS supports the policy in principle in that it will seek to ensure proposals do not have a detrimental impact on health. However, we would welcome further engagement on the proposed thresholds as suggested in Policy XX- Health Impact Assessment.

NHSPS thanks the Council for the opportunity to comment on the draft Regulation 18 Issues and Options, and look forward to working with you to ensure that the needs of the health service are taken into consideration.

We would request that NHSPS be added to the consultation database, and we be notified on the progression of all planning policy consultations in the North West Leicestershire Local Plan Substantive Review.

Kind regards

Miriam Rogers

**Senior Planner**  
**NHS Property Services Limited**

04 February 2022

Our ref: North West Leicestershire 23

Dear Sir/Madam

## North West Leicestershire Local Plan Review Issues and Options

Thank you for the opportunity to comment on your consultation, please find responses to each of the questions raised within the North West Leicestershire Local Plan Review Issues and options consultation below.

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

Severn Trent do not object to the proposed approach, however we would recommend specific references to the need to incorporate SuDS and water efficiency into objectives 7, 9 or 10. we do acknowledge that these aspects are covered by other policies, but note that by incorporating them into the strategic objectives may support NWLDC in their attempts to delivery sustainable development and mitigate flood risk and climate change.

### **Q2 – Do you agree with the proposed settlement hierarchy? If not, why not?**

Outside of Severn Trent specialism therefore no comments

### **Q3 - Do you agree with the approach to Local Housing Needs Villages? If not, why not?**

Outside of Severn Trent specialism therefore no comments

### **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.**

Whilst the question is outside of Severn Trent specialism, we therefore cannot comment on which is the most appropriate approach. However, from a Water and Sewerage perspective the increased number of potential development sites would also make it more difficult to plan for future growth and result in increased certainty being needed before infrastructure improvements could be promoted for a specific scheme, to prevent abortive work.

### **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.**

Outside of Severn Trent specialism therefore no specific preference can be provided, however the location of the new village could result in significant infrastructure requirements resulting in large

lead in times before occupation would be possible, this would need to be accommodated within the planning process and expectations.

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

Outside of Severn Trent specialism therefore no specific comments

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

Outside of Severn Trent specialism therefore no specific comments

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

Outside of Severn Trent specialism therefore no specific comments

**Q9- Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?**

Outside of Severn Trent specialism therefore no specific comments

**Q10 - Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?**

Option 1 could benefit the resilience of any sewerage upgrades as potential developments could be considered alongside the existing allocations. Especially where reserve sites are anticipated to become allocations in subsequent local plans. It would also maintain current levels of certainty regarding current allocations.

Option 2 would decrease certainty in the short term as additional sites could be brought forward as such developers / sites will need to provide additional confidence regarding development timescales to promote capacity upgrades, potentially delaying the provision of network improvements. This approach could also increase confidence in long term projections for specific locations enabling more proactive solutions / strategies to be developed.

Option 3 prevents the loss of short-term certainty but still leaves significant unknowns that may not be deliverable given some of the constraints on upgrading WwTW in NWLDC as such this approach would seem inappropriate.

Option 4 appears to follow option 3 but with flexibility for standalone sites to be proposed it would need to be accepted that there is a risk that unknown sites may not be deliverable within the required timeframe.

**Q11 - Which general employment land strategy option do you prefer? Is there a different option which should be considered?**

Option 1 could result in unknown sites coming forward where allocated sites are insufficient or not delivered, this may present a risk to providing sewerage longer term capacity solutions as it cannot be accounted for within current plans, resulting in more reactive capacity improvements. However, it

does maintain confidence in current allocations when developing the infrastructure in a particular area.

Option 2 would support the longer-term planning of sewer resilience whilst removing some confidence in the short-term development of individual sites. A balanced decision will need to be made on this aspect. This option does support the principles of DWMP and enable more proactive working to be considered rather than the current reactive approach used to meet the needs of Option 1.

Option 3 could result in new flows into the sewerage system across a wider area of NWLDC this will make the undeliverability in terms of Project promotion/timing and certainty of development more difficult potentially delaying any infrastructure improvement works.

Option 4 Whilst there are risks in terms of provision of sewerage capacity in time for the development at a new location, it would result in a focused area for work to be designed and progressed. The cost of this would however be likely to be significant and may impact on development viability. We would also note that Money Hill drains into the Packington WwTW which outfalls to the River Mease, there are limitations on the flows that the WwTW can receive and treat to protect the watercourse. Whilst we are looking at solutions to this issue, the delivery of a solution may not be aligned with new growth if additional growth is allocated at this time.

**Q12 - Do you agree with the initial policy option for strategic warehousing? If not, why not?**

Outside of Severn Trent specialism therefore no specific comments

**Q13 - Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?**

Outside of Severn Trent specialism therefore no comments regarding a preferred approach, however we would not that the provision a policy that widens the ability for employment land to come forward will reduce the certainty of development occurring, and make the delivery of any required infrastructure improvements more difficult to plan for an program into to our workloads.

**Q14 - Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?**

Outside of Severn Trent specialism therefore no specific comments

**Q15 - Which policy option for local employment do you prefer? Is there a different option which should be considered?**

Outside of Severn Trent specialism therefore no specific comments

**Q16 - Do you agree with the proposed health and wellbeing policy? If not, why not?**

Severn Trent are supportive fo the general principles, however we would recommend the policy encourages the use of SuDS to create multi-use amenity space and flood mitigation, this could also be applied alongside sustainable transport routes.

**Q17 - Do you agree with the proposed Health Impact Assessment policy? If not, why not?**

Outside of Severn Trent specialism therefore no specific comments

**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?**

Outside of Severn Trent specialism therefore no specific comments

**Q19 - Do you agree with the proposed renewable energy policy? If not, why not?**

Outside of Severn Trent specialism therefore no specific comments

**Q20 - Do you agree with the preferred policy approach for energy efficiency? If not, why not?**

Severn Trent are supportive of the need to develop Energy Efficient homes and are working towards delivering our own carbon reduction commitments, we would also highlight that water efficient technology is often energy efficient by reducing the need to heat water, therefore the promotion of water efficiency in line with Energy efficiency has the potential to support the delivery of the energy efficiency targets whilst also managing a vital resource in a more sustainable way.

**Q21- Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?**

Whilst the assessment is outside of Severn Trent specialism, we would note that energy and water efficiency go hand in hand and can potentially produce multiple benefits if delivered.

**Q22 - Do you agree with the preferred policy approach for overheating? If not, why not?**

Outside of Severn Trent specialism therefore no specific comments

**Q23 - Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?**

Severn Trent would support the proposed requirement for BREEAM to be applied on non-residential developments particularly the incorporation of the water efficiency policies.

**Q24 - Do you agree with the proposed policy for reducing carbon emissions? If not, why not?**

Whilst Severn Trent Note that there is a separate policy relating to Water efficiency we would highlight that water efficiency and the implementation of Water Efficient design and technology often supports energy efficiency and would therefore help to reduce household carbon production, but also carbon production the water treatment for consumption and wastewater treatment process

### **Q25 - Do you agree with the proposed policy for water efficiency standards? If not, why not?**

Severn Trent are supportive of the proposals to change the policy and recommend the 110 l/p/d water efficiency standard this supports the delivery of a more resilient water system and mitigate some of the anticipated changes as a result of climate change. It also supports the objectives of the Humber River Basin Management plan that recommends the implementation of this water efficiency standard, as referenced in the water efficiency section of our general guidance provided below.

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

No further comments

Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.

For your information we have set out some general guidelines that may be useful to you.

#### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

#### **Sewage Strategy**

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

#### **Surface Water and Sewer Flooding**

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

### **Water Quality**

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

### **Water Supply**

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

### **Water Efficiency**

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website







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

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Philip	
Last Name	Sharpe	
[Job Title]	Planning Officer	
[Organisation]	Inland Waterways Association (Lichfield Branch)	
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...

**Q26**

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

It is understood that NWLDC is considering, as part of the next stage of the Local Plan Review, allocating a large housing site on the north side of Oakthorpe. The site, labelled Oa7 on a plan we have seen, lies between Measham Road and Canal Street, and north of the properties on New Street. Its northern boundary includes the route of the Ashby Canal as shown on Inset Map 17: Measham and Oakthorpe.

The adopted Local Plan supports the restoration of the canal and protects this route:

### **Policy IF6 – Ashby Canal**

**Development which would prejudice the restoration of the Ashby Canal and its historic route, as identified on the policies map, or the provision of canal side facilities will not be permitted.**

Therefore, IWA considers that any such site allocation boundary should exclude the full original width of the canal, as shown on historic mapping. Alternatively, if the canal land is included within the site then it should be made clear from the outset that there should be no built development or services in the area which is reserved for the restored canal, and that the development will be expected to contribute financially (e.g. via S106 or CIL) to its restoration.

Whilst we appreciate that this matter is outside the current consultation, IWA would welcome an assurance that it will be addressed at the appropriate time.

(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

14/2/2022

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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.

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**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** FW: EXTERNAL: Meeting at Diseworth Village Hall on the evening of 14th February 2022. Housing Developments  
**Date:** 16 February 2022 07:43:37

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[REDACTED]  
[REDACTED]  
[REDACTED]

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**From:** [REDACTED]  
**Sent:** 15 February 2022 16:51  
**To:** IAN NELSON [REDACTED]  
**Subject:** EXTERNAL: Meeting at Diseworth Village Hall on the evening of 14th February 2022. Housing Developments

Dear Mr Nelson,

Thank you for giving up your time and attending the meeting in Diseworth Village Hall yesterday evening. Although you stressed that the new housing developments were by no means a 'done deal', I certainly came away depressed and disillusioned.

A lady at the meeting, on hearing that LCC, failing to meet their housing requirement, and were dumping the burden on the districts of the county, queried what would happen when our district was 'full'. Your response was, not surprisingly, that this scenario was not realistic – or something along those lines. I believe that by not recognising that there is a distinct possibility that one day North West Leicestershire will be fully developed, you are making a fundamental mistake. Everything over the previous millennia points in that direction. By all means have a Local Plan, but what about the 100, 1000, and 10,000 Year plans? Perhaps it is government's opinion that science will solve the problems, or periodic serious pandemics and nuclear wars will help by reducing the population so that the NWL= FULL situation will never arise.

I would be very interested to know the year when our district will be fully developed. I'm sure that the NWLDC Planning Department know the current rate at which the district's land is being developed, I'm sure you know what percentage of land has already been developed within the district and I'm equally sure you know the total area of the district. Factor in a little for brownfield re-development and there you have it. It should be calculable.

It was mentioned at the meeting that the village of Diseworth has already suffered greatly from various developments surrounding our village – the airport, the racetrack, the roads, the motorway services, the infill for housing, etc.. It is almost as if some bureaucrat in central government has placed their finger on a map and decreed that, because of the position and transport links, this is the area that must be sacrificed. Underneath the finger was Diseworth. Do the people of this village have no value? Should we be sacrificed for the 'greater good'?

I was born in 1953 in this area. I used to play on the fields before the MI was built. There was no power station on the horizon, the airport was tranquil farmland, the racetrack was a peaceful deer park. Over 60 years I've watched the relentless, desecration of my countryside. I often wonder about the planners - why don't they see the countryside as I do? Why do they value it so insignificantly? After all, it is the countryside that produces the

very food we eat and cleans the air we breathe, why is it not appreciated? If a planning officer is employed for say 10 years and during that time he is responsible for the development of say 3% of the district, on leaving the role, he can hold his head high, content with the fact that only 3% of the land was developed during his tenure. During my short lifetime I've seen nearly 7 of these theoretical planners with the resultant 21% development – a much higher figure.

We do not need any more low-tech, low skilled, low paid warehouse jobs and the associated housing needs. The district is already known as 'The Warehouse District'. At the meeting it was mentioned on two occasions that there were environmental benefits due to people not needing to commute so far to work if the proposed new developments are built. Not once was the environmental disadvantage of tens of hectares being covered by concrete and tarmac mentioned. How can the government spout that climate change is a top priority and allow these massive developments on our countryside? The BBC, in an article by Matt McGarth on 25<sup>th</sup> June 2014, stated 'UK faces a significant shortage of farmland by 2030'. If that is true, and I don't doubt it, then how can the authority reconcile that against the proposed land take? It appears that we humans are in a race to destruction and the pacemakers are the developers.

Last year I emailed our MP, Mr Bridgen, who is of the opinion that the development of the area is 'vital' for economic growth and that it would be "disingenuous for me to cite the need for more homes and jobs in the UK and then reject and campaign against when it is in my constituency". So, the developers have the land, our MP is 'for it', is it any wonder that so many left the meeting feeling that in fact it is a 'done deal' and all that is left is for your department to go through the necessary motions. What Mr Bridgen doesn't realise is that his 'backyard' is full.

From what you said yesterday evening it would appear that there are serious problems within central and local government with regard to planning. I seriously doubt that LCC have exhausted all the land within their boundary. The way forward is 'up', not 'out', building good quality homes and not the rubbish that was erected in the 1960s. We already have massive developments south of Clifton in Rushcliffe and surrounding Shepshed and Hathern in Charnwood. There is no need for any additional housing schemes around Diseworth.

I realise that in your position you cannot please everyone – but haven't the residents of Diseworth been hurt enough?

"The beauty of our English countryside is daily being disfigured, not only by the thoughtlessness of speculative builders, but also through the apathy and indifference of the public, for there are today great numbers of people, many in responsible positions, who think that the present has no obligations either to the past or the future, and that if a man wants to build a house he need consider only his own convenience and profit, and that it may be as ugly and out of place as he chooses to make it."

The above was written in 1933 as the Foreword to the very first Design Guide for the Peak District and prepared by the Peak District Advisory Panel of the Council for the Protection of Rural England.

We, today, have obligations both to the past and the future and they need serious consideration. Since 1933 all that has changed is the evermore overwhelming priority given to money and the erosion of consideration for actual value ... So, if something has no easily calculable price ... it is deemed irrelevant by default.

Thank you for reading this far.

Regards, Michael Goy.



**From:** carly snee [REDACTED]  
**Sent:** 15 February 2022 16:13  
**To:** CHRIS ELSTON [REDACTED]  
**Subject:** EXTERNAL: Air Pollution

Dear Chris,

Thank you for inviting me to write to you regarding my question on Air Pollution , at Diseworth Village Hall last night.

I have long been concerned about the levels of air pollution in our area as we are surrounded by contributors including from the Airport. E.M.A. must be responsible for a considerable amount due to every vehicle arriving and leaving for flights, planes running their engines on the ground and on take off and much more. At night it is not uncommon to hear engines running for a considerable time, being tested I suspect. I understand this airport is the only one still allowing flights throughout the night. Passengers, staff and freight movements must cause very high levels of harmful air content to Diseworth as we are low down and so very close.

On top of all the above we now have a constant stream of traffic going to and from the Hub , plus the vast numbers of vehicles using the nearby A42 and M1 motorway day and night.

I would be very grateful if you would be able to put me in touch with someone who could do regular air pollution checks and have them recorded and available for all to access.

I find it extremely worrying that the Government and Councils are keen to encourage Development so near to Diseworth which will produce so much more air contamination and traffic on local roads. If each household owned just one vehicle in the proposed development that would be shocking enough but these days so often people need 2 cars for work purposes.

Just because there is apparently a need for a certain number of new homes doesn't mean all other considerations are put to one side. It seems boxes are to be ticked and a line drawn.

Green spaces are vital for people's well being as has been proven by Lockdown. I don't mean a small area of grass , a pond and a couple of benches. Fields , hedges, trees and wild life not to mention precious farmland to feed our nation are precious beyond value.

All of the residents of Diseworth made a choice to live somewhere that offers all this and it is heartbreaking to think people sitting in offices make decisions affecting our every day lives dramatically.

I am not sure I believe the figures quoted for housing needs. People have far smaller families these days and since Covid so many commercial properties have closed, especially shops. These can provide housing surely? I think more people will work from home and office space will be less important.

I acknowledge I have strayed from the subject of pollution but I think you will understand my train of thought and reasoning. On the positive side the planting of trees around new local development and wild flowers on the Kegworth bypass are very much appreciated!



I look forward to your response

Sincerely  
Carly Snee



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**DEVELOPMENT STRATEGY  
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January 2022

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Chris	
Last Name	Tandy	
[Job Title]	Vice chairman	
[Organisation]	Ashby civic society	
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...

**Q 1-6**

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

Question 1 - Should the plan build in a flexibility allowance?

**YES**

Question 2 - If we build in flexibility should the plan include a 'buffer' to the housing requirement figure when deciding how much land to allocate for new housing or should we identify reserve sites?

**FLEXIBILITY SHOULD BE ACHIEVED BY USE OF A BUFFER RATHER THAN RESERVED SITES. THIS WOULD ALLOW ALL SITES TO BE PREPARED FOR DEVELOPMENT AND IMPROVE LIKELIHOOD OF**

Question 3 - If we were to include a 'buffer' what would be an appropriate figure?

**10%**

Question 4 - If we were to identify reserve sites under what circumstances should sites be released?

**WHEN MONITORING SHOWS THAT 5 YEAR LAND SUPPLY WILL NOT BE ACHIEVED.**

Question 5 - Should the review build in the potential for sites to be developed which go beyond the end of the plan period?

**YES TO ENSURE CONTINUITY AND LINKAGE TO NEXT PLAN PERIOD?**

Question 6 - Are there any other ways that the plan can build in flexibility?

**NO**

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"/>
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.

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

**Signed**


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**Date**

16th February 2022
--------------------

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

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Chris	
Last Name	Tandy	
[Job Title]	Vice Chairman	
[Organisation]	Ashby Civic Society	
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...

**Q7-9**



Question 7 - Is the HEDNA an appropriate evidence base on which to formulate our employment land policies?

**HEDNA IS A STARTING DATABASE! BUT IT NEEDS TO BE MODIFIED TO TAKE INTO ACCOUNT THE STRATEGIC PLAN FOR LEICESTERSHIRE AND THE HISTORICAL BUILD RATE WHICH HAS GENERALLY EXCEEDED FORECAST OVER RECENT YEARS.**

Question 8 - Which of the options set out above would best address the outstanding need for employment land?

**WE SUPPORT OPTION 4**

Question 9 - Are there any other options that we could consider?

**THE CURRENT OPTION OF UNDER-ALLOCATION AND A POLICY OF APPROVING APPLICATIONS FROM DEVELOPERS THAT MEET CERTAIN CRITERIA HAS LEAD TO UNDESIRABLE DEVELOPMENTS OUTSIDE ALLOCATED AREAS .AT LEAST THE LAND ALLOCATION MUST MEET THE MINIMUM REQUIREMENTS.**

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"/>
No	<input type="checkbox"/>

**Declaration**

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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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## DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

January 2022

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Chris	
Last Name	Tandy	
[Job Title]	Vice chairman	
[Organisation]		
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...

**Q 10-12**

Question 10 - Is the Strategic Distribution Study an appropriate evidence base on which to formulate our strategic B8 employment land policies?

**NO. THE STUDY IS OUT OF DATE. THE LEICESTERSHIRE STRATEGIC PLAN WOULD BE A BETTER STARTING BASE.**

Question 11 - What should our preferred approach be to deal with strategic B8?

Option 1: Do not allocate any additional sites, as we have already met our need. We could, instead, have a general criteria based policy.

Option 2: Identify sites with permission and have a presumption of renewal.

Option 3: Allocate more sites for strategic B8 due to current market demand.

**WE SUPPORT OPTION 3. OPTION 1 CRITERIA BASE POLICY IS CURRENTLY USED AND LEAD TO THE SPECULATIVE JAGUAR WAREHOUSE AT APPLEBY MAGNA.**

Question 12 - Are there any other options that we could consider?

**NO**

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"/>
No	<input type="checkbox"/>

**Declaration**

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

**Signed**


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**Date**

16/2/20222
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**DEVELOPMENT STRATEGY  
OPTIONS & POLICY OPTIONS**  
January 2022

**Consultation Response Form**

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	<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
Title	Mr	
First Name	Chris	
Last Name	Tandy	
[Job Title]	Vice chairman	
[Organisation]	Ashby civic society	
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...

**Q13-15**

Question 13 - Do you agree that the settlement hierarchy policy should be amended so as to allow for some development in small villages where it can be demonstrated that it is to meet the needs of somebody with a local connection?

**YES**

Question 14 - Do you agree with the suggested criteria for identifying somebody with a local connection? Are there any additional criteria which should be included?

**YES**

Question 15 - Are there any other options which we should consider if we are to address local needs? Do you agree with our assessment of these options?

**DESPITE THE RESTRICTIONS THERE HAVE BEEN MAJOR DEVELOPMENTS IN SMALL 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	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

**Declaration**

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Signed


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Date

16/2/2022
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**DEVELOPMENT STRATEGY  
OPTIONS & POLICY OPTIONS**  
January 2022

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Title	Mr	
First Name	Chris	
Last Name	Tandy	
[Job Title]	Vice chairman	
[Organisation]	Ashby civic so cite your	
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...

**Q16-17**

Question 16 - Is this general approach to site assessment methodology an appropriate one.

**NO. THE CURRENT APPROACH MOVES DEVELOPMENT TO THE PRINCIPAL TOWN OR SERVICE CENTRES. THE CURRENT STRATEGIC EMPLOYMENT GROWTH TO THE NORTH OF THE DISTRICT WOULD BE BETTER SERVED BY A NEW SETTLEMENT. CURRENT POLICY WOULD NOT SUPPORT THIS PROPOSAL**

Question 17 - Are there any specific criteria that we should include when assessing sites?

**ALL ELEMENTS OF SUSTAINABILITY ISSUES SHOULD HAVE MORE PRIORITY IN DECISION MAKING**

(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	<input checked="" type="checkbox"/>
No	<input type="checkbox"/>

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<b>Signed</b>	<input type="text" value="██████████"/>	<b>Date</b>	<input type="text" value="16/2/2022"/>
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# DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

January 2022

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[Organisation]	Ashby civic society	
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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...

**Q18-23**

Question 18 - Should we include a specific policy on self and custom build? Question 19 - Which of the options do you prefer and why?

**Yes WE SUPPORT THE STRATEGIC SELF AND CUSTOM BUILD POLICY. SELF BUILDER WILL WANT FREEDOM OF CHOOSING LOCATION AN NEIGHBOURS. ONLY THE POLICY SELECTED WOULD ALLOW THIS.**

Question 20 - If a percentage approach is supported, what threshold and percentage would you apply and why?

**NUMBER SHOULD BE DETERMINED BY DEMAND EXPERIENCED SO FAR ON THE REGISTER. IT IS DIFFICULT TO GUESS A PERCENTAGE AS IT WOULD BE TINY.**

Question 21 - Should the Council allocate sites for self and custom housebuilding properties only and/or seek to identify opportunities for self and custom plots as part of allocated housing sites?

**COUNCIL SHOULD ALLOCATE SPECIFIC SITES**

Question 22 - Should the occupation of these 'allocated' plots be restricted, in the first instance, to those on the Council's self and custom build register?

**YES**

Question 23 – Are there any other options we should consider?

**NO**

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Yes

No

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Last Name	Tandy	
[Job Title]	Vice Chairman	
[Organisation]	Ashby de la Zouch Civic Society	
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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...

**Q24-30**

Question 24 - Should we include a policy (or policies) to address health and wellbeing issues as part of new development?

**YES**

Question 25 – Should we have a strategic policy which would support the health and wellbeing of North West Leicestershire’s residents?

**YES**

Question 26 – Do you support the use of a Health Impact Assessment Screening Statement to demonstrate the potential impact of a proposal, and to identify whether a more in depth Health Impact Assessment is required?

**YES**

Question 27 - If we required a Health Impact Assessment what threshold should be used above which a Health Impact Assessment would be required?

**50 HOUSES**

Question 28 - Would you support the inclusion of a policy which would restrict further take away uses within a specific distance of the boundary of a school?

**YES**

Question 29 - If yes, what evidence do you have to support this approach? What specific distance would you suggest and why?

**THERE IS A LARGE % OF CHILDREN WHO ARE OBESE. 100m IS A REASONABLE EXCLUSION ZONE**

Question 30 - Are you aware of any evidence that demonstrates health issues suffered by residents within the district that would justify a restriction on further take away uses?

**NO**

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Yes

No

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Signed



Date

16 feb 2022

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**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Local Plan Review comments  
**Date:** 17 February 2022 21:09:29

---

The Parish Council would make the following comments regarding the Local Plan Review in terms of the classification of Coleorton:

It is felt very strongly that the village is no longer a sustainable village with the loss of the post office and shop recently, the church 5/6 years ago and only a very sporadic bus service.

It should now be "other villages/settlements".

**Fiona Palmer**

**Coleorton Parish Council Clerk and RFO**



**(Hours of work are part-time (10 per week in the evenings and weekends), so I will respond as soon as practicable)**

DISCLAIMER: You have received this email from Coleorton Parish Council. The content of this email is confidential, may be legally privileged and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

Coleorton Parish Council ensures that email security is a high priority. Therefore, we have put efforts into ensuring that the message is error and virus-free. Unfortunately, full security of the email cannot be ensured as, despite our efforts, the data included in emails could be infected, intercepted or corrupted. Therefore, the recipient should check the email for threats with proper software, as the sender does not accept liability for any damaged inflicted by viewing the content of this email.

By contacting Coleorton Parish Council you agree that your contact details may be held and processed for the purpose of corresponding. You may request access to the information we hold on you



You may request to be removed as a contact at anytime [REDACTED]

To view Coleorton Parish Council Privacy Notice please visit the website [www.coleorton.org.uk](http://www.coleorton.org.uk)

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Virus-free. [www.avg.com](http://www.avg.com)

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Isley Walton - A New Town  
**Date:** 18 February 2022 11:18:01

---

Dear Sirs,

The suitability of North Leicestershire as an applicant to develop a New Town within the National Forest as proposed in outline is beyond plausibility. The Council has over recent years demonstrated a predisposition to initiate an arrogant prerogative to despoil the region with heavy industrial and residential development that is in total conflict with the nearby surroundings.

The southerly housing and industrial development of Castle Donington towards the A453 is demonstration enough of the type of highly disagreeable Council development thereupon that resembles a Stalinist Gulag in its bleak soul destroying and dated visual impact. There has been no endeavour to characterise, or scenically develop the site. It is, and will remain a scenic eyesore, upon which any ambition to develop the Isley Walton site can be prejudged, and found to be unacceptable for its desecration of natural farmland.

On the aspect of how such a mixed development of over 4,000 houses could impact on neighbouring communities it should not be overlooked that bordering the westerly boundary there is the historic town of Melbourne upon which the Donington area already deluges a mass of 'rat run' commuter traffic along the Isley to Swarkestone road. The Swarkestone Causeway is a Historic Monument that is already endangered by the volume of traffic and the disrespect of drivers originating from the industrial and residential metropolis that you have established out of your self interest around Castle Donington. Again, reason enough to deny the site development around Isley Walton.

Yours faithfully,

Michael White  
[REDACTED]

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Local Plan comments  
**Date:** 18 February 2022 21:46:03

---

The Parish Council would query the classification of Swannington as a Sustainable Village, and would like clarification as to how it fell in to this category.

Kind Regards

Fiona

Fiona Palmer

Clerk to Swannington Parish Council

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

(Hours of work are part-time (10 per week in the evenings and weekends), so I will respond as soon as practicable.

DISCLAIMER: You have received this email from Swannington Parish Council. The content of this email is confidential, may be legally privileged and intended for the recipient specified in message only. It is strictly forbidden to share any part of this message with any third party, without a written consent of the sender. If you received this message by mistake, please reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

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[REDACTED]

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# Stone Planning Services Limited

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Ref: SPS/0019

Date: 20<sup>th</sup> February 2022

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

Dear Sir/Madam,

## **Representations: North west Leicestershire Local Plan Review Development Strategy and Policy Options January 2022 (Regulation 18)**

Stone Planning Services Limited represents Peveril Homes Limited who are regional house builders with interests in North West Leicestershire. These representations relate to the North West Leicestershire Local Plan Review Development Strategy and Policy Options January 2022 (Regulation 18)

Our representations refer to Questions 4 and 5

### **Question 4 - Do you agree with our proposed approach to the amount of housing growth at this time?**

We agree with the Council that High Scenario 2 performs best and provides flexibility and takes account of the inward commuting and the need to take account of economic growth. It also takes account of the need to accommodate some of the residual housing need from the City of Leicester.

### **Question 5 - Do you agree with our proposed approach to the distribution of housing growth at this time?**

The Principal Town, Key Service Centres and Local Service Centres have witnessed significant growth over recent years. We consider that there are a number of smaller settlements - Sustainable Villages that could accommodate a degree of growth for a number of reasons:

1. They are sustainable settlements.
2. Growth will support and enhance the existing economic and social infrastructure.
3. Potential development sites will be smaller which will attract medium sized builders who will deliver quickly.
4. They are where people want to live.

We note that a number of Options rely on the delivery of a new settlement and relatively high delivery at Coalville. Option 7b distributes housing across the broad range of settlements which we support. However, the level of development at Coalville and the delivery of housing at a new settlement may be overly optimistic such that greater numbers should be transferred to sustainable settlements lower down the hierarchy. We don't believe that development in the 'smaller villages' would be a sustainable option.

We support Option 7b in principle subject to a higher distribution to the Service Centres and the Sustainable Villages.

As you will be aware our client constructed a small development on Normanton Road, Packington. Outline consent (13/01002) was issued in 2014 and Reserved Matters (16/00082) approved in 2017. The site is completed, and the internal access has been designed to facilitate access to a small area of land to the southwest.



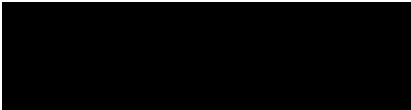
Drawing No PAC-LOC-02 - Location Plan.pdf shows the extent of the land and Drawing No EM3112 - PK2-SP-02 Coloured Layout.pdf shows how the site could be developed with 7 additional houses. We estimate a yield of 7-10 houses, including affordable.

The land is well contained by existing mature hedges that would be retained. The infrastructure is already in place such that delivery would be very early in the plan period.

In terms of scale it is proportionate to the size of a sustainable village such as Packington. We consider that moving forward this site should be allocated in the Plan.

If you require any further information at this stage, then do not hesitate to contact me.

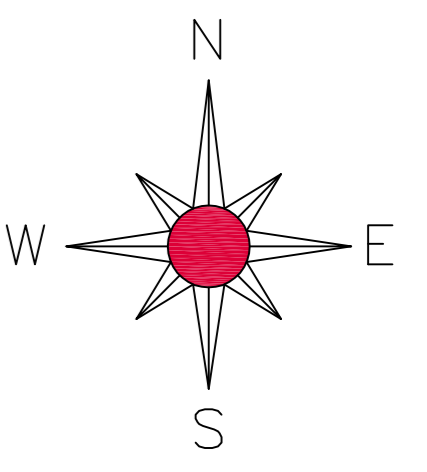
Yours faithfully



Paul Stone  
Director - Stone Planning Services Limited

Enclosures

1. Drawing No PAC-LOC-02 - Location Plan
2. Drawing No EM3112 - PK2-SP-02 Coloured Layout.





**REVISIONS**

REV	AMENDMENTS	BY	DATE

**KEY**

- \* Indicates Affordable Dwellings
- Flood Zone (1 in 100 years + climate change)
- Flood Zone (1 in 1000 years)
- Application Boundary



**HOUSING MIX**

2 Bedroom		Number
Acresford	Type J	3
4 Bedroom		
Appleby	Type F	1
5 Bedroom		
Shardlow	Type E	3
Dovedale	Type D	1
Bradbourne	Type G	2
<b>Total</b>		<b>10</b>



**Peeveril Homes Ltd**

**Normanton Road, Packington**

Phase 2 - Coloured Layout

DATE: 24.08.2016 SCALE: 1:500 @ A1

DRAWN BY / REVIEWED BY: VMJ/ CG

PROJECT NO: DRAWING NO: REVISION:

EM112 - PK2 SP-02 -

**WYG**

Rowe House, 10 East Parade, Harrogate, HG1 5LT  
Tel: +44 (0)1423 857 510  
Email: info@wyg.com www.wyg.com

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**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Response to NWL District plan  
**Date:** 22 February 2022 11:43:34

---

I would like to make the following comments on the Local Plan:

#### Housing

I acknowledge the need for adequate housing for the area. These houses need to be spread fairly and sensibly across the district where there is suitable public transport (especially rail links) and employment opportunities nearby.

Hugglescote has already had a disproportionate number of new houses. There is very little employment so that these will all result in commuting substantial distances for work; there is next to no public transport: the Ivanhoe line would be a mitigation of the consequences of this commuting, and schools and doctors are now struggling to cope with the increased population. There has been a huge reduction in the amount of open space resulting in increasing pressure on the few remaining open spaces and this can lead to mental health problems as people need access to open space. It is essential to prevent any further building round Hugglescote and Donington-le-Heath to protect the remaining countryside and wildlife and to maintain some quality of life to residents of the area both old and new.

Coalville town centre needs regeneration. I note that there is some work being done in the precinct. It is important to encourage small businesses to set up to provide the variety of shops which will encourage people to use the town (there is now a huge potential demand from all the new housing), and to provide support for these businesses to continue and thrive.

Reopening the Ivanhoe line would be a valuable asset to the area as it would reduce the road traffic and enable people to get to Burton and Leicester and from there on to the main rail networks.

A new school is required on the new housing estates at Grange Road Hugglescote since children currently have to go to Stanton-under-Bardon and other distant schools.

Mary Lorimer

Date: 23 February 2022  
Our ref: 380500  
Your ref: N/A



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

Customer Services  
Hornbeam House  
Crewe Business Park  
Electra Way  
Crewe  
Cheshire  
CW1 6GJ

T 0300 060 3900

**BY EMAIL ONLY**

Dear Sir/Madam

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

Thank you for your consultation on the above dated 17 January 2022 which was received by Natural England on the same date.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the opportunity to comment on the Development Strategy Options and Policy Options Document. We have the following comments:

We note that this document poses a number of questions and we have tried to address those which are of particular relevance to our interests in the natural environment.

**Question 11: Do you agree with these Local Plan Review Objectives? If not, why not?**

Natural England broadly welcomes the Objectives for the Local Plan Review and have the following comments to make:

We welcome Objective 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'*, and advise that the role of specifically Green Infrastructure could be mentioned within this objective, especially considering the GI Study for the district which is currently underway. This would encompass opportunities to create green links, enhance PRow and public access to nature and the countryside.

We welcome Objective 7, *'Ensure new development mitigates for and adapts to climate change, including reducing vulnerability to flooding, and contributes to reduced net greenhouse gas emissions to support the district becoming carbon neutral by 2050'*, and would only suggest that the importance of nature-based solutions could be referenced within the objective.

Lastly, we welcome Objective 9, *'Conserve and enhance 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'*, and note the inclusion of an 'enhance' objective, in line with the NPPF. We advise that inclusion of wording regarding enhancing habitat connectivity and/or contributing to the wider Nature Recovery Network, a key part of the government's 25-year environment plan, would be beneficial here. We also suggest that another notable area which could be mentioned is the River Mease SAC, due to its European designation.

**Question 4: 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.**

**& 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.**

Natural England does not have a particular preference for the housing growth scenarios that have been set out but would wish to ensure that the chosen approach results in no adverse impact on any designated nature conservation sites. We would also advise that housing development should avoid Best & Most Versatile Land (BMV) where possible.

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

Similarly to the above, we do not have a particular preference for the employment growth scenarios that have been set out but again would wish to ensure that the chosen approach results in no adverse impact on any designated nature conservation sites and avoids BMV land. We would also like to note that significant warehousing development may create Air Quality issues where the Affected Road Network is close to any designated sites, due to increases in HGV movements.

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

We welcome the health and wellbeing policy, and the intention to include health and wellbeing as a standalone policy. We also note that the health and wellbeing benefits of green infrastructure have been realised and welcome the policy wording promoting access to green space. We would like to suggest further addition to point 'v.' of the policy, to include specific reference to creating new, and enhancing existing, green spaces and providing multi-functional green infrastructure within new developments, rather than simply ensuring access to existing resources. The addition of wording to prevent negative impacts on landscape character may also be beneficial within this policy. Although this will likely be covered elsewhere within the plan, the specific role of landscapes in enhancing health and wellbeing may deserve specific mention here. Perhaps even if it were to add landscape character to the list in point iii 'preventing negative impacts on residential amenity and wider public safety from...'.

Furthermore, we welcome the wording of creating an inclusive built and natural environment. Natural England have recently released our Green Infrastructure principles and standards, alongside a new Green Infrastructure mapping tool, [here](#). The mapping includes datasets such as the Index of Multiple Deprivation, and Population Density, two factors which are known to be related to access to green space. With the creation of NWLDC's GI strategy underway, we would suggest that this new resource could be utilised to identify important areas lacking in Green Infrastructure, and in doing so help to deliver on creating an inclusive and natural environment for all.

We also welcome the use of a Health Impact Screening Statement for certain developments to help ensure health and wellbeing are not impacted, and ideally are enhanced, by development in the district.

**Question 19: Do you agree with the proposed renewable energy policy? If not, why not?**

Once again we have no specific comments, but welcome the requirement for renewable energy infrastructure to adequately mitigate or enhance biodiversity, although we would advise a slight alteration in the wording to say 'mitigate impacts on, or provide enhancements for, biodiversity'. Preference for brownfield sites for renewables is also welcome, along with avoidance of BMV land. We have seen solar proposals in Charnwood altering their design significantly to avoid loss of BMV land; this policy encourages such action.

**Question 22: Do you agree with the preferred policy approach for overheating? If not, why not?**

Natural England would like to take the opportunity to stress the important role in which multi-functional Green Infrastructure and SuDS can play in preventing overheating. Design elements such as street trees and open swales can have a significant impact on overheating whilst providing a plethora of other biodiversity, wellbeing and amenity benefits. These GI/SuDS elements could be included within any checklists for developments to demonstrate that the risk of overheating has been considered.

**Question 25: Do you agree with the proposed policy for water efficiency standards? If not, why not?**

The proposed policy to adopt the Building Regulations lower water use requirement carries various benefits, as listed within the document. We would also advise that implementing this lower water use requirements would have the additional benefit of lowering the impact of new development on the River Mease SAC: This is a result of A) Less water being abstracted, and B) less foul water discharging to the river via waste-water treatment works, which subsequently results in a reduced amount of phosphorous entering the River.

We also welcome the intention to stick to the recognised lower water use requirements as used within the Building Regulations and the RBMP, as well as to further investigate the viability of setting this requirement to ensure its sustainability.

**Question 26: What additional comments do you have about the Local Plan Review not covered by the preceding questions?**

**The River Mease SAC:**

Natural England would specifically like to mention the River Mease SAC, as the site is one we have historically been involved with, i.e. during the development of the Developer Contribution Scheme (DCS).

The local plan policies throughout the plan should have regard for the site, its sensitivities, and actions which would improve its condition. We also recommend that the specific River Mease Policy in the adopted local plan should be updated to reflect the current situation where DCS1/2 are no longer available, as well as any future plans for DCS3 or alternative solutions. Whilst the pump out solution for the river is still anticipated, this will not cover the entirety of the catchment; alternative strategies for areas not benefitting from this should be explored.

During the next steps in the Local Plan review, sites proposed for allocation should particularly consider the sensitivities of the River Mease.

**Biodiversity Net Gain:**

We note the intention to address Biodiversity Net Gain in the next steps in developing the plan. As you will be aware, the Environment Act recently gained Royal Assent; thus Biodiversity Net Gain will become mandatory in the coming years. At the current stage, we provide the following advice:

Biodiversity net gain is a key tool to help nature's recovery and is also fundamental to health and wellbeing as well as creating attractive and sustainable places to live and work in. The National Planning Policy Framework (NPPF) states: *'Planning policies and decisions should contribute to and enhance the natural and local environment by... d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures'* (para 174).

Planning Practice Guidance describes net gain as an 'approach to development that leaves the natural environment in a measurably better state than it was beforehand' and applies to both

biodiversity net gain and wider environmental net gains. For biodiversity net gain, the [Biodiversity Metric 3.0](#), can be used to measure gains and losses to biodiversity resulting from development. We advise you to use this metric to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain. The Chartered Institute of Ecology and Environmental Management, along with partners, has developed '[good practice principles](#)' for biodiversity net gain, which can assist plan-making authorities in gathering evidence and developing policy.

For any queries relating to the specific advice in this letter only please contact me on [REDACTED]. For any new consultations, or to provide further information on this consultation please send your correspondences to [consultations@naturalengland.org.uk](mailto:consultations@naturalengland.org.uk).

Yours sincerely,

Robbie Clarey  
Lead Adviser – East Midlands Area Delivery





**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 1**

Yes, I agree with the Local Plan Review Objectives which provide a good basis for the policies which will emerge as the Local Plan Review progresses.

)

## **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**

Yes, it is appropriate that the role of 'Sustainable Villages' such as Appleby Magna in meeting housing need are recognised.

## **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 3**

I agree that there needs to be a demonstrable local connection, but this should be widened from just the village to the parish within which the village is located whilst 10 years is considered unduly onerous.

## **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**

Yes, it is a flexible and pragmatic approach to the amount of housing growth given the uncertainties around how the unmet housing need of Leicester City will be redistributed. High 2 Scenario would also provide an opportunity to address in-commuting and reflects recent build rates.

## **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**

I support Option 7b as this will enable people to move onto or up and down the housing ladder whilst remaining in their local communities and is of benefit to small and medium sized developers (which the NPPF requires Local Plans to support) who can provide choice and early housing delivery in the period before the strategic sites start to deliver housing.

The role that sustainable villages, such as Appleby Magna, can play in meeting housing growth should not be under estimated.

**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 6**

Yes, this seems a reasonable approach to self-build and custom housebuilding.

**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 7**

Yes, this approach allows flexibility should the space standards change over the plan period.



## **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 8**

This is a matter that is more appropriately dealt with under the Building Regulations rather than planning policy.

**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 9**

This is a matter that is more appropriately dealt with under the Building Regulations rather than planning policy.

**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 22**

This issue is best dealt with under the Building Regulations not planning policy.

**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 25**

This issue is already dealt with under the Building Regulations.

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



Date

24/02/2022

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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](mailto:planning.policy@nwleicestershire.gov.uk).



The countryside charity  
Leicestershire

Charity Number: 1164985

# **North West Leicestershire Local Plan Review 2022**

## **Development Strategy and Policy Options Consultation**

### **Response of CPRE Leicestershire**

#### **February 2022**

## **1. Introduction**

This document sets out CPRE Leicestershire's response to the North West Leicestershire Local Plan Review: Development Strategy and Policy Options Consultation.

Our answers to the questions are accompanied by a report, *North West Leicestershire Plan - Review of Housing and Logistics Evidence for CPRE Leicestershire*, which we commissioned. This sets out a detailed analysis of our concerns with regard to the proposed Development Strategy options for Housing and Employment. It should be read in conjunction with the answers to Questions 4, 5, and 10-12.

We have grouped our answers to questions around different issues rather answering them in strict numerical order.

## **2. Key Points**

Key points from this response and the accompanying report include:

- a) A strategic policy should be set out at the front of the plan to address Climate Change and meet net-Zero targets.
- b) The Standard Methodology figure of 359 dpa should be considered housing need for North West Leicestershire.
- c) Option 7b promoted by the Council for distribution of housing is unacceptable, unneeded and contradictory to the Council's expressed transport and climate goals.
- d) A New Settlement is not required and would create an unsustainable pattern of development, inconsistent with protecting the countryside, reducing the need to travel and controlling Climate Change emissions.

- e) The need for employment land is over generous given the existing supply.
- f) The provision of large-scale logistics warehousing is also not justified.
- g) The proposed Health and Wellbeing policy is welcomed.
- h) Policies for the energy use and reduction of carbon emissions are generally supported but with some caveats.
- i) Transport, Sustainable Travel and their relationship to development are almost totally neglected in this consultation. No policy for this is presented or discussed.
- j) A more proactive and strategic approach to nature and biodiversity is needed.

### **3. Local Plan Review objectives**

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

CPRE Leicestershire supports Objective 2 of the Plan but considers the current plan fails to achieve that because rather than providing housing ‘which meet local housing needs including in terms of size, tenure and type.’ it is actually over-allocating housing which will lead to development being poorly located to meet local need.

Moreover, the plan as part of Objective 2 should ensure brownfield land is prioritized. This is currently downgraded to ‘efficient use’ of brownfield land in Objective 10. There is currently no objective for ‘efficient use’ of greenfield land or a policy which sets out density requirements to ensure this happens. This should be remedied in the submitted plan.

CPRE Leicestershire supports Objective 4 of the Plan but considers that the proposals for high housing allocations, particularly the adoption of a New Settlement, if the highest option is pursued, would inevitably increase the level of commuting by car, as it would be unlikely that such a settlement could be well served by Public Transport. Moreover, experience suggests that such New Settlements tend to be car-orientated in design and rely on services provided in existing service centres and so become heavily car-dependent.

CPRE Leicestershire supports Objective 5 of the Plan but is concerned that some options for employment land will conflict with Objective 4. The potential over-supply of logistics development is also not needed to fulfil this Objective.

CPRE Leicestershire supports Objective 6 of the Plan but it should specify areas which will be supported, including new housing within and close to town centres.



CPRE Leicestershire supports Objective 7 of the Plan but arguably the most important element in supporting Climate Change goals is the location of development. There should be an overarching and prominent objective to contribute to reaching Net-Zero Emissions, and included in that should be an assessment of location. It is noteworthy that North West Leicestershire is promoting options (Such as Option 7b) which its own Sustainability Appraisal warns performs badly in terms of Climate Change.

We also support Objective 9 but given the nature emergency, CPRE would argue the nature conservation policy in the existing Local Plan needs strengthening. The current policy is too reactive as it seeks to avoid significant harm to particular valued sites, rather than adopting a more proactive and strategic approach in which biodiversity and ecological networks, including strategically important links (corridors) in the wildlife network between valuable habitats are conserved, protected and enhanced.

## **4. Development strategy options for housing and employment**

*For a more detailed analysis of the evidence on these options, please see our report, North West Leicestershire Plan - Review of Housing and Logistics Evidence for CPRE Leicestershire.*

***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.***

No, CPRE Leicestershire considers that the two high options are not consistent with the evidence. The Standard Methodology would create a surplus of housing and, even if the (now dated) figures in the SGP were adopted, the use of its 2051 end date for a plan ending in 2039, especially when those figures are speculative, does not stand up to scrutiny. The use of the ONS2018 figures is also unacceptable as this is inconsistent with other Leicestershire Authorities and most important Leicester itself. There is a large risk of double counting.

Furthermore, the authority has failed to include a windfall allowance, even though it appears there is clear evidence to support it, or to demonstrate that it is ensuring the efficient use of land on housing sites.

In our view the Standard Methodology should be adopted using the ONS2104 figures and the existing over-supply, along with a suitable allowance for windfalls, should be considered as fulfilling the Authorities duty to cooperate with neighbouring authorities should a short-fall be established.

If additional housing comes forwards on urban brownfield sites, that should be supported as well as affordable housing on exceptional sites in villages and other small settlements.

Otherwise we do not consider there is a need for additional green field allocations, which would also undermine goals on sustainable transport and climate change.

The Plan should also include a specific policy to encourage appropriate densities.

***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 do not consider there is a need to allocate additional houses so we do not think this is required. In terms of the Options 2a is more sustainable than Option 3a but since the housing needed could be provided on windfall sites, the distinction has limited value. We would generally support the approach of 2a with allowance for affordable housing on exceptional sites in villages and other small settlements.

The Option 7b promoted by the Council is completely unacceptable and unneeded and would be contradictory to the expressed transport and climate goals in the plan.

***Q10 - Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?***

We consider the level of need for additional employment land may be exaggerated, especially the replacement rate, given the evidence from the Stantec Report.

Option 1 has some benefits in that it creates additional supply but it is held in reserve. However, once sites are identified, there will be increasing pressure to release them.

Option 2 is unacceptable. Option 3 seems consistent with the evidence and CPRE could support those. Option 4 could be supported provided sufficient safeguards were in place to ensure site selection was rigorous and not simply based on first-come-first-served (See answer to Question 13).

Overall Option 3 is to be preferred.

***Q11 - Which general employment land strategy option do you prefer? Is there a different option which should be considered?***

Option 1 is probably the most sustainable and Option 3 the least. In terms of Option 4, for additional land to be concentrated at Money Hill (Ashby-de-la-Zouch), we are concerned that currently there is insufficient information about what is proposed to make a fully informed comment.

***Q12 - Do you agree with the initial policy option for strategic warehousing? If not, why not?***

No, we consider this is based on double-counting including over-supply at the Hinckley National Rail Freight terminal. When that is properly accounted for the 50% figure amounts to no more than 16 hectares which may be too small for a viable scheme.

That being the case the justification for any further allocation is weak and there appears to be too little joint analysis with other local authorities.

Further work should be undertaken to identify whether any further provision is needed.

## **5. Housing**

***Question 2: Do you agree with the proposed settlement hierarchy? If not, why not?***

Agreed – no comments

***Question 3: Do you agree with the approach to Local Housing Needs Villages? If not, why not?***

It is not clear from the text whether the proposal applies to the 'Other Villages/Settlements' as well. The proposal is well intentioned but we have concerns that with regard to new-build applications they could be open to abuse where life expectancy of those requiring care is very short.

***Question 6: Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?***

We agree with preferred approach subject to including guidance as to how such applications should be assessed regarding design, amenity, highway safety and in line with low carbon and net zero development.

***Question 7: Do you agree with the proposed policy on Space Standards? If not, why not?***

Agree with policy proposed.

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

Agree with proposed policy approach.

***Question 9: Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?***

Yes, numbers should be assessed on a site by site basis following discussion between the District Council and developers.

## 6. Employment

***Q13 - Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?***

The current Policy E2 (2) is too permissive. The current need and demand justification is woolly and does not consider alternative sites, either in North West Leicestershire or other nearby authorities. This is particularly concerning where sites would have a regional or national purpose.

Options 3-8 all suggest ways the policy could be tightened and a combination of these might be required. Option 8 has much to commend it. A further trigger might be a review of the plan to consider need (consistent with Q10 Option 3). It is hard to comment further without a revised policy wording to consider, but any review of E2 (2) should include climate change implications and be linked to a climate change policy (See answer to Q24).

The alternative is Option 1. Option 2 is not acceptable.

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

A combination of Options 4 and 5 merit consideration. Supporting start-up businesses in rural communities is important for them being sustainable and thriving communities.

***Question 15: Which policy option for local employment do you prefer? Is there a different option which should be considered?***

With the need to cut emissions through more sustainable modes of travel, the opportunity of local employment becomes more important. A policy to encourage local employment as suggested in Option 1 is a useful step in providing and encouraging local employment through planning policies.

## 7. Health and Wellbeing

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

We agree with proposed policy objectives and support Option 2. We are pleased to see that the contribution of planning can make to health and wellbeing is being recognised and promoted.

From a CPRE perspective, promoting health and wellbeing involves decisions on where development is located, how it is designed and what access is afforded to countryside and nature. These Health and Wellbeing considerations have to be incorporated directly in decisions and policies for development and not just promoted as general policy aspirations.

The countryside matters and needs to be valued. This aspect should be specifically addressed in the policy.

***Question 17: Do you agree with the proposed Health Impact Assessment policy? If not, why not?***

Option 3 seems to be an appropriate way forward to support the general policy on Health and Wellbeing.

***Question 18: 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?***

We have concerns regarding the costs associated with implementation and monitoring this and the resources required to ensure its effectiveness in delivering improved health and wellbeing outcomes.

## **8. Renewable Energy, Low Carbon and Climate**

***Question 19: Do you agree with the proposed renewable energy policy? If not, why not.***

We agree with this policy and choice of Option 2 with some caveats.

Our priority would be for solar panels to be placed on appropriate buildings, e.g. warehouses, and on brownfield land rather than greenfield sites, especially on best and most versatile agricultural land.

We would draw attention to the importance of recognising the impact of solar and wind on landscape character (proposed policy 2(b) and their potential cumulative adverse impact in particular locations (proposed policy 2(e)). In this context, we would like to see stronger design requirements, subject to the constraints set out in 2(a) to 2(e), for solar and wind infrastructure to be integrated into the surrounding landscape with minimal impact where projects are allowed go ahead.

***Question 20: Do you agree with the preferred policy approach for energy efficiency? If not, why not?***

We agree with the Local Plan setting a higher energy efficiency target and support Option 3 for the reasons set out in the AECOM study. In CPRE's view, achieving higher levels of energy efficiency is crucial and should be a priority.

***Question 21: Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?***

We support the proposal to spell out some more specific requirements to address ‘Embodied Carbon’ through life cycle carbon assessments. The proposals in Option 3, which we support, represent a useful step forward from the existing rather general Local Plan policy that “new development should have regard to sustainable design and construction methods”.

***Question 22: Do you agree with the preferred policy approach for overheating? If not, why not?***

We support Option 3. It makes sense for new developments to be required to address potential overheating issues in design and construction phases now rather than having ‘retrofit’ these properties in future.

***Question 23: Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?***

As with Q24, CPRE supports the aim of improving developments to better deliver Climate Change goals with Option 3 as the preferred one.

However, that needs to be seen in the context of the location of development. CPRE would argue that there should be a strategic policy at the very front of the plan to address Climate Change and meet net-Zero targets and both the design and location of development should be judged against that policy.

***Question 24: Do you agree with the proposed policy for reducing carbon emissions? If not, why not?***

CPRE supports the aim of improving developments to better deliver Climate Change goals and supports elements of the proposed policy in para. 9.55.

As with Q 23, that needs to be seen in the context of the location of development. This policy needs to be judged against a strategic policy set out at the very front of the plan to address Climate Change and meet net-Zero targets. We note this policy is mainly related to how the energy features of buildings contribute to reducing carbon emissions. However it does not address the reduction of carbon emissions through different modes of travel and the location of developments. (See our comments in answer to Question 26.) For purposes of clarity, this policy should re-named ‘Sustainable Buildings and Reducing Carbon Emissions’.

**Q25 - Do you agree with the proposed policy for water efficiency standards? If not, why not?**

Agree with approach.

## **9. Additional Comments – Transport and Sustainable Travel**

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

There is a serious failure to discuss or propose policies relating to transport or active/sustainable travel. CPRE is concerned that this consultation document fails to demonstrate that the District Council is fully committed to meeting the challenges of sustainable travel and climate change.

Beyond the indication in Objective 4 about reducing the need to travel and increase opportunities for cycling, walking and public transport use, there is no clue in this document about how this is to be achieved in relation the location of either housing or employment developments.

We are aware of the difficulties of ensuring that public transport can be made sufficiently attractive to make any significant contribution to reducing car use but the possibility must not be ignored. Consequently, we regard that it is essential that development is located in places where cycling and walking could be attractive. We consider that much greater emphasis must be placed on the internal design and the links to nearby facilities, especially schools, to make this an attractive option.

Paragraphs 104 and 105 of the NPPF relate to the promotion of sustainable travel. Para 104 says that transport issues should be considered from the earliest stages of plan-making and development proposals and sets out a number of elements that should be considered while para 105 says that:

*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.*

It is far from clear from this consultation that the requirements set out in either paragraph have or will be achieved with this Local Plan. There is no specific policy in the existing Plan or suggested for the new Plan that specifically relates Sustainable Travel or Sustainable Transport to patterns and locations of development or addresses their car dependent nature. This is very concerning and we hope it will be clearly addressed in the next iteration of the North West Leicestershire Local Plan.

We are concerned about the lack of any monitoring proposals to demonstrate how the Plan is achieving its objective to reduce the need to travel, and its other objectives.

In Paragraph 10.4 it states that the council is preparing an Infrastructure Delivery Plan. We find it surprising that the Potential Strategic Sites Infrastructure Study fails to consider transport infrastructure of any form. We would expect an Infrastructure Delivery Plan to pay particular regard to reducing the impact of traffic with an emphasis on delivery of infrastructure to achieve that and contribute to meeting national climate change targets.

*/ends answers to questions*

***A report - North West Leicestershire Plan - Review of Housing and Logistics Evidence for CPRE Leicestershire follows on starting on the next page.***





The countryside charity  
Leicestershire

Charity Number: 1164985

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## **NORTH WEST LEICESTERSHIRE PLAN**

### **Review of Housing and Logistics Evidence for CPRE Leicestershire**

**Gerald Kells**

**Feb 2022**

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#### **1. Introduction**

I was asked by CPRE Leicestershire to review the assumption behind the housing numbers and employment land provision presented in the North West Leicestershire Local Plan (Regulation 18) consultation to inform their comments.

I have also considered the approach to supply and whether all avenues of supply have been allowed for and the assumptions made in relation to supply. To do this I examined the most recent Strategic Housing and Economic Land Availability Assessment (SHELAA 2021) as well as the 5-year Land Supply Statement and the Leicester/Leicestershire Statement of Common Ground (2021)<sup>1</sup> as well as the Leicester and Leicestershire Strategic Growth Plan (SGP 2018)<sup>2</sup> and Housing and Economic Development Needs Assessment (HEDNA 2017)<sup>3</sup>.

Unfortunately, the housing supply side information is somewhat scanty and there is no easy way of checking the figures given in either the consultation document or the joint statement. It would be helpful if North West Leicestershire provided a breakdown of the current permitted, allocated and committed supply, along with windfall information and assumptions in relation to the density of sites.

I have not examined the specific sites in the SHELAA (particularly in regards to capacity). Many of those sites will not be progressed, but CPRE Leicestershire may wish to examine the Council's approach in more detail.

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<sup>1</sup> [The Statement of Common Ground.pdf \(leics.gov.uk\)](https://www.leics.gov.uk/~/media/leicsgovuk/2021/04/16/Statement_of_Common_Ground.pdf), Appendix A and Appendix b.

<sup>2</sup> [Strategic Growth Plan LCC \(llstrategicgrowthplan.org.uk\)](https://www.leicestershire.gov.uk/~/media/leicestershiregovuk/2018/04/16/Strategic_Growth_Plan_LCC.pdf)

<sup>3</sup> [Housing and Economic Development Needs Assessment \(HEDNA\) -Strategic Growth Plan LCC \(llstrategicgrowthplan.org.uk\)](https://www.leicestershire.gov.uk/~/media/leicestershiregovuk/2017/04/16/Housing_and_Economic_Development_Needs_Assessment_(HEDNA).pdf)

I have reviewed the options set out for distribution of housing. However, more detailed local knowledge may assist in refining where best to locate development, especially given the issues I identify with the supply-side evidence.

CPRE Leicestershire has previously expressed specific concerns about the impact of any overspill requirement of so-called ‘unmet need’ from Leicester on other local authorities in Leicester, especially given the Government Planning Announcement on 16 Dec 2020. That arbitrarily increased the housing requirement in Leicester by 35% but also made clear that the additional provision (in the twenty largest English cities) should be found on brown field sites with in the cities, not exported to other local authorities, especially as it proposes to abolish the Duty to Cooperate as part of upcoming planning legislation <sup>4</sup>.

I have also reviewed the evidence on Employment Land provided by Stantec and the Logistics Study for Leicestershire and Leicester. It is important to stress that while I have considered the quantitative employment land issues there may be qualitative issues that need to be taken into account and CPRE should consider these.

## 2. Housing Requirement

The Consultation Plan starts its consideration of housing requirement by setting out the latest 2018 ONS projections for housing growth in North West Leicestershire. Unlike many authorities these are considerably higher than the 2014 figures. They are also not the figures that would be derived from the Standard Methodology (which is based on 10-year growth patterns).

**Table 1: 2018-based household projections**

<b>Projection</b>	<b>Annual household growth 2020-39</b>
10-year variant	370
Alternative internal	570
Principal (or Main) Projection	707
Low International migration	661
High international migration	752

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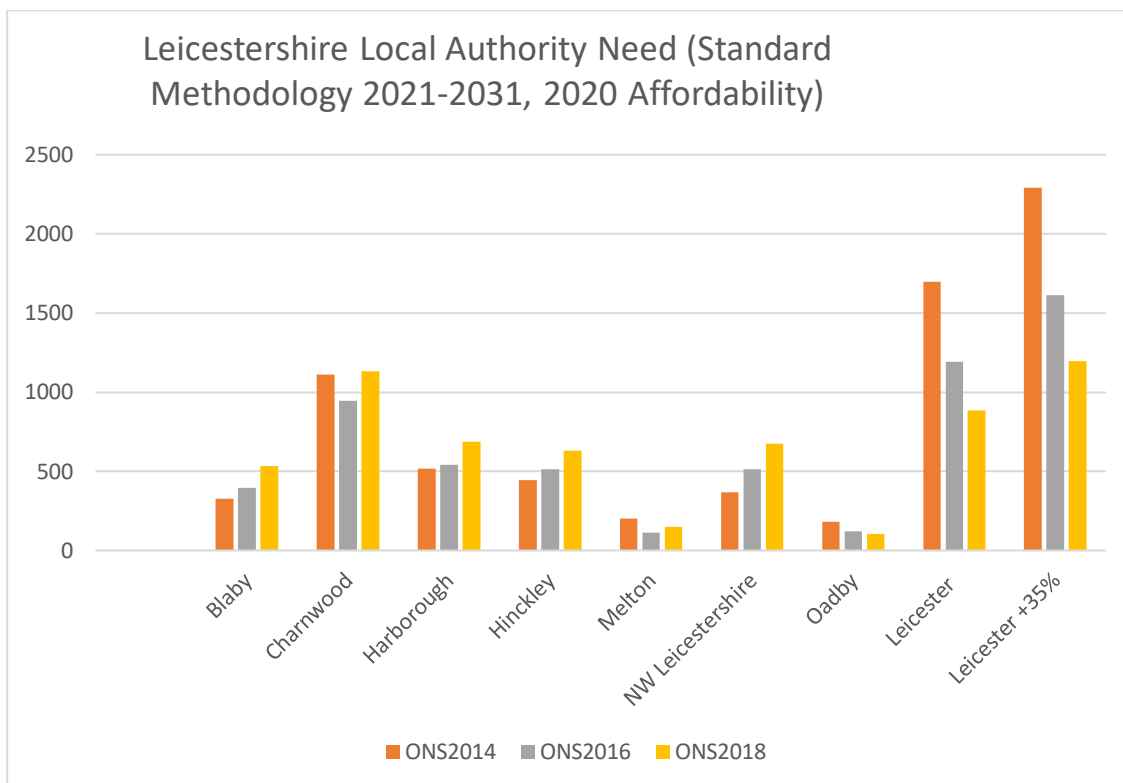
<sup>4</sup> Government response to the local housing need proposals in “Changes to the current planning system” - GOV.UK ([www.gov.uk](http://www.gov.uk))

Unlike the 2016 projections these are based on updated calculations of NHS registrations which only cover two years, so there are potentially volatilities in the ONS2018 figures.

More fundamentally they represent a lower overall national housing need than the 2014 figures, similar to the 2016 figures, but with a significantly different distribution. Perhaps most importantly, they drastically change the balance of housing growth away from Leicester City and towards other parts of Leicestershire. Even with the 35% added on to Leicester (in the Government's 16 December 2020 announcement) there is 500 dwellings per annum (dpa) less in the 2018 projection than in the 2014 ONS figure without the uplift.

I previously commented on the draft Leicester Plan for Leicestershire CPRE and questioned whether Leicester could have identified additional capacity and whether the Leicester shortfall is as great as is being claimed, particularly when one takes into account the potential for windfalls and increased capacity on some sites. A further likely cause of housing inflation in Leicester is its high student population which has elsewhere led to concerns about the creation of a 'phantom' population when NHS registrations are not reversed.

In other words, it seems to me an inconsistent position to base consideration of housing numbers in North West Leicestershire on how close they are to the long term ONS2018 figures when that additional theoretical housing need is being double-counted in Leicester (and to an extent in other Leicestershire Authorities) who are using the ONS2014 figures as can be seen in the graph below. This is especially worrying given the doubt that should be cast on the Leicester supply side figures.



	ONS2014	ONS2016	ONS2018
Blaby	329	397	532
Charnwood	1111	946	1131
Harborough	516	540	686
Hinckley	444	511	630
Melton	201	114	150
NW Leicestershire	368	513	673
Oadby	180	121	103
Leicester	1697	1194	885
Leicester +35%	2291	1612	1195

Dwellings Per Annum

The section on housing requirement in the Consultation Plan goes on to produce a table based on four scenarios. The Standard Method, which is labelled ‘Low’ even though it is the chosen methodology by Government, would create a surplus of housing against supply. The HEDNA figure from 2016 is then included as a medium figure. Two high projections are then added, one from the Leicestershire and Leicester Strategic Growth Plan of 2017, which is derived from the HEDNA figure and one which is based on the 2018 projection with a contingency added on.

**Table 2: Housing requirements by scenario**

Scenario	Annual Amount	Total Requirement 2020-39	Total projected provision	Over provision/ Shortfall
Standard Method (Low)	359	6,103	8,784	+2,681
HEDNA (Medium)	448	8,512	8,784	+272
Strategic Growth Plan (High 1)	512	9,728	8,784	-944
2018-based projections (High 2)	730	13,870	8,784	-5,086

It should be noted that the SGP actually gives two figures for housing need, one for 2036 which would be the same as the HEDNA figure of 448 and one for 2051 which is 512. I was heavily critical of that 2051 figure because it was derived by assuming that the population trends to 2036 continued on the same level up to 2051, even though the evidence from ONS was of a tapering of housing need. The assumption that it would continue like that had, in my view, no rational justification, as I commented at the time of the HEDNA. Even if that figure were justified it is hardly credible to use the annual figure to 2051 rather than to 2036 when deriving a plan figure up to 2039.

In what seems a contradictory manner the 2018ONS projections used in the line four of the table are lower than the raw 2018 Standard Methodology 10-year output and this is precisely because, unlike the HEDNA, it averages out the housing need over a period of tapering additional requirement. Moreover, the ONS 2018 figure would be capped under the Standard Methodology at 673 which is 40% above the current plan requirement.

It seems to me, therefore, that the Standard Methodology figure of 359 dpa should be considered the need for North West Leicestershire. That allows scope even within the current acknowledged supply for 2,681 additional homes to be identified as contributing to overspill from Leicester, (albeit the level of that overspill is likely to be lower than currently acknowledged.) To do it in any other way is to double-count housing which in the 2018ONS calculation would be in North West Leicestershire but is accounted for elsewhere in the 2014ONS calculation.

### 3. Housing Supply

Supply side information is set out in the most recent North West Leicestershire Strategic Housing and Economic Land Availability Assessment (SHELAA 2021), as well as

the 5-year Land Supply Statement and the Leicester/Leicestershire Statement of Common Ground (2021)<sup>5</sup>

Neither the SHELAA, nor the 5-Year Land Supply document are particularly helpful and are difficult to interrogate. In particular, it would be useful to have a breakdown of the sites which are completed, currently being built, have planning permission or are within the current local plan allocations.

There is currently no way to test the 8,784 existing supply figure which is given in the plan against up-to-date supply-side information with a breakdown of sources. Notably the Joint Statement includes a supply side figure up to 2036 of 8960 which is already 176 above the supply-side figure given in the plan to 2039.

One reason for the discrepancy may be the issue of windfall sites. Para 4.16 implies that the figure of 8,784 is allocated and planned sites, and does not include any allowance for windfalls, even though local authorities are encouraged to do this when they have a clear basis for doing so.

Neither the SHELAA nor the 5-Year Land Supply document include historic windfall data. It is quite usual for 5-Year Land Supply to include small windfalls. The fact that the land supply calculation adds up to 13.5 years supply, even without windfalls, may explain why the authority decided not to include them but it does not assist with longer term planning.

The Joint Statement assumes 40 small scale windfalls per annum (calculated by subtracting the windfall calculation in Appendix A from Appendix B and dividing by 5). If one removed the first three years windfalls (assuming they are already in the system) that would amount to an additional 680 dwellings over the plan period. I see no reason not to include those in the plan calculation as has been done in other authorities such as Harborough.

Of course, it is unlikely that the only windfall sites in North West Leicestershire will be under 10 dwellings. It is also likely that there will be projects that come forwards as a result of industrial renewal, changes in retail patterns and conversion of offices and other existing uses to housing.

The Government anticipated this in its 16 December 2020 Planning Statement that post-COVID changes to retail and office will lead to changes in the property market which will create new additional larger sites which would also be windfalls. As they said then:

*'there is potentially a profound structural change working through the retail and commercial sector, and we should expect more opportunities for creative use of land in urban areas to emerge. Utilising this land allows us to give priority to the development of brownfield land, and thereby protect our green spaces.'*

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<sup>5</sup> [The Statement of Common Ground.pdf \(leics.gov.uk\)](#), Appendix A and Appendix b.

Clearly the effect of that change, further accelerated by the COVID pandemic, which is likely to kick-start longer term changes in office and retail floorspace needs, will only become fully apparent over the longer term, but it would suggest that a figure based only on small sites is extremely conservative.

One other indication of the potential for windfalls would be sites excluded from the SHELAA as being unsuitable because they were not currently available but I can see no indication of those. Nor is it clear to me how many sites not in the current plan within the SHELAA are brownfield sites which could be bought forwards without controversy and so boost supply.

The other issue which may significantly impact on supply is density. The Joint Leicestershire Methodology for SHELAA's (2019) says:

*Density is also used to calculate the housing potential of a site. For Leicester, densities within the city centre will normally be at least 50 dwellings per hectare (dph), with generally lower densities (30-50 dph) elsewhere in the city. Sites within and adjacent to the Principal Urban Area and in selected Centres will generally be 40dph, and all other sites will generally be 30dph. This may be altered by each local planning authority in some instances having regard to local circumstances, and where this is the case, a clear explanation will be set out in the authorities SHELAA report. Where a developer or landowner provides a density figure individual authorities may choose to use this instead of the above agreed densities.*

I have not examined all the sites in the North West Leicestershire SHELAA, and there is no explanation given in text, but it appears that a density of 30dph has been applied to all sites where there is no planning permission, including Urban sites where one might expect higher densities to be applied.

In terms of how capacity was assessed in the SHELAA, it followed, we are told the joint methodology set out in the 2017 Leicester and Leicestershire Joint Methodology for SHELAA's<sup>6</sup>.

The North West Leicestershire SHELAA does not appear to following the Joint Methodology by assuming a density 40 dph on 'sites within and adjacent to the Principal Urban Area and in selected Centres'.

And unlike some other Plans, such as the current consultation plan by Hinckley and Bosworth, the North West Leicestershire Plan does not include a Policy with a minimum density requirement.

Finally, it would also have been useful to have a breakdown of potential additional supply from brownfield sites. I searched the SHELAA for brownfield sites and identified 11 sites with a capacity of 471 houses, although it is unclear exactly how many of these are additional capacity or whether the assumed 30 dph is too low given the location of the sites, meaning they may have a greater yield.

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<sup>6</sup> [SHELAA Joint Methodology Paper - 2019.pdf \(nwleics.gov.uk\)](#)

Site	SHELAA Capacity
AP10	38
B3	27
CD5	94
C12	14
C28	38
C12	9
C30	108
C62	41
IB21	38
K2	59
Oa6	5
<b>Total</b>	<b>471</b>

Taking all this into account it seems to me that it is reasonable to assume there is additional supply in North West Leicestershire, including an allowance of at least 680 for windfall sites. Indeed, there may be evidence to support a higher figure, given the nature of the settlements in North West Leicestershire, and a review of the densities for urban sites along with identification of new provision on urban brownfield sites may well yield considerable additional justifiable supply.

This would suggest, based on the Standard Methodology figure of 6,103 dwellings, North West Leicestershire has a very significant surplus of supply, at least 3,361 dwellings and potentially significantly more. This would satisfy all options in the draft plan, except the long-term ONS2018 figure which risks double-count housing with other areas.

Given this surplus of supply in North West Leicestershire, (as well as some additional brownfield sites), it should be considered its own need is fully met with some of its supply assisting to reduce any undersupply in surrounding areas.

However, I would recommend considering adopting the Low Scenario additional housing identified as meeting need for other Local Authorities.

#### 4. Housing Distribution Options

The Consultation Plan includes a number of Options to meet the shortfall of housing it identifies. Notwithstanding the issues raised above about adopting either of the two high scenarios I would make the following comments.



<b>High 1 scenario (residual requirement = 1,000 dwellings)</b>	
Option2a	Principal Town (Coalville – 600 dwellings) and Key Service Centres (KSC) (Castle Donington and Ashby de la Zouch – 400dwellings)
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
Option4a	Principal Town (400 dwellings) and New Settlement (600 dwellings)
Option5a	Principal Town (450 dwellings), New Settlement (450 dwellings)and KSC (100 dwellings)
Option6a	Principal Town (350 dwellings), New Settlement (350 dwellings),KSC (200 dwellings) and LSC (100 dwellings)
Option7a	Principal Town (350 dwellings), New Settlement (350 dwellings),KSC (150 dwellings), LSC (100 dwellings) and Sustainable Villages (50 dwellings)
Option9a	Principal Town (200 dwellings), New Settlement (350 dwellings), KSC 90 dwellings), LSC (50 dwellings), Sustainable Villages (270dwellings) and Small Villages (40 dwellings)
<b>New Settlement (residual requirement = 5,100 dwellings)</b>	
Option8	New Settlement

In terms of the H1 Option, I consider there is likely to be sufficient supply without additional housing. I do agree that the Consultation is right to reject the new settlement option, as that would provide too few homes within the plan period to justify the infrastructure. It considers Option 3a to be preferable despite the conclusion of the Sustainability Appraisal that it was less sustainable because the Local Service Centres were not as well served by Public Transport.

I agree with the view of the 3a and would recommend on balance that CPRE support Option 2a rather than 3a taking account particularly of sustainable transport and access to existing services.

However, the Options do risk being too prescriptive, especially if windfalls are included, as they are best measured across the borough, given that their locations are, by their nature, uncertain, albeit one would expect more in the larger settlements.

Moreover, CPRE may consider there are specific reasons, such as service provision, which support some housing in Local Service Areas as well as rural exception sites to provide affordable housing in villages and this may only become fully apparent when there is further refinement to the Plan.

High 2 scenario (residual requirement = 5,100 dwellings)	
Option2b	Principal Town (3,060 dwellings) and Key Service Centres (2,040dwellings))
Option3b	Principal Town (2,550 dwellings), Key Service Centres (1,530dwellings) and LSC (1,020 dwellings)
Option4b	Principal Town (2,040 dwellings) and New Settlement (3,060 dwellings)
Option5b	Principal Town (2,295 dwellings), New Settlement (2,295 dwellings) and KSC (510 dwellings)
Option6b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (1,020 dwellings) and LSC (510 dwellings)
Option7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

In terms of the H2 Option this should not be supported at all by CPRE. The Consultation Plan favours Option 7b (although I note that the main table only includes 7 options, while the text also adds an Option 9b). The plan questions the deliverability of the Options relying largely on development in the Principal Town but also Option 4b and 5b where the new settlement delivers at a rate considered unachievable.

Option 7b is favoured which results in significant additional development in Coalville as well as additional development in all other levels of settlement down to villages, which is likely to lead to dispersed and potentially unsustainable sites, with the Sustainability Appraisal identifying 5 significant negative effects - SA2 (Inequalities), SA11(Climate Change), SA12 (Bio/geodiversity) and SA13 (Landscape/Townscape) and SA14 (Land use) and 2 negative effects - SA1 (Health) and SA8 (Sustainable travel). It is hard to see why the SA results do not appear to have weighed more heavily.

Option 7b also relies heavily on the New Settlement. Para 4.24 of the Consultation Plan seems to suggest this will be site IW1 in the SHELAA at Isley Walton, adjacent to East Midlands Airport, which was favoured in the Appraisal of Strategic Sites carried out by Gillespies in 2020 for North West Leicestershire. According to the SHELAA the site could be deliverable in years 11-20 of the Plan. It is currently open countryside and is not close to any other settlement or likely to be well served by public transport. The SHELAA suggests IW1 could include 4,740 dwellings if fully utilised for housing. The Plan only includes 1785 dwellings on the site. However, Para 4.47 suggests the promoters estimate a build-rate of 250 dpa or 2750 in the period from 2028-2039. Even if there were some delay (as suggested in Para 4.39 which references work by Lichfield on development timescales) it is reasonable to allow for significantly higher overall delivery at the site within the plan period. This would suggest the adoption of Option 7b could lead to higher levels of housing on this site.

The risk would then be that with so much overprovision the market delivers housing at this location as well as the less sustainable locations identified in Option 7b but not where it is arguably most needed in the more sustainable locations, Coalville and the two key service centres.

This would appear to be highly undesirable and should be resisted by CPRE. It would also underline CPRE's concerns about the identification of a growth area around the airport in the SGP which CPRE argue should be fundamentally reviewed.

## 5. General Employment Land

The justification for the employment land requirement in the consultation plan is set out in Table 7. This leads to an overall requirement of 33 hectares of general employment along with 0.3 hectares of office space.

**Table 7: Employment Land Need/Supply balance at 31 March 2021**

		Offices		Industrial/smaller warehousing	
		Sqm	Ha	Sqm	Ha
A	<i>Stantec Requirement (2017 – 39)</i>	57,000	9.0	187,000	47.00
B	<i>Losses allowance (2023 – 39)</i>	2,400	0.4	72,800	18.2
C	<i>Flexibility Margin</i>	11,285	1.88	25,484	6.37
D	<b>Total Requirement [A+B+C]</b>	<b>70,685</b>	<b>11.28</b>	<b>285,284</b>	<b>71.57</b>
E	<i>Net completions (2017 – 2021)</i>	12,784	6.33	2,990	-0.49
F	<i>Net permissions at 31/03/2021</i>	23,986	8.74	73,910	28.22
G	<i>Allocation (Money Hill)</i>	31,980	5.33	42,640	10.66
H	<b>Total Supply [E+F+G]</b>	<b>68,750</b>	<b>20.4</b>	<b>119,540</b>	<b>38.39</b>
	<b>Residual requirement(+)/surplus(-) (2021-39) [H-D]</b>	<b>1,935</b>	<b>-9.12</b>	<b>165,744</b>	<b>33.18</b>

What is noticeable is how much of the industrial requirement is related to losses of employment land, i.e. 24.57 hectares. If this were removed only 8.61 hectares would be required.

However, while the Stantec Report on The Need for Employment Land in North West Leicestershire (November 2020) suggests there may be a need for some losses to be accounted for (including where offices are converted to housing) their analysis also suggests that losses of industrial land in North West Leicestershire have not been high and that most employment land is fit for purpose.

*In Para 3.41 they say: Our forecast relates to net demand, which as discussed earlier is the difference between floorspace gained in new development and existing floorspace lost when employment sites are transferred to other uses. For the purpose of plan-making we need to predict gross demand - the total amount of land that will be developed for employment, if the planning authority provides it. To arrive at gross demand we would normally add to the net figure land to replace such future losses. But in this study we do not do this, because the Council's monitoring does not identify any planning permissions or allocations that imply loss of existing industrial land, and*

*the recent site assessment commissioned by the Council found that all employment sites were fit for purpose, with just one minor exception.*

*And in Para 6.3 they say: If any existing employment floorspace is lost or expected to be lost during the plan period, for example through redevelopment for housing, land over and above those estimates should be provided to offset the losses. In the new Local Plan the Council may consider providing a buffer to cover such potential losses - bearing in mind that under the new Use Classes Order it is now easier to change the use of offices and light industrial buildings to other uses within Class E.*

This does not suggest to me that the level of losses in the Plan is likely to be justified and that the addition of a further flexibility margin is unlikely to be required.

The Plan then discusses further contingency to allow for a situation in which industrial and office space falls short at the end of the plan, although it acknowledges that, unlike housing, there is no specific 5-year land requirement. Given what Stantec say I do not consider such additional requirement is needed, although I agree that the Council may want to monitor this and review the plan if needed. I would also suggest the overall figure may be too high.

In terms of how any new industrial land should be distributed (as set out in Paragraphs 6.20-6.23 of the Plan) Option 1 has a lot to commend itself in terms of sustainability while Option 3 would appear to be the least sustainable. Option 4, which concentrates development at one new industrial development, might be appropriate dependent on that location. Money Hill (Ashby-de-la-Zouch) is mentioned and there are already industrial sites at that location. CPRE would need to examine the area in more detail to come to a view on its suitability, including issues such as how much of the site would be developed.

It is worth also noting here that the Plan does not assume a windfall housing benefit from office conversions. There is potentially a contradiction in including 18.2 hectares of industrial land losses with no housing gains.

## **6. Logistics**

The plan then considers logistics provision. The baseline it uses is the April 2021 Logistics Study for Leicestershire and Leicester<sup>7</sup>, (taking account of a supply baseline update from 2020 to 2021).

The result, it concludes, is that: *When this supply position is deducted from the amount of additional floorspace needed to 2041, the result is a shortfall of 718,875 sqm (288Ha) at rail served sites and 334,986 sqm (96Ha) at non-rail served sites.* (Para 6.26)

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<sup>7</sup> [Leicester and Leicestershire Strategic Distribution Study - North West Leicestershire District Council \(nwleics.gov.uk\)](http://nwleics.gov.uk)

That assumes 2,500 sqm per hectare for rail served sites and 3,500 sqm for non-rail served sites.

I do have some concern about the conclusions of that study. It is a demand-led industry orientated study which projects forwards past growth rates in logistics. Apart from the obvious issues about the sustainability of this and the impact on Carbon Emissions, I am concerned there is a risk of double counting, because predictions of growth in rail freight and road freight may be in competition.

The plan goes on to say that in Para 6.27 that *'The rail-served requirement would be largely fulfilled through the proposed Hinckley National Rail Freight Interchange (NRFI) at Junction 2 of the M69 if it were to be permitted.'* This is not correct. The NRFI would provide 850,000 sqm, which is an additional 131,125 sqm above the rail-served need and since the majority of the NRFI site is actually B8 units which are not directly linked to the rail terminal, with only some 25% of freight movements at the site related to the terminal, so even if the logic of the 2021 study is correct there seems no reason in my mind not to use that over-requirement at the NRFI site to meet some of Leicestershire's need for road-based logistics provision.

That would reduce the floor space required to 203,861 sqm. Taking account of the 89,200 sqm approved on Hinckley (See para 6.28) the residual provision would 114,661 sqm. (approximately 33 hectares at 2,500 sqm per hectare) which would equate to all the provision proposed in the consultation plan at Para 6.31 (106,000-150,000 sqm). 50% of the outstanding provision would amount to 57,330 sqm or 16 hectares. it seems to me that such a level of provision may not be sustainable, so further discussion should be undertaken between North West Leicestershire and its neighbours to consider how best to meet any residual requirement, subject to the approval or not of the NRFI which is currently being consulted on.

## **7. Conclusions**

Having reviewed the evidence in the plan I would conclude that the level of housing requirement should be reduced in line with the lower option of 359 dpa with any additional housing being considered as meeting the duty to cooperate requirement with other local authorities, particularly Leicester.

The supply should be updated to include a reasonable allowance for windfall sites.

The distribution of development should favour Coalville and the two larger service centres, but be flexible enough to allow for suitable windfall provision.

I see no reason to make substantial additional green field provision.

In particular a New Settlement is not required and would create an unsustainable pattern of development, inconsistent with protecting the countryside, reducing the need to travel and controlling Climate Change emissions.

I also consider the need for employment land is probably over generous given the existing supply. There is no need at this stage for additional provision, and while this may be subject to a plan review, I would suggest that a figure closer to 10 has might be appropriate.

The provision of large-scale logistics warehousing is also not justified. Subject to the outcome to the Hinckley NRFI it seems to me there is very little need for additional road-based provision, and what little need there is may be best amalgamated with other authorities in Leicestershire. Further work coordinated work needs to be done to avoid over provision.

## North West Leicestershire Local Plan Review

### Development Strategy and Policy Options – Regulation 18 Consultation Response

#### Packington Nook Residents Association (PNRA)

No.	Question	Yes, No, Option, C'ment	Notes
1	Do you agree with these Local Plan Review Objectives? If not, why not?	Yes	<p>It is agreed that maintaining the local economy, with appropriate levels of growth and seeking to reduce greenhouse gas emissions are of fundamental importance. Consequently, the plan must ensure that development is based on local sustainability, ensuring that the district is vibrant and not a dormitory location for car commuting to Leicester, Nottingham, Derby and the West Midlands conurbation.</p> <p>In respect of the focus on Coalville (objective 6) it is accepted that regeneration must aid the attractiveness of Coalville in order to mitigate the concerns stated in 4.41, where the market there is struggling to deliver scale of growth needed. The inability of Coalville to deliver development will cause more pressure on other towns in the district – particularly Ashby de la Zouch which we consider has already taken a disproportionate level of development.</p>
2	Do you agree with the proposed settlement hierarchy? If not, why not?	Yes	<p>It is of concern that the policy of designation of Coalville as the principal town must take into account the constraints of Policy En5 (Areas of Separation) which could continue to limit the extent of deliverable development in that area.</p> <p>It is also of concern, as evidenced in the SHELAA, that sites identified for development around Ashby de la Zouch could challenge separation with surrounding sustainable villages, including Moira and Packington. We are concerned that if settlement policy is not carefully managed a lot of the boundary definitions could be lost.</p>
3	Do you agree with the approach to Local Housing Needs Villages? If not, why not?	Yes	
4	Q4 - Do you agree with our proposed approach to the amount of housing growth at this time? If	No	Having set out the principals of sustainability and ambitions of zero-carbon, there is an immediate conflict in the expectation that the district will absorb undelivered housing volumes from Leicester. That fundamentally imposes a lot of development in North

	<p>not please explain why, including any specific evidence you think is relevant.</p>		<p>West Leicestershire that will be unsustainable, especially since sustainable transport infrastructure such as the re-opening of the Leicester-Burton railway line is not assured.</p> <p>It is also important that development volumetrics are deliverable. The proliferation of sites identified in the SHELAA is of great concern, particularly as the inclusion of any site does not, in our opinion, take account of whether the site is sustainable and could meet the tests of a planning application. Indeed, there are many sites in the SHELAA which have already failed in the planning process, are unsustainable and/or are outside the existing development boundaries.</p> <p>Taking these factors into consideration, the plan must prevent planning uncertainty by ensuring that volumes are in place, based on the constraints of sustainability and the deliverability of sites in the district. The High 1 scenario of 512 dwellings per annum is a realistic figure to include in the Local Plan. It significantly exceeds the Standard Method calculation, meets the strategic Growth Strategy and provides a good allowance to meet the Leicester unmet Need, should that become unavoidable. However, it is expected that the authority will resist unsustainable development where it exists simply to “help the numbers” in Leicester.</p> <p>In any case, development must be appropriate to the character of the local area (objective 9 ) <i>“Conserve and enhance 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.”</i></p>
5	<p>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.</p>	No	<p>If the High 1 scenario is considered, the combination of option 8 is considered the best option in planning terms.</p> <p>The Principal Town and Key Service Centres already have large allocations of housing in the current Local Plan. It will encourage builders to progress with sites currently within the plan and remove the uncertainty and speculation that the volume of sites identified in the SHELAA represents. However, the new settlement must be carefully planned with excellent infrastructure and have high sustainability credentials which are not immediately evident in the current proposals. Without this, it will fail. Once identified, a new settlement would stop excessive population increase in Ashby de la Zouch and other settlements around the district.</p>



6	Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?	No	It is considered likely that most self-build proposals will come from applicants that already have their own land.
7	Do you agree with the proposed policy on Space Standards? If not, why not?	Yes	
8	Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?	Yes	
9	Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?	Yes	
10	Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?	Option 3	<p>This is considered the best option as it allows for monitoring of needs and supply and review at 5 yearly intervals.</p> <p>An inevitable outcome of the Covid-19 pandemic is a reduction in demand for office space as home working becomes normalised.</p>
11	Which general employment land strategy option do you prefer? Is there a different option which should be considered?	NA	<p>The distribution of employment sites in option 3 appears to be the most sustainable as located near to where people live.</p> <p>However, as we have mentioned in previous consultations, there seems to be an inherent automatic qualification for residential use of brownfield sites – which tends to push employment land to greenfield sites. Brownfield must also qualify for employment use.</p>
12	Do you agree with the initial policy option for strategic warehousing? If not, why not?	No	The option of meeting 50% of the outstanding road-served requirement for the whole of Leicestershire and Leicester City is excessive. Already the central location of the district (which is not exclusive to North West Leicestershire) has very large amounts of development in place. The policy must apply the same objectives of sustainability to such developments, not just to favour mixed rail/road sites, but to ensure there is sustainability in transport for those who work at such locations.
13	Which policy option for employment land	Option 1.	Existing Policy EC2(2) is wide open to not preventing such development throughout the district, including in

	proposals on unidentified sites do you prefer? Is there a different option which should be considered?		<p>areas of open countryside such as the site at Appleby Magna.</p> <p>Our answer to question 11 relating to brownfield sites applies.</p>
14	Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?	Option 1	<p>Option 1 is preferable. which allows for selected sites across the district to be allocated which are best suited to start-ups in terms of accessibility and convenience.</p> <p>There has long been an advantage for both shared services and innovation in start-up businesses being co-located, particularly where a centre justifies the installation of full-fibre broadband, for example.</p>
15	Which policy option for local employment do you prefer? Is there a different option which should be considered?	Option 2	
16	Do you agree with the proposed health and wellbeing policy? If not, why not?	Yes	
17	Do you agree with the proposed Health Impact Assessment policy? If not, why not?	Yes	
18	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	
19	Do you agree with the proposed renewable energy policy? If not, why not?	No	<p>Option 3 is preferred.</p> <p>An ambitious target should be set in order to over-achieve on the delivery of renewable energy. Specifically, to mandate and maximise the use of photovoltaic solar generation from innovative materials on new and existing properties.</p> <p>The widescale use of farm land for photovoltaic solar energy generation, at the expense of growing crops, should be avoided.</p>

			The plan should also provide a consistent approach to renewably-sourced electric vehicle charging, ensuring that new buildings are EV-ready and that car parks and commercial premises have substantially more than a perfunctory level of vehicle charging spaces.
20	Do you agree with the preferred policy approach for energy efficiency? If not, why not?	Yes	Option 3 is ambitious. Clear policies to maximise the take up of insulation and ensure that new builds meet and exceed energy efficiency standards. Where opportunities exist, the plan should also seek to encourage Passivhaus designs.
21	Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?	Yes	
22	Do you agree with the preferred policy approach for overheating? If not, why not?	Yes	
23	Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?	Yes	
24	Do you agree with the proposed policy for reducing carbon emissions? If not, why not?	Yes	
25	Do you agree with the proposed policy for water efficiency standards? If not, why not?	Yes	
26	What additional comments do you have about the Local Plan Review not covered by the preceding questions?		<p>The relationship between the depth of detail in this consultation and the time provided for responses (even taking into account the proposed extension) are unmatched, considering the fundamental impacts the plan will have on the future of everyone in the district.</p> <p>Developers with interests in promoting sites in the district, many of which are identified in the SHELAA, have substantially more resources at their disposal than either individual residents or residents' groups. They often employ planning consultants who have a lot more</p>

		<p>experience in dealing with local plans and know how to position their responses to the maximum benefit of their clients.</p> <p>PNRA has made representations at all stages of the district local plan, with a feeling that our contribution really is not making impact. Specific proposals we have made covering cycling provision in Ashby de la Zouch and the identification of green spaces appear to have been of no consequence.</p> <p>We encourage the authority to recognise these aspects and provide more information and assistance to local people. There is a risk that the frequency of consultations and lack of resulting tangible benefits will lead residents to become disengaged and disillusioned with the entire process.</p>
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**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL:  
**Date:** 28 February 2022 11:51:04  
**Attachments:** [LP Template Letter Detailed.docx](#)

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Dear Sir

With regards to the attachment letter I am voicing my total rejection of the plans to develop 4700 houses around Diseworth and Isley Walton.

My concerns are laid out in the attachment.

[REDACTED]

Julie Werb  
Sent from my iPhone

## The Detailed Template Letter:-

### Local Plan Review. Consultation Response

Name .....

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 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.

**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.N. Other

## Local Plan Review. Consultation Response

Name Mervyn Johnson.

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] 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.

**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 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,

Signed

Mervyn Johnson.



**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](http://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.*

	<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
Title		Miss
First Name		Eleanor
Last Name		Dukes
[Job Title]		Senior Planner
[Organisation]	Williams Builders Ltd	rg+p Ltd
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... to:

**Q2, Q4,  
Q5**

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

Please refer to covering letter and enclosures



(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

A rectangular box containing a solid black rectangle, indicating that the signature has been redacted.

Date

28/02/22

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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](mailto:planning.policy@nwleicestershire.gov.uk).

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cdm principal designer  
project management  
quantity surveyor

master planning  
interior design  
architecture

landscape architecture  
party wall surveyor  
sustainable design

28<sup>th</sup> February 2022

Our Ref: 41227/ED

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



Dear Sir / Madam,

**Without Prejudice - North West Leicestershire Publication Development Strategy Options and Policy Options (Regulation 18) Consultation**

Thank you for the opportunity to submit representations in respect of the above consultation undertaken in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

By way of introduction, our client (Williams Builders) is the freehold owner of an area of land (3.32Ha) known as "Land off the Green / Richmond Road" located to the south of Donnington-le-Heath and Hugglescote and north of Elistown. rg+p are instructed to promote the "Land off the Green / Richmond Road" for development. Referred to hereon as 'the site', the landholding has been submitted for consideration by the Council as part of the 2022 Strategic Housing and Economic Land Availability Assessment (SHELAA).

**The Site and its Surroundings**

Donington-le-Heath is defined within settlement hierarchy as part of the 'Principal Town' (Coalville Urban Area). The village of Donington-le-Heath is located in the eastern part of the District, a well-placed settlement for access to onward travel, employment and services. The Village has strong links to the Coalville and nearby Hugglescote. Our clients are committed to the comprehensive promotion of their land "off the Green / Richmond Road" (3.32Ha.) for residential development of up to 70 dwellings. Please find enclosed a Location Plan (as Enclosure 1). Further work has been carried out to date, including the preparation of an indicative site framework for development (shown in Enclosure 2). Through the promotion of this site, we are seeking to work with the Council and other relevant stakeholders to secure its allocation for development and bring forward the delivery of homes in this area.

Various land uses surround the site including older residential development to the north of the site and agricultural land to the south. The site abuts a railway line to the south, separating the site from the wider countryside and agricultural land. The railway line also provides a strong boundary, identifying an area of separation between Donington-le-Heath and Elistown to the south. As officers will no doubt be aware, to the east lies the recently approved (outline allowed at appeal) development by our client, Williams Builders (Appeal Ref PP/G2435/W/16/3162843, full appeal statement in Enclosure 3) followed by a successful build out of the site following reserved matters stage. The main issue at appeal was the effect on highway safety. Other matters considered by the Inspector included landscape, heritage, drainage and the area of separation between Donington-le-Heath and Elistown (although not the main issue at appeal). The Inspector concluded that the proposal would not be harmful to highway safety and would be an acceptable use of a greenfield site in a sustainable location, close to services and amenities (with no adverse impacts on landscape, heritage, drainage, or the area of separation).

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The principle of development beyond the settlement boundary to the south of Donington-le-Heath was therefore accepted in principle. The residential land uses immediately adjacent to the site are accessed from The Green, Richmond Road and Station Road, which lead to key services in the area, including Hugglescote and Donington-le-Heath including their associated services.

The landholding has been submitted for consideration by the Council as part of the Strategic Housing and Economic Land Availability Assessment (SHELAA). To date, the landholding's position has not been published in an updated SHELAA. However, footnote 12 to paragraph 47 of the NPPF clarifies that: **"To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged"** (my emphasis).

Furthermore, to be considered to be deliverable, in line with footnote 11 to paragraph 47 of the NPPF this means that there must be consensus on the following:

1. **The site is available for development now;**
2. **The site offers a suitable location for development now;**
3. **The development is achievable with a realistic prospect that housing will be delivered within the next 5 years; and,**
4. **In particular the development of the site is viable.**

Our clients submit that their land is not only a developable site for housing, rather it is "deliverable" and is an available and viable scheme, capable of providing housing within the next five years.

Enclosure 2 shows an indicative site framework. Within this plan, the site has been subdivided into two allocations and developments. Parcel 'A' (0.44Ha.) shows a development that would complement the built-out site by our client, Williams Builders (further sketched detail can be found in Enclosure 4). It represents an option for the Council to meet its obligation to support SME housebuilders in North West Leicestershire, whilst also providing up to 12 dwellings to meet housing need in the short term. It would connect with the existing site and create a pedestrian link towards the existing Public Right of Way towards Richmond Road. This would connect the site to our client's landholding and provide a green connection towards the remainder of Donington-le-Heath. Our client's intention is to proceed with discussions with the Council in the near future.

Adjacent to the proposal for Parcel 'A' is the larger site, Parcel 'B' (2.91Ha.). This site, although larger, presents an opportunity to deliver homes within the first 5 years of the plan period. This parcel presents an opportunity to deliver homes in a sustainable location, as a part of a comprehensive scheme that would include pedestrian connectivity to existing dwellings and green infrastructure provision. Parcel 'B' would complement the adjacent development present and the development, as a whole, would create a logical boundary for the new limits to development.

## **Q2 Do you agree with the proposed settlement hierarchy? If not, why not?**

Our client supports the inclusion of Donington-le-Heath within the Principal Town (Coalville Urban Area) and agree with the settlement hierarchy as proposed in the Development Strategy Options and Policy Options document. Our client recognises the role played by the Coalville Urban Area with the District and wider Leicestershire area. The area provides a range of services and facilities necessary for communities to thrive. Donington-le-Heath, as part of the Coalville Urban Area, proposes strong transport links to the wider district and beyond to key services and employment opportunities.

The sustainability of proposed locations for growth is embedded in the NPPF, to ensure that areas of growth meet their own needs and the needs of future generations. Paragraph 7 of the NPPF states: **"The purpose of the planning system is to contribute to the achievement of sustainable development. At a very high level, the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs"**.

The decision regarding the previous appeal on "Land South of The Green, Donington Le Heath, Leicestershire" (Appeal Ref APP/G2435/W/16/3162843) determines the site to be "near to local services that would be accessible by other means than the car and in this respect the proposal would contribute to the social and environmental roles of planning as contained within paragraph 7 of the Framework". It is our client's view that the Coalville Urban can continue to support the needs of residents, including the provision of housing in a sustainable location.

**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.**

Williams Builders support the approach proposed under the 'High 2 Scenario'. Williams Builders welcome the recognition that the standard method identifies a minimum annual housing need figure, not the housing requirement (our emphasis). It is considered that the option to deliver 730 dpa (using 2018-based projections) would provide a sufficient buffer to the standard method and would deliver enough homes to support NWLDC's growth. Taking note of the build rates currently recorded in the District, combined with the government's target to deliver 300,000 new (net) homes a year, an 18% increase in build rates is considered by our client to be an acceptable target for growth.

Williams Builders agree that the amount of housing needed to be redistributed from Leicester City in NWLDC is largely unknown at this stage. Our client appreciates the positive approach taken to providing homes within North West Leicestershire, understanding that high levels of growth will be required, whilst also taking into account in-commuting to the District. As a result of this joint working obligation, Williams Builders do not believe that the buffer provided by the 'High 1' scenario is sufficient to supply homes for NCLDC's own need, alongside the need of the wider Housing Market Area. The reliance on a smaller pool of allocations would present a risk to the delivery of homes in the District and if not delivered as envisaged, leave the District vulnerable to development in unsustainable and unsuitable locations. Our client believes that the 'High 1' scenario (512 dpa) should not be taken forward.

**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**

Taking into account the preferred approaches to meeting NWLDC's own need and that of the wider Leicester HMA, careful consideration of housing distribution will be required. Paragraph 68 of the NPPF states:

**"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.** Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan." (my emphasis)"

It is our client's position is that 'the site' "Land off the Green / Richmond Road" is available, achievable, and deliverable within the first 5 years of the plan period. It is located adjacent to the main urban area and presents a key opportunity to deliver homes within the first 5 years of the plan period.

However, our client is concerned with the lack of focus on the role that SMEs play to deliver new homes in the District. It is not clear at this stage whether the distribution of housing growth in the North West Leicestershire will come in the form of large sites or a good mix of different sized sites that can deliver housing growth over the plan period, ensuring that supply is healthy. It is becoming recognised that the delivery of new homes has increasingly relied on a small number of larger, often nationally active developers. This has come to the forefront of discussion within the construction industry and the role SME sites play is recognised within the NPPF. Paragraph 69 of the NPPF states: **"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."** Understanding the ability for SME housebuilders to build out sites relatively quickly is required within Local Plans to ensure that supply is consistent. This is particularly relevant within the Coalville Urban Area as a sufficient supply of homes throughout the plan period will be required to support growth without overwhelming services and allowing them to adjust and expand as investment is realised.

A recently published report from the House of Lords (Meeting Housing Demand)<sup>1</sup> sheds light on the impact of a lack of small and medium sized housebuilders in meeting housing need. The advantages of a diverse and

<sup>1</sup> <https://committees.parliament.uk/publications/8354/documents/85292/default/>

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competitive housebuilding market are now becoming well understood. The report (in paragraph 95) notes that “The largest four developers complete around 60,000 homes annually, approximately one third of the total” (homes built).

It is not only a discussion for the volume of dwellings built annually over a plan period, but the character of areas that developments contribute to. Paragraph 133 of the NPPF states that **“Local planning authorities should ensure that they have access to, and make appropriate use of, tools and processes for assessing and improving the design of development”**. It should be recognised that many SME housebuilders, such as our client, live and work within the local area and have the ability to shape and contribute to local communities, with development that is sensitive to the area’s needs. By ensuring that SME housebuilders, such as our client, play an active role in the process of developing Local Plans and throughout the development management process, design of schemes can be shaped to complement local areas.

Paragraph 4.56 of the Development Strategy Options and Policy Options consultation document discusses the options for housing growth, specifically option 9b and its ability to support SME housebuilders. Whilst it is accepted that the allocation of smaller sites (providing opportunities for SME housebuilders) would be possible under option 9b, an opportunity to support SME housebuilders could be realised under preferred option 7b, in areas where there is a good provision of local services and employment opportunities. This would therefore satisfy the District Council’s obligation to allocate small sites (under Paragraph 69 NPPF) whilst also ensuring that supply is consistent throughout the plan period. It is more appropriate to ensure that there is a varied allocation of sites across the urban area, key service centres, sustainable villages and beyond, ensuring that a healthy supply of sites is identified (without the reliance on large sites that take a longer time to build out), rather than relying on national housebuilders to develop large sites.

Williams Builders believe that option 7b could provide flexibility and reduce deliverability issues in the provision of new homes, if the role of SME housebuilders was recognised in the allocation of development sites in the District. Williams Builders agree that option 7b provides a deliverable and sustainable pattern of development and should be taken forward for future discussion within the Substantial Review of the Local Plan. If option 7b is taken forward as a preferred option, a closer inspection of the role of small and medium sized sites is requested.

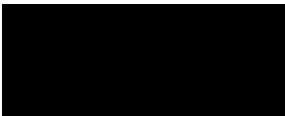
## Conclusions

It is evident through the review of the Local Plan in North West Leicestershire, that the District will need to accommodate a significant number of new homes, not only to meet its own need but the need of the Leicester and Leicestershire HMA. The permission secured at 'Land South of The Green' is now located outside of the limits to development (under current policy S3). In this particular location, the area benefits from a strong, defensible feature, the railway line, which could be feasibly used as a boundary to the limits of development in this location. In light of this, and the settlement hierarchy proposed in this document, Williams Builders consider that the limits to development in this sustainable location should be reviewed to deliver new homes in Donington-le-Heath.

Our clients therefore assert that allocating their land for residential development would not result in an overly dominant housing development within the town and in light of reviewing the plan, the site as a whole should be considered for allocation for up to 70 dwellings, along with an amendment to the settlement boundaries for Donington-le-Heath and the South of Coalville.

Our clients are committed to playing an active role in the preparation of the draft Local Plan and look forward to taking part in future consultation, including oral participation at the eventual examination (as may be required). I trust that this letter is useful in refining the policies and development strategy. If any clarification is required, please do not hesitate to contact me.

Yours faithfully



Eleanor Dukes BA (Hons) MSc  
Senior Planner  
rg+p Ltd.



c.c.  
Stephen Williams (Williams Builders)  
Ian Anderson (Williams Builders)

Enc:  
Enclosure 1 - Site Location Plan  
Enclosure 2 - Site Development Framework  
Enclosure 3 - Appeal Decision  
Enclosure 4 - Parcel A Sketch Layout



Project: Land at Donington Le Heath

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Status: Planning

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Client: Williams Builders Ltd

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Sheet title: Call for Sites plan

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Scale: 1:1250@A3

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Date: September 2021

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Drawn: DNW

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Checked: CSL

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Ref: **41277/301**

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 0203 327 0381 | 0121 309 0071 | 0116 204 5800  
 rg-p.co.uk - design@rg-p.co.uk

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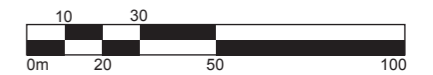
Revision:                      Date:                      Drawn: Check:

Key

- Site boundary
- Vehicular Access Points
- Proposed Pedestrian Access
- Existing public footpath (PROW)
- Primary Circulation
- Proposed Green space
- Residential Development
- Attenuation



SCALE 1:2,000



Project: Land off Richmond Road,  
Donington Le Heath, Coalville

Status: Feasibility

Client: Williams Homes

Sheet title: Call for Sites Framework Plan

Scale: 1:2,000@A3

Date: February 2022

Drawn: AIG / DNW

Checked: DNW

Ref: **41227/201**

Development Schedule:

Total site Area: 3.35ha

Parcel A: 0.44ha

Parcel B: 2.91ha

POS / Attenuation within Parcel B: 0.65ha

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## Appeal Decision

Site visit made on 20 February 2017

**by Zoe Raygen Dip URP MRTPI**

**an Inspector appointed by the Secretary of State for Communities and Local Government**

**Decision date: 28 March 2017**

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**Appeal Ref: APP/G2435/W/16/3162843**

**Land South of The Green, Donington Le Heath, Leicestershire**

- The appeal is made under section 78 of the Town and Country Planning Act 1990 against a refusal to grant outline planning permission.
  - The appeal is made by Wrenbury Properties Ltd against the decision of North West Leicestershire District Council.
  - The application Ref 15/00951/OUTM, dated 30 September 2015, was refused by notice dated 7 October 2016.
  - The development proposed is described on the application form as outline proposal for a development of up to 45 dwellings.
- 

### Decision

1. The appeal is allowed and planning permission is granted for outline proposal for a development of up to 34 dwellings at Land South of The Green, Donington Le Heath, Leicestershire in accordance with the terms of the application, Ref 15/00951/OUTM, dated 30 September 2015 subject to the conditions set out in the schedule to this decision notice.

### Costs

2. Two applications for costs were made by Wrenbury Properties Ltd. One was against North West Leicestershire District Council and the other against Hugglescote and Donington Le Heath Parish Council. Both applications are the subject of a separate decision.

### Procedural matters

3. The application is in outline; with all matters except for access reserved for future consideration. A layout plan has been submitted and I will treat this as indicative only.
  4. During the course of the application the number of proposed dwellings was reduced to 34. I have determined the appeal accordingly.
  5. The appellant has submitted a copy of a signed section 106 planning obligation in respect of affordable housing, bus stop improvement, civic amenity site improvement, education, library provision, affordable housing, travel packs and bus passes, construction traffic routeing and National Forest Planting Scheme. I return to this matter below.
  6. I have given main parties the opportunity to comment on Paragraph 29 of the judgement *Mayowa-Emmanuel v Royal Borough of Greenwich* [2015] EWHC
-

4076 which identified that paragraph 32 of the National Planning Policy Framework (the Framework) addresses matters of highway capacity and congestion, rather than highway safety considerations in themselves. I have taken the judgement and the responses by main parties into consideration in my determination of the appeal.

### **Main Issue**

7. The main issue is the effect of the proposal on highway safety.

### **Reasons**

8. The appeal site forms a large area of undeveloped land on the south side of The Green extending to the rear of properties along Midland Road. There are residential properties to the north side of The Green the majority of which have no access to off street parking. As a result cars are parked outside of the houses along the north side of the Green. The south side is subject to a Traffic Regulation Order restricting parking in the form of double yellow lines. The speed limit along the road is 30mph. The proposed development of 34 houses would be served by a single access from the Green.
9. The Council and local residents raise concerns regarding the amount of cars parked on The Green together with speeding cars and the consequent impact on the visibility for vehicles using the proposed new access.
10. The appellants have submitted a transport statement prepared by BSP Consultants 2015 (TS) together with updated information within their appeal statement (AS) following the reduction of the number of dwellings from 45 to 34. The appellant's highways evidence, based upon the nationally recognised TRICS (Trip Rate Information Computer System) database, estimates that the appeal proposal would generate 18 additional vehicle movements within both the morning and evening peak periods. These figures equate to an average of one additional vehicle movement every 3 minutes or so. Although the actual traffic levels may vary from these figures, they provide reasonable estimates based upon the number of dwellings proposed. Traffic generation caused by the new development outside peak periods would be lower.
11. Residents indicate the highway network has become busier over recent years particularly with HGV vehicles and agricultural vehicles using The Green as a shortcut despite there being a weight restriction on the road. Nevertheless, I have no substantive evidence to suggest that the existing highway network is at or near capacity. As a result, the limited number of additional traffic movements caused by the proposal would have very little impact on the capacity of the local highway network.
12. The appellants have undertaken a speed survey carried out in accordance with TA22/81 within the Design Manual for Roads and Bridges (DMRB). The results found that the design speed, based on the 85<sup>th</sup> percentile wet weather journey speed is 31.7 mph in a westerly direction and 30 mph in an easterly direction. Similar results were found by the Parish Council (PC) when undertaking a speed survey. Both the PC and the AS acknowledge that at the time of the survey some cars were parked along the north side of The Green, however cars were only measured that did not stop to allow oncoming cars to proceed. At the time of my site visit there were a number of cars parked on the Green, and from evidence supplied by various parties that situation would appear to be an

- intrinsic element of traffic conditions along the Green. I therefore consider that the speed surveys were carried out under appropriate conditions and the results can be taken to be a reasonable assessment of speeds along the road at most times.
13. The PC also refers to data from their Speedwatch Initiative which recorded speeds of 36mph and 44mph. However, I note that these readings were made in the vicinity of Manor Road which is some distance from the proposed access. Furthermore, it is not disputed that some vehicles will travel at speeds above 30mph along the road and both surveys record this.
  14. The Council suggest that from the data in the appellant's statement about a third of vehicles in the survey were travelling above 30 mph in both directions. Nevertheless the figures demonstrate that the large majority of vehicles were adhering to the speed limit or very marginally above it. At my site visit I observed most drivers being reasonably respectful of conditions, but with occasional very obvious exceptions. Furthermore, the presence of parked cars act as a speed restraint in the area. I therefore consider that it has not been demonstrated that there is a significant speeding problem along this stretch of road. Moreover, DMRB is concerned with the 85<sup>th</sup> percentile for design purposes, which in this case has been shown to be around 30mph.
  15. All parties refer to the statistics for Personal Injury Collisions over the past five years. These show that there has been one serious-injury accident on the Green within the proximity of the appeal site which occurred when a parked vehicle was emerging into the carriageway and collided with a vehicle travelling in the opposite direction. Three accidents occurred near to the junction of The Green, Midland Road and Station Road away from the proposed junction on the Green. However, I am not aware of the cause of these. Residents also highlight minor incidents and one refers to at least 9 incidents within 13 years which have resulted in damage to property and vehicles. Nevertheless, such a low incident of accidents would not weigh significantly against the proposals.
  16. The appellant has used the result of the speed surveys to propose visibility splays of 2.4m x 43 m to the left and 2.4m x 54m to the right. Such provision would be in accordance with the national advice contained within the Department for Transport publication Manual for Streets 2007 (MfS) and local advice contained within the Leicestershire County Council's 6C's Design Guide 2007 (DG). Furthermore, the appellant has submitted a copy of a plan showing land in the ownership of the Highway Authority (HA) and it is apparent that the required visibility splays can be achieved in both directions on land owned by either the appellant or the HA. The existing double yellow lines would ensure that cars would not be parked within the visibility spay. Furthermore a condition could be imposed to ensure the visibility splay would be kept clear of vegetation or other obstruction.
  17. It is acknowledged that cars park along the northern side of The Green. At the time of my site visit 1600 -1630 there was a significant number of cars parked, although none opposite the location of the proposed access. I appreciate that this is only a snap shot in time and photos submitted do show incidences of cars parked opposite the site. However, I have no evidence to suggest what time periods or how often such parking would occur. Furthermore, the photographs supplied by all parties show limited numbers of cars parked opposite the proposed entrance to the site.

18. The parking of cars would effectively reduce the carriageway to a single lane. I observed passing cars and vans and while there were some areas where two cars could pass adjacent to the parked cars, equally there were others where the carriageway was too narrow for this to occur. Furthermore, larger vehicles would not be able to pass at the same time as cars. This is reinforced in photographs supplied by the PC. However, I did not see any dangerous driving as vehicles sought to pass each other.
19. The appellant has demonstrated that even if cars are parked along the northern side of The Green, forward visibility along The Green to the proposed site access junction is over 75m in both directions meaning that oncoming drivers/cyclists can see any potential vehicles exiting the site from a distance comfortably beyond the recommended forward visibility distances, I saw that this was a reasonable assessment of visibility from the proposed site access.
20. The Council's concern relates to the ability of drivers of vehicles turning right into the site when travelling eastwards to see oncoming cars because of the slight bend in the road, parked cars and the speed of traffic. I saw that drivers of vehicles travelling eastwards, even with the bend in the road are able to adequately see approaching vehicles whichever side of the road they travel on. The appellant confirms that forward visibility would be greater than the 43 metres required in MfS and the DG. I have seen no evidence from the Council to dispute this. Accordingly adding a right turn would not significantly change the current situation.
21. I note that the HA originally had concerns regarding the ability of HGV vehicles to access the site given the incidence of on street parking. In response the appellant submitted swept path analysis which demonstrates that large vehicles would be able to access the site even with cars parked opposite the site. Furthermore, the access into the site would be widened for the first 10 metres to accommodate larger vehicles.
22. The Parish Council raise concerns that the plans do not show a true representation of the extent of parking and submit their own swept path analysis with what they consider to be a more realistic situation. As a result larger vehicles would need to use the full width of the access road and a pantechinon would need to traverse the footway. The PC raise a number of scenarios which could occur as a result of large vehicles accessing the site.
23. However, I have no substantive evidence to demonstrate that parking occurs to the extent shown in the PC's swept path analysis opposite the site. Even the photos submitted by the Council and PC do not show a solid bank of parked cars opposite the site. Furthermore, the amount of larger vehicles visiting the site once developed is not likely to be significant. Refuse vehicles are likely to attend once a week, otherwise larger delivery vehicles are not likely to be a regular presence. Moreover the HA raised no objections to the proposal in this respect.
24. The build out period for a site of 34 dwellings is unlikely to be lengthy. While larger vehicles would be likely to need to access the site during this period it would be for a temporary period only. The PC also refer to the possibility of the requirement to have large earth moving equipment on site to achieve roads of the required gradient within the DG and the impact this would have on highway safety. However, if such equipment is required it is unlikely to be a regular occurrence.

25. The appellant states that the proposal would provide footways either side of the proposed access together with non-controlled pedestrian crossings to link the site to the footway on the opposite side of the road which in turn would give access to facilities within Hugglescote. In addition there would be a footpath link within the site to the north-eastern corner of the site to existing footways. The HA has suggested that this should be provided within the highway verge. Despite the comments of the PC regarding land levels I have seen no substantive evidence in the submissions or on my site visit to demonstrate that this could not be achieved. Accordingly I see no reason why the exact location of the footway could not be the subject of a condition.
26. Drawing all the above together there would be a limited number of cars generated by the development, even during the peak period. Visibility splays can be achieved appropriate for the speed of traffic using The Green. Even with cars parked opposite the site larger vehicles would be able to access safely and it is unlikely that there would be a significant number of such movements. Finally drivers of cars turning right into the site when travelling eastwards would have adequate visibility. I therefore consider that the proposal would lead to an environment that would be safe for all users and makes adequate provision for vehicular access together with safe and accessible connections to the transport network.
27. For the reasons above I do not consider that the proposal would be harmful to highway safety. Accordingly, there would be no conflict with saved Policy T3 of the North West Leicestershire Local Plan Written Statement 2002 (LP), emerging Policy IF4 of the North West Leicestershire Local Plan Publication Version 2016 (LPPV), the DG and the Framework. These require amongst other things that safe and suitable access to the site can be achieved for all people and takes account of the impact on the highway network.

### **Other matters**

28. Concerns have been raised regarding the proximity of the proposed houses to existing gardens and dwellings on Midland Road. However, the submitted layout plan is illustrative and only represents one way of developing the site. Exact details of the siting, design and appearance of the houses would need to be submitted to the Council for further consideration.
29. The appellant has submitted an archaeological desk-based assessment for the site. The report identifies the archaeological potential for medieval and postmediaeval remains within the application area, associated with the historic settlement cores of Hugglescote. Local records also highlighted the potential for the presence of Prehistoric and Roman archaeological remains within the appeal site. I note that Leicestershire County Council's Senior Planning Archaeologist is content for the development to proceed subject to a scheme of investigation and potential mitigation being agreed. I see no reason to disagree with this approach.
30. Concern has been raised regarding the drainage of the site particularly in relation to the capacity of foul sewers. However Severn Trent has confirmed it has no objections to the scheme.
31. The appeal site is outside the limits to development of the settlement and also within a designated Area of Separation which seeks to ensure that Hugglescote and Ellistown remain as two separate and distinct settlements. I saw though

that the appeal site would be in walking distance of bus stops and a range of facilities in Hugglescote that would provide day to day needs for future occupiers with regard to shopping, health, some education and recreation facilities. The proposals to provide a footway would give convenient pedestrian access to the facilities.

32. The nearest bus stop would be about 300m from the site which would be in accordance with the guidance in the Institute of Highways and Transportation's Guidelines for Planning for Public Transport in Developments (1999). The bus stop has a regular service to the larger settlements of Coalville and Leicester which have a wider range of facilities and services than Hugglescote. Therefore the site would be near to local services that would be accessible by other means than the car and in this respect the proposal would contribute to the social and environmental roles of planning as contained within paragraph 7 of the Framework. Even though therefore the proposal would be contrary to Policy S3 of the LP and emerging Policy S3 of the LPPV it would nonetheless be in an accessible location.
33. The proposed houses would extend no further than properties fronting Midland Road and would also be viewed against the back drop of housing on The Green. As a result the proposal would not result in a reduction in the physical separation between the built-up areas of adjoining settlements Hugglescote and Ellistown. Furthermore, I note that this particular Area of Separation would not be carried through to the LPPV.
34. The appeal site was previously used as allotments, but now the site is grassed over. To the south it abuts a railway line where there is some planting. This together with the hedge along The Green and the western boundary of the site would be retained. Bearing this in mind and taking into account the appellants Landscape and Visual Appraisal (LVA), I saw nothing on my site visit that would lead me to disagree with the Council's conclusion in its Committee report that a residential scheme could come forward at the reserved matters stage without having significant visual and landscape impacts.

#### *Obligation*

35. I have been supplied with a certified copy of a Section 106 planning obligation dated 20 February 2017 which secures the provision of various contributions to local facilities and the provision of affordable housing.
36. Key Principle AH2 of the North West Leicestershire District Council Affordable Housing Supplementary Planning Document (the SPD) provides that affordable housing will be sought on all sites of 15 or more dwellings in the Greater Coalville Area where the appeal site is located. Furthermore, Key Principle AH3 requires a minimum of 20% of residential units be affordable. The affordable housing obligation requires that 20% of the houses built on site be affordable.
37. It also provides for financial contributions; to bus stop improvement; a sustainable travel pack for each dwelling together with bus passes; to the improvement of the local civic amenity site; towards the provision of Primary and Secondary education facilities serving the development; and towards the provision of Library services.
38. The Council has indicated that the contributions would not lead to the pooled contributions limit set out in Regulation 123 (3) of the Community

Infrastructure Levy (CIL) Regulations being exceeded. The limitations on pooled contributions do not apply to affordable housing.

39. The National Forest Company's Planting Guidelines expects 20% of the site area to be for woodland and planting. This expectation, together with the requirement for the submission of a construction traffic routeing plan, is also part of the S106 agreement.
40. The obligations within the S106 are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development. Therefore, they meet the tests within CIL Regulation 122 and paragraph 204 of the Framework. I have taken them into account in the decision.

### **Conditions**

41. I have had regard to the various planning conditions that have been suggested by the Council and considered them against the tests in the Framework and the advice in the Planning Practice Guidance and have made such amendments as necessary to comply with those documents. In the interests of clarity it is appropriate that there is a condition requiring that the development is carried out in accordance with the approved location plan and one restricting the numbers of houses to be built. Any increase in numbers would require further highway and landscape consideration.
42. The reserved matters should demonstrate compliance with Building for Life 12 through an assessment and this should be required by condition. Conditions regarding the submission of details of the archaeological evaluation of the site and the protection of trees are necessary prior to work commencing on site to ensure no harm is caused to archaeology and trees by any development. Given the proximity of the railway line I concur that conditions are necessary regarding investigation of the land for contamination to ensure that appropriate mitigation takes place should the land be found to be contaminated before any development takes place. Condition 7 is imposed to protect nesting birds. Foul and surface water conditions are applied to ensure the proper drainage of the site. Conditions 10-15 are imposed to protect highway safety.

### **Conclusion**

43. For the reasons set out above, and having regard to all other matters raised, I conclude that the appeal should be allowed.

*Zoe Raygen*

INSPECTOR



## **SCHEDULE OF CONDITIONS**

- 1) Details of the access (save for the details of vehicular access into the site from The Green), appearance, landscaping, layout, and scale, (hereinafter called "the reserved matters") shall be submitted to and approved in writing by the local planning authority before any development takes place and the development shall be carried out as approved.
- 2) Application for approval of the reserved matters shall be made to the Local Planning Authority before the expiration of three years from the date of this permission and the development hereby permitted shall begin before the expiration of two years from the date of approval of the last of the reserved matters to be approved.
- 3) The proposed development shall be carried out strictly in accordance with the following plans, unless otherwise required by another condition of this planning permission: - Site Location Plan (40261/001)
- 4) A total of no more than 34 dwellings shall be erected.
- 5) No development (except any demolition permitted by this permission) shall commence on site until a Further Risk Based Land Contamination Assessment, as recommended by BSP Consulting report Land south of The Green, Donington Le Heath, Leicestershire Geotechnical & Geo-Environmental Desk Study On behalf of William Builders Ltd Project: 15210 Date 02.10.15, has been submitted to and approved in writing by the Local Planning Authority. The Risk Based Land Contamination Assessment shall be carried out in accordance with:
  - i) BS10175:2011+A1:2013 Investigation Of Potentially Contaminated Sites Code of Practice;
  - ii) BS 8576:2013 Guidance on Investigations for Ground Gas - Permanent Gases and Volatile Organic Compounds (VOCs); and
  - iii) CLR 11 Model Procedures for the Management of Land Contamination, published by The Environment Agency 2004.

Should any unacceptable risks be identified in the Risk Based Land Contamination Assessment, no development shall commence on site until a Remedial Scheme and a Verification Plan is prepared, and submitted to, and agreed in writing by the Local Planning Authority. The Remedial Scheme shall be prepared in accordance with the requirements of:

- i) CLR 11 Model Procedures for the Management of Land Contamination, published by The Environment Agency 2004; and
- ii) BS 8485:2015 Code of practice for the design of protective measures for methane and carbon dioxide ground gases for new buildings

The Verification Plan shall be prepared in accordance with the requirements of:

- i) Evidence Report on the Verification of Remediation of Land Contamination Report: SC030114/R1, published by the Environment Agency 2010;
- ii) CLR 11 Model Procedures for the Management of Land Contamination, published by The Environment Agency 2004.

If, during the course of development, previously unidentified contamination is discovered, development must cease on that part of the site and it must be reported in writing to the Local Planning Authority within 10 working days. Prior to the recommencement of development on that part of the site, a Risk Based Land Contamination Assessment for the discovered contamination (to include any required amendments to the Remedial Scheme and Verification Plan) must be submitted to and approved in writing by the Local Planning Authority. Thereafter, the development shall be implemented in accordance with the approved details and retained as such in perpetuity, unless otherwise agreed in writing by the Local Planning Authority.

- 6) Prior to occupation of any part of the completed development, either

If no remediation was required by Condition 5 a statement from the developer or an approved agent confirming that no previously identified contamination was discovered during the course of development is submitted to and approved in writing by the Planning Authority, or

A Verification Investigation shall be undertaken in line with the agreed Verification Plan for any works outlined in the Remedial Scheme and a report showing the findings of the Verification Investigation relevant to either the whole development or that part of the development shall be submitted to and approved in writing by the Local Planning Authority. The Verification Investigation Report shall:

- i. Contain a full description of the works undertaken in accordance with the agreed Remedial Scheme and Verification Plan;
- ii. Contain results of any additional monitoring or testing carried out between the submission of the Remedial Scheme and the completion of remediation works;
- iii. Contain Movement Permits for all materials taken to and from the site and/or a copy of the completed site waste management plan if one was required;
- iv. Contain Test Certificates of imported material to show that it is suitable for its proposed use;
- v. Demonstrate the effectiveness of the approved Remedial Scheme; and
- vi. Include a statement signed by the developer, or the approved agent, confirming that all the works specified in the Remedial Scheme have been completed.

- 7) Unless first agreed in writing by the Local Planning Authority, no site clearance operations that involve the destruction or removal of vegetation on the site shall be undertaken during the months of March to August (inclusive).
- 8) Other than site clearance and preparation works no works shall commence on the construction of the hereby permitted dwellings until a surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme shall include the utilisation of holding sustainable drainage techniques with the incorporation of two treatment trains to improve water quality; the limitation of surface water run-off to equivalent greenfield rates; the ability to accommodate surface water run-off on site up to the critical 1 in 100 year event plus an appropriate allowance for climate change, based upon the submission of drainage calculations; and the responsibility for the future maintenance of drainage features. The scheme shall be fully implemented and subsequently maintained, in accordance with the timing and phasing arrangements embodied within the approved scheme.
- 9) Other than site clearance and preparation works no works shall commence on the construction of the hereby permitted dwellings until a scheme for foul drainage has been submitted to and approved in writing by the local planning authority. The scheme shall be implemented prior to the occupation of the first house in accordance with the approved details.
- 10) Before first use of the development hereby permitted, visibility splays of 2.4 metres by 54 metres to the right and 2.4 metres x 43 metres to the left shall be provided at the junction of the access with The Green. These shall be in accordance with the standards contained in the current County Council design guide and shall thereafter be permanently so maintained. Nothing shall be allowed to grow above a height of 0.6 metres above ground level within the visibility splays.
- 11) The proposed access shall be provided with a width of a minimum of 5.5 metres for a distance of at least 10 metres behind the highway boundary on The Green.
- 12) Before first use of the development hereby permitted, the vehicular access to the site shall be provided with 6 metre radii on both sides of the access.
- 13) No development shall commence on site until such time as details of a footway from existing footways on The Green to the point of the new access to the development shall be submitted to and agreed in writing with the Local Planning Authority. The footway shall be implemented in full prior to any dwelling being occupied.
- 14) No development shall commence on the site until such time as a construction traffic/site traffic management plan, including wheel cleansing facilities and vehicle parking facilities, and a timetable for their provision, has been submitted to and approved in writing by the Local Planning Authority. The development shall thereafter be carried out in accordance with the approved details and timetable.

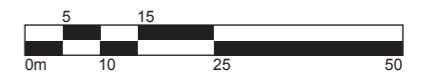
- 15) The gradient of the access into the site shall not exceed 1:12 for the first 10 metres behind the highway boundary.
- 16) No development shall commence on the site until such time as a programme of archaeological mitigation work, informed by an initial phase of trial trenching and detailed within a Written Scheme(s) of Investigation has first been submitted to and agreed in writing by the Local Planning Authority. The scheme shall include an assessment of significance and research questions, and:
  - i. The programme and methodology of site investigation and recording (including the initial trial trenching, assessment of results and preparation of an appropriate mitigation scheme);
  - ii. The programme for post-investigation assessment;
  - iii. Provision to be made for analysis of the site investigation and recording;
  - iv. Provision to be made for publication and dissemination of the analysis and records of the site investigation;
  - v. Provision to be made for archive deposition of the analysis and records of the site investigation; and
  - vi. Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation

No development shall take place at any time other than in accordance with the agreed Written Scheme of Investigation. None of the dwellings shall be occupied until such time as the site investigation and post investigation assessment has been completed in accordance with the programme set out in the agreed Written Scheme of Investigation and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.

- 17) No site works of any description shall take place on the site until such time as the existing trees to be retained have been securely fenced off in accordance with a scheme that has first been submitted to and agreed in writing with the Local Planning Authority. Within the fenced off areas there shall be no alteration to ground levels, no compaction of the soil, no stacking or storing of any materials and any service trenches shall be dug and back-filled by hand.
- 18) The first reserved matters application shall be accompanied by a further Building for Life 12 assessment.



SCALE 1:1,000



Project: Land off Richmond Road,  
Donington Le Heath, Coalville

Status: Feasibility

Client: Williams Homes

Sheet title: Parcel A Sketch Layout

Scale: 1:2,000@A3

Date: February 2022

Drawn: AIG / DNW

Checked: DNW

Ref: 41227/301

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## Local Plan Review. Consultation Response

Geoffrey Stone.



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 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 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

G.P. Stone.

## Local Plan Review. Consultation Response

Margaret A. Stone.



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 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 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.

**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.

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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

M. A. Stone.



**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](http://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.*

	<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
Title		Mr
First Name		Ben
Last Name		Williams
[Job Title]		Senior Planner
[Organisation]	Harworth Estates Investments Limited	Turley
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...

N/A

### Introduction

We write on behalf of our client *Harworth Estates Investments Limited* ('Harworth') in respect of the Regulation 18 consultation on the Substantive Review of the North West Leicestershire Local Plan (document entitled 'Development Strategy Options and Policy Options').

The Regulation 18 consultation document confirms that the next stage of the consultation process on the Substantive Review will be a 'consultation on potential site allocations' in spring 2022. Accordingly, we have submitted a separate Call for Sites submission to NWLDC. Although this consultation is not yet underway, the Planning Practice Guidance is clear that local planning authorities "*need to be proactive in identifying as wide a range of sites and broad locations for development as possible*" (Paragraph: 010 Reference ID: 3-010-20190722). This process should not be restricted to a formal consultation period.

### Harworth Estates Investments Limited

Harworth is one of the leading land and property regeneration companies in the UK. The company primarily focuses on sites in the north of England and the Midlands, owning and managing approximately 18,000 acres on around 100 sites. Harworth look to create sustainable places, which minimise their environmental impact while delivering successful developments.

Harworth is a significant investor in North West Leicestershire district, having secured outline planning permission for the South-East Coalville SUE and more recently planning permission for employment development uses on land to the east of Regs Way ('Bardon Hill East').

Harworth plans to continue its multi-million pound investment in this area with further employment development at Bardon Hill West, on the final parcel of land between the 2,700 home new community to the west and employment site to the east.

### The Site | Bardon Hill West

Harworth is promoting a site for employment development in Bardon, Coalville ('Bardon Hill West'). It is bounded by Grange Road to the north, Regs Way to the east, established employment development to the south, and a freight railway line to the west.

The site is located approximately 2.5km to the south-east of Coalville Town Centre and approximately 3.5km to the north-west of Junction 22 of the M1. The site sits within an area that has seen / will see significant development over the coming years. There are around 3,500 homes being constructed to the west, while an employment development of significant scale is being delivered by Harworth to the east – Bardon Hill East. This is in addition to the existing employment uses to the north (Quarry Manufacturing & Supplies Ltd) and south (Bardon Business Park and Industrial Estate) of the site.

Once these developments have been completed, the Bardon Hill West site will effectively be an 'infill' area of land and undeserving of its 'countryside' status as currently defined in the adopted Local Plan (Policy S3).

The site lies within the Coalville Urban Area, which is designated as a 'Principal Town', the primary tier of settlement in the adopted Local Plan (Policy S2). This is in line with the direction of the NPPF which is to focus significant development in sustainable locations.

### **Previous SHELAA Assessments**

The site has been submitted to previous Call for Sites processes and was assessed by the Council as part of its Strategic Housing and Economic Land Availability Assessment (SHELAA), most recently in 2021. The site was assessed as a potential employment site and is referred to as '**EMP34 – Land to West of Regs Way**'.

The assessment confirms the site is currently in 'agricultural' use and is allocated as 'Countryside' in the adopted Local Plan. It considers the potential uses are "offices; industrial; storage / distribution", with a potential employment floorspace of 24,320 sqm (11,480 sqm for the parcel north of the River Sence).

### **Planning Application ref. 21/02281/FULM**

The northern extent of site ref. EMP34 is currently the subject of a hybrid planning application which was submitted and validated in December 2021 (application ref. 21/02281/FULM). Its determination date is 9 March 2022 and the description of development is as follows:

*"Part full/part outline planning application for the development of the site comprising site wide infrastructure works including access from (and alterations to) Grange Road, internal spine road, earthworks and development plateaus, structural landscaping, utilities infrastructure, foul and surface water drainage infrastructure (including attenuation pond and outlets). Full consent sought for the erection of 5 employment units (totalling 2,719 square metres) comprising light industry (Class E(g)(iii)), general industry (Class B2) and/or storage and distribution (Class B8) floorspace and ancillary offices (Class E(g)(i)), including associated service yards and service vehicle parking, vehicular and cycle parking, boundary treatments and retaining walls, utilities infrastructure, foul and surface water drainage infrastructure and hard/soft landscaping. Outline consent (with all matters reserved except vehicular access from Grange Road and re-grading of site) sought for up to 4,000 square metres of floorspace for light industry (Class E(g)(iii)), general industry (Class B2) and/or storage and distribution (Class B8) employment floorspace and ancillary offices (Class E(g)(i)) and associated development including service yards and parking, plant, hard and soft landscaping (including boundary treatments and retaining walls), and drainage infrastructure and other associated infrastructure".*

The proposed development is split into two phases. Phase 1 is sought in full (detail). Phase 1(a) relates to enabling works across the whole site. Phase 1(b) relates primarily to the northern / eastern part of the site and the western boundary where permission is sought for five employment units (totalling 2,719 sqm) for light industry (Class E), general industry (Class B2) and / or non-strategic storage and distribution (Class B8) floorspace.

Phase 2 relates to the majority of the southern part of the site and seeks outline planning permission for up to 4,000 sqm of employment floorspace (light industry (Class E), general industry (Class B2) and or storage and distribution (Class B8).

Phase 1 of the proposals can be delivered immediately. Phase 2 (the outline development areas) can be delivered in the next couple of years subject to reserved matters approvals. The structure of the planning application allows for an occupier to come forward on the outline development plot (Harworth has evidence of strong demand in the local area) and deliver an employment unit that meets their requirements. Given the above, then subject to the grant of planning permission, the site should form part of the council's immediate supply of employment land.

### **Need' for Employment Development**

The Regulation 18 consultation document states 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). That said, the supply of industrial space is in competition with the strong demand from the strategic warehouse sector which generates higher land values with which non-strategic industrial development cannot compete. An up-to-date assessment of the need for additional general employment land is provided by the North West Leicestershire: The Need for Employment Land (December 2020) study (the Stantec*

*study'). This study is part of the evidence base for the Local Plan Review and covers the period 2017-39'.*

Table 7 in the Regulation 18 consultation document confirms that the identified need up to 2039 is 285,284 sqm for industrial / small warehousing (Class B2 and non-strategic B8). The council states that "*based on current information, the Local Plan Review would need to allocate new sites sufficient for up to 2,000sqm of office space and **at least 166,000sqm/33Ha of industrial/smaller warehousing***". Given the site essentially represents infilling within a significant employment area in the District, it should be allocated to contribute 6,719sqm to the wider employment land shortfall.

### **Summary**

Harworth's Bardon Hill West site is suitable, available, and achievable, and could be delivered within 5 years. It is located in the most sustainable settlement in the district close to residential and employment uses. The information provided above and in support of application ref. 21/02281/FULM confirms beyond any doubt that this site can deliver employment floorspace immediately and should be allocated within the Local Plan Substantive Review to address the identified need up to 2039.

## **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...

**Q2**

### **Question 2**

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

#### **Harworth Response**

Harworth agree with the proposed settlement hierarchy. The Coalville Urban Area (which includes the employment areas in Bardon) is clearly the most sustainable location within the district and should be the primary focus for development.

## 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...

Q10

### Question 10

Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?

#### Harworth Response

At paragraph 82(d), the NPPF states that planning policies should “*be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances*”.

We have reviewed the four policy options within the consultation document in the context of the NPPF and set out our views below.

#### Option 1 – Identify Reserve Sites

Although this option can be an effective way of dealing with uncertainties around need requirements of the plan period (which is a particular issue within this district due to the emerging replacement HEDNA and unknown shortfall from Leicester City Council), it is often difficult to agree an appropriate trigger point for the release of sites.

Stratford-on-Avon District Core Strategy (adopted 2016) includes a policy (CS.16) that allows for the release of housing sites in certain circumstances. One of the trigger points for releasing housing land is if the district fails to maintain a 5 year housing land supply. The consultation document acknowledges that it may be difficult to formulate definitive triggers for releasing employment sites. We agree on this point, particularly as there are no national requirements for maintaining a supply of employment land so it is not clear how the council would monitor trigger points for the release of sites. There are also complications around when sites need to be brought forward (immediately, or towards the end of the plan period), and which sites should be delivered to address specific demand / type of employment uses.

Another issue with this approach is the diverse nature of employment development. Certain sites (based on site, location etc) are more suited to particular employment uses. Creating a reserve site list would need to take this into account which would be very complex. There is a significant risk that the allocated reserve sites will not be aligned with market demand at that time (which may be very different in 10 years’ time). Again, the council acknowledge in the consultation document.

Finally, the council need to be certain that the reserve sites are deliverable, which is often only confirmed beyond any reasonable doubt after a planning application (which has assessed in detail the technical elements of the site) has been approved.

This approach is not in accordance with paragraph 82(d) as it does not provide sufficiently flexibility or adaptability in the plan.

#### Option 2 – Increase the requirement figures by an additional factor

We would recommend that NWLDC consider this option as allocating more sites for development over the minimum need requirements would build flexibility into the plan period and enable the council to respond to market demand and changing requirements.

As part of this option, Harworth's Bardon Hill West site (SHELAA reference EMP34) can make a significant contribution to the District's employment shortfall and should therefore be allocated.

#### Option 3 – Await the next review of the Local Plan

We strongly urge the council not to pursue the 'do nothing' approach. As an absolute minimum, the NPPF states that local plans and development strategies should be reviewed at least once every five years (paragraph 33). Limiting the strategy to this most basic of national requirements would be contrary to the wider spirit of national planning policy which requires planning policies to be flexible and support economic growth and productivity. Pursuing this option would create policies which are rigid and unable to deal with changes to employment needs in a timely manner.

#### Option 4 – Rely on Policy EC2(2) or its equivalent

In addition to increasing the requirement as per Option 2, to ensure the plan provides sufficient flexibility Option 4 should also be pursued and Policy Ec2(2) retained. Indeed, the NPPF encourages local plans to provide more flexible and criteria-based policies to allow planning applications for employment development where need is proven and proposals are sustainable.

Policy Ec2(2) is a strong example of an adopted planning policy that provides flexibility to a local plan to enable the planning authority to deal with changes to need and market demand through the plan period.

We consider that the policy could go further to align with the spirit of the NPPF (as discussed in response to question 13 below). One option would be to remove the reference to 'immediate' in the policy. This would allow the plan to deal with need or demand over the entire plan period. The second option would be to expand on the meaning of the term 'immediate' by introducing a timescale and / or base it upon a fixed floorspace supply position. This will ensure that the trigger for releasing speculative development to address need and demand would provide greater clarity to developers looking to bring forward development.



## **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...

**Q11**

### **Question 11**

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

#### **Harworth Response**

A central theme of the NPPF is to focus development in the most sustainable locations. Coalville, Ashby and Castle Donington are the principal settlements at the top of the settlement hierarchy and are clearly the most sustainable locations within the district, served by established and emerging housing development and significant transport infrastructure.

Whilst plan-making should create policies that provide flexibility and encourage appropriate scale employment development in rural locations, the focus needs to be directed to the most sustainable locations. Coalville, Castle Donington and Ashby are considered to be the most sustainable locations for development and they can continue to accommodate employment growth over the plan period, subject to the results of the forthcoming Sustainability Appraisal. We therefore recommend that the council pursue General Employment Land Strategy Option 1 to continue the adopted distribution strategy.

## 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...

Q13

### Question 13

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

#### Harworth Response

Paragraph 7.6 in the consultation document states the following:

*"The clear implication is that it would be inappropriate for the Local Plan Review to plan simply for the economic growth which is forecast at a point in time. The plan's policies should be sufficiently flexible to deal with changing circumstances over the plan's lifetime, for example if the economy grows more strongly than current studies anticipate and/or if the nature of business needs turns out to be different to what can be anticipated now".*

Policy Ec2(2) is a strong example of an adopted planning policy that provides flexibility to a local plan to enable the planning authority to deal with changes to need and market demand through the plan period. Therefore, the council should not be considering deleting this policy, or amending the wording to make it more restrictive. As we explained in our answer to question 10, we consider that the policy should be more flexible / permissive to align fully with the spirit of the NPPF.

We set out our views on the various options briefly below.

Option 1 – deleting Policy Ec2(2): this option is contrary to paragraph 82(d) and the spirit of the NPPF which is to provide flexibility and introduce planning policies that can adapt to changes over the plan period. The consultation document implies that a reserve site policy could help replace Policy Ec2(2). As referred to in our response to question 10, there are various issues with a reserve site policy including appropriate trigger points, issues around timing of delivery, whether the sites can respond to changing need / demand, and even doubts over whether they are deliverable without having undertaken detailed technical assessments.

Option 2 – retain Ec2(2) in its current form: this is our preferred option although, as stated above, we consider that this policy could be made clearer / more flexible to align with the NPPF.

Options 3 – 8: amend Policy Ec2(2) to make it more specific / restrictive: the remaining options look to introduce caveats / requirements to make it more difficult to comply with Policy Ec2(2). Simply, this is contrary to paragraph 82(d) and the spirit of the NPPF, and we would not encourage the council to pursue these options, particularly as the council need to be able to respond to changes to need / demand throughout the plan period.

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



Date

28 February 2022

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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](mailto:planning.policy@nwleicestershire.gov.uk).



22<sup>nd</sup> February 2022

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

Dear Sirs,

**Re: NWLDC Local Plan Review, February 2022**

The following are the consultation responses made by Osgathorpe Parish Council. In the interests of clarity we have limited our consultation response to the questions posed in the Local Plan Review.

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

A Yes

Q2 Do you agree with the proposed settlement hierarchy? If not, why not?

A Yes<sup>[a1]</sup>.

Q3 - Do you agree with the approach to Local Housing Needs Villages? If not, why not?

A Yes

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.

A No. We feel that the 'High 2' forecast is too high and would result in unnecessary housing development within the District. We feel the 'High 1' forecast to be more appropriate. The large majority of new employment development is being constructed towards the District's boundaries and employees will most likely travel to these from outside the NWLDC boundary. For instance, the employment related developments at: Appleby Magna, Bardon and Castle Donington.

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.

A We support the proposed Option 3a, but NOT Option 7b. We do not feel there is a need to identify the number of dwellings forecast under the 'High 2' scenario.

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

A Yes

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

A Yes

Q10 Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?

A We favour Option 3, i.e. Option 3 – await the next review of the Local Plan.

Q16 Do you agree with the proposed health and wellbeing policy? If not, why not?

A Yes

Q17 Do you agree with the proposed Health Impact Assessment policy? If not, why not?

A Yes

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?

A Yes

Q19 Do you agree with the proposed renewable energy policy? If not, why not?

A Yes<sup>[a2]</sup>

Q20 Do you agree with the preferred policy approach for energy efficiency? If not, why not?

A Yes

Q25 Do you agree with the proposed policy for water efficiency standards? If not, why not?

A Yes

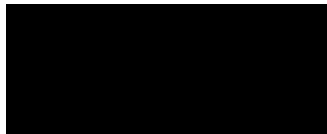
Q26 What additional comments do you have about the Local Plan Review not covered by the preceding questions?

A We strongly believe that it would be highly inappropriate for a new town to be proposed in the immediate vicinity of Osgathorpe, Worthington and Belton. The site proposed in the SHELAA was submitted by another Council without landowner consultation. Our understanding is that the landowners for this area are not willing to see their lands developed for large scale housing. This means there is a lack of certainty that the site would become available for development within the Local Plan time-frame.

We do not believe a new township is needed anywhere in the District. However, if it is concluded beyond reasonable doubt that the 'High 2' forecast is appropriate we would not object to the proposals for Isley Walton.

We look forward to receiving acknowledgement of this letter at your early convenience.

Yours faithfully.



Lisa Clarke  
Parish Clerk

**NWLDC LOCAL PLAN REVIEW – FEBRUARY 2022**  
**Consultation Response by Osgathorpe Parish Council**

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

Q2 Do you agree with the proposed settlement hierarchy? If not, why not?  
A Yes<sup>[a1]</sup>.

Q3 - Do you agree with the approach to Local Housing Needs Villages? If not, why not?  
A Yes

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.  
A No. We feel that the 'High 2' forecast is too high and would result in unnecessary housing development within the District. We feel the 'High 1' forecast to be more appropriate. The large majority of new employment development is being constructed towards the District's boundaries and employees will most likely travel to these from outside the NWLDC boundary. For instance, the employment related developments at: Appleby Magna, Bardon and Castle Donington.

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

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

Q10 Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?  
A We favour Option 3, i.e. Option 3 – await the next review of the Local Plan.

Q16 Do you agree with the proposed health and wellbeing policy? If not, why not?  
A Yes

Q17 Do you agree with the proposed Health Impact Assessment policy? If not, why not?  
A Yes

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?  
A Yes

Q19 Do you agree with the proposed renewable energy policy? If not, why not?  
A Yes<sup>[a2]</sup>

Q20 Do you agree with the preferred policy approach for energy efficiency? If not, why not?

A Yes

Q25 Do you agree with the proposed policy for water efficiency standards? If not, why not

A Yes

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

A We strongly believe that it would be highly inappropriate for a new town to be proposed in the immediate vicinity of Osgathorpe, Worthington and Belton. The site proposed in the SHELAA was submitted by another Council without landowner consultation. Our understanding is that the landowners for this area are not willing to see their lands developed for large scale housing. This means there is a lack of certainty that the site would become available for development within the Local Plan time-frame.

We do not believe a new township is needed anywhere in the District. However, if it is concluded beyond reasonable doubt that the 'High 2' forecast is appropriate we would not object to the proposals for Isley Walton.

Osgathorpe Parish Council.

2/3/21

Dated .....



**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Objection to planning  
**Date:** 01 March 2022 21:38:45

---

To whom it May concern,

I would like to record my objection to the proposed plan for the potential development of the land around Isley Walton and the potential development of land for industrial use on the boundary of Diseworth ( ref: EMP 90)

I am strongly against these plans for the following reasons:

1. Both developments would substantially increase traffic through Diseworth, which already struggles to accommodate the flow of traffic from the airport to Grimes Gate and into the village, in particular, where parked cars and school traffic already make this road congested with buses and delivery vans struggling to pass through the village in numerous places. Both developments would make the village roads significantly more busy and in passable.

2. This huge use of Green belt land would damage masses of country side, destroying masses of hedgerows and natural habitat. Brown field sites should be found instead.

3. Development EMP 90 would prevent Diseworth residents from accessing country walks along Hyams and Long Holden Lane. With very few traffic free options and no safe pedestrian friendly routes to other places, the loss of these lanes, isolate residents further, surrounding us by even more infrastructure and preventing villagers from using these routes to access near by villages and amenities safely on foot.

3. Both developments would create more noise pollution for years to come. We already have noise pollution caused by the airport, M1 and A42. We are soon due to have HS2 near by too. To also add such huge developments on either side of the village is not reasonable.

4. Our countryside is becoming increasingly urbanised, rural life in a village is being destroyed.

5. Local facilities such as doctors surgery's etc are full to capacity and can not accommodate such a huge increase in population.

6. Diseworth is used as a "rat run" to loughborough and surrounding areas from the A453. This issue will increase significantly with the proposed developments.

7. Huge developments have already taken place near Lockington to create more industrial facilities and more are still being developed. To develop the otherside of the airport (EMP 90) Would create facilities of this kind that are disproportionate to the rural areas existing around it.

Thank you for considering my objections,

Kind regards,

Emily and David Briggs-Minton  
[REDACTED]

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## Local Plan Review. Consultation Response

Name Michael Prosser.

Address [REDACTED]

Dear Sir/ Madam,

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 it's 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 - 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 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 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, 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.

**Yours Faithfully**

**Mr MJ Prosser**

**Dated: 02.03.2022**

## Local Plan Review. Consultation Response

Name Thomas Prosser

Address [REDACTED]

Dear Sir/ Madam,

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 it's eastern boundary adjacent to the western edge of the conservation village of Diseworth. **My objections are based on the following:-**

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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 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, 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.

**Yours Faithfully**

**Master Thomas Prosser**

**Dated: 02.03.2022**

## Local Plan Review. Consultation Response

Name Amelia Prosser

Address [REDACTED]

Dear Sir/ Madam,

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 it's 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 - 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 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 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, 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.

**Yours Faithfully**

**Miss Amelia Prosser**

**Dated: 02.03.2022**

## The Template Letter:-

### Local Plan Review. Consultation Response

Name .Adrian & Vivien Wright.....

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 and which has it's 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 - 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 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 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, 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.

Robert Higgins

## 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] 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 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 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. 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 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 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.

In addition to the above I would also point out that it is galling that for me that I have restrictions on what I can do (planning for a shed) in the conservation area but you appear to be able to run rough shod over all policies.

Yours Faithfully

Robert Higgins  
[REDACTED]

**The Template Letter PLUS personal views:-  
Local Plan Review. Consultation Response**

Name .Kevin Brown.....  
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 and which has it's 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 - 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 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 Domesday 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 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, 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 **It simply will not cope**, 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]. **The 453 struggles to maintain flow at busy times even now when reduced traffic due working from home as per COVID directives. Without the predicted increased traffic there is stationary traffic from the MOTO services roundabout back as far as the airport junction without the additional traffic of the Race track calendar.** 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.

Lesley Higgins

## 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] 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 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 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. 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 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

Lesley Higgins  


## **Local Plan Review. Consultation Response**

Name ..Alan E Leech.....

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 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 disingenuous and also unsustainable.

**4. LP. 4.6. Objective 1** - *"Promote the health and wellbeing of the district's population"* Both the IW1 and EMP90 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? Where

**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 the site to accommodate 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 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 sufficient demand to justify 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 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 I am sceptical 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 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. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it instead 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. An argument of integrity would suggest the 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 sight.

**10. LP Page 18. [Pollution]. This tates that:-** *"..new development is not itself detrimentally affected by noise.."* In the context of 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 through tourism. 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. 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. 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 only the growl from diesel engines of countless pantechicons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary.

**11. Traffic.** In the context of road traffic and infrastructure generally, 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 above]. Certainly, in the case of development 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 requirements. We are therefore 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 and 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 this project 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] - and 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.

This considered response to the proposed Local Plan is one that I fully support in all its elements and I offer it as my own view in this consultation.

Yours faithfully,

A E Leech

## The Template Letter:-

### Local Plan Review. Consultation Response

Name Kieron Ellery-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 and which has it's 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 - 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 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 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, 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.



**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: EMP90 land south of EMA SW j33aM1  
**Date:** 02 March 2022 15:52:09

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I am writing to object in the strongest possible terms to the proposal to build industrial units on this land this will totally change the rural area and village of a remaining small pockets of pleasant NW Leicestershire. It will totally ruin the lovely village of Diseworth by surrounding it with industry and the proposed massive housing estate by Isley Walton. The facilities of the area cannot now sustain the number of residents in particular the GP health facilities and traffic for the airport and DHL. Pulling out onto the A453 risks daily death now not least from the Breedon lorries travelling at high speed, presumably on a pay per load deal judging by their speeds.

I will follow this with a more comprehensive arguments against but I want to register our immediate objections.

Richard and Sue Smith



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~~The Short Template Letter:-~~

**Local Plan Review. Consultation Response**

Name **RICHARD S. SMITH**

Address [REDACTED] [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.





**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Diseworth Planning Applications  
**Date:** 02 March 2022 15:59:12

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I write regarding

the proposed Andrew Granger residential development scheme at land on the west of Grimesgate in Diseworth,

the development of a new town on land around Isley Walton (SHELAA 2021.IW1) and

the potential development of land for industrial use south of East Midlands Airport (SHELAA 2021.EMP90).

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I have lived in Diseworth for over 40 years now and our house was flooded for the first time in February 2020. I can assure you it was not a pleasant experience. I understand also that several other properties in the village have been flooded as have properties in Long Whatton.

Back in the early 1980's the now East Midlands Airport was not much more than an Aerodrome and the Diseworth Brook was nothing more than a gentle stream. Even following prolonged periods (even days) the stream never posed a threat to flooding.

Over the years the Airport has been developed and perhaps significantly there have been many developments in and around the village itself. During this period the brook has posed an increasing threat to the point where many, including myself, are "On watch" every time it rains. In fact nowadays, and this is only following the developments on the east side of Grimesgate, whenever it rains Grimesgate and Ladygate are like a river and this obviously settles into a flood at the lowest point on Ladygate. It is my strong personal belief that the flood risk to Diseworth has been brought on by "Planners" or "Developers" rather than "Global Warming".

My own opinion is based on a real life experience living near the bank of the Diseworth Brook rather than the many studies which have been undertaken. I would suggest a major factor is that the more concrete and tarmac put down the faster surface water finds its way into the Brook. Clearly the Brook can no longer cope.

No doubt these applications will succeed as have many others so that Govt targets can be achieved etc. I personally find the whole idea of proposing more building works in the area to be "laughing in the face" of those that have been flooded. I find it difficult to understand how "Planners" and "Developers" are able to gain approval for building works given the flooding issues in Diseworth.

I am not anti the airport nor anti building but do strongly feel that NO further building developments should be approved until the problem of flooding in Diseworth has been resolved.

I am not seeking or expecting a response to this letter based on past communications but would be very interested to hear the views of those making the decisions, particularly with regard to flooding.

Rex and Margaret Chester

## Local Plan Review. Consultation Response

Name Charlotte Dable

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 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 - 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 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 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, 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. The detrimental effect this development would have on the surrounding villages would be irreversible and would ruin their character even before you consider the appalling effect it would have on the area itself. The beauty of the countryside has been destroyed enough without destroying it any further with this unsustainable proposal. Then add the destruction of the wildlife in the proposed area which is just unthinkable in an age where we are supposed to be trying to reduce our impact on this planet, not destroy the few green areas we have left.
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.

# Objections to Development Strategy Policy Options - Proposed development of land between Belton and Isley Walton N.W. Leics.

2.3.2022

## I object to the above proposed development for the following reasons:-

- The area is agricultural and needs to remain so, to help feed the nation and provide green space. People, encouraged to come to live from urban areas are not used to cattle, ploughing, mud, horses, hedge cutting and smells and country living. This would be an undesirable urban development in a rural landscape.

- Langley Priory is an ancient building in this area and any nearby development would be detrimental and not in keeping.

Type to enter text

- The HS2 rail line is due to run close to that area of proposed development. It will cause major disruption in its building. It will not stop for passengers, so will just cause extra noise and disruption as it passes through. Most unpleasant to live near to.
- The airport is close to this proposed development and has huge impact on peoples lives and health, due to noise pollution, especially at night, so it would not be in anyones interest to live close by.
- The nearby quarry at Breedon has planned expansion of their quarry workings in this direction on the opposite side of A453. This causes blasts, dust, noise and transport disruption, making living close undesirable.
- Donington Park Race Track is also close and causes loud noise both on race days and rock festival events.
- Increase in traffic on rural roads and car rat runs through villages nearby.
- There are insufficient schools, GP surgeries, dentists, public transport, shops, and it would be better to place extra housing in areas that already have this infrastructure and increase and improve on it. eg Castle Donington and Kegworth.
- If people lived in this proposed area they would gravitate to shop in Derby or Nottingham, but since transport links have always been provided, (sparsely) towards Coalville, Ashby or Leicester, I feel a development here would be detrimental.

Lesley Hextall

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

**The Template Letter:-**  
**Local Plan Review. Consultation Response**

Name Richard Hodges

Address [REDACTED]

Dear Sirs,

2 March 2022

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.
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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 local as no viable public transport system exists.

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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.

### **Personal Conclusion**

I am staggered that yet another huge development (4,700 new homes ? Really ? Just who is going to buy them ?) is being considered – especially after the 3,000 or so to be built between Hathern/Loughborough/Shepshed. The concreting over of all this countryside will have awful consequences and this next proposed plan just adds to the general loss of countryside and gradual “creep” of an ever growing urban sprawl. How this plan fits in with the requirement for green space bemuses me. It is the wrong development in the wrong place at the wrong time.

I cannot blame opportunistic landowners for “cashing in” on this current boom but I CAN blame planners for standing idly by and letting it happen. Once those fields are concreted over there is no returning to green and pleasant land.

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Local Plan Review. Consultation Response  
**Date:** 02 March 2022 21:29:42

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Ellen Arnold



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. 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 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.

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

Ellen Arnold

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Potential development of land around Isley Walton and potential development of land around diseworth for industrial use  
**Date:** 02 March 2022 23:27:12

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Having looked at the plans and considering them, I am putting in my objection. Both of these proposals will swallow up much needed green field land full of wildlife and areas valuable to us Diseworth residents and where brown field sites should be considered instead. The extra congestion and vehicles on the local roads has seemingly not been considered with the imminent building of HS2 through this area and these new proposed developments, life and transport for the existing population will become very difficult and cars will inevitably use existing roads through the villages, such as Diseworth, to get to work in or from the towns to and from these new proposed areas.

This is a vital time where the government should be considering caring for the environment and protecting against climate change however these new proposals go against this, with loss of habitats, clean air, countryside walks and an increase in pollution and traffic.

I hope you take this all into strong consideration and rethink your proposals.

Regards,  
Lucy

Sent from my iPhone

## Local Plan Review. Consultation Response

Name Miss A.R.Lee

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 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 - 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 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 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, 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, 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: Potential development of land around Diseworth  
**Date:** 03 March 2022 09:16:16

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## Local Plan Review. Consultation Response

Name .....Trevor Jones.....

Address [REDACTED] .....

Dear Sirs,

My 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] boundary adjacent to the 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:-

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,

T. M. Jones

Sent from my iPad



**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Potential development of land around Diseworth  
**Date:** 03 March 2022 09:26:12

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Local Plan Review. Consultation Response

Name Sara Metcalfe

Address. [REDACTED]

Dear Sirs,

My 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] boundary adjacent to the 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:-

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,  
Sara Metcalfe

Our Ref: NWLeicsLP

Your Ref:

Planning Policy  
North West Leicestershire District Council  
Whitwick Road  
Coalville  
Leicestershire  
LE67 3FJ  
[Planning.Policy@NWLeicestershire.gov.uk](mailto:Planning.Policy@NWLeicestershire.gov.uk)

**Eri Wong**  
**Midlands Operations Directorate**

National Highways  
Stirling House  
Lakeside Court, Osier Drive  
Annesley NG15 0DS

[www.highwaysengland.co.uk](http://www.highwaysengland.co.uk)

03 March 2022

Dear Sir / Madam,

### **Consultation on the North West Leicestershire Local Plan Review – Development Strategy and Policy Options**

We welcome the opportunity to comment on the proposed development strategy and policy options associated with the North West Leicestershire Local Plan (NWLLP) Review. Following consultation on the NWLLP Partial Review which National Highways provided comments on in a letter dated 18 December 2019, the latest version of the NWLLP was adopted in March 2021. We note that since this time, the Local Plan Review (formerly referred to as the Substantive Review) has been taking place.

An Interim Sustainability Appraisal (SA) Report of the Spatial Options for the NWLLP has also been prepared as part of this consultation, and National Highways comments on this report are collated within this consultation response on the Local Plan Review.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the NWLLP, our principal interest is safeguarding the operation of the M1, A42 and sections of the M42, A50 and A453.

#### **Previous Consultation**

For ease of reference, our December 2019 and January 2020 response to the NWLLP Partial Review is summarised here.

We noted that Leicester City cannot meet its housing supply requirements within its own boundaries, and advised that it would be important for the North West Leicestershire District Council to ensure that in dealing with this additional housing need within the district, there should be sufficient infrastructure capacity to

accommodate the growth. This includes adequate capacity on the SRN to ensure the safe and efficient operation of the network and we would expect that the impacts from the redistribution of unmet needs from Leicester City are appropriately assessed. This will allow for any potential impacts on the operation of the SRN to be better understood and relevant mitigation to be identified.

Our most recent consultation response of January 2021 to the Main Modifications of the NWLLP Partial Review stated that the consultation documents provided clarity in respect of how the issue of unmet need in Leicester City will be addressed. However, we did not consider that the Main Modifications will have direct relevance to National Highways, and we concluded that the proposed Modifications do not materially affect our previous position on the NWLLP Partial Review, of December 2019.

### **Current Consultation**

Although growth is proposed across the entire district, we note the concentration of significant levels of growth in the vicinity of East Midlands Airport (EMA).

We note that the Strategic Housing and Economic Land Availability Assessment (SHELAA) identified a site for 4,740 dwellings south of EMA, though it is understood that this would not all come forward within the current Local Plan period, as detailed below.

Of multiple housing scenarios investigated, the option to be taken forward includes a total of 5,100 dwellings at the following locations: 1,785 dwellings in the Coalville urban area, 1,785 dwellings at the new settlement south of EMA, 765 dwellings at Ashby de la Zouch and Castle Donnington, 510 at Ibstock, Kegworth and Measham, and 255 shared across other villages.

It is also noted that the current level of overall unmet need from Leicester City is given as being about 18,000 dwellings, and we note that there is not yet any agreement as how this will be distributed but would accept the conclusion that it is reasonable to assume that some will be located with NW Leicestershire. We would therefore encourage you to continue with the joint working in order to establish the requirement for your Authority.

Based upon the above distribution of housing, the impact, as it relates to the SRN, would be focused around the A50 / A42 / M1 junction 23A and 24 due the proposals around EMA, as well as around the M1 junction 22 and junction 13 of the A42 associated with the proposals around Coalville and Ashby de la Zouch respectively.

Regarding employment growth, the Local Plan Review would need to allocate new sites sufficient for up to 2,000sqm of office space and at least 166,000sqm of industrial/smaller warehousing.

It is therefore important to ensure new development is facilitated through the delivery of necessary infrastructure to accommodate the growth plans. We note that this is

acknowledged in the Local Plan Review and we welcome the preparation of an Infrastructure Delivery Plan to address this.

We would therefore encourage you to fully engage and continue with the development of the transport evidence, including liaising with other neighbouring authorities so that the impact upon the SRN can be better understood.

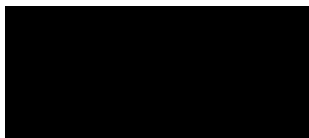
### **Interim Sustainability Appraisal**

As mentioned above, through this consultation we have also been provided the Interim Report for the Sustainability Appraisal (SA) of the NWLLP Review. We understand that this interim SA report presents the appraisal findings for housing distribution in the district which are referred to as 'spatial options', and scores the various options investigated on sustainability metrics such as carbon emissions, sustainable transport, light/noise implications, and biodiversity.

The interim SA report contains little detail regarding the extent to which forthcoming growth could be expected to impact upon the SRN, which is understandable due to the nature of the document. However, the objectives identify the need to increase the use of public transport and other sustainable modes of transport, to ensure that new development has sustainable transport access to facilities, services and jobs, and the need to reduce congestion in locations where it impacts on road safety, local amenity, causes severance, or adversely impacts on the economy. We find this appropriate.

We have no further comments to provide at this stage but would welcome further engagement with North West Leicestershire District Council as the proposed allocations and infrastructure requirement becomes clearer and as the review of the Local Plan progresses.

Yours sincerely,



Eri Wong  
Midlands Operations Directorate



**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Local Plan Review Isley Walton  
**Date:** 03 March 2022 10:23:10

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### **Local Plan Review. Consultation Response**

Name .Mrs. Miriam Wallace.....

Address [REDACTED]

[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 and which has it's 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 - 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 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 Domesday 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 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, 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.

Whatever will happen to this "Green and Pleasant Land"?

Regards  
Mrs. Miriam Wallace

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Isley Walton Proposed Development  
**Date:** 03 March 2022 11:19:35

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Dear Sir/Madam,

I write on behalf of Isley cum Langley Parochial Church Council.

The PCC are opposed to this unwanted and unnecessary proposal for development in such a rural area.

However, if the proposal was to proceed there has been no thought taken into account as to how it will affect our Church.

The church has been through many restorations and is of significance because it is Grade Two listed and it was the Knights Templar Church (abolished in 1312) and still has one 14th century and one 15th century bell..

As a result of various disputes when the Manor House changed hands, there is no car park, access is officially up the Manor House drive but there is no parking allowed, so the only parking is on the A453 by the Manor House entrance, a wholly unsatisfactory position and also a danger even with the size of the hamlet now. There is an agreement to park on Walton House drive, which works for now but parking is still limited and with a potential increase in population of 15000 people an alternative access to the Church and parking needs to be considered.

Neither of the owners of the Manor House or Walton House are party to the proposed planning application and so should not be expected to bear any of the burden of any resulting provisions.

I see from the current proposal that Manor Farm buildings are not included in the application but are within ownership of one of the applicants.

The PCC believe that there is a compelling case for providing pedestrian and vehicular access down Manor Farm drive along with ample car parking within the farm complex area.

This could easily be achieved and would make a great deal of sense.

Yours faithfully,

Angus Shields

Secretary for Isley cum Langley PCC

## Local Plan Review. Consultation Response

Name Anita Highet.....  
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 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 - 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.
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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.

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: [REDACTED]  
**Date:** 03 March 2022 12:03:58

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I am strongly disagree with proposal of urbanisation of our local rural area due to which is obvious to all residents , which will cause:

- Extra vehicles to our congested local roads
- Rat run's through our villages
- Heavy traffic
- Loss of countryside walks and clean air
- Suffer years of noise and disruption
- Environmental degradation.
- Loss of rural village life

Hope all the above is taken seriously before any proceedings  
Sent from my iPhone

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Objections to planning  
**Date:** 03 March 2022 12:16:37

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Local Plan Review. Consultation Response

Name Charlotte Mountain

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] 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,

Charlotte Mountain

Sent from my iPhone



**From:** [REDACTED]  
**To:** [PLANNING POLICY](#); [REDACTED]  
**Subject:** EXTERNAL: Local Response to EMP 90 Potential development Isley Walton/ South of East Midlands Airport & South West of J23a M1  
**Date:** 03 March 2022 13:13:46

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**Local Plan Review. Consultation Response/ Objection Letter**

Name Mrs Vanessa H Johnson  
[REDACTED]

Dear Sirs/ Madam

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 - 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 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 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. 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 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, 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.

Please acknowledge receipt of my response and objections against any form of developments in the above areas

Yours Faithfully

Vanessa H Johnson

## Local Plan Review. Consultation Response

Name

Mr P J Widdowson.....

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 and which has it's 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 - 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 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 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, 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.
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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.

## Local Plan Review. Consultation Response

Name Craig Jones

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 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].
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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 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 is 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.
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recreation and entertainment ~10miles away. The principal 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 its partners make to do so. The proposed site will substitute a vast amount of open grassland for concrete which 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 effectively managed. Further development will only make the situation worse.
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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 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 Donnington 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 does not work when you have an open window in the bedroom or elsewhere in summer - and you cannot 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 [even with slight earth tremors].
1. **Traffic**. In the context of road traffic and infrastructure, 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 problematic 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 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.** 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: Local Development Consultation  
**Date:** 03 March 2022 15:28:59

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## Local Plan Review. Consultation Response

Name: Jonathan Peake  
[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.
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.

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In addition to the template letter above. I would just like to add that I understand why these developments are necessary, and some of our green space must make way for progress. But as a resident of Diseworth for over 20 years, since I was 1 year old, this village is part of who I am. The green space, the clean air, the peace and quiet, the community, it's what makes this place so special to me, and I fear that this development project will see an end to that. If this development is to go ahead, I don't it is unreasonable for the residents of the area to ask for something in return, if you're going to destroy our green space, then build us a nature reserve, give something back to the environment.

Yours Faithfully,

Jonathan Peake

Sent with [ProtonMail](#) Secure Email.


Your ref:

Date: 3rd.March 2022

**North West Leicestershire D C,  
Council Offices,  
Whitwick Road,  
Coalville.  
LE67 3FJ**

**For the attention of the  
Planning Policy & Land Charges Team**

Dear Sir or Madam,

**RE: Development Strategy around EMA and Effect on Local Villages.**

Having been made aware of the "Options" relating to the above, that instigates the building of some 4,700 new homes over 780 acres of scenic countryside surrounding Isley Walton, I wish to strongly object against all of these proposals that also includes the change of use from farming to that of Industrial Units to the south of the East Midland Airport.

The reasons for my objections are as follows:

- (1) The resultant horrendous additional vehicle numbers using our already heavily congested roads.
- (2) The inevitable rat runs through our villages to gain access to Loughborough.
- (3) Heavy public and commercial vehicle use on the A453.
- (4) The loss of public footpaths that detrimentally affect the taking of exercise either in the form of walking or running through what is currently scenic countryside.
- (5) The detrimental affect on animal, bird and insect habitat and the clean air that we all enjoy.
- (6) The detrimental affect on the quiet enjoyment of our current "green and pleasant" environment.
- (7) Future years of intense disruption especially if the proposals coincide with the construction of HS2, unless the government of the day sees sense and abandons this particular scheme.

- (8) The loss of our "treasured" rural village life.
- (9) Both the intention to Urbanise and Industrialise our beautiful countryside that will consequently suffer from noise and light pollution.
- (10) The additional industrialisation proposed will inevitably result in a significant increase in freight carrying aircraft passing to and from over our air space.

Since over 3,000 houses and an incinerator are already under construction within five miles of the new options I do hope that, together with many others, my comments are taken seriously and do not fall upon "deaf ears".

Yours sincerely,



**JEFFREY W HUMPHRIES.**



**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](http://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	Mamun	
Last Name	Madaser	
[Job Title]	Parliamentary & research officer	
[Organisation]	Habinteg Housing Association	
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.

Do you agree with the proposed policy on accessible and adaptable

Q8

Policy XX: Accessible and Adaptable Housing states “ *All new build residential developments will be required to meet at least M4(2) (accessible and adaptable) standards of the Building Regulations (or subsequent update).*”

Habinteg strongly supports this policy and recommends that all new homes meet Building Regulations M4 Category 2 accessible and adaptable standard homes to meet the needs of disabled and older people in North West Leicestershire.

- 14.1 million people in the UK are disabled (Scope)
- 45% of pension age adults are disabled
- 1.2 million people use wheelchairs (NHS)
- Over 400,000 people nationwide are living in homes that do not provide the accessibility they need.

### NORTH WEST LEICESTERSHIRE FREEDOM OF INFORMATION REQUEST

On the 26<sup>th</sup> of January 2022 Habinteg submitted a freedom of information asking for data on the number of people in North West Leicestershire who require an accessible home. The following data was provided by the local authority:

- We use 3 categories of classification based on applicants requirements although these do not necessarily align completely with Cat 2 and Cat 3 they are:  
Requires Single level  
Requires Single level with level access shower  
Requires Wheelchair accessible accommodation
- As per the categories above we have the following applicants identified  
Requires Single level – 111 applicants  
Requires Single level with level access shower – 146 applicants
- Requires Wheelchair accessible – 14 applicants
- There are 13 applicants banded because their home required adaptations that cannot be carried out (or their landlord has refused permission)
- 96 applicants are banded as having a medical need to move some of which will require adaptations but some may need to move to alternative accommodation for another non-adaptation reason

### LOCAL BENEFITS OF ADAPTABLE AND ACCESSIBLE HOMES

New homes that meet category M4(2) will deliver:

- significantly fewer disabled people out of work, further reducing the impact on local government spending\*
- faster hospital discharges
- Reduced local government expenditure on more expensive residential care settings
- provide a better environment for ongoing independence when needs change,

\*Research from Habinteg and Papworth Trust reported that disabled people with appropriate, accessible homes are four times more likely to be in work than those in unsuitable properties.

Providing suitably accessible homes in a welcoming and inclusively designed neighborhood can transform the lives of people who are so often left to 'make do' in unsuitable accommodation.

Habinteg tenants have reported that having their need for accessible homes met can have wide-ranging positive impacts:

- finding and maintaining employment
- Improved family life such as the ability to access their children's rooms or to cook a family meal
- the ability to come and go as they wish to visit family and friends.



(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.

<b>Signed</b>		<b>Date</b>	03/03/2022
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Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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](mailto:planning.policy@nwleicestershire.gov.uk).



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

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Mamun	
Last Name	Madaser	
[Job Title]	Parliamentary & research officer	
[Organisation]	Habinteg Housing Association	
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.**

Should part M4(3)(a) wheelchair adaptable dwellings also apply to

**Q 9**

Policy XX: Accessible and Adaptable Housing states “ 5% of all new dwellings of the affordable housing requirement of all new proposals will be required to meet Part M4(3) (wheelchair user dwellings) standard – with the number of these dwellings to meet Part M4(3)(b) (wheelchair accessible) to be determined in consultation with the District Council and the respective registered provider.”

Habinteg recommends that 10% of new homes comply with Part M4 (3) Standard (wheelchair accessible). Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of wheelchair ready (Part M4(3)) homes should be considered as a starting point for all local plans, with the remaining 90% meeting Part M4(2) accessible and adaptable dwellings.

We, therefore, recommend that North West Leicestershire sets a similar requirement for wheelchair user dwellings which requires that 10% of new homes comply with Part M4 (3) Standard (the other 90% required to be built to part M4 (2) accessible and adaptable standard). There is a precedent for the successful adoption of this approach in the London plan.

#### LOCAL BENEFITS OF WHEELCHAIR-READY HOMES

Habinteg recommends that alongside an increased supply of accessible and adaptable homes, an adequate number of homes should be built to Building Regulations M4 Category 3 (wheelchair user dwellings standard).

There are 1.2 million wheelchair users in the UK, and Habinteg’s Insight Report found that just 1.5% of homes outside London are set to be built to wheelchair dwelling standards between 2020 and 2030.

Given the lack of wheelchair accessible properties available in general across the country, Habinteg believes that a 10% requirement of Part M4(3) homes should be considered as a starting point for all new homes, with the remaining 90% meeting Part M4(2) accessible and adaptable dwellings.

#### A NATIONAL ACCESSIBLE HOMES DEFICIT WITH A LOCAL SOLUTION

The English Housing survey reported that 91% of existing homes do not provide the four access features for even the lowest level of accessibility – a home that is ‘visitable’.

Habinteg’s Insight Report: A Forecast for Accessible Homes 2020 found that just 31.5% of homes are required to meet an accessible housing standard between 2020 and 2030. This will compound the national accessible homes deficit.

It is essential that new homes deliver accessibility and adaptability to help meet the national accessible homes deficit.

ABOUT HABINTEG

Habinteg has over 50 years of experience as a registered provider of accessible and inclusive housing. Our mission is to provide and promote accessible and adaptable homes so that disabled and non-disabled people can live together as neighbours. Our response, therefore, focuses on issues of access and inclusion that we believe are vital to the development of a plan to serve the needs of the whole population of North Norfolk.

Please don't hesitate to contact us if we can help in any way 

(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

Date

03/03/2020

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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**

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**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Planning Development Around Diserworth  
**Date:** 03 March 2022 16:39:25

**Local Plan Review. Consultation Response**

**I am appalled by these potential developments. Diserworth is a conservation village - a farming community. It has already been overdeveloped. These latest plans if they proceed will ruin the village. I live in a Grade 2 Listed building the setting of which has already been compromised by over development. Diserworth will be trapped /surrounded by warehousing & a new town. The PM has said future development should start with brown field sites. It has been a policy of NWLDC for a number of years that Land South of the A453 would not be developed & would remain open country side!!! My detailed response is below. Please acknowledge receipt of this memo.**

Name Ian Robertson .....

[REDACTED] .....

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 Diserworth. It also includes the potential industrial development of land south of the A453 and bordering the north and east of Diserworth [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 Diserworth 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 Diserworth. 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 Diserworth. 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 Diserworth, 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 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 of the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 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

I K Robertson



**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Consultation response to potential development of land around Isley Walton and East Midlands Airport  
**Date:** 03 March 2022 16:47:56

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Dear Sirs

As a resident of Diseworth I wish to inform you of my objections regarding the Local Plan Review, specifically the potential development of land around Isley Walton and the potential industrial development by EMA of the land south of the A453 which borders the north and east of Diseworth.

The NWLDC Local Plan, which was amended in 2021, sets out fifteen primary objectives. The proposed new town at Isley Walton and the expansion of EMA both fail to meet several of these objectives which I have detailed below:

Objective 1)

Health and well being - both of the proposals fail to meet health and well-being objectives. The rural setting of Diseworth and the surrounding unspoiled countryside will be destroyed. The rural setting and unspoiled countryside are two of the main reasons residents have chosen to live in Diseworth.

Objective 4)

Reduce the need to travel - unless everyone employed at the new EMA expansion lives on site, obviously there will be a need for employees to travel to work. Likewise, unless all the inhabitants of the new housing development are employed within their living location, they will need to travel to the site of their employment. In both instances, this would mean a substantial increase of vehicles and travelling.

The location of the new town is an odd choice as it is at the far end of the county. People working in the city of Leicester would need to endure a thirty minute commute from the site resulting in increasing pollution and congestion within the locality.

Objective 9)

Effective flood prevention - both proposals will absolutely fail this objective which is of immense concern to a village that has suffered from previous flooding issues.

The proposed development of Isley Walton is a significant threat to the management of water coming into Diseworth and the horrendous consequences that follow when Diseworth brook is filled beyond its capacity. The expansion of EMA and the resulting creation of 100 hectares of concrete which is on a downslope to Diseworth is a truly terrifying prospect.

Objective 10)

Preserve and enhance the district's natural and rural heritage - surely it doesn't

need pointing out that both developments are in direct opposition to this objective.

How can industrial expansion and the development of open countryside and farmland be “preserving” or “enhancing”.

Objective 11)

Protect and enhance the natural environment - again the construction of an industrial development, together with the creation of over four and a half thousand houses is in direct opposition to this objective. The natural environment will be devastated by such large scale development - the associated wildlife, plant life and ecological systems will be greatly disturbed, if not totally destroyed.

National Planning Policy Framework (Local Plan Policy S3)

This states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. How do either of the proposals follow this policy plan when the countryside will be destroyed?

Sustainability

The NPPF has a core principle that states planners should focus significant developments in areas which are or can be made sustainable. Neither of the proposed developments will achieve this. Pollution and traffic congestion will ensue and the carbon footprint will be unrecoverable. Building on farmland and countryside is not only undesirable, it is also unsustainable.

Noise

The Local Plan asserts that new developments should not be affected by noise. Whilst the Isley Walton development would not in itself be noisy for the inhabitants of Diseworth, the location of the development is adjacent to Castle Donington Racing Circuit and also the EMA take-off and landing flight paths. The noise for the inhabitants of the new development would be exceedingly high and most unpleasant. The EMA expansion would increase the noise levels within Diseworth impinging on the health and well-being of the residents.

Traffic

The local roads struggle to accommodate the traffic currently generated and this is particularly evident when the M1 or the A42 become congested. A housing development at Isley Walton will generate an additional 10,000 residential vehicles as well as the increased volume of service traffic.

Loughborough will be the closest town to the site which will mean a huge increase of traffic passing through Diseworth creating a rat run access.

Non Compliance

The EMA development does not comply with Planning Policy EC2 which states there should be “an immediate need for additional employment land”. There is

no evidence that there is an “immediate need”. The Planning Policy also states the requirement of not being “detrimental to ...nearby residential properties”. The separation between the expansion and Diseworth would be 75 metres which is without a doubt detrimental.

#### The Settlement Hierarchy

Diseworth is listed in the Settlement Hierarchy as being restricted to limited growth with the defined Limits of Development. Both proposals would be in variance of the defined limits which is unacceptable.

#### Geographic Location

The Local Plan states a need for 9,620 houses throughout the district between now and 2039. What is the rationale behind building nearly half of this total amount in one single location? This is even more nonsensical when considering the development of 860 houses in Castle Donington with a further 1,800 to follow. Furthermore, construction has begun on the development of 3,200 houses between Hathern and Loughborough. Building on the Isley Walton site would mean houses planned to be built over the coming 17 years throughout the district, would all be built within a five mile radius of Diseworth. How can this be considered appropriate?

#### Over Development

Other recent developments have had an impact on Diseworth. The rail/freight interchange has generated a massive increase in HGV traffic and the development of the DHL and UPS air freight hubs at EMA has added to this. The residents of Diseworth endure unpleasant and increasing levels of noise from night flights at Europe’s last unregulated airport. Additional developments will increase levels of congestion and pollution and continue the unwarranted destruction of our heritage.

To conclude, both proposals flagrantly abuse the NWLDC Local Plan which is totally unacceptable. To allow these developments to take place would be a betrayal of the people who trust in the authorities to make and uphold the policies giving us protection of our heritage and well-being. The developments would have a devastating effect on the local community, the ecology and the environment.

The proposed Isley Walton development is in totally the wrong location, both in terms of the residents of Diseworth and the future residents of the new housing development.

The expansion of EMA would cause air, light, traffic and noise pollution which would be extremely detrimental to the residents of Diseworth and the wider environment.

Yours faithfully

Helen Louise Warren (Mrs)

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Cc:** [REDACTED]  
**Subject:** EXTERNAL: Objections to proposal of land around Isley Walton  
**Date:** 03 March 2022 18:06:24

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Local Plan Review. Consultation Response

Name- Sadie Dunmore

[REDACTED]

Dear Sir/ Madam,

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,  
Sadie Dunmore



## PART B – Your Representation

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

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. **NO**

Q4

The planners should concentrate on High 1 scenario (512 dwellings per annum). This more than satisfies the Standard Method calculation, meets the strategic Growth Strategy and provides a good buffer to meet the Leicester Unmet Need. Even if the suggested Leicester city unmet need of 18,000 were distributed evenly between the five more rural Leicestershire Districts, each district would need to accommodate an additional 3600 dwellings. 512 dwellings pa would provide an additional 3625 dwellings above the standard method calculation which is more than enough. However, it would be hoped that at least some of the Leicester unmet need could also be met by Blaby and Oadby/Wigston. Furthermore, NWL is one of only two Leicestershire Districts that do not have a boundary with Leicester city and these should be expected to meet a lower portion of the city's unmet need than those with physical boundaries to the city.

The consultation document proposes the ONS 2018-based housing projections as an indicator of market signals and thus a justification for the High2 scenario. However, the NPPF clearly states that "current and future demographic trends and market signals" only need to be taken into account in "exceptional circumstances". No exceptional circumstances have been suggested. Firstly, the current trends have been exaggerated by the planning free for all that occurred during the period running up to adoption of the local plan in 2017 when the council could not demonstrate a 5 year housing supply and which was, in part, a balancing of much low build rates in the first half of the last decade due to the 2010 economic crisis. Secondly the cited ONS Household Projection document clearly states that, "**Household projections are not a prediction or forecast of how many houses should be built in the future. Instead, they show how many additional households would form if assumptions based on previous demographic trends in population growth and household formation were to be realised. Projections do not factor in the effect of the coronavirus (COVID-19) or attempt to predict the impact of political circumstances.**" It is the 2016-2020 trend that is exceptional and so this should not be used as a basis for future requirements.

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 . **NO**

**Q5**

Even on the basis that only the High 1 Scenario should be considered, I would favour option 8. This is based on the fact that the Principal Town and Key Service Centres already have large allocations of housing within the current local plan which are still to be built or even receive planning permission in many cases. Option 8 would put pressure on developers to progress their current plans and build out these developments on a reasonable timescale, thus ending the current planning blight being suffered around those areas, with the new town coming on stream towards the end of the plan period and providing a long-term solution to future housing needs in the area which does not require further overdevelopment of the existing main towns. The building out of the current allocations should also hasten implementation of the infrastructure needs that they are generating. The delay to the need for the new town would provide time for detailed, joined-up planning of the development and its associated infrastructure. The arguments put forward for option 8 not being suitable for High Scenario 2 make sweeping assumptions about when work would commence on the new development. The text states that a build rate of 250 dwellings pa would not be sufficient to deliver High 2 scenario. However, it would be more than sufficient to supply the 1000 house shortfall under High 1 scenario even if only commenced during the 2030s. Furthermore, the flexibility required under the NPPF is easily catered for by the large number of unbuilt allocations across the district within the current local plan.

Should this approach be unacceptable then Option 3a would be a reluctant second choice for High 1 Scenario.

If High 2 Scenario were to be progressed, then Option 7b appears to be the best compromise of the options presented. However, I would suggest the New Town takes a greater proportion, up to the maximum number deliverable over the timescale of the plan (2295), with the allocations to the other categories reduced pro-rata i.e. Principal Town (1510), KSC (647), LSC (232) and sustainable villages (216.)

Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?

**OPTION 3**

**Q10**

As recommended by Stantec. This option allows the situation to be monitored and additional sites allocated under future reviews should it become necessary. This is a sensible approach as trends for office space in particular are rapidly changing with more home working.

Which general employment land strategy option do you prefer? Is there a different option which should be considered? **N/A**

**Q11**

If option 3 above is adopted then no new employment land will need to be allocated at this stage. However, should this become necessary in the future then I would advocate option 3 to provide small industrial units and offices near where people live and this reduce commuting.

Do you agree with the initial policy option for strategic warehousing? If not, why not? **NO**

**Q12**

50% of the outstanding road served requirement for the whole County and City is too high, especially given the enormous amount already permitted. 25% would be a more acceptable level. Much of the County has similar strategic road connections to this District, with the M1 and M69 passing through it. This District is already a major net importer of labour from the surrounding cities to the employment provision located here. Future development needs to be closer to the centres of population in order to be accessible by public transport and cycling and reduce commuting, especially car use.

Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered? **OPTION 1**

**Q13**

Policy EC2 (2) has led to developers being able to choose almost any site for strategic warehousing within the District and obtain planning permission regardless of whether the land is allocated as countryside. Developers have taken advantage of the poor and ambiguous wording of EC2 (2). This includes the use of the term “demand” as a criterion, with their very planning application being taken as proof of demand despite the application being purely speculative with no end user specified. They have also been able to choose a particular size of warehouse that hasn’t yet been covered by existing provision to imply an unmet need when no proof is required that that particular size of warehouse is necessary. Also, the absence of any need to consider sites outside the District or those already with planning permission (but not allocated in the original plan) has allowed the unfettered sprawl of warehousing across the District that has led to the 24,000 two way commuting trips a day into the NW Leicestershire from surrounding districts, mainly by car. This cannot continue and is unsustainable. If Option 1 is not possible then Option 8 is required combining all of Options 3-7 .



Which policy option for start-up workspace do you prefer? Is there a different option which should be considered? **OPTION 1**

**Q14**

This will allow selected sites across the District to be allocated which are best suited to start-ups in terms of accessibility and convenience. A concentration of start-up businesses in specific locations will allow them to work together and be mutually supportive where this is advantageous and allow appropriate services to be provided on site to cater to their needs, such as reception, accountancy and office services. The Coalville Springboard Centre is an example of where this works well.

Which policy option for local employment do you prefer? Is there a different option which should be considered? **OPTION 2**

**Q15**

Policies that only “encourage” are unenforceable and usually ignored.

Do you agree with the proposed renewable energy policy? If not, why not? **NO**

**Q19**

Option 3 is preferable. We should endeavour to reach the 2050 targets set out in the Roadmap well before 2050. I would prefer these not to be pro-rated but adopted as the targets for 2039. This will accelerate provision and allow the inevitable shortfalls and delays to be recognised and addressed before it is too late.

Do you agree with the preferred policy approach for energy efficiency?  
If not, why not? **YES**

**Q20**

The suggested policy includes the 31% efficiency improvement and contributions to a carbon offset fund. The latter will provide valuable resources for the Council to be proactive in the retrofitting of net zero carbon measures to the existing housing stock and to promote/support low carbon infrastructure.

Do you agree with the proposed policy for reducing carbon emissions?

If not, why not? **YES**

**Q24**

However, it should be made more clear that the last paragraph does not negate or qualify the requirement for a 31% improvement in energy efficiency over the 2013 edition of the Building regulations but applies to any shortfall below 100% net zero.

**For all other questions I agree with the proposals.**

**Q**  
**1,2,3,7,8,9,16,17,**  
**18,21,22,23,25**

**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

Yes

No

No

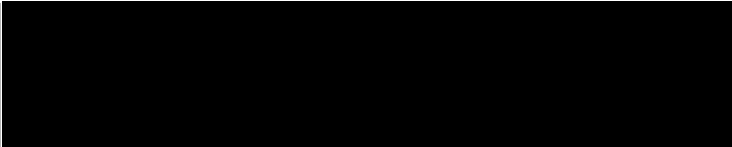
## Declaration

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

A large black rectangular redaction box covering the signature area.

Date

03/03/2022

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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](mailto:planning.policy@nwleicestershire.gov.uk).

## Local Plan Review. Consultation Response

Name .Mrs G.M Lee.....

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 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].

**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.

**L.P. 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 considerable ongoing CO2 pollution. All these are at variance with the principles of the Local Plan.

**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 - what comes next? Where lie 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.

**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.

**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 the housing 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 in Ashby, Loughborough etc., as will recreation and entertainment, approximately 10miles away. The principal mode of transport will be the car as no local 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).*" 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 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.

**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.

**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 Domesday entry.

**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, 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).

**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.

**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.

**Summary.** This proposal is an ill-thought-out scheme, in the wrong place and on an unprecedented scale, would not significantly reduce the demand for housing in Leicester, is promoted only by the alliance of opportunistic landowners/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 put in place by NWLDC in the present Local Plan.

**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: Objection to the proposed building development at Isley Walton  
**Date:** 03 March 2022 22:37:49

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Hello,

As a resident of [REDACTED], I wish to let you know that I very strongly object to the proposed development at Isley Walton.

We are already facing an enlarged quarry at Breedon that nearly includes Wilson, increase in traffic every year through our village, noise pollution from East Midlands Airport and Donnington raceway, and now this.

It 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.

Yours

Rod Dawson

[REDACTED]



## Local Plan Review – Response to consultation

Dear Sirs

Further to the review into the Local Plan, for which I note the deadline for responses has been deferred to 14<sup>th</sup> March 2022, please see below my response.

Question 1 – Local Plan Review Objectives. I agree.

Question 2 – Settlement hierarchy. I agree.

Question 3 – Suggested approach to Local Housing Needs Villages. I agree.

Question 4 – Amount of housing growth. I disagree.

I do not believe that it is sensible to provide for housing growth in excess of High 1 scenario and that if two scenarios *need* to be taken forward at this stage they should be the Medium and High 1 scenarios.

By your own analysis High 2 exceeds the market signals from build rates, provides a very large buffer when the two lower scenarios already provide buffers and it exceeds the growth in the SGP.

The Coronavirus pandemic has accelerated by several years the trend towards internet retailing and kickstarted working from home/hybrid working, neither of which will go away. Both of these will significantly reduce the demand for retail and office space in cities and Leicester will be no exception. Many city centres are going to have increasing amounts of “brownfield” land as shopping and office areas contract. In order to retain some vitality in its central areas Leicester will, again like other cities, surely need to promote residential development within the urban core thus increasing its ability to cope with its own housing demand and reducing the need for displacement into the county.

There is an additional point here connected to Employment Land, particularly Strategic Warehousing (Q12). The “corner” of North West Leicestershire where it adjoins both Nottinghamshire and Derbyshire near to East Midlands Airport is a very strong location for Strategic Warehousing and associated activities. This is to a degree a regional, rather than a District or even County issue. The development of the Freeport will add to the attractiveness

of the area at the same time as reinforcing the regional dimension. East Midlands Airport has for many years worked in collaboration with the City Councils in Leicester, Derby and Nottingham to develop sustainable transport corridors into the cities such that jobs created on or near the airport site are readily available to those seeking work within those cities. East Midlands Gateway has been brought into the same network of public transport, the Skylink buses for example and there is potential for this model to grow further, including the Freeport. What this means for the Local Plan is that just as the employment generating capability of this corner of the District is part of a larger regional picture, the housing of employees is also part of the same broader picture. Thus, many of the jobs being created in North West Leicestershire, or just over the border in the other two counties will be served by people currently living in one of the cities, not just Leicester. This is another reason not to “over allow” for new housing in the District.

Question 5 - Distribution of housing growth. I disagree with the recommendation only in so far as I do not consider that the High 2 growth scenario should be considered. I agree with the recommendation as regards High 1 scenario.

Question 6 – Self Build Housing. I agree.

Question 7- Space standards. I agree.

Question 8 – Accessible and adaptable housing. I agree.

Question 9 – Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? I agree, this is sensible in order to help make up for the relative lack in older housing stock.

Question 10 - Continuity of Employment Land supply. I prefer Option 1. It strikes a good balance.

Question 11 – Employment Land Strategy options. I prefer Option 2. Once again it strikes a sensible balance in terms of concentrating employment near to existing concentrations of workers.

Question 12 – Strategic Warehousing. I agree with suggested allocation, i.e. 50% in North West Leicestershire, but I think the numbers you are using may be too low.

Strategic warehousing is by its very nature strategic and there are incredibly strong economic and logistical forces that drive it to locate where it works best. Planning policy might be able to stop it locating in the ideal location but if the ideal location is available elsewhere then financial incentives to make it locate in the wrong location will not work. North West Leicestershire, driven by the M1 corridor and in particular the tri county border area near East Midlands Airport is very attractive to this type of business, as is the Magna Park area further south in the county.

Question 13 – New Employment Sites. I prefer Option 5. I think this gets the best balance and is realistic as regards looking outside the District and County. Administrative boundaries are a line on the map, logistics is driven by time and distance which has a monetary value, not by those lines.

Question 14 – Start up premises. I prefer Option 3. However, I agree with your point in Option 2 that a requirement for a percentage of starter units is not appropriate in, probably most, single occupier sites and would not work at all on strategic warehousing sites.

Question 15 – Local Employment. I prefer Option 3 because I do not believe that the other two options can be made to work effectively.

Question 16 – Health and wellbeing. I agree.

Question 17 - Health Impact Assessment policy. I agree.

Question 18 – Health Impact Screening Statements. I agree.

Question 19 – Renewable Energy Policy. I agree.

Question 20 – Energy efficiency. I disagree. I am wary of the implications for residents and consumers of energy efficiency measures which include possibly impractical and or very costly heating solutions being rushed through and prefer Option 2 as a better balance.

Question 21 – Lifecycle carbon assessments. I agree.

Question 22 – Overheating policy. I agree.

Question 23 – Climate change assessment. I disagree, option 3 seems preferable subject to my caveat with regard to question 20. It makes sense to assess all developments but realism will be needed as to the standards themselves.

Question 24 - Reducing carbon emissions. I agree in principle, but am wary of the reality on the ground. I appreciate however that this is not an issue that the Council can decide in isolation.

Question 25 – Water efficiency. I agree.

Question 26 – Additional comments. I have made a number of comments above where I believe that they best fit the questions, even if they go somewhat beyond them. In summary:

1) I appreciate the need to have a Plan in being in order for the Council to be able to control development effectively.

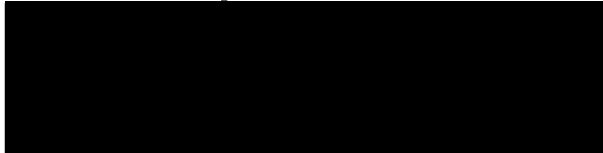
2) I am wary of the “top level down” forecasts that drive much of the housing and employment land requirements. Internet shopping and working from home/hybrid working pose a major threat to city centres, if not cities themselves and will create large additional areas of land and buildings that should be used for residential development instead of overspilling into the county. Without this the cities risk a slow death of their centres.

I am wary in the opposite direction that any attempt to look at strategic warehousing on a county or district level risks ignoring the special factors that drive its location.

3) Whilst not arguing against climate change in principle I am wary of the government's apparent adoption of targets without any thought as to how to manage the transition and the financial impact of for example low carbon heating systems in older properties. There is no mention as far as I can see of the very substantial increase in the resilience required for power networks as electricity becomes critical to more and more aspects of everyday life.

Thank you for reading this and for your efforts in the Plan to date.

Yours faithfully



J.E.T.Froggatt

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

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Planning, Policy & Land Change Team  
N. W. Leic District Council  
Council Office  
Whitwick Road  
Coalville  
LE67 3 FS

15<sup>th</sup> Feb 2022

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. 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

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.

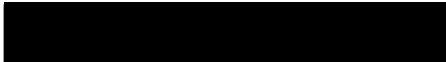
**17. L.P. [2017. Page 62] Policy Ec2.** SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies *"...an immediate need for additional employment land"*. It is merely a glint in the eyes of the landowners and the 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 redaction box covering the signature of the sender.

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

Date

Local Plan Review. Consultation Response

Name

ELAINE C. MITCHELL

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

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....

Yours Faithfully,

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

By email:- [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

By Post:- **Planning Policy & Land Charges Team, NWLDC Council Offices, Whitwick Road, Coalville LE67 3FJ**

[REDACTED]

Planning Policy and Charge Team  
N.W.L. District Council  
Council Office  
Whitwick Road  
Coalville  
LE67. 3 FS.

[REDACTED]

2<sup>nd</sup> March 2022

Dear Sirs,

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Yours Faithfully,

MALCOLM MITCHELL



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

Date

Local Plan Review. Consultation Response

Name MALCOLM MITCHELL  
Address [REDACTED]

Dear Sirs,

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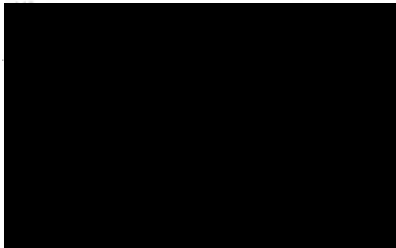
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(M. MITCHELL)

By email:- [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

By Post:- Planning Policy & Land Charges Team, NWLDC Council Offices, Whitwick Road, Coalville LE67 3FJ

## Local Plan Review. Consultation Response

Name LEIGH BREEN

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 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 - 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 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 Domesday 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 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, 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.

## Local Plan Review. Consultation Response

Name Mrs S Buzzard

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 - 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 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 Domesday 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 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, 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/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: Potential development of land for industrial use EMP90  
**Date:** 04 March 2022 13:19:25

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EMP 90 - Land south of East Midlands Airport and South West of J23a M1

Dear Sir/Madam

As a resident of [REDACTED] I would like to object to this development on the following grounds

Environmental - Flooding ( this village already as flood issues), green space destruction, air pollution (the area already has the airport, HS2, M1 motorway, power station and incinerator at Shepshed, plus the new housing estates at Hathern, Shepshed, Castle Donnington, Loughborough and Kegworth.

Safety - Increased traffic. Child safety (no village green, not teenage play area). Affect on listed building along the main road. The village will become a short cut to Loughborough. Danger to school children.

Utilities - the sewage system in the village is constantly being repaired due to age and I have told by a parish councillor is at capacity.

The size of the development compared to the surrounding villages. No consideration for the local villages.

Surrounding infrastructure - Roads (Loughborough already cannot cope), increased traffic.

We are a small village but we should still have a say on how these changes will affect our lives.

Regards  
Mrs S Buzzard

[REDACTED]

By Email. [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

### **Local Plan Review. Consultation Response**

Name Hilary Taylor

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.

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Objection To Isley Walton Development  
**Date:** 04 March 2022 15:42:01

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Hello,

I strongly object to the land around Isley Walton being developed.

This land is greenbelt land and will destroy the local area.

This area has already seen vast construction over the past 10 years, please give the local people a break.

Kind regards,

Daniel Homer

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Objection To Isley Walton Development  
**Date:** 04 March 2022 16:26:17

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**Gillian Rankin**

3:44 PM (40 minutes ago)



to planning.policy



Hello,

I live in [REDACTED] and object to the land around Isley Walton being developed into a new town.

This land is greenbelt land and it will further destroy the local area.

I've last count the amount of times I meet local people who tell me "Donington has been ruined".

Kind regards,

Gillian Rankin

**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Objections to planning  
**Date:** 06 March 2022 14:55:10

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Regarding development of land for industrial use / development of land around Isley Walton

1. Why have we not been properly informed and consulted on planning proposals for significant additional development around Diseworth, and only been made aware by well-meaning people on Facebook
2. Local infrastructure is already unable to cope with volume of traffic, schools, doctors etc
3. There are no local shops or amenities so more people just means even more traffic
4. We chose to live 'in the countryside' - these proposals would completely destroy that way of life. Will we be compensated to go and live somewhere else or for the significant reduction in our property values?
5. loss of countryside and impact on wildlife and environment - it's disgusting to see constant building on greenfield sites when there is so much industrial brownfield around - shame on everyone involved

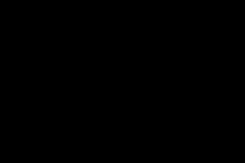
Sent from my iPhone



By Email. [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

## Local Plan Review. Consultation Response

Mr L Norrish



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.

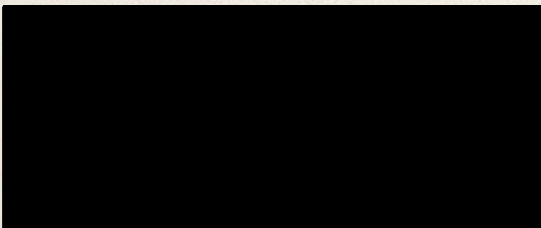
**14. Over Development.** In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at 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,



**From:** Planning Policy

**To:** PLANNING POLICY

**Subject:** EXTERNAL: RE: North West Leicestershire Local Plan Review: public consultation (Regulation 18) - EXTENSION OF TIME

**Date:** 07 March 2022 08:01:45

Good Morning,

Thank you for consulting Erewash Borough Council; at this stage we have no comments. We look forward to engaging with the Local Plan process as it progresses towards detailed proposals.

Regards,

Planning Policy Team

Erewash Borough Council

## Local Plan Review. Consultation Response

Name Charles Henry

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 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 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 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

Charles Henry



7<sup>th</sup> March 2022

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

Objection to proposed Isley Walton New Town housing development & industrial development of land northeast of Diseworth ref EMP90

Dear Sir or Madam,

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.

I also offer my objections regarding the proposed development of agricultural land directly east of Diseworth village for industrial and commercial use.

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].
2. **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.
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 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.
4. **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 - 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 it is plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development.
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*”. 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.
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 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 that 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 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)*.” 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. Further development will only make the situation worse.
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, 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.

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"*. 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.
10. **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 development. 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].
11. **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 wagons. 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 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.
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 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.
13. **Summary**. This proposal is an ill thought out scheme, in the wrong place, is on an unprecedented scale and would not significantly reduce the demand for housing in Leicester. It is promoted only by the alliance of opportunistic landowner/owners and 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.
14. **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.

#### Objection to proposed development of greenfield land for industrial use directly northeast of Diseworth village ref EMP90

The above proposed greenfield industrial development; identified as EMP90 and divided into three distinct areas with its northern boundary on the A453 and its southern boundary on Long Holden lane, would, if it was allowed to go ahead, result in a multitude of unwanted consequences for local village life and environment, particularly that of Diseworth village that is situated directly on the western boundary of the proposed development. The large numbers of additional commercial vehicles, increased noise & air pollution, of vehicle movements at all hours of the day & night, of general environmental degradation, loss of public footpaths and loss of access to the countryside by the local inhabitants and the general blight on local village life would be unacceptable!

Also many of the points raised above regarding the proposed Isley Walton New Town development are also relevant to the proposed EMP90 industrial development.

Current global circumstances dictate the need for the preservation of the countryside and green spaces and indeed the enhancement of such areas if no longer required for agriculture purposes by the large scale planting of deciduous woodland as a necessary contribution to the fight against the global heating dilemma!

Yours faithfully,

SD Rolfe

PLEASE CONFIRM RECEIPT

By Email. [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

## **Local Plan Review. Consultation Response**

Name ...Julie Draycott.....

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...J Draycott.....



By Appointment to  
Her Majesty Queen Elizabeth II  
Express Parcel Carriers  
DHL International (UK) Limited  
Berkshire



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

By Email  
planning.policy@nwleicestershire.gov.uk

7<sup>th</sup> March 2022

To whom it may concern,

**North West Leicestershire Local Plan Review – Development Strategy and Policy Options (Reg 18) Representations**

On behalf of Deutsche Post DHL (“DHL”), please find enclosed representations in response to North West Leicestershire Council’s (“the Council”) Regulation 18 consultation on the “Local Plan Review Development Strategy and Policy Options” (January 2022).

These representations respond to Consultation 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”*.

Before responding to this question, these representations first set out some background information and the importance of East Midlands Airport (“EMA”). The nationally important role played by the airport would be put at risk by some of the proposed options for housing growth.

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## Background

DHL is a significant employer in the UK across its various divisions employing over 50,000 people across 450 locations. As a business, DHL plays an essential role in supporting UK Plc and operates across all sectors of the UK economy, from ensuring convenience stores and supermarkets remain stocked to moving time definite shipments such as medical samples. At EMA, DHL has a significant footprint across our Supply Chain and Express divisions.

DHL Express has been at the airport since 1983, having moved to its current location in 2000 with a £35m initial build. The 2018 hub expansion saw a further investment of circa £165 million, with total warehouse space increasing from 40,000m<sup>2</sup> to 70,000m<sup>2</sup>. The site has 16 dedicated aircraft parking stands with over 30 aircraft handled per night, moving over 260k tonnes of cargo per annum (62% of the total airport volume), and supporting UK businesses export around the world. The site also provides jobs to 3,373 employees.

DHL Supply Chain has made some significant investments at East Midlands Gateway to the north of the runway, operating a distribution centre for Caterpillar and developing a facility for Mars. The connectivity of the airport also plays a fundamental role in the business case for the Freeport itself, which is the only identified airport in the UK.

EMA is the UK's largest dedicated air cargo airport and is second only to London Heathrow in terms of total cargo handled. EMA is one of DHL's biggest global air freight centres in its global network, with the airports 24-hour operation policy a key reason for this.

The 24-hour operation at the airport is critically important and enables EMA to be a key strategic asset in the UK's global supply chain; connecting UK with Europe and nearly 200 non-EU countries. In addition to being host to DHL, the airport is also home to freight operations for Amazon, FedEx, Royal Mail and UPS (amongst others).

The uniqueness of EMA also lies in the fact that EMA has been recently confirmed as one of the 8 UK Freeports, and is the only identified freeport airport in the UK. Freeports are a government initiative to attract and boost economic investment and job creation and their deployment forms an important part of the government's levelling up agenda. The Freeport includes EMA and EMG, a further new strategic rail freight interchange (East Midlands Intermodal Park) and Ratcliffe-on-Soar Power Station. In the government's information and guidance on Freeports (October 2021)<sup>1</sup>, the government states:

*“Freeports will play a crucial part in our post-COVID-19 recovery, helping to build back better, driving clean growth and contribute to realising the levelling up agenda”*

The guidance states that Freeports have three main objectives: national hubs for global trade and investment; create hotbeds for innovation; and promote regeneration.

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<sup>1</sup> <https://www.gov.uk/guidance/freeports>

The continued success of EMA, and the surrounding area, is important to the UK economy and the acknowledgement of this both in Government and North West Leicestershire Council policy documents has been important to DHL's investment decisions.

### ***EMA night flight restrictions***

Planning permission was granted by the Council in February 2011 for a 190m extension to the main runway at EMA (Ref: 00/00867/FUL) and the permission was implemented in February 2016. Condition 5 of the permission established a night noise envelope for EMA and requires that the area enclosed by the 55dB LAeq (8-hour) night noise contour shall not exceed 16km. Condition 5 of this permission also requires EMA to submit forecast aircraft movements and consequential noise contours on 31 January each year for the following year. The airport complies with its obligations.

### **Importance and nature of operations from EMA**

#### ***Government support for EMA***

The Government published the Aviation Policy Framework in March 2013. One of the principal objectives of the Framework is to ensure that air links continue to make the UK one of the best connected countries in the world, enabling the UK to compete successfully for economic growth opportunities.

The Framework notes that airports act as focal points for business development and employment by providing rapid delivery of products by air and convenient access to international markets. The Framework specifically recognises the importance of EMA, and identifies EMA acts as a hub for freight, noting three of the four global express air freight providers (including DHL) maintain major operations at the airport.

The Government is developing a long term Aviation Strategy to 2050 and beyond. As part of this emerging strategy, the Government has consulted on a number of documents, including "Aviation 2050 – The Future of UK Aviation" that was published for consultation in December 2018.

Paragraph 4.45 states:

*"Air freight is a major part of aviation. It connects UK exporters to new markets across the world, and benefits consumers who increasingly have access to a range of globally sourced goods which can be delivered within days of ordering"*

Paragraph 4.48 goes on to specifically recognise the importance of the 24 hour operation at EMA, and particularly night flights. It states:

*"The government recognises the importance of night flights to the air freight industry particularly for the express freight market which allows UK consumers to receive products from around the world in ever shorter timescales. For example, around 50% of freight at East Midlands Airport arrives before 7.00am." (emphasis added)*

The Strategy confirms at paragraph 4.49 that it supports the continued growth of the air freight sector at existing airports:

*“The government supports continued growth of the air freight sector particularly making best use of existing capacity at airports, to continue to facilitate global trade for UK businesses and consumers.”<sup>2</sup>*

Overall, it is clear that the Government considers air freight to be a particularly important part of the UK economy and recognises the importance of night flights at EMA and encourages their continued growth.

### ***Council support for EMA***

The Council also recognises the importance of EMA. The evidence base document “The Housing and Economic Development Needs Assessment (January 2017)” states that North West Leicestershire has seen the strongest employment growth relevant to its size in Leicester and Leicestershire. The document recognises that this is partly as a result of EMA. It states at paragraph 3.39:

*“Transportation and storage employment is influenced by East Midlands Airport which is the second largest cargo airport in the UK. DHL, UPS and TNT all have major distribution facilities around the airport. It is also a reflection of the strength of the logistics/distribution sector”*

A further evidence base document that has been prepared for the Local Plan Review is “The Need for Employment Land Report” (November 2020). That document also recognises the importance of EMA, paragraph 5.17 states that North West Leicestershire:

*“... also contains East Midlands Airport, which is the second largest freight handling airport in the UK after Heathrow and has attracted a thriving transport industry and international logistics operators”*

Paragraph 5.81 confirms that:

*“The offices at EMA are attractive to larger occupiers because of the excellent transport links and comparatively low rents. The area also contains several large aviation-related companies, who seek to be close to the airport.”*

As part of the Local Plan Review, the Council commissioned Arup to produce a study assessing the infrastructure impacts of a number of potential future strategic development sites. That study, known as the “Leicestershire International Gateway: Potential Strategic Sites Infrastructure Study

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<sup>2</sup> The government has also published a document titled “Making best use of existing runway” (June 2018). Paragraph 1.25 states that the “government believes there is a case for airports making best of their existing runways across the whole of the UK”. Paragraph 1.29 states “...the government is supportive of airports beyond Heathrow making best use of their existing runways”.

Final Report” (June, 2020) helpfully recognises that nature of operations at EMA inevitably has noise consequences:

*“The nature of the Airport’s operations as the UK’s second largest air freight hub result in particular noise characteristics. The Airport is a hub for UPS, DHL, TNT FedEx and Royal Mail – it is therefore busier (and noisier) at night; classed as 20:00 to 06:00.”*

DHL welcomes the recognition of the importance of EMA at a local, regional, national and international scale, including acknowledgement that the successful operation of EMA is critically dependent on night flights and that this brings particular characteristics. Those characteristics need to be recognised and respected and fully taken into account in plan making – which must also recognise the national importance of enabling the airport operations to continue to grow.

As part of the Local Plan Review “Development Strategy and Policy Options”, however, DHL is aware that the Council is now considering a number of spatial distribution options to accommodate new housing growth in the District.

**Consultation 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**

In planning for new housing development, the Council has considered four growth scenarios (Low, Medium, High 1 and High 2), and 16 detailed housing distribution options. Of these options, the Council proposes to consider the following in more detail:

- High 1 scenario (512 dwellings per annum) Option 3a – growth directed to Principal Town, Key Service Centres and Local Service Centres; and
- High 2 scenario (730 dwellings per annum) Option 7b – growth directed to Principal Town, New Settlement, Key Service Centres, Local Service Centres and Sustainable Villages.

Option 7b includes the possibility of a new settlement. In considering the potential location of a new settlement, the Council’s Strategic Housing and Economic Land Availability Assessment 2021 (SHELAA) includes Site IW1 which adjoins the southern boundary of EMA. This site has been promoted by landowners with an estimated capacity of 4,740 dwellings. DHL notes that this site was promoted as two separate sites in the previous 2019 SHELAA, but is now being promoted as a single site.

The 2021 SHELAA also includes a number of other smaller sites that have been promoted for development within Kegworth, which lies immediately to the east of EMA and is classed as a ‘Local Services Centre’, and at Castle Donington which lies immediately to the north of EMA and is classed as a ‘Key Services Centre’.

The sites in Kegworth that have been promoted include Site K2, which is within 1000 metres of EMA with an estimated capacity of 59 dwellings, Site K12 with an estimated capacity of 110

dwelling and Site K5 with an estimated capacity of 79 dwellings. The sites in Castle Donington that have been promoted include Site CD10 with a capacity of up to 1,425 dwellings and Site CD12 with an estimated capacity of 39 dwellings. Site CD11 has also been promoted with an estimated capacity of 233 dwellings and adjoins the northern boundary of EMA.

DHL notes that these sites have been promoted by landowners as part of the SHELAA and acknowledges that this consultation relates to the spatial distribution of growth, rather than consultation on specific proposed site allocations.

Whilst DHL welcomes and supports proposed growth in North West Leicestershire, that support depends on the spatial distribution of growth that is chosen. Growth in the wrong locations could result in additional residential homes being built close to EMA at Kegworth and Castle Donington and/or a new settlement immediately to the south of EMA.

Any potential allocations must recognise that EMA is a 24 hour operation airport that is home to the UK's largest dedicated air cargo operation. EMA is a key and unique strategic asset in the UK's global supply chain. Around 50% of freight at EMA arrives before 7.00am, consequently, EMA is busier at night. The Government has made it clear that it supports the continued expansion of freight at existing airports, including EMA.

Paragraph 187 of the NPPF is helpful in this respect. It states:

*“Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities ..... Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established.”*

Paragraph 187 provides:

*“Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or ‘agent of change’) should be required to provide suitable mitigation before the development has been completed.”*

Paragraph 009 (Reference ID: 30-009-20190722) of Planning Policy Guidance (PPG) expands on the policy within the NPPF and states that where development is proposed in the vicinity of existing businesses, then:

*“In these circumstances the applicant (or ‘agent of change’) will need to clearly identify the effects of existing businesses that may cause a nuisance (including noise, but also dust, odours, vibration and other sources of pollution) and the likelihood that they could have a significant adverse effect on new residents/users. In doing so, the agent of change will need to take into account not only the current activities that may cause a nuisance, but also those activities that businesses or other facilities are permitted to carry out, even if they are not occurring at the time of the application being made.”*

Existing business operations of the airport must, therefore, be taken into account and protected when the Council is planning the location of new development in the vicinity of EMA. Any housing options that could hamper the operation of EMA would be directly inconsistent with important and up to date government policy on Freeports.

Any new development will be required to provide suitable mitigation before the development has been completed to ensure that all permitted activities are able to occur. The best means of achieving this, however, would be to plan development in locations where the operation and expansion of the airport would not be affected.

The evidence base published so far in relation to the emerging local plan does not demonstrate that this clear planning duty has been discharged.

As required by “The Airports (Noise-related Operating Restrictions) (England and Wales) Regulations 2018”, the Council is EMA’s “competent authority”. Therefore, the Council is required to consider the “Balanced Approach” when establishing noise-related operating restrictions at the airport. The “Balanced Approach” is promoted by the International Civil Aviation Organisation (ICAO) and comprises four principle elements: land-use planning and management, reduction of noise at source, noise abatement operating procedure and operating restrictions. On land-use planning and management, the ICAO state that:

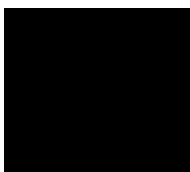
*“Compatible land-use planning and management is also a vital instrument in ensuring that the gains achieved by the reduced noise of the latest generation of aircraft are not offset by further residential development around airports”*

DHL encourage the Council to take a holistic view when considering further housing developments considering the proximity to the airport and the prevalence of night flights given EMA’s role as a national freight hub.

DHL remains supportive of growth in the East Midlands, and would be delighted to work with the Council going forward to ensure the housing can be delivered to meet the Council’s needs and aspirations without impeding on the future success of the nationally important EMA and the wider East Midlands Freeport area.

Should you require any further information on the above, please do not hesitate to contact me.

Yours sincerely,



James Stephens  
VP Corporate Affairs UK & Ireland

**DHL – Excellence. Simply delivered.**

enc. Completed Consultation Response Form  
cc. Alex MacGregor (Quod)  
Kevin Sey, Vice President Corporate Real Estate, DHL  
Mark Evans, Vice President, Hubs & Gateways UK



**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](http://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.*

	<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
Title		Mr
First Name	DHL	Alex
Last Name		MacGregor
[Job Title]		Associate
[Organisation]		Quod
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.

Please see accompanying letter for the response to consultation question 5.

(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

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



Date

7 March 2022

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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](mailto:planning.policy@nwleicestershire.gov.uk).

## Local Plan Review. Consultation Response

Name: Mrs. G.Laverick

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear sirs,

My response to the Local Plan (LP) 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 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.

My family and I chose to move to Diseworth 20 years ago and we moved into our new home, also in Diseworth, 2 years ago. This is our dream home. It overlooks fields where my horses are kept. We live at the bottom of Hyam's Lane and, like many villagers, we walk the lane daily with our dog, our horses and revel in seeing the local wildlife, including hares and birds of prey, as the countryside around us lifts our spirits. The pandemic has highlighted the importance of being outdoors for our mental health, and the benefits of regular exercise are also well documented. By building on the countryside, green fields, village lanes that are part of our lovely village, you are denying us the benefits to our mental health and wellbeing. We all make choices in our lives and we chose to live in a village surrounded by countryside and trees and wildlife. We do not want to see it destroyed and become yet another concrete jungle with all the pollution, noise and traffic that comes with it. Both proposals fail this test.

2. Objective 3 – High quality housing stock and reflection of local context.

IW1 will fail to reflect local context. The development will be cramped and over crowded and will fail to reflect the reality of living in a village environment. As well as that, it will encroach on the village that is Diseworth and will irrevocably damage the local environment and setting of our village. The countryside will be irretrievably destroyed, resulting in the feel of living in a town and not a village surrounded by fields, trees, farm animals and trees.

3. Objective 4 – Reduce the need to travel.

Sadly, the development at IS1 will achieve exactly the opposite. Roads around Diseworth will become even more congested, leading to an increase in pollution levels, potential danger to our local children, (also bike riders, horse riders and walkers) and an increase in noise levels. The relative tranquillity of our small village will be lost.

The development of land EMP90 will also increase the use of cars as local people will no longer be able to (or have the desire to) walk up the lane to the services as they often do now. For some in our village, this is an opportunity to enjoy our local countryside as they walk up to the services for newspapers or coffee and benefit from the exercise, fresh air and benefits of being outdoors surrounded by the natural environment.

4. Objective 9 – Effective flood prevention

This is a huge concern for the villagers in Diseworth and Long Whatton. In the winter of 2019-20 before the arrival of the pandemic, our villages were subject to unprecedented flooding partly due to mismanagement of water. An increase in vast areas of concrete, housing and industrial developments will add significantly to the problem and Diseworth faces more road closures due to local flooding and houses in high risk areas suffering flood damage again. Water needs somewhere to drain to and fields and ditches are essential for this. By building on yet more countryside around our village, it will seriously impact on the effects of local flooding and is surely something to be avoided at all costs. Our weather is getting wetter, all year round and the last thing we need is to lose fields where the water can drain naturally. EMP90 will cause a potential disaster to our beautiful village.

5. Objective 10 – Preserve and enhance the district's natural and rural heritage

The only way to achieve this objective is to throw the plans for the developments EMP90 and IW1 in the bin. Even my dog would be able to understand that any developments which destroy the local countryside are going to fail this test. The only way to enhance the Diseworth's natural and rural heritage is to leave Diseworth's surrounding countryside undeveloped. Fields can continue to be rented out to local farmers, villagers can continue to enjoy the small amount of countryside with its varied wildlife which is on our doorstep and we can continue to enjoy the benefits of living in a small, friendly, pretty village. The setting of Diseworth is why we chose to live here. We have many friends here. We are outdoor people. We enjoy country life. We have no desire to live in a crowded, over concreted, ugly man-made, busy, polluted place with no natural wildlife or trees and fields.

6. Objective 11 – Protect and enhance the natural environment

I completely fail to see how the proposed plans (EMP90 and IW1) can do this. I think there has been a typo. It should read **completely ruin and destroy** the natural environment. There you are objective achieved. Tick.

I know I'm repeating myself, but sometimes it's necessary to get the message across. The natural environment of trees, fields, hedges, flowers, etc. etc. CAN NOT be enhanced. It can, however, be PROTECTED. That involves preserving our fields, trees, hedges, countryside. Leaving them alone. Not replacing them with houses, shops, car parks, warehouses, industrial units etc. etc. The local people do not want either of these developments. The developments will not protect our countryside. The developments will certainly ruin our local countryside and farmland. Forever.

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.

Not sure if you've read this but the plans EMP90 and IW1 certainly fail to achieve this. Diseworth has a rich history of farming and country pursuits. Although several farms have been developed for housing (and they have been thoughtfully done to fit in with the very old village buildings) there are still many farmers working the fields in and around the village. The local school children are able to visit lambs that are born in fields near the school and they go on local nature walks around the village to see the changes in nature during the four seasons. They can see fields with crops so they appreciate where their food comes from. They can see sheep, lambs, cows, calves, horses in the fields and learn about how to look after them and their place in the food chain. There are a huge variety of birds ranging from birds of prey (buzzards, kestrels, kites, owls – all seen in fields around Hyams Lane EMP90) to swallows and house martins returning to nest in barns and stables. We have a large number of hedge sparrows, robins, blue tits, finches, collared doves, woodpeckers, herons and even a visiting egret. All these birds need a natural habitat of hedges, fields and trees to feed, breed and thrive. We, as humans, benefit hugely from seeing this wildlife out of our windows and in our gardens. I've seen hares and foxes in the fields around Diseworth. I've come face to face with an owl, hedgehogs, squirrels. All these creatures share our countryside around Diseworth. They will not thrive in a concrete jungle. We have a solitary bridlepath in the village. There are many horse owners in the village and many moved to Diseworth because of its proximity to countryside but sadly, over the years, the roads around Diseworth have become busier and busier. It's daunting riding a horse on roads as they are inherently nervous and jumpy animals. Most drivers are very thoughtful and slow down so we feel safe. Some however, drive quickly and the amount of traffic on the roads now limits how much I hack around the village. The proposed developments are only going to make it harder for horse owners to enjoy their hobby as roads are going to become even more congested.

8. Sustainability – The NPPF has a core principle that planners should focus significant developments in locations which are or can be made sustainable, as highlighted in the Local Plan (5.17). I understand that EMP90 regulations will have to be changed to accommodate the site. This is unacceptable. The countryside and farmland around Diseworth is much needed and any building on these fields will have a huge, negative impact on the village in terms of congestion, pollution, flooding and the removal of paths and lanes which are regularly used by walkers, cyclists, riders and children. It is not sustainable to build on much needed and valued farmland and countryside.

#### 9. Noise

IW1 will be significantly affected by noise pollution from East Midlands Airport and the race circuit at Donington.

Diseworth already suffers noise pollution from planes taking off and landing 24 hours a day, and also from the race circuit at Donington. EMP90 will add significantly to this noise pollution with increased traffic (24/7) and also light pollution. The skies of Diseworth are already affected by night lighting at the airport and EMP90 will also emit a significant amount of night lights affecting houses at that side of the village.

#### 10. Traffic

IW1 will generate a huge amount of extra traffic (circa 10,000 residential vehicles) not to mention delivery vans, dustbin lorries, etc. etc. Our local roads are already congested and traffic through the village has increased significantly over the last ten years. Our village will be used as a rat run for this new traffic as they choose a route to Loughborough. EMP90 will also add to congestion at the A42/M1 roundabout which often leads to traffic cutting through Diseworth and increases the level of pollution as well as being a potential danger to school children.

#### 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.”* The harm to the village if this building goes ahead vastly outweighs the need for it to be built. Access to the site is also not compliant with existing Highways Authority regulation. The site will also be 75m away from houses including ours. This DOES NOT meet the requirement of not being detrimental to nearby residential properties. We feel it will significantly affect our physical and mental well being.

#### 12. The settlement hierarchy

In the local plan, Diseworth is listed as being restricted to limited growth within the defined limits of development. Our village is a conservation village and as such

should be respected and honoured in terms of future developments. EMP90 and IW1 would be disastrous for our village and change it entirely. The boundaries of our village should be respected and no further development should take place so there is a clear separation of our village from any future developments. We do not want the village to be swallowed up by neighbouring developments thus losing the countryside which surrounds us.

### 13. Geographic location

The Local Plan identifies a need for 9,620 houses over the whole district between now and **2039** therefore, it makes no sense to build such a huge development in one place (IW1) particularly as large developments are already being built in Castle Donington, Breedon on the Hill and Shepshed. The result of these developments (EMP90 and IW1) would be increased congestion, increased pollution, increased danger of flooding and loss of valuable farmland and countryside. All of these factors will contribute to climate change.

### 14. Over Development

Diseworth and its environs have already been significantly developed over recent years. The rail/freight development and monumental warehouses nearby have significantly altered the landscape and increased the HGV traffic which does come through our small village. The developments at the DHL and UPS air freight hubs at EMA have also increased HGV traffic (24/7) The noise levels from the airport continue to rise and are increasingly frequent, both day and night. Junction 23A, the M1 and A42 continue to cause congestion, noise and pollution as does the newly reinvented junction 24 of the M1. Hold ups have become common place and this results in frustrated drivers using Diseworth as a rat run.

Diseworth is being destroyed. It is in danger of becoming completely surrounded and will no longer be considered a village. Enough is enough. We are standing up for the village that we fell in love with enough to live here.

### 15. Summary

When I was made aware of the proposed developments EMP90 and IW1 I was absolutely horrified. The destruction of countryside, farmland, wildlife habitats. An increase in pollution we breathe, light pollution, noise pollution. More traffic on our village roads. Loss of footpaths and lanes where we can walk, ride, cycle safely. Loss of beautiful local wildlife and birds. Our village being sucked into a concrete jungle of development. Nightmare. The only people to benefit from this are the greedy landowners and the exploitative developers who have no knowledge of or interest in our village. Planning principles should be adhered to and not bent to suit the whim of people who seek to get rich quickly with no regard for the environment or the heritage of small villages. I believe the LHA Guidance Policy is compromised.

## 16. Conclusion and Planning Integrity

I urge NWLDC to remain true to its primary planning objectives and guidance. The countryside and farmland around Diseworth needs to be respected, valued and preserved for it can never be replaced once gone. We residents of Diseworth do NOT want, need or support these proposed developments. They will ruin our beautiful village and destroy its heritage.

Yours faithfully,

G. Laverick



## The Detailed Template Letter:-

### Local Plan Review. Consultation Response

Name .....

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 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 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.

**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.N. Other

## Local Plan Review. Consultation Response

Andrew Astbury



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. Having a field that borders this land which already floods I am aware that the situation will become much worse with more run off
- 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

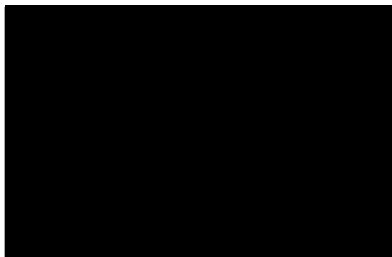


A42, then MOTO, then Junction 23A on the M1, and more recently the disaster that is the modified J24 of the M1. This, coupled with turning the M1 into a 'smart' motorway, has generated more holdups and local and rat running than can be tolerated. There has to be a point at which this cumulative development 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,



4 March 2022

NWLDC  
Whitwick Rd  
Coalville  
LE67 3FJ.

Dear Sir/Madam

I object most strongly to proposals for development on two sites close to Diseworth

1) for even suggesting building on green field sites when there are brown field sites available

2) for the devastating effect on the environment.

I am a non-driving pensioner living in Diseworth and rely greatly on the Derby to Leicester bus service to get to the doctor, hospital and shops. I am afraid that with such increases in traffic volumes this service may become unreliable. The A453 between the main airport entrance and the roundabout near the motorway, J23, is a nightmare, this stretch will have to be dual carriaged, if not the entire stretch between Isley Watten and the motorway. There will also be an increase in traffic from Isley Watten through Diseworth and Long Whetton to the A6.

I do understand there is a need for more housing, but 4,700? The majority must be affordable homes (unlike all

the recent new builds in Diseworth (that come with a price tag of 500k) and built to the highest standards of insulation and carbon neutrality. There won't have to be at least shops, schools and doctor's surgery, it's difficult enough getting an appointment at the doctor in Castle Donington at the moment due to the expansion there.

The proposed industrial site between Diseworth and the A453, who was so insensitive to propose building such a site right up to peoples' back gardens at the top of Clements Gate? Come on, let the development be at least a field away, would you like a huge warehouse at the bottom of your garden? There should be no access to the site from Clements Gate and Longthorpe. Please let us preserve the character of Clements Gate, it is a conservation area after all.

Country walks during the Pandemic have been important for us oldies trying to keep fit, and I'm about to lose 2 of them.

I have never ever felt it necessary to put pen to paper about any development before in all my 70+ years, so I hope you will treat it in all seriousness.

Yours sincerely

[Redacted Signature]

**The Template Letter:-**

**Local Plan Review. Consultation Response**

Name

MR DAVID WILLS

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 it's 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 - 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. ~10 miles away. The principal 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 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. 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, 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.

**The Template Letter:-**

**Local Plan Review. Consultation Response**

Name

MRS GAYNOR WILKES

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 - 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. ~10 miles away. The principal 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 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. 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, 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.

3 March -  
2022.



Dear Sirs,

I wish to say NO to any kind of Buildings, certainly housing on such a VAST SCALE. We cannot allow big industries of any kind to rise rough shed over peoples lives without some regulations.

Please reconsider this dreadful proposal, not only for our lives, but our future & our children & the future.

We are ruining the planet not only villages here but over the globe. with selfishness & greed

of some Companies. Please consider the outcome of this, not just now, but for the future of our planet & other Peoples lives.

Yours faithfully,



By Email. [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

## Local Plan Review. Consultation Response

Sarah jane Astbury



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. Having a field that borders this land which already floods I am aware that the situation will become much worse with more run off
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,

SJ Astbury

Sue Hurley

Local Plan Review. Consultation Response

Dear Sirs,

I would firstly like to say that when I moved to Diseworth, I did so because of its rural location with great access to open countryside. I did not envisage that it could end up being in the middle of a huge housing/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 along with 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 [EMP90] 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 on what is an already busy road.
- 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 and then Junction 23A on 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.

Sue Hurley



**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,



S C Hurley



By Email. [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

## **Local Plan Review. Consultation Response**

Lesley and Andrew Allman  
[REDACTED]  
[REDACTED]  
[REDACTED]

Dear Sirs,

Please find my response to the Local Plan [LP] Review which 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].

After discussion with other local residents, 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 the following objectives.

- 1. Objective 1.** Health and wellbeing. Both proposals fail this test as they will increase pollution and reduce green space in the area. They will also reduce the ability to access health care in the area.
- 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 as there is little public transport in the area or included in the scheme.
- 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 countryside and farmland. We are currently hemmed in by the M1, M42 and airport and these developments will make the situation much worse.

**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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**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,

Andrew and Lesley Allman

# REPRESENTATIONS IN RESPECT OF THE NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW – DEVELOPMENT STRATEGY AND POLICY OPTIONS

**ON BEHALF OF ESE CAPITAL**



**Pegasus Group**

Birmingham | Bracknell | Bristol | Cambridge | Cirencester | Dublin | East Midlands | Edinburgh | Leeds | Liverpool | London | Manchester | Newcastle | Peterborough | Solent

**DESIGN** **ENVIRONMENT** **PLANNING** **ECONOMICS** **HERITAGE**

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**APPENDICES:**

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## **1. Introduction**

- 1.1. These representations have been submitted by Pegasus Group on behalf of Ese Capital 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 in land south of Park Road, Castle Donington.
- 1.4. Our clients have previously engaged in the preparation of the plan including submissions to the Call for Sites. For completeness we have included at Appendix 1 details of our client's land interests.
- 1.5. The following sections respond to the relevant questions in the Options consultation.

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## 2. Representations

- 3.6. 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?***

- 3.7. 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.
- 3.8. Castle Donington continues to be identified as one of two Key Service Centres along with Ashby de la Zouch, the second level of the hierarchy below the Principal Town of Coalville.
- 3.9. The Settlement Study, 2021 sets out the findings of the review of the proposed settlement hierarchy. This shows that Castle Donington 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 continued designation of the settlement as a Key Service Centre is an accurate reflection of the sustainability of the settlement as a suitable location for further growth and is therefore supported.

### 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.***

- 3.10. 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';
- 3.11. 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 'high1 scenario' would require some additional 1,000 dwellings to be allocated and the 'high 2 scenario' and additional 5,100 dwellings.

- 3.12. 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.
- 3.13. 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.
- 3.14. 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.**

- 3.15. 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.
- 3.16. The nine options are combined with the alternative scales of growth to provide 16 options that have been assessed through the Sustainability Appraisal.
- 3.17. The overall conclusion of the Options Paper is that the following two options should be taken forward for further consideration;



**Extract from Options Paper**

**Table 6 - options to be taken forward**

Option	Description
<b>High 1 scenario (1,000 dwellings)</b>	
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
<b>High 2 scenario (5,100 dwellings)</b>	
Option7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

- 3.18. 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.
- 3.19. 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.
- 3.20. 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 under this scenario.
- 3.21. 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 generally is supported as it allow for the allocation of a range of sites of different sizes in a range of locations, including at the more sustainable Key Service Centres of Castle Donington and Ashby de la Zouch, helping to provide a strategy that should ensure the delivery of housing in the early part of the plan period. We would however question whether the scale of development proposed for Coalville can be delivered without impacting on locally important areas of separation.
- 3.22. In terms of Ese Capital's interests in land south of Park Road, the site extends to some 1.81 hectares and is well related to the existing settlement form, being adjacent to the new Castle Donington link Road and associated residential development. As one of the more sustainable settlements in the district, further

opportunities for residential development in the settlement should be identified as part of the proposed planning strategy.

- 3.23. Due various constraints around the settlement, including flood plain to the east and noise and safety limitations associated with East Midlands Airport to the south, opportunities for further growth are limited to the east and north of the settlement.
- 3.24. The land at Park Road would represent a logical extension to recent residential development to the west of Castle Donington. The site provides the opportunity to deliver some 50 dwellings at standard gross to net discounts. Development on the site would not result in any unacceptable landscape impacts and would provide further housing to help meet future requirements in a location with good access to local services and facilities including the wide range of employment opportunities available in the area.

## **5. Housing**

### **Self-Build and Custom Housing**

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

- 3.25. 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.
- 3.26. This would be a reasonable approach. 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. The Plan should support the delivery of self-build housing and encourage provision on larger sites, recognising the potential difficulties and the need for robust evidence of need.

### **Space Standards**

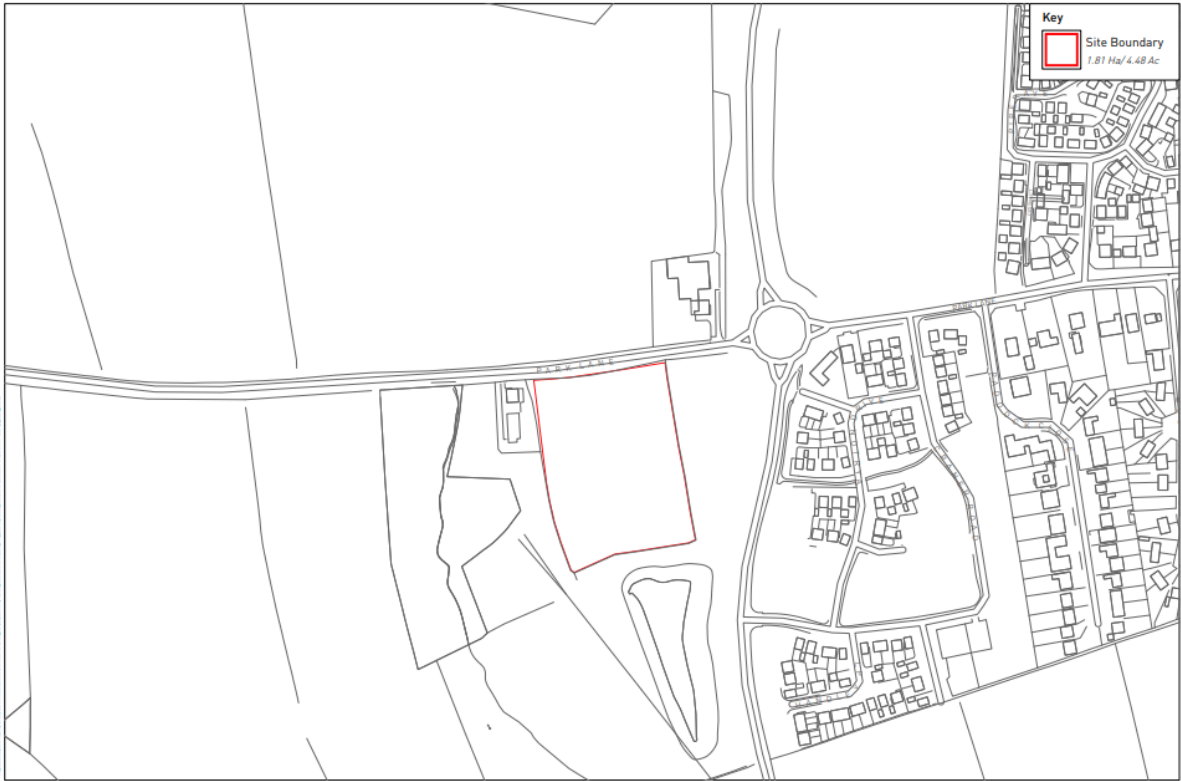
#### **Q7 Do you agree with the proposed policy for Space Standards? If not why not?**

- 3.27. 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.
- 3.28. 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.

- 3.29. 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.
- 3.30. There is a clear risk that the proposed inflexible policy approach to this issue will impact on affordability and effect customer choice. Smaller dwellings have always played a valuable role in meeting specific needs for both market and affordable housing.
- 3.31. 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.

# Appendix 1 – Land South of Park Road, Castle Donington



Planning | Design | Environment | Economics | Heritage  
East Midlands  
www.pegasusgroup.co.uk

Park Lane, Castle Donington - Site Location Plan Pegasus  
1 Drawn by: LCJ/F | Approved by: GLO | Date: 12/10/20 | Scale: 1:2500 B.A.3 | DRS: P18-1589\_301 Sheet No. - Rev. A | Client: Castle Donington Limited

## Local Plan Review. Consultation Response

Name Alicia Smithies

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,

Alicia Smithies

Mr N C Canty

7<sup>th</sup> March 2022

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

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Yours Faithfully,

Mr N C Canty

Mrs P Canty



8th March 2022

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Yours Faithfully,

Mrs Paula Canty

Dear Sir / Madam.

I write to express my concerns about the proposed development of a new town around Isley Walton and the Freeport EMAGIC industrial development to the east of Diseworth.

**Housing development:**

Whilst I acknowledge that the country as a whole needs more housing, I am less certain that quite so many houses need to be built around Isley Walton to serve the excessive demand from those living in the city of Leicester.

More local demand would be better met by increasing the size of both Isley Walton and Diseworth in a more modest way say, 50 houses on land to the east of Isley Walton alongside the A453 and perhaps 100 on land to the north of Diseworth between Hyams Lane and the A453. What is being proposed by the land promoter is a shocking land grab amounting to almost 800 acres.

What a terrible loss of much loved countryside. It would ruin the area for all residents. It is wildly out of proportion.

Apart from Harworth, who now own High Barns Farm (120 acres) , only two men own the rest of the land in question: Mark Spalton (Isley Walton – Manor Farm 320 acres)) and Alan Sherwood (Wartoft Farm and Woodhouse Farm 350 acres), those two stand to make tens of millions of pounds each if consent is granted for the whole proposed amount whilst hundreds of people will suffer property blight, a huge drop in the value of their homes and a drastic reduction in their amenity. That doesn't seem fair.

At least with *modest* housing plans the rural nature of the area would be retained and most of the demand met. If all local villages (Kegworth, Castle Donington, Lockington etc) all had modest housing additions then all the housing demand would be met without savaging the countryside.

**EMAGIC- Freeport:**

I can't argue with the opportunities and the potential of having a freeport on the doorstep but again it is the *scale* of the proposed development that is so scary. Again, its vast!!! Far too big

Would developing just the top half of EMP 90 above Hyams Lane not be sufficient? Keeping the commercial developments away from the housing on Long Holden? Some perspective is needed here. Imagine it was your house.

By all means, develop some commercial employment space around that area but just don't overkill it.

In both proposals (especially the housing) some serious downward adjustment in size would be welcome. Otherwise NWLDC will be knowingly overseeing the ruin of a lovely part of the county alongside the fabulous enrichment of two men.

Yours faithfully

Tim Wagstaff

**By Email**

[planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

**Local Plan Review. Consultation Response**

Name Arthur Garnett.



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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.

**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. Garnett Esq.





## 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... to:

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.*

The proposed approach to the amount of housing growth is not agreed.

The National Planning Policy Framework (NPPF) expects strategic policy-making authorities to follow the standard method for assessing local housing need. The standard method uses a formula to identify the minimum number of homes expected to be planned for, in a way which addresses projected household growth and historic under-supply.

Whilst the use of the standard method for strategic policy making purposes is not mandatory, Planning Practice Guidance (PPG) makes it clear that if it is felt that circumstances warrant an alternative approach, authorities can expect this to be scrutinised more closely at examination. There is an expectation that the standard method will be used and that any other method will be used only in exceptional circumstances. (Paragraph: 003 Reference ID: 2a-003-20190220).

Circumstances where it might be appropriate to consider whether actual housing need is higher than the standard method indicates include, but are not limited to situations where increases in housing need are likely to exceed past trends because of:

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

There may, occasionally, also be situations where previous levels of housing delivery in an area, or previous assessments of need (such as a recently produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method. Authorities are encouraged to make as much use as possible of previously developed or brownfield land, and therefore cities and urban centres, not only those subject to the cities and urban centres uplift may strive to plan for more home. Authorities will need to take this into account when considering whether it is appropriate to plan for a higher level of need than the standard model suggests (Paragraph: 010 Reference ID: 2a-010-20201216).

The standard methodology requires a 35% uplift to be applied to the largest 20 cities or urban centres in England, one of which is Leicester. PPG makes it clear that the increase in number of homes to be delivered in urban areas is expected to be met by the cities and urban centres themselves, rather than the surrounding areas, unless it would conflict with national policy and legal obligations. This is to make sure that homes are built in the right places, to make the most of existing infrastructure, and to allow people to live nearby the service they rely on, making travel patterns more sustainable (Paragraph: 035 Reference ID: 2a-035-20201216).

Application of the standard methodology would result in a housing requirement of 368 dwellings a year. What is being suggested by the local planning authority as an appropriate basis for planning future housing development is significantly above this figure.

The High 1 scenario would result in a housing requirement of 512 dwellings a year, for which there would be a residual requirement of about 1,000 dwellings. The alternative being suggested is the High 2 scenario which would result in a housing requirement of 730 dwellings a year (nearly double the figure produced using the standard methodology), for which there would be a residual requirement of about 5,100 dwellings.

The High 1 scenario utilises the figure from the Leicester and Leicestershire Strategic Growth Plan (SGP). The SGP is a non-statutory plan formally approved by the ten partner organisations in Leicester and Leicestershire at a series of meetings held during November and December 2018. It notes that sufficient provision has been made in adopted or emerging Local Plans to accommodate the objectively assessed need for housing, across the Housing Market Area (HMA) as a whole (including unmet need arising in the administrative areas of Leicester City Council), for the period 2011-31. The SGP sets out the agreed strategy for the period 2031 to 2050 to be delivered through Local Plans.

Policy S1 of the adopted Local Plan sets out the future housing and economic development needs for the district to 2031. It was the subject of a recent partial Local Plan review, found sound by an independent Inspector in February 2021 and adopted by the Council in March 2021. It is therefore reasonable to conclude that it represents an up to date assessment of housing need.

Policy S1 requires provision to be made for 481 dwellings per annum to 2031. Even if it was accepted that the SGP was the appropriate basis for planning future housing growth (the High 1 scenario), the increased housing requirement of 512 dwellings would only apply from 2031 to 2039, not from 2020 to 2031. This would reduce the total requirement to 9,387 dwellings over the period 2020 to 2039 leaving a residual housing requirement of only 603 dwellings.

Similarly, if the High 2 scenario was adopted, the residual housing requirement would only be 2,347 dwellings to 2039 and not the 5,086 referred to in Table 2.

It is not clear why the figure for the standard methodology in Table 2 is set at 359 dwellings per annum, when paragraph 4.15 suggests this should be 368 dwellings per annum. Even if it was assumed that the 359 dwellings was correct and it was required from 2020 to 2039, the total requirement would be 6,821 dwellings not 6,103 dwellings leaving a shortfall of 1,963 dwellings and not 2,681 as set out in Table 1. There is clearly an error in the calculations.

A revised version of Table 2 is set out below illustrating the over provision / shortfall under each scenario based on the Policy S1 requirements for the period 2031 to 2039. Two alternative figures are provided for the standard method as it is not clear which of the quoted figures is correct.

Scenario	Annual Amount 2020-2031	Annual Amount 2031-2039	Total Requirement 2020-2039	Total Projected Provision	Over Provision / Shortfall
<b>Standard Method (Low)</b>	5,291 (481 x 11)	2,872 (359 x 8)	8,163	8,784	621
		2,944 (368 x 8)	8,235		549
<b>HEDNA (Medium)</b>	5,291 (481 x 11)	3,584 (448 x 8)	8,875	8,784	-91
<b>Strategic Growth Plan</b>	5,291 (481 x 11)	4,096 (512 x 8)	9,387	8,784	-603

<b>(High 1)</b>					
<b>2018 Based Projections</b>	5,291 (481 x 11)	5,840 (730 x 8)	11,131	8,784	-2,347
<b>(High 2)</b>					

What is clear from the figures in the above table, is that the residual requirement is significantly less than indicated in the consultation document. Even at the highest growth scenario, the shortfall is only 2,347 dwellings.

MSV consider that the proposed level of housing growth should not exceed levels set out the SGP (High 1), which was prepared in consultation with the local planning authorities for Leicester and Leicestershire. Over provision of housing in North West Leicestershire will prejudice delivery of development on previously developed sites in the wider area, contrary to the NPPF, and has the potential to undermine the cities first approach advocated in Planning Practice Guidance. The residual housing requirement under this approach would be limited to 603 dwellings by 2039.

## 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

*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.*

On the basis that the approach to the overall housing requirement is not agreed, the residual requirement is also not agreed. This has a significant bearing on the approach to the distribution of housing growth, in particular options relating to new settlements.

Notwithstanding the above, comments are provided below on the various distribution options.

Under the High 1 scenario, options 4a to 9a all include a new settlement of between 350 to 600 dwellings as an element of the potential strategy. It is agreed that this level of development is insufficient to deliver the necessary infrastructure required for a new settlement and that these options should not be taken forward under this growth scenario.

The only options being considered under the High 1 scenario are therefore option 2a (600 dwellings at Coalville and 400 dwellings at Castle Donington and Ashby de la Zouch) or option 3a (500 dwellings at Coalville, 300 dwellings at Castle Donington and Ashby de la Zouch and 200 dwellings at local service centres).

Option 2a is dismissed on the basis that it would result in development being concentrated in a more limited number of settlements, because it would not provide flexibility or choice in the housing market and represents a potential risk in terms of deliverability and would provide fewer benefits from a housing perspective.

Option 3a is proposed to be taken forward by the Council as it provides a greater opportunity for growth in villages.

There is not a significant difference between Options 2a and 3a and therefore MSV do not wish to make comments on which of these options should be taken forward.

Under the High 2 scenario, the Council propose a new settlement of varying sizes in options 4b, 5b, 6b, 7b, 9b and 8, with option 8 requiring a new settlement of 5,100 dwellings.

Paragraph 4.24 of the Development Strategy Options and Policy Options consultation document refers to a site to the south of East Midlands Airport at Isley Walton being promoted as a potential new settlement in the Strategic Housing and Economic Land Availability Assessment (SHELAA) (Site IW1). It states that it is for this reason, that a new settlement has been considered as a potential option for meeting any residual housing requirement.

It is therefore assumed that references to a new settlement as a component of the various development scenarios, are to Site IW1. This is supported by the reference to a new settlement to the south west of the East Midlands Airport in the Sustainability Appraisal (see page 33).

MSV strongly objects to any option that includes a new settlement at Isley Walton given its proximity to Donington Park motor racing circuit, which is a significant contributor to the local economy. Any development that prejudices its future operation is likely to have a significant adverse impact on the local economy.

The National Planning Policy Framework makes it clear at paragraph 187 that planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and that they should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

In light of the above, it would be the responsibility of the promoters of the new settlement to ensure that adequate mitigation is incorporated into any scheme to address any issues emanating from the motor racing circuit, and indeed East Midlands Airport which operates 24 hours per day. This is likely to require a significant buffer between the motor racing circuit and any residential development.

The SHELAA considers the capacity of the site based on a gross to net development ratio of 50%, in accordance with the approach set out in the Joint Methodology Paper (February 2019) for the Leicester and Leicestershire Housing Market Area SHELAA. This paper makes it clear that the gross to net development ratio has been determined to allow for items such as roads, green infrastructure and sustainable drainage systems to be taken into account when identifying the developable land available on site. It does not take into account the need to provide employment floorspace, shops, schools and community facilities necessary to make the development sustainable.

As the split between employment and housing is not known, a range of housing capacities have been considered in the SHELAA ranging from 50% to 100%. Even at 100% housing the capacity of the site is only capable of accommodating 4,740 dwellings, which falls short of the 5,100 dwellings referred to in Option 8. This level of housing development would not allow for any of the community facilities or employment floorspace required to make the new settlement sustainable.

It is not therefore clear how the Sustainability Appraisal can conclude that there would be a significant positive effect for objective SA2 (access to health, education, employment and community services) which would require the provision of a new primary school, employment space and local centre, none of which have been allowed for in this development scenario. The suggestion that the degree of self-containment would be such as to conclude that there would be a significant positive effect under objectives SA3 (integrated approach to delivery of housing and community facilities) and SA8 (reduce the need to travel) is also not accepted.

Notwithstanding the above, the amount of land potentially available for residential development is likely to diminish further given that a significant part of the site would need to be kept free from residential development due to the potential for adverse effects given that the site is only 400m from the motor racing circuit at its closest point and less than 700m from the runway at East Midlands Airport.

The Sustainability Appraisal acknowledges the fact that the site is located close to both the circuit and the airport and that residents could be adversely affected by high levels of noise and air pollution. A significant negative effect should be recorded under objective SA9 which relates to noise and air pollution however, as it stands, assessment against this objective is recorded as being 'uncertain' on the basis that effects could be mitigated by design. It is highly improbable that design alone would be sufficient to mitigate any adverse effects. A significant buffer free of residential development would be required between the airport and circuit.

In order for the Sustainability Appraisal to have any value as a decision-making tool, it is essential that it makes clear what assumptions have been made on land uses. A significant part of the site would be unsuitable for residential development which will inevitably have an impact on the quantum of residential development that can be accommodated on site. As the amount of housing decreases so does the likelihood of sustaining the facilities and services essential to make a new settlement sustainable.

The Council acknowledge that a new settlement of 5,100 dwellings would not be capable of being delivered within the Plan period and therefore this option is dismissed from further consideration. This conclusion is supported.

Option 4b would require a new settlement of 3,060 dwellings alongside development of 2,040 dwellings at Coalville as a Principal Town. Notwithstanding the comments above which are equally applicable to this option, it is highly unlikely that a development of the scale proposed could be delivered by 2039. The Lichfields report referred to in paragraph 4.39 of the consultation document states that sites of over 2,000 dwellings take on average 8.4 years from validation of first planning application to first dwelling being completed. Bearing in mind that the Local Plan is not due for adoption until mid 2024 (based on a very optimistic Local Development Scheme which is already running behind schedule having only been published in January 2022), a planning application for a new settlement is unlikely to be approved until at least 2026, with the first dwelling not being completed until mid 2034 at the earliest. The Lichfields report notes that the average annual build rate for a scheme of 2,000+ dwellings is 161 dwellings. At this rate, a new settlement would only deliver 805 dwellings within the plan period. This option should therefore also be dismissed from further consideration.

The Council's preferred option is 7b – principal town (1,785 dwellings), new settlement (1,785 dwellings), key service centres (765 dwellings), local service centres (510 dwellings) and sustainable villages (255 dwellings).

A new settlement of only 1,785 dwellings is too small to support the key services and facilities to make it sustainable. It would be highly unlikely to even sustain a secondary school leading to unsustainable travel patterns and reliance on larger settlements. It is also questionable whether development of this scale would be capable of being delivered within the plan period.

The transport implications of a development at Isley Walton would also need to be considered given its relationship with East Midlands Airport. It is not clear how the site would be accessed given that the SHELAA notes that any new access onto the A453 which impacts its primary function is likely to be viewed unfavourably.

Other concerns raised in the SHELAA include flood risk on the western boundary of the site as well as the potential for impact on protected species and BAP habitat. All of these issues further constrain the amount of developable land.

As stated in the response to Q4, the residual housing requirement is lower than stated in the consultation document for the High 2 scenario. The dismissal of Options 2b and 3b (neither of which rely on a new settlement) on the basis of delivery within the plan period is therefore not accepted.

Should the Council proceed with the High 2 scenario, either Options 2b or 3b should be taken forward for further consideration.

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

X

No

## Declaration

I understand that all representations submitted will be considered in line with this consultation, and that my comments will be made publicly 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

Date

8<sup>th</sup> March 2022

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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](mailto:planning.policy@nwleicestershire.gov.uk).

Susan D Brompton



8<sup>TH</sup> March 2022

### 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] 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 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. 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 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

Susan D Brompton

North West Leicestershire  
Local Plan Review:  
Development Strategy and  
Policy Options  
Land off Abney Drive,  
Measham

Prepared by Fisher German LLP on behalf of  
David Wilson Homes East Midlands



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Land off Abney Drive, Measham

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# 01 Introduction

1.1 These representations have been prepared on behalf of David Wilson Homes East Midlands in respect of their land interests at Land off Abney Drive, Measham, as illustrated on Figure 1 below. David Wilson Homes are a respected national housebuilder who deliver high quality new residential development and who have a strong track record of delivery in the local area. The Company is proud to have been awarded the Home Builders Federation (HBF) 5 Star Home Builder status for twelve consecutive years. This accolade demonstrates the quality of both our client's product and service; awarded only to housebuilders who receive a higher than 90% recommendation by their customers.

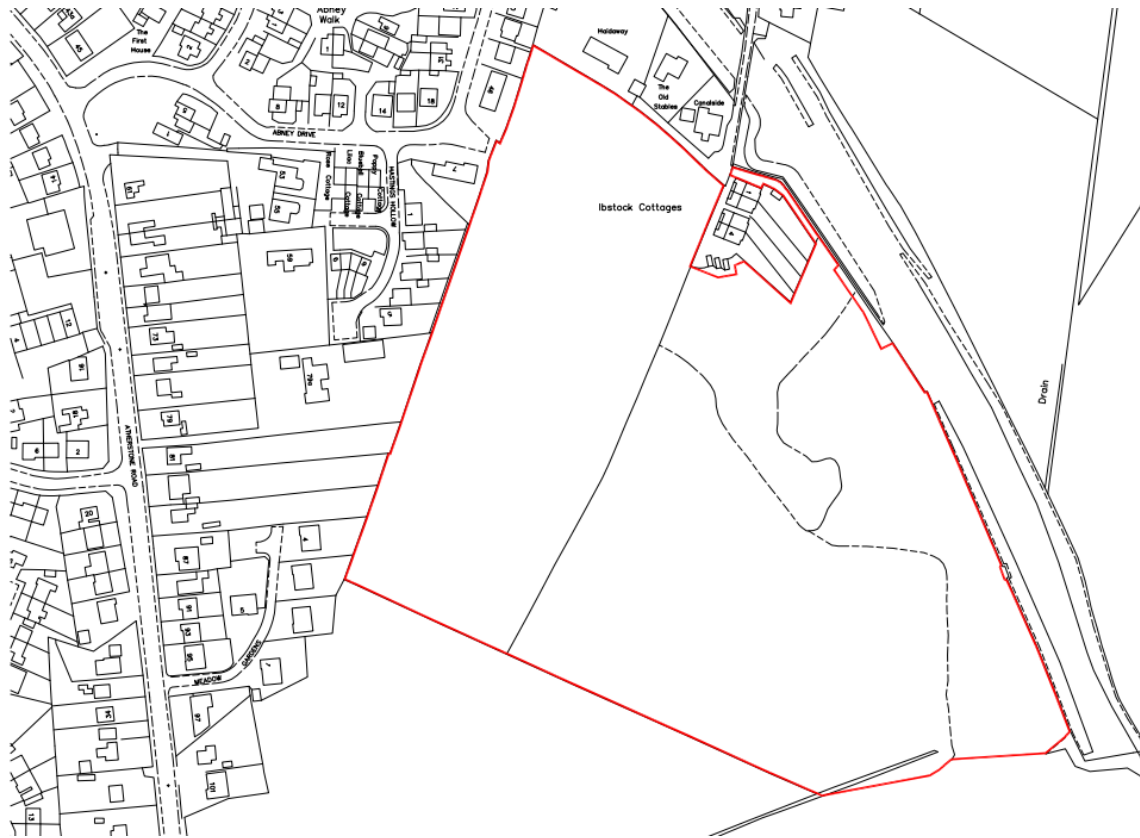


Figure 1: Site Location Plan

1.2 A full planning application (ref 18/01842/FULM) for the erection of 150 dwellings, including vehicular access, pedestrian links, public open space, car parking, landscaping, drainage and associated works was submitted in October 2018 in relation to the above land and at the time of writing remains undetermined. David Wilson Homes are committed to the timely delivery of this site and consider it can deliver in excess of the 150 dwellings originally sought, making a valuable sustainable contribution to



the emerging housing needs of North West Leicestershire.

- 1.3 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 David Wilson 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 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 Measham as a Local Service Centre in the third tier of the Spatial Hierarchy. Measham, with Kegworth and Ibstock are demonstrably some of the most sustainable settlements within North West Leicestershire, 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 these three settlements are clearly more sustainable than the Sustainable Villages and are very close to Ashby and Castle Donnington (the proposed Key Service Centres) in terms of overall sustainability.

- 2.5 Measham benefits from a 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. Measham benefits from good levels of existing public transport, providing regular access to larger centres such as Burton upon Trent and Ashby de la Zouch.
- 2.6 Measham is also located in very close proximity to Mercia Park, a strategic employment development off the A42/M42 at Junction 11, circa 2 miles southwest of Measham. Mercia Park when fully built out is expected to create approximately 3,000 new jobs. Measham is the second nearest sustainable settlement (behind Appleby Magna) and the nearest Service Centre to this strategically important employment development, and would be a logical home for the workers who are based there, given the close proximity and ease of access. This means it is likely to see increasing demand for new properties on the market, raising house prices if sufficient supply is not made available. It is vital therefore that Measham is recognised spatially as a settlement which will require growth to cater for this increased demand.

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.

- 2.7 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 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.
- 2.8 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).

- 2.9 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)
- 2.10 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.
- 2.11 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.
- 2.12 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.
- 2.13 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)

2.14 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*".

2.15 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.

2.16 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 the Leicestershire International Gateway 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.

- 2.17 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.
- 2.18 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.

- 2.19 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.
- 2.20 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.
- 2.21 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.

- 2.22 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.
- 2.23 In respect of Measham, a planning strategy which delivers no new positive allocations or only small numbers would not be justified or effective. It would not meet the established demographic need for Measham, nor would it deliver the necessary level of affordable housing. Moreover, it would fail to take advantage of Measham's spatial location close to Mercia Park.
- 2.24 Options 7b and 9b are broadly supported in that they offer some potential that Measham will be apportioned a commensurate level of growth relative to its spatial location and inherent sustainability. 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, particularly 9b which would deliver only 255 dwellings to the 3 service centres, equating to only 85 dwellings per settlement within the tier. This equates to only 4 dwellings per annum, clearly inappropriate for a sustainable and spatially important settlement such as Measham.
- 2.25 Through the consultation document the Council acknowledge the increases in demographic and affordable housing needs across the sustainable settlements (settlements above the Local Housing Needs Tier), 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.

- 2.26 North West Leicestershire's Local Housing Needs Assessment - Report 3 (June 2020) confirms that Measham has an annual net affordable need of 7 dwellings per annum. This equates to a net need up to 2039 of 126 dwellings. Notwithstanding the potential for an exception site, this will require allocations or sites delivering circa 420 dwellings, assuming 30% affordable housing.
- 2.27 North West Leicestershire's Local Housing Needs Assessment - Report 2 (June 2020) sets out that the housing need for Measham, based on demographic, policy-off need, is likely to be in the region of 368-488 dwellings up to 2039, comparable to that required to meet its affordable housing needs. However, these are based on demographic needs, 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 Measham is likely to be far in excess of that having regard for the proximity to Mercia Park. It is considered vital therefore that the Council ensure that Measham and other settlements in close proximity to strategic employment growth locations, respond positively to increased housing needs and this should be reflected either within the spatial distribution of housing.
- 2.28 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.

- 2.29 The risks associated with overreliance on strategic site delivery are well documented. Your attention is drawn 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.
- 2.30 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, including Measham.
- 2.31 We would object to any approach which would mean demographic and affordable housing needs for settlements such as Measham 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, 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?

- 2.32 David Wilson Homes maintain their objection 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. David Wilson Homes have confirmed that they build at pace and with set routes through sites and thus it is incredibly difficult to bring independent builders or other organisations onto an operational building site safely. 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.

2.33 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 unnecessarily 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 of 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.

2.34 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?

2.35 David Wilson Homes 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 such as David Wilson generally provide a mix of housing, including larger dwellings, and thus individuals are able to choose 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?

- 2.36 David Wilson Homes object 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.
- 2.37 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.

### Q9- Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?

- 2.38 David Wilson Homes do not object to the requirement that 5% of affordable housing should be delivered to M4(3) standards, subject to a recognition that the topography of some sites will mean this may not be possible to deliver.
- 2.39 David Wilson Homes however do object to the suggestion that this requirement should be applied to the market housing. This requirement has not been justified and there is no evidence to justify such a requirement. Such a requirement seems to be arbitrary and should not be pursued as part of the ongoing development of this Local Plan.

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

- 2.40 At this stage it is reasonable to say there are significant questions relating to the delivery of the Council's existing housing allocation within Measham. Whilst there is an existing reserve site, this does not deliver a suitable quantum of dwellings in isolation and thus we consider it is commensurate for the Council to deliver a new allocation in Measham and remove the existing allocation, which cannot continue as an allocation with such critical doubts relating to its deliverability. We consider in this regard that our client's land interests at Abney Drive (Figure 1) is in an optimal location to deliver this housing, for the reasons set out below.
- 2.41 It is noted that the Council's adopted Landscape evidence (Landscape Sensitivity Study Part 1) assesses the site as part of a larger parcel of land to east and north of Measham (06MEA-C). The assessment sets out that the landscape of the parcel is small to medium scale and irregular in pattern. Landform is flat across much of the parcel. Tranquillity is considered to be appreciable within wooded areas, but the parcel is affected by the A42 to the north of industry to the south. Areas of the parcel are acknowledged to have a weakened character. 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 few views within the parcel of a high scenic quality. There is no evidence that views are valued more than at local levels, beyond recreational users of Public Right of Ways. Most views are typically constrained by mature trees or hedgerows. Lower visual susceptibility results from contained views and a lack of intervisibility beyond the settlement edge. Due to these factors, the overall visual sensitivity is considered to be low. Whilst this confirms that the parcel as a whole is not overly sensitive to new residential development, the promoted site itself as shown in Figure 1 is considered to be even less sensitive, given its high level of enclosure with built development to the west and south, and mature vegetation to the east.
- 2.42 The promoted land has been assessed as part of the most recent SHELAA (2021), under reference M14. The SHELAA assessment for 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 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 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, it is generally considered poor for wildlife. Subject to

the retention of veteran trees and a suitable buffer to the railway/parkland and targeted further assessment and mitigation the site is considered acceptable. Finally, the eastern extent of the site is within a minerals control zone due to the presence of brick clay and as such the County Council will need to be consulted. Having regard for existing residential development in the vicinity of the site, it is not considered possible that clay excavation would be possible on site without unacceptable impacts on residential amenity. For this reason, it is not considered that the release of the site would sterilise mineral extraction to an unacceptable degree, given the minerals within the site are already considered to be sterilised.

- 2.43 In conclusion the SHELAA assessment considers the site as potentially suitable, subject to a redrawing of the limits to development. The site is acknowledged to be available, being promoted by a respected and experienced housebuilder and a short notice on the existing agricultural tenancy. There are no known viability issues and thus the site is considered potentially achievable.
- 2.44 We confirm that the site is being actively promoted by a respected housebuilder who consider the site to be available and achievable. As set out within these representations the site is subject to a planning application for 150 dwellings. The evidence which supports this application demonstrates that there are no insurmountable issues with the site's delivery and no reasons to withhold an allocation or permission.
- 2.45 Two ecological appraisals have been undertaken in respect of the site in support of the submitted planning application. These conclude that the ecological value of most of the site is limited due to its current arable use which results in limited habitat and species diversity. The higher value habitat, the trees and hedgerows are to be retained where possible as part of proposals. The evidence concludes that subject to mitigation measures, the site can be delivered. This is a conclusion broadly accepted by the County's ecologist. The only outstanding issue in terms of ecology is the removal of one tree, however this issue will not preclude the delivery of the site and is something which can be easily remedied through the site's layout and design. The site is otherwise considered to be acceptable for allocation in ecological terms.
- 2.46 In respect of impacts on historic assets, the site is not considered to have an undue impact on any designated asset. The site is acknowledged to have some archaeological potential, but as confirmed by the County Archaeologist's response to the current application, subject to the provision of suitable conditions, this should not preclude development.

- 2.47 The site is not at significant flood risk and development can be made acceptable through usual on site mitigation measures such as SuDS. The submitted application is supported by an FRA and Drainage Strategy. 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.
- 2.48 In terms of access, access to the proposed allocation is proposed to be delivered through an extension of Abney Drive. Abney Drive currently serves 98 dwellings, which means that there is residual capacity to provide for the proposed dwellings, with remaining capacity as per the Leicestershire Highway Design Guidance which enables the delivery of up to 400 dwellings of a single point of access. The principle of this access was confirmed by the Local Highways Authority as part of the submitted application. The Authority confirmed that the characteristics of Abney Drive means it can safely accommodate the number of dwellings proposed.
- 2.49 The site is located centrally to Measham, with a 2km walking catchment covering the whole of Measham, including existing employment development to the north and south. Most key services and facilities however are located closer than this. Measham High Street which contains a number of services and facilities, and Measham Primary School, are both located within 800m of the site.
- 2.50 There are a number of bus stops located within 650m walk from the site, providing convenient access to the larger centres of Burton upon Trent and Ashby-de-la-Zouch.
- 2.51 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 and the residual cumulative impacts would not be severe. The development therefore can be delivered in accordance with national policy requirements.
- 2.52 The submitted application was supported by a Phase 1 and 2 Ground Investigation and a Coal Assessment. These studies demonstrate that the site is at low risk for geotechnical hazards, risks associated with historic mining and other associated issues. These demonstrate that the site is not at undue risk and fully acceptable for the residential uses sought.
- 2.53 The submitted application is supported by a planning layout, however as already set out due to changes in the housing market in the years since submission, a new housing mix is now promoted which reduces

the number of more space intensive larger dwellings to enable more dwellings to be delivered on site, with up to 199 dwellings now considered to be deliverable. This is considered to be entirely commensurate to the spatial role of Measham and should be positively allocated irrespective as to the outcome of the existing allocations. Conversations have already taken place with the Council's Development Management Officers to update the current application to reflect these changes. Having regard for the inherent acceptability of the site, forming a highly logical development parcel, we consider this application should reasonably be approved ahead of Local Plan examination, providing certainty to the Examiner as to North West Leicestershire's ability to demonstrate both a five-year housing land supply and the ability to deliver the higher housing figure of **High 2** in full.

- 2.54 There remains an extant objection to the submitted scheme from Natural England due to them considering that the scheme would have unacceptable impacts on the River Mease Special Area of Conservation. David Wilson Homes submitted a response to this objection in February 2019 setting out that DCS2 enables the development of the Council's primary allocation in Measham (H2a).. This means that there is capacity within the existing Developer Contribution Scheme (DCS2) given that H2a is currently sterilised by the safeguarded route of HS2. It is not considered justified or effective to withhold development indefinitely awaiting the delivery of HS2 and thus it would be logical to allocate suitable sites which are currently available for development free from this constraint, such as the land at Abney Drive. The current primary allocation could move to a reserve site and be released for development in the event it is not sterilised by HS2. In any event we understand that North West Leicestershire District Council are seeking to deliver a new Developer Contribution Scheme (DCS3) in order to provide additional capacity, prior to the delivery of a more permanent solution of pumping waste out of catchment. As such, there is no basis for withholding an allocation as development can reasonably be brought forward now through DCS2 as set out above, or in the near future through DCS3 or eventually through the pumping of waste out of catchment.



Figure 2: Emerging Masterplan

2.55 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.



## North West Leicestershire Local Plan Review

### Development Strategy and Policy Options – Regulation 18 Consultation Response

#### Willesley Environment Protection Association (WEPA)

No.	Question	Yes, No, Option, C'ment	Notes
1	Do you agree with these Local Plan Review Objectives? If not, why not?	See Notes	It is considered that Objective 6 places too much emphasis on and therefore resources being allocated to Coalville. Whilst it is accepted that Coalville does need some regeneration, this should not be to the significant and disproportionate disadvantage of other settlements in the District, and Ashby de la Zouch in particular. Once the 'jewel in the crown' in the district, lying at the very 'Heart of the National Forest', rated as one of the country's best places to live, but now seriously suffering as a result of very substantial residential growth, but without the necessary improvements to infrastructure and services.
2	Do you agree with the proposed settlement hierarchy? If not, why not?	Yes	<p>One has to question why the whole of Coalville Urban Area which comprises of Coalville, as well as Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone and Whitwick as well as the Bardon employment area, is all considered as a 'Principal Town'. It is considered that it would have been more appropriate to regard some of the surrounding areas, such as Donington-le-Heath, Hugglescote, Snibston, Thringstone and Whitwick as separate settlements. Particularly in the case of Whitwick.</p> <p>Policy En5 – Areas of Separation states:            (1) Land between Coalville and Whitwick, as identified on the Policies Map, is designated as an Area of Separation where only agricultural, forestry, nature conservation, leisure and sport and recreation uses will be allowed. Any other proposed uses will need to demonstrate why they cannot be accommodated elsewhere within the district.            (2) Development will not be permitted which, either individually or cumulatively, would demonstrably adversely affect or diminish the present open and undeveloped character of the area.</p> <p>In so doing this could artificially inflate the needs of Coalville and the amount of funding allocated to it in comparison to other needs throughout the District, including Ashby.</p>

3	Do you agree with the approach to Local Housing Needs Villages? If not, why not?	Yes	
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.	No	<p>It is considered that the High 1 scenario of 512 dwellings per annum is a realistic figure to include in the Local Plan. It significantly exceeds the Standard Method calculation, meets the strategic Growth Strategy and provides a good allowance to meet the Leicester Unmet Need. North West Leics District should not be expected to meet this level of need, of which a greater proportion should be met by those districts close to the City boundary. the NPPF states that “current and future demographic trends and market signals” only need to be taken into account in “exceptional circumstances”. Such exceptional circumstances have not been demonstrated and are not considered to exist.</p> <p>NWL District contains a significant proportion of its area lying within the special areas of the National Forest and Charnwood Forest, which must be taken into account when considering the level of development that can be accommodated without seriously compromising the Council’s vital proposed objective 9 - Conserve and enhance 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.</p>
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.	No	<p>Option 8 is considered the best option in planning terms. The Principal Town and Key Service Centres already have large allocations of housing in the current Local Plan. This would get developers to get on with building these existing allocations first before moving onto development on other sites, including the new settlement later. A new settlement would stop excessive population increase in Ashby without the ability and funding being allocated to provide the necessary supporting facilities including leisure, healthcare, car parking etc.</p>
6	Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?	No	<p>It is believed that most requests for self-build and custom housebuilding will arise from individuals that own land and wish to build there – not as part of a larger development or on land specifically allocated for this purpose.</p>

7	Do you agree with the proposed policy on Space Standards? If not, why not?	Yes	
8	Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?	Yes	
9	Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?	Yes	
10	Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?	Option 3	This is considered the best option as it allows for monitoring of needs and supply and review at 5 yearly intervals. The need for office space is uncertain at present with the likelihood of more home working in the future.
11	Which general employment land strategy option do you prefer? Is there a different option which should be considered?	NA	Based on the adoption of option 3 in Q10, if and when land for employment becomes necessary then it is considered that this should be co-located with new and existing residential properties to reduce the need for people to travel, in the interests of minimising people's cost of living and the effects of travel on climate change, in line with the proposed Local Plan objectives 1, 4, 5, 7, and 11.
12	Do you agree with the initial policy option for strategic warehousing? If not, why not?	No	This option of meeting 50% of the outstanding road-served requirement for the whole of Leicestershire and Leicester City is far too much. The study shows the extent of this type of development which is already built or permitted. We have already seen large amounts of such development such as at the Jaguar/Land rover site near Appleby, which is remote from where people live and good public transport connections, requiring non-sustainable means of travel for warehouse workers. Other Districts also have good Motorway and Primary Road network connections and must take more of this requirement.
13	Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?	Option 1.	Existing Policy EC2(2) is wide open to not preventing such development throughout the District, including in areas of open countryside. Otherwise, the second-best option 8 must be adopted. The comments made in relation to questions 11 and 12 are relevant in respect of reducing the need for people to travel, in the interests of minimising people's cost of living and the effects of travel on climate change, in line with the proposed Local Plan objectives 1, 4, 5, 7, and 11.

14	Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?	Option 1	This allows for allocated sites which are best located in terms of accessibility and need. There are advantages in co-locating start-up businesses on a site which can then have the necessary quality of infrastructure and support services, rather than individual businesses setting up on individual sites, with poor conditions and potentially creating nuisance to neighbouring properties and land. Also, poor access, resulting in damage to unsuitable minor access roads being used by large commercial vehicles.
15	Which policy option for local employment do you prefer? Is there a different option which should be considered?	Option 2	Option 1 is not a requirement and therefore unenforceable.
16	Do you agree with the proposed health and wellbeing policy? If not, why not?	Yes	
17	Do you agree with the proposed Health Impact Assessment policy? If not, why not?	No	Option 3 is realistic. However, the suggested policy wording requires further consideration as to whether there is a case for a reduction in the scale of residential and non-residential development proposals to a lower size level than proposed.
18	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	
19	Do you agree with the proposed renewable energy policy? If not, why not?	No	<p>Option 3 is preferred.</p> <p>A higher target should be set for the period up to 2039 to allow for slippage in achieving the Government's net zero target by 2050. This can be reviewed in due course in the light of worldwide agreements on targets relating to climate change and the possibility of affordable and achievable alternative non-renewable nuclear fission and small-scale fusion energy generation.</p> <p>There should be included in the policy or elsewhere in the Local Plan the ability to prevent the installation of wind and solar energy generation equipment in the most valuable locations in terms of landscape character and value unless it can be introduced without having a serious impact by siting, screening or other acceptable means.</p>

			The same applies to land of good agricultural value. This should not be used for large-scale solar energy generation at the expense of growing food crops, which is now of increasing importance in the light of climate change and international influences on future food supplies.
20	Do you agree with the preferred policy approach for energy efficiency? If not, why not?	Yes	There should be a greater emphasis on incorporation of renewable energy generation and better standards of insulation etc. in new developments. This needs to be achieved with clear and enforceable policies.
21	Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?	Yes	
22	Do you agree with the preferred policy approach for overheating? If not, why not?	Yes	
23	Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?	No	It is considered that option 2 should be adopted. This is an important issue and it is considered that all developments should demonstrate that they are addressing climate change and meeting BREEAM/HQM requirements.
24	Do you agree with the proposed policy for reducing carbon emissions? If not, why not?	Yes	
25	Do you agree with the proposed policy for water efficiency standards? If not, why not?	Yes	
26	What additional comments do you have about the Local Plan Review not covered by the preceding questions?		This is a very important issue for all the present and future residents of NWL District in terms of its effect on their lives. A 2-week consultation extension isn't enough, and the consultation needs to be given greater publicity and the responses from individuals and local parish and town councils and other groups taken fully into account in any decision making by the District Council's officers and members. One can become very cynical that the consultation process is merely going through the legislative requirement of this and it is vital that the Planning Authority demonstrates that this is not the case with North West Leicestershire District Council.



## Local Plan Review. Consultation Response

Peter Miller



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. Diseworth is set in a Valley with a brook through the centre. With overflow from the holding tanks at the airport being regularly released into it, the brook can take no more capacity of water.
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. The few fields we have left are rich farmland and act as a small buffer around our historic conservation status village of ancient thatched cottages and more modern housing. We are surrounded by busy roads and the airport. You want to put 40

foot high warehouses right up to our houses. The noise, light and lorry fume pollution will make our lives hell.

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, 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.

I am devastated by these proposals. My heart aches for the displaced wildlife, ancient hedgerows, ridge and furrow fields and the historic "green lanes" that are going to disappear under concrete and warehousing fueled by your short sighted need to import so much from abroad. How is this sustainable? How is this Green? You are blowing up global warming, this planet won't survive much longer with this indiscriminate destruction of the fields that are needed to feed us.

The light pollution and destruction of a quiet village environment would be huge.

Yours Faithfully,

Peter Miller