

Mr B J Canty

[REDACTED]
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13th March 2022

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

Dear Sirs,

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] 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 will 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 problems. The creation of 100 hectares of concrete on EMP90, on a downslope to Diseworth will be catastrophic.
- 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,

Mr B J Canty

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response [SHELAA 2021. IW1] & [SHELAA 2021. EMP90]
Date: 13 March 2022 19:05:18

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

Local Plan Review. Consultation Response

Name David Hawtin

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 well-being. Both proposals fail this test. An extra 5000+ cars due to the proposed housing development plus the extra lorries and commercial traffic generated by the proposed industrial development will cause a massive deterioration in air quality. The extra noise created from the extra traffic will also affect the health and well-being of the local population. These affects would not just be felt in Diseworth but also spread to surrounding villages & towns.

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. In local context the local plan allows for building only of in-fill within the bounds of the village of Diseworth. Neither of these proposals are in-fill, they are expansion on an unacceptable and damaging scale to the local environment and to the health and well-being of local residents.

3. Objective 4. Reduce the need to travel. IW1 will fail this test. Both travel and car use will be increased as will increased commercial traffic. With 4700 new homes this will put a further 5640 cars on local roads that are already heavily congested at peak times, based on an average of 1.2 cars per household. It's difficult to calculate the increase in heavy goods vehicles and other commercial traffic without knowing how many businesses would be based at proposed new site.

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. 4700 new homes are going to remove a further 780 acres of green belt land, which will become hard surface, and would lead to a huge increase in the volume of water passing through the local village brook, as the planned site is a huge contributor to the local water system and also a huge area that soaks up water. The proposed site for the industrial buildings will also be hard covered removing both valuable soak up land and any run off water will flow directly through the village.

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. Diseworth's rural heritage will be decimated. There are still a number of farmers who operate locally and work the land to provide both meat and vegetables. Why is greenfield land being targeted rather than using brownfield sites.

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. The complete opposite will be achieved with the destruction of the local environment.

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. There will be no countryside left on 3 sides of the village, completely destroying both its character and beauty.

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. The destruction of over 780 acres of green belt land can never be deemed sustainable.

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 from the proposed new housing by 75 metres, and the industrial park will come right up to the houses at the edge of the village.

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. This plan creates a new town the size of Kegworth on green belt farmland.

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: David Hawtin

A solid black rectangular redaction box covering the signature area.

Local Plan Review. Consultation Response

Name Stephen Smith

Address [REDACTED]

Dear Sirs,

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

Mr S Smith

Local Plan Review. Consultation Response

Name Jamis Smith

Address [REDACTED]

Dear Sirs,

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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.

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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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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

Mr J Smith

Local Plan Review. Consultation Response

Name Carla Smith

Address [REDACTED]

Dear Sirs,

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

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Mrs C Smith

Local Plan Review. Consultation Response

Name Chloe Smith

Address [REDACTED]

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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].

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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 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. **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.

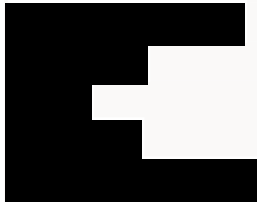
18. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers who clearly have no real knowledge 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

Ms C Smith

From. Jim Snee.



13TH March 2022

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

Dear Sirs,

Local Plan Review. Consultation Response

My response to the Local Plan [LP] is primarily concerned with the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021.Appendix 1 IW1] and the potential industrial development of land south of the A453 and bordering the Conservation village of Diseworth [SHELAA 2021. Appendix 2. EMP90].

My objections are based on the fact that both these development proposals significantly compromise NWLDC Local Plan [LP] guidance and regulations, as they presently stand, and are also not compliant with NPPF requirements.

My comments also take account of the fact that the EMP90 land site was, a mere 14 days before the consultation closing date - 14th March 2022 - announced as being 'Designated'. One wonders if it was only coincidence that this announcement was made the day after the original closing date of the LP consultation process.

It is unacceptable that planning guidance should be manipulated to meet the needs of the potential development. Rather, the development should be modified to fit the planning requirements or abandoned. This becomes even more significant when pressure has been applied by Central Government in the form of 'Designation' of one of the sites discussed.

- 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 of open countryside and farmland. The sites are also outside the Limits of Development of Diseworth. Both are at variance with Planning Policy S3 in this

regard

- 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 5.25 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 that it can be made so without huge cost to the local environment, wholesale change to local infrastructure and without considerable ongoing CO2 pollution. Wherein lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside etc? All at variance with the principles of both the Local Plan and the NPPF.

In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *"The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy"*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is also 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 which forms the core of the rural setting in which Diseworth sits. Most residents have moved to the village because of this rural setting and the access afforded to open and unspoiled countryside. We have, until now, had no real fear that this countryside would be despoiled, not least because Diseworth, is a designated 'Conservation Village - with all that this implies and the land in question is designated countryside. 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 before, and MOTO before that - what comes next [after HS2, of course]?

- 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 Appendix 1 [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. This is a caricature of blind greed and Treasury expediency and an exemplary example of the Westminster bubble's ignorance of rural Britain. NWLDC will be well advised to resist such blatant greed and expediency.

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 shortfall of demand for housing in Leicester. It is therefore illogical to build these houses 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 40 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 town will therefore become primarily a dormitory conurbation, 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.

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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 has never been 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, aided and abetted by the blind ignorance of central government of the rural environment in pursuing their otherwise legitimate 'levelling up' policies, without first exercising due diligence.

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 [Appendix 1 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 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. It is the stuff of the Mad Hatters Tea Party.

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 and 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.

Further, this development will contravene the Aerodrome (Noise Restrictions) (Rules and Procedures) Regulations, 2003 which require that the number of people affected by aircraft noise be reduced, not increased.

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 the countless diesel engines of many pantechinons and the piercing sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. This will be the new aural inheritance for Diseworth, rendering the sound of birdsong 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, with a further 4.7k houses will produce circa an additional 16k car movements per day. 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. To make it so the A453 would need to be 'duelled' and other local roads would need to be upgraded. This is not progress, it is desecration of our rural heritage.

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 reasonably be 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 countryside already 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 of loss of agricultural land, rural amenities and future 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, as is the Lidl site. 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 either of these schemes would signal a failure of the LP - from the first sentence of the document - its own definition of Planning – and onward.

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 IW1 site 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. It is an example of social engineering at its worst.

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. Policy Ec2.[2] [Page 64].

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"*.

Unemployment in the 'EMAGIC' area is running at 3% [Clare Smart, EMA, 4TH March 2022]. There is absolutely no imperative to provide employment land to satisfy any 'immediate need'.

Policy Ec2.[2] further states that an employment site should not be *"...detrimental to the amenities of...nearby residential properties and the wider environment"*

There is no question other than that the site, self-evidently, would be exceedingly detrimental to nearby properties, etc. – vis. Diseworth.

Again, we arrive at a stumbling block that would require the rules to be changed to fit the project. Another ruse in this dystopian quagmire of deceit and sleaze.

This project is merely a glint in the eyes of the landowners, the developers and the Treasury.

18. Summary.

These proposals are both ill conceived schemes, in the wrong place, are on an unprecedented scale and neither would be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative developer/developers in league with a misguided Treasury. Clearly, none of these protagonists have any real knowledge - or interest- in the locality. They exist only because no regard is given to the consequence of their proposals on either the local communities or on the environment.

More importantly, 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 in place. Additionally, the LHA Guidance Policy is compromised.

It seems that there is a clear attempt in play here, to manipulate the Local Plan to suit the whims of others at the expense of the best interests of both local people, North West Leicester countryside and the future of our children and grandchildren.

19. Conclusion and Planning Integrity.

In order for either of these proposals to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives and to ignore significant elements of the NPPF. This would be neither a principled, nor a sustainable position. Further, it would render any future Local Plan valueless. Changing the rules to suit the poacher is not an acceptable practice.

Recommendations.

The Revised Local Plan should take account of, and mitigates against, the effects of cumulative development in any one area.

NWLDC follows its own planning principles and those of NPPF and resists efforts to change the rules to suit the proposal.

NWLDC Planning Dept. does not let itself be bullied and bulldozed by inappropriate dictate from Central Government [Designation].

The Isley Walton [IW1] proposal be rejected – if submitted for planning approval.

The Diseworth/Long Whetton [EMP90] proposal be rejected – if submitted for planning.

Yours Faithfully

Jim Snee

C.C. Andrew Bridgen Esq. M.P.

Nick Rushton Esq. L.C.C.

Local Plan Review. Consultation Response

Name Amy Millward

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,

A.Millward

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Isley Walton and Diseworth Building Proposals
Date: 13 March 2022 19:47:22

Dear Sirs,

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

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

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

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

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

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

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

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

9. Noise. Page 18 of the Local Plan [Pollution] states that new developments should not

be affected by noise. IW1 fails this test comprehensively. It is immediately adjacent to both Donington Circuit and the EMA take-off and landing flight paths. By definition it is noisy. EMP90 will generate unacceptable noise within Diseworth. Both will produce immeasurable additional traffic exhaust and noise pollution.

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

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

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,

Josh Bunyan

The Detailed Template Letter:-

Local Plan Review. Consultation Response

Name Georgia Elizabeth Ann Hughes

Address [REDACTED]

Dear Sirs,

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

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

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

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

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

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

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

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

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

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

7. LP. 4.6. Objective 9 - "*New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of*

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

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

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

10. LP Page 18. [Pollution]. This states that:- "*..new development is not itself detrimentally affected by noise.*". Anyone purchasing a property on the IW1 site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the

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

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

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

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

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

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

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

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

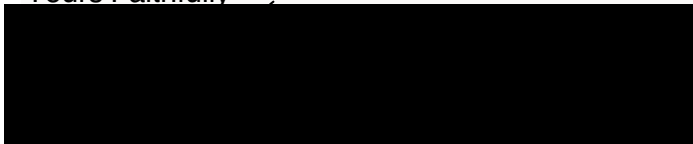
17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies “...*an immediate need for additional employment land*”. It is merely a glint in the eyes of the landowners and the developers.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

of...nearby residential properties and the wider environment” –vis. Diseworth.

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

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

Yours Faithfully



The Detailed Template Letter:-

Local Plan Review. Consultation Response

Name Jane Elizabeth Hughes

Address [REDACTED],

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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].

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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?

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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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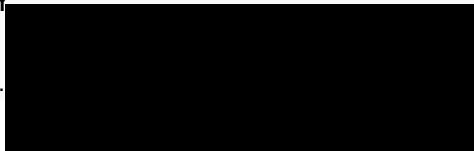
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of...nearby residential properties and the wider environment” –vis. Diseworth.

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.

Y



The Detailed Template Letter:-

Local Plan Review. Consultation Response

Name Peter Hughes

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].

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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?

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Yours Faithfully



From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response
Date: 13 March 2022 20:03:25

Local Plan Review. Consultation Response

Name Joe Goy

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,

Joe Goy

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response
Date: 13 March 2022 20:22:00

From :

Mr JH and Mrs DJ Martin



Dear Sirs,

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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,

Signed John H Martin

D Jane Martin

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Fw: Local plan Consultation Response for development of land around Diseworth and Isley Walton
Date: 13 March 2022 20:32:11

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 very clearly illustrated in the specific points below.

However, from a broader perspective I find myself increasingly frustrated that as a country focused on a 'Net Zero' goal through delivering the outputs of the high profile COP26 conference, it is deemed acceptable to once again destroy open countryside. These proposals will destroy fields, hedgerows, wildlife and in their place drive pollution (noise, air and light) and likely contribute to the growing flooding issues previous developments have caused for Diseworth.

There is copious Brownfield land in and around the local cities to deliver ample housing for individuals and families who would surely prefer to live close or amidst the facilities that a city can provide. In addition, given the reducing role of the traditional high street, city centres are ripe for redevelopment.

With reference to the potential industrial development, in the immediate area to this development we have 'full' employment. Why then is it appropriate to create employment distanced from any potential workforce? This will result in additional commuter miles or green field developments (see my comments above). Is it more environmentally friendly to have thousands of commuter miles or to locate the work near to the available workforce and find environmentally friendly ways to move any product produced or stored?

I appreciate the economic implications of my points above for any developer, however, the environment should surely take priority over costs to develop and costs to operate? It is up to the government and local councils to do the right thing not the cheapest.

My specific objections based on the objectives of the local plan are as follows:-

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, 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 and the prospect of increasing flooding in Diseworth due to these 2 developments are having a major impact on my mental health.

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. 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 opportunistic landowner/owners and 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

Alison Millard





Historic England

Sir/Madam
North West Leicestershire District Council
Planning Policy, Council Offices
Whitwick Road
Coalville
Leicestershire
LE67 3FJ

Direct Dial: [REDACTED]

Our ref: PL00762423

13 March 2022

Dear Sir/Madam ,

NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW: DEVELOPMENT STRATEGY AND POLICY OPTIONS 2022 and associated INTERIM SUSTAINABILITY APPRAISAL

Historic England welcomes the opportunity to respond to this consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process.

We note that the current consultation, and associated Sustainability Appraisal (SA), addresses some of the Local Plan review issues and that there will be separate consultations on other policy matters, including the historic environment, in due course.

We have responded to questions 1, 5, 11, 16, 17, 19, 21, 22, 23, and 24 as set out below, and have also provided a general comment on the interim SA in relation to SA objectives 13 and 15.

Development Strategy and Policy Options

Q1: Local Plan Review Objectives - Historic England agrees with the objectives set out but would recommend that Objective 8 includes reference to setting in order that NPPF requirements for the historic environment can be addressed. We suggest wording is revised to read 'Conserve or enhance the district's built, cultural, industrial and rural heritage and heritage assets *and their setting*'.

Q5: Distribution of housing growth - The conclusions are set out clearly. We would wish to highlight the need to consider the historic environment in due course as potential site allocations are assessed and recommend that the five assessment steps set out in HEAN 3 are followed as part of that work:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>



THE FOUNDRY 82 GRANVILLE STREET BIRMINGHAM B1 2LH

Telephone 0121 625 6888
HistoricEngland.org.uk





We note that a new settlement option is ruled out at present. You may be aware that the Bassetlaw Local Plan is including a new settlement in its plan review where part of the housing delivery is included in the draft Plan with the remainder extending life of the Plan, and may be a model to look at should there be a need to revisit a new settlement option as part of the NWLDC Local Plan review.

Q11: Employment land strategy option - We would wish to highlight the need to consider the historic environment in due course as potential site allocations are assessed and recommend that the five assessment steps set out in HEAN 3 are followed as part of that work:

<https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Q16: Health and well-being policy - Historic England agrees with the policy approach. The wider Plan SA should highlight links between the historic environment/cultural heritage and well-being opportunities. The policy approach also aligns with the work set out in the Council's draft Green and Blue Infrastructure Strategy where links between natural and historic environments exist, and from which potential opportunities for enhancement can be identified to assist with place making and well-being.

Q17: Health Impact Assessment - query typo - At Table 8.19, Option 1 should the text read EIA rather than SEA?

Q19: Renewable Energy Policy - We note that the policy criterion includes reference to heritage assets and setting and this is welcomed.

Q21: Lifecycle carbon assessment - We agree with the policy approach and welcome the opportunity the review gives to consider how repurposing existing built fabric (designated or non-designated heritage assets) can assist with considerations about embodied carbon.

Q22: Overheating - We agree with the policy approach to consideration of overheating. Without consideration of this issue at an early stage in the planning process there is the risk that future maladaptation of new build schemes, to reduce any increase in heating that may occur, could affect the setting of heritage assets in a way that was not taken into account at application stage.

Q23: Climate change assessment - We agree with the policy approach for climate change assessment of development. Without consideration of this issue at an early stage in the planning process there is the risk that future maladaptation of new build schemes, to reduce any increase in heating that may occur, could affect the setting of heritage assets in a way that was not taken into account at application stage.





Q24: Reducing carbon emissions - We agree with the proposed policy for reducing carbon emissions. We note that the carbon offset fund is still under consideration at this time.

Development Strategy and Policy Options Interim SA

Historic England has particularly considered SAO13 (Landscape and townscape character) and SAO15 (Built and historic heritage). We note that, other than Option 1 for SAO13, the outcomes of the development strategy and options are largely negative for SAO13, and all uncertain for SAO15.

This is to be expected at this early point of the Plan review but we would expect sufficient assessment work to be undertaken as the Plan progresses to move away from 'uncertainty' in respect of the historic environment. HEAN8 may be of use to you at this time:

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

We hope that this information is of use to you at this time. Please do not hesitate to contact me should you have any queries. We look forward to working with you in due course as the Plan progresses.

Yours sincerely,

Rosamund Worrall

Rosamund Worrall
Team Leader (Development Advice)



Local Plan Review. Consultation Response

Name Ellie Bunyan

Address [REDACTED]

Dear Sirs,

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

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

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

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

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

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

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

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through Diseworth and Long Whatton. This watercourse now also carries much of the surface water from East Midlands Airport. History shows that this water course is already not properly managed. Further development will only make the situation worse. Likewise EMP90, which will confiscate 100 hectares of natural draining land and turn it entirely over to concrete and solid roofing. Any thoughts of discharging the fast run-off of surface water thus created, into the existing watercourses serving Diseworth/Long Whatton will badly fail.

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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. SHELA 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

Ellie Bunyan

Local Plan Review. Consultation Response

Name Ellie Bunyan

Address [REDACTED]

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As a 24-year-old who has lived in the village all my life and have recently bought my own home in the village last year, it is extremely alarming to hear the closing in of all of the industrial buildings that already have taken to much of our countryside. We are a small village, filled with adventurous outdoor minded people. That is part of the reason people move here and why they love it so much – the open space, the views and nature.

Building the industrial development is a huge concern and completely changes the dynamic of the village and everything it has to offer. You are taking away the majority of the fields that people walk, cycle and explore. Horse riders and dog walkers are also keen users of this space to stay away from the road where many accidents can happen. You are pushing all of these activities back onto the roads as this will be peoples only option, massively increasing the risk of accidents. Having grown up opposite Hyams Lane with our stables located on there, we see people using the lanes all day everyday with animals and children socialising and enjoying the fresh air and nature.

You may not be concerned at all, and to you all it is a business opportunity, but please consider the families you are directly affecting by doing this. There are many spaces away from rural villages that you are able to build. I really hope you reconsider the plans and listen to all of the villagers you are harming by doing this.

It will no longer be the Diseworth many people long to live in anymore.

Yours Faithfully

Ellie Bunyan

Local Plan Review. Consultation Response

Name Joshua Lawrence

Address [REDACTED]

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

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- *"What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations."* As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a

hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

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

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

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

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

18. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an

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

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

Joshua Lawrence

Local Plan Review. Consultation Response

Name Joshua Lawrence

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].

As I have recently bought a house in the village, completely unaware of the plans of the possible industrial estate being built, I am deeply disappointed with your transparency. This construction will massively affect the value of our house, as the countryside and peacefulness that people move to Diseworth for is slowly being taken away from us.

We use the lanes and fields daily to get out, get fresh air and enjoy the countryside without vehicles to worry about. It is a place for people to go and clear their head. You are taking this away from not only myself, but many other families in the village.

I really hope you reconsider this plan and listen to the people directly affected. You are making a decision on something that does not affect yourself or your family. Imagine if this was happening where you live, where you want to walk your dog, walk with your family and friends or even just walk yourself.

Yours Faithfully

Joshua Lawrence



10 March 2022

Dear Sirs,

Response to Consultation on Diseworth Industrial and Housing Plans

The points that I wish to be considered are:

A. PLANNING PROCESS

The process is being followed simply to give legitimacy to decisions which have already been made and is therefore subject to challenge. The consultation document is apparently deliberately inaccessible to ordinary people who have a legitimate right to participate in the process.

On 14 February 2022, a planning officer at NWLDC said publicly that a planning application was anticipated by the end of the year in relation to the Isley Walton/housing land, Part has already been transferred to the prospective developers. It is inconceivable that developers would make such an investment without the assurance that the development would go ahead. This suggests to me that subterfuge and dishonesty may well be involved. Indeed, evidence suggests that this covert approach has been used throughout this process, denying robust objections that have now been registered by the local population.

B. THE PROPOSALS FOR HOUSING

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 of open countryside and farmland. The site is also outside the Limits of Development and is in designated countryside so is at variance with the National Planning Policy Framework [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)"*. 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 glaring 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 is not good for health and wellbeing. Much of the demography of Diseworth is older, an age group that will suffer disproportionately from

pollution, excessive traffic and the loss of green space on their doorstep. In addition, the plans give scant regard to mental health, an area that has been starkly highlighted over the past two years and which is disregarded at massive cost to individuals, communities and the NHS.

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 grave 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 other 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. There is no evidence to suggest that they wish or would wish to relocate. Additionally the policy requires that travel should be reduced. This new village will become primarily yet another ecologically damaging dormitory town, thus increasing, rather than reducing, travel.

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 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 Domesday entry. This aspect of the environment can never be replaced once it has been destroyed, no matter how appealing and financially tempting to some, new generic development may seem.

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 development 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. Houses may be double glazed and insulated. This is not the case for gardens. The impact on quality

of life would be massive. Further, Breedon quarry lies close to the western edge of the proposed site and residents will be subjected to the sounding of regular [loud] warning sirens - shortly followed by the loud explosion of quarry blasting possibly 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 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, where there are flourishing primary schools. 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. 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.

Yours faithfully,

Julia A. Matthew

The Short Template Letter:-

Local Plan Review. Consultation Response

Name Julie Doyle

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,

Julie Doyle

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: NWLDC LOCAL PLAN REVIEW - DISEWORTH RESIDENT'S FEEDBACK
Date: 13 March 2022 21:12:56
Attachments: [B28ACDAD5CC04489A111E82A3F750CB9.jpg](#)

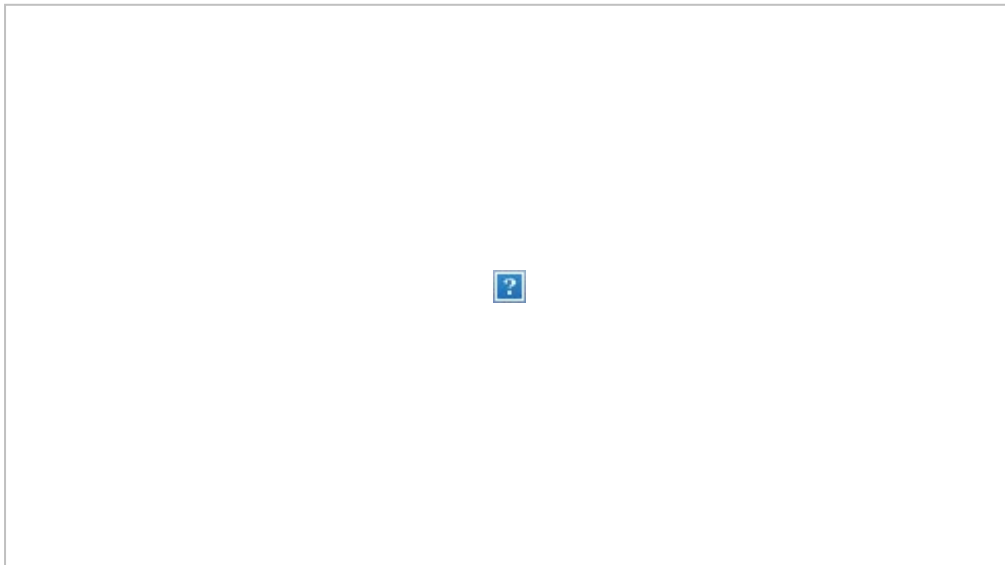
Dear NWLDC Planning Policy Team,

As a Diseworth resident of the Parish of Long Whatton & Diseworth since 1987, I have already submitted a feedback form, which only takes into consideration the Isley Walton development (because no one knew about the Freeport proposal until very recently). May I, therefore, submit further feedback on the development proposals which I believe will significantly impact our parish, our environment and our future well-being?

The proposed two developments are:

1. The new settlement of about 4,700 houses to the west of Diseworth.
2. The EMAGIC industrial complex proposed **WITHIN our Parish** to the north and east of Diseworth.

Courtesy of our WINGS Group, the two proposed developments look like this:



It is clear that the shaded areas of these maps (representing sites 1 & 2) dwarf Diseworth from outside and within our parish.

I will not detail the ecological impact of gobbling up nearly 2,000 acres of farmland (losing miles of hedgerow habitat, trees and carbon sink capability), including the potential flooding implications. The proposal is that these developments will be carbon zero. How does that make sense when, in order to create them, they will take such a huge swathe of carbon sink capability out of the environment?

**ONE MAJOR PLEA:
PLEASE INVOLVE THE RESIDENTS OF THE PARISH OF LONG WHATTON & DISEWORTH IN
INFLUENCING THESE PLANS,
WITH IMMEDIATE EFFECT.**

Bring us on board.

Make us part of the decision making process.

Liaise with our Parish Council.

Don't just tell us what you have done at meetings - **BRING US INTO THOSE MEETINGS.**

A group of local residents from both Long Whatton & Diseworth are currently developing a Neighbourhood Plan for our Parish.

The proposed EMAGIC development will fall ENTIRELY within our Parish.

How can we formulate a Neighbourhood Plan without having EMAGIC / FREEPORT representatives working with us on that plan?

As far as I am aware, no representative of the Freeport Consortium has yet reached out to our Parish Community with an offer to work with us.

This has already got off to a bad start because of the piecemeal way in which local residents have learned about the proposals.

However, there may still be an opportunity to set a world-class example of involving local residents from the very outset.

Create synergy.

Call on our local knowledge and experience.

Grant us influence.

Resistance is, naturally, already high. Just one of these proposals would be a shock, but both within weeks of each other is a sledgehammer blow.

This has been exacerbated because many residents already feel that this is something that is "being done to them" instead of something which they are invited to influence.

Please, bring us on board ... **NOW.**

Finally – what co-ordination has there been between NWLDC and the Freeport Consortium in co-ordinating these announcements, and what consideration was given to how the residents of the Parish of Long Whatton & Diseworth might react?

Kind Regards

Julie Doyle

13th March 2022.

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



Planning Policy Team

13th March, 2022.

Dear Sirs,

**RE: North West Leicestershire Local Plan Review: Development Strategy
Options and Policy Options. Extension of Time to the end of
Monday 14th March 2022**

I would first of all refer to my previous correspondence from July 2011, regarding the Core Strategy Consultation and affirmed why Ibstock should be utilising for housing development as detailed below:

Where should the new housing go?

I can see no reason why Ibstock should not be utilised for housing development. In particular, the parcel of land (identified on the attached plan) located on Leicester Road, Ibstock and as quoted in 4.2.1 of the (SHLAA) Strategic Land Availability Assessment ref Lb8, should be included. As a previously considered site for inclusion, it should be part of the numbered (1500) dwellings required for allocation of the rural town of Ibstock as a potential, available site.

This site would also improve and compliment the new development at 'Rose Gardens' on Leicester Road.

I also note that the North West Leicestershire Core Strategy Cabinet Report of 1st March 2011 on your website, referenced as 'housing requirements – point 4.9' states '*The Government remains committed to new housing growth*'.

Therefore, this site would alleviate pressure on the Coalville District which was previously mentioned.

I found the North West Leicestershire Local Plan Review: Public Consultation document to be extensive and would have welcomed discussion with the Planning Policy team to better understand and comment more fully, but I would remark as follows.

Having spoken with someone in Planning regarding the 'Strategic Housing and Employment Land Availability Assessment' I found 'the field' shown as lb8 on page 328 of the document and observes it to be **available and potentially suitable**.

The field at Leicester Road, Ibstock can be used best to enhance the Ibstock area and as noted in page 15 of the North West Leicestershire Local Plan Review: Build rates (market signals) the reference to market signals in the NPPF could be taken to refer to build rates as an indicator of market demand. Since the start of the adopted Local Plan (2011) build rates have averaged 619 dwellings per annum (2011-2021) **although a higher figure (770 dwellings) has been achieved.** **There is an unmet need for Leicester City of about 18,000 dwellings and there is reason to assume that some of this is likely to be redirected towards North West Leicestershire.** Nevertheless, there is a demand for development and this area should be part of the inclusion for Ibstock.

In point 4.14 the above suggests that **any housing requirement included as part of the Local Plan will have to be higher than the standard method.**

I request most earnestly, that the field Ib8 on page 328 of the Strategic Housing and Employment Land Availability Assessment should be added to the developable plan.

I believe affordable housing could be incorporated for this site which identifies the opportunities for villages to grow and thrive and support local services.

Yours faithfully

R. Cox

MRS RUTH COX



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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr and Mrs	Miss
First Name	G	Eleanor
Last Name	Mansfield	Dukes
[Job Title]		Senior Planner
[Organisation]		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, Q3,
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

14.03.2021

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.

planning consultant

cdm principal designer
project management
quantity surveyor

master planning
interior design
architecture

landscape architecture
party wall surveyor
sustainable design

14th March 2022

Our Ref: 101-893/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 (Mrs and Mrs G Mansfield) are the freehold landowners of two areas of land located in the north western corner of the North West Leicestershire District. rg+p are instructed to promote the two landholdings for development. The landholdings are:

- Land known as “Land at Butt Lane, Blackfordby”, which is located to the north west of Blackfordby and south of the neighbouring urban area of Woodville. The site has been submitted for consideration by the Council as part of the 2021 Strategic Housing and Economic Land Availability Assessment (SHELAA). It is identified in the SHELAA as ‘By4’.
- Land known as “Land at Heath Lane, Boundary”, which is located to the south of the village of Boundary. The site has also been submitted for consideration by the Council as part of the 2021 Strategic Housing and Economic Land Availability Assessment (SHELAA). It is identified in the SHELAA as ‘Bo1’.

Site By4

Blackfordby is defined within the settlement hierarchy as a ‘Sustainable Village’. The settlement study defines a “Sustainable Village” 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.” The village of Blackfordby is located in the western part of the District and it has strong links to Woodville which is located in South Derbyshire District. It is a well-placed settlement for access to onward travel, employment and services. Our clients are committed to the comprehensive promotion of an area of their land (extending to some 6.6Ha) for residential development of up to 124 units. Please find enclosed a Location Plan showing site By4 (Enclosure 1). Through the promotion of site By4, 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.

To date the landholding has been submitted for consideration by the Council as part of the 2021 Strategic Housing Land Availability Assessment (SHELAA). For your information, the site is considered under SHELAA reference “By4” (see Enclosure 2 for an extract of the assessment). This assessment concludes that the land could deliver housing in the “11-20 year” delivery period. The assessment by the Council concludes that the site is neither physically nor environmentally constrained, is economically viable, is potentially suitable, is potentially available, and potentially achievable.

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The Council's own methodology for assessing the availability of sites in the SHELAA states that: The Planning Practice Guidance (para 20) considers a site to be available for development; **"when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership problems"**. Our clients dispute the classification that the site is "potentially available", as there are no legal or ownership problems that would prevent the site coming forward for development.

The site's location between the urban area of Woodville and Blackfordby offers a range of options for services. Various land uses surround the site including recently built out residential development to the southeast of the site, completed by Davidsons. This development was delivered following an appeal which was allowed in 2016 (Appeal Ref APP/G2435/W/15/3137258). A key issue was the Council's (withdrawn) reason for refusal that the site was "an undeveloped greenfield site outside the limits of development, remote from services which would constitute un-sustainable development". By resolving the reason for refusal prior to the appeal, it can therefore be concluded that development in this location is 'sustainable in principle. This evidence of continued market interest in the area combined with the location with access to both Blackfordby and Woodville demonstrates that the site is considered to be available for development in the early years of the plan period.

Site Bo1

Boundary is defined within the settlement hierarchy as a 'Local Housing Needs Village'. The village of Boundary is located in the western part of the District, with good links to nearby Woodville (located in South Derbyshire District) to the west and Blackfordby to the south.

My clients are committed to the comprehensive promotion of an area of their land (extending to some 10.7Ha) for residential development of up to 200 units. Please find enclosed a Location Plan showing Bo1 (Enclosure 1). 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.

To date the landholding has been submitted for consideration by the Council as part of the 2021 Strategic Housing Land Availability Assessment (SHELAA). For your information, the site is considered under SHELAA reference "Bo1" (see Enclosure 3 for an extract of the assessment). This assessment concludes that the land could deliver housing in the "11-20 year" delivery period. The assessment by the Council concludes that the site is neither physically nor environmentally constrained, is economically viable, is potentially suitable, is potentially available, and potentially achievable. Again, our clients dispute the classification that the site is "potentially available", by the Council's own definition, as there are no legal or ownership problems that would prevent the site coming forward for development and there is a demonstrable market interest for housebuilding in the area. The site would form a logical extension to the villages of Boundary. Therefore, our clients consider that the site could come forward earlier in the plan period than stated in the SHELAA.

These representations respond to specific questions raised by the consultation documents and are provided under the headings below. They are relevant to both By4 and Bo1.

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

Our clients consider the settlement hierarchy as proposed to be flawed and in its current form, it does not fully consider the individual circumstances of local villages, including commuting patterns and access to services nearby. Our clients welcome the identification of Blackfordby as 'Sustainable'; however, they object to the exclusion of Boundary as a settlement that could provide development that would support the housing need of the wider NWLDC.

Although outside of the NWLDC administrative area, the urban area of Woodville acts as a major service centre for residents in Blackfordby and Boundary. Woodville is identified as an 'Urban Area' within South Derbyshire's Local Plan Part 1 (2016), but is identified as a 'Sustainable Village' in North West Leicestershire's settlement hierarchy. Currently, the proposed options overlook the role that Woodville and other built-up areas play in residents' day to day lives. By classifying Woodville as a 'Sustainable Village' it calls the parameters of the settlement hierarchy into question, as rather than looking at the settlement as a whole (despite being outside of the District) the strategy takes only the parts of the settlement into account. The nature of modern lifestyles often means that many residents will move around their local area, taking advantage of larger settlements, particularly those within walking or cycling distance to access vital services, recreation and employment opportunities. Although only part of Woodville is within the District, by failing to recognise its role as an "urban area", home to various employment opportunities and key services, our clients believe that the

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settlement hierarchy is flawed.

NPPF Paragraph 79 states that Local Plans and Local Planning Authorities should **“promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby” (my emphasis)**. By restricting development in Sustainable and Small Villages/‘Local Housing Need Villages’ the strategy for the settlement hierarchy fails to adequately respond to the changing and developing nature of local housing need, especially in more rural areas. Future policies should be shaped to adhere with the NPPF paragraph 78, and **“should be responsive to local circumstances and support housing developments that reflect local needs”**. The settlement hierarchy should provide some flexibility to allow future expansion of Sustainable Villages and Small Villages/‘Local Housing Need Villages’ adjacent to the current limits to development.

Therefore, whilst we would agree that the principle of a settlement hierarchy is the correct mechanism to direct appropriate development, it is crucial that it is flexible enough to adapt to any changes in the overall housing needs of the District and ensure that NWLDC continue to maintain a 5 year supply of deliverable housing sites (in line with Paragraphs 16 of the NPPF).

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

Our client, whilst welcoming the possibility of development in smaller villages within the District, believes that the strategy for ‘Local Housing Need Villages’ is not appropriate. It is not clear whether the development permitted in ‘Local Housing Need Villages’ would be for market sale, for affordable housing provision, or for self-build plots. This strategy in practice would likely be redundant, given its restrictive nature, and would struggle to contribute to local housing need within North West Leicestershire. Consequently, it is not yet understood whether landowners or developers would respond to the opportunity to deliver a small number of homes in ‘Local Housing Need Villages’, due to a potential risk that the hyperlocal need (including restrictive nature of sale/rent) does not materialise.

A further consideration is to what extent dwellings would be delivered over the plan period that go onto be long term homes for local people (as the restriction for resale to only ‘local’ people may limit the future mobility of local residents, perhaps those wishing to move up the housing ladder or downsize their home). Whilst the provision of market dwellings for purchase would present an opportunity for local people to get on the housing ladder, or invest in their local area, the overarching strategy is unduly restrictive.

Widening the scope of development permitted at Small Villages/‘Local Housing Need Villages’ would encourage further development to come forward in appropriate locations to meet identified housing needs for the District and the wider Leicester and Leicestershire HMA, whilst providing opportunities for people to live locally if they wish.

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 issue of the amount of housing development proposed within the Local Plan is clearly a matter of great importance, particularly as the Government clearly signals its intention for Local Planning Authorities to **“significantly boosting the supply of homes”** (para 60 NPPF) and use their evidence base to ensure that their plan is ‘Positively Prepared’ to **“meet the area’s objectively assessed needs”** (para 35 NPPF).

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, our clients do not believe that the buffer provided by the ‘High 1’ scenario is sufficient to supply homes for NWLDC’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, would leave the District vulnerable to development in unsustainable and unsuitable locations, in a disjointed manner.

Our clients support the approach proposed under the ‘High 2 Scenario’. Our clients welcome the acknowledgement by the Council that it considers the standard methodology as minimum housing figure, not

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'the' housing figure. 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 over the plan period.

Therefore, the 'High 1' scenario (512 dpa) should not be taken forward, and the 'High 2' scenario would provide the most certainty for the delivery of homes over the plan period.

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 accepted that the distribution of housing need arising from Leicester City in NWLDC is largely unknown at this stage. Therefore, it is essential that the strategy for the Local Plan Review remains flexible and able to adapt to the changing needs of the District. The approach presented in this consultation has placed the majority of housing growth in the "higher order" settlements. The concept of a settlement hierarchy is sensible as it helps to understand what facilities are located in each settlement, understandably identifying more services in larger settlements. However, disregarding smaller settlements for expansion fails to address the economic and social needs of those areas, removing the ability for them to improve service provision and to improve rural housing supply.

A more balanced approach to the location of new development should be undertaken which will allow more development in the sustainable villages and small villages/local housing need villages, which will assist in the improvement of services and provide more housing choice. This type of approach will allow for variety in housing provision within the District, adding flexibility to the plan. Research recently undertaken by the Country Land and Business Association (CLA) "Sustainable Villages – Making Rural Communities Fit for the Future"¹ emphasises the shortfalls of Local Plans in supporting growth in more rural areas of local authority areas. The preferred options presented in the NWLDC consultation document do not adequately address the issue of rural housing need and therefore, we would recommend considering an option which supports growth on the edge of existing villages to allow suitable and sustainable growth to occur.

Restricting development to Sustainable Villages, Local Service Centres, Key Service Centres and the Principal Town (under options 3a and 7b) fails to adequately understand and respond to the potential opportunities to meet local housing need and the 'High' scenarios proposed within this consultation. A more detailed breakdown of settlements, incorporating their wider accessibility to services (within and beyond the District), would allow for a more nuanced settlement hierarchy that would be able to respond to local circumstances across the District. Option 3b, under the High 1 scenario, would not support the NPPF Paragraph 78 to allow for rural areas to grow and thrive. To a certain extent, our clients support option 7b, although the option does also not effectively deal with rural housing need in smaller settlements in the settlement hierarchy. This option should be reviewed to better reflect the role of housing in rural areas (in easy access of services and employment opportunities) in delivering homes, contributing to the housing need of NWLDC.

NWLDC should, where necessary, give weight to the sustainability credentials of potential development sites which are not located in 'preferred development locations' according to the Settlement Hierarchy, but are located in sustainable locations close to other areas with a wider range of services, such as the urban area of Woodville, just beyond the settlement boundary of NWLDC. The Local Plan Review should offer favourable

¹ <https://www.cla.org.uk/policy/strong-foundations-sustainable-villages-report/>

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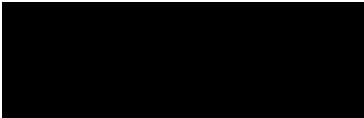
weight to potential development sites that can demonstrate they are in such proximity to services and facilities that sustainable modes of transport can be used rather than private car dependence.

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. However, the approaches to housing distribution currently proposed do not effectively address the challenges that will be faced by NWLDC, particularly when a better understanding of its neighbour's needs are realised. Our clients therefore assert that allocating their land for residential development would contribute to the housing requirement in NWLDC and in light of reviewing the plan, the sites should be considered for allocation, along with an amendment to the settlement boundaries for Blackfordby and Boundary.

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



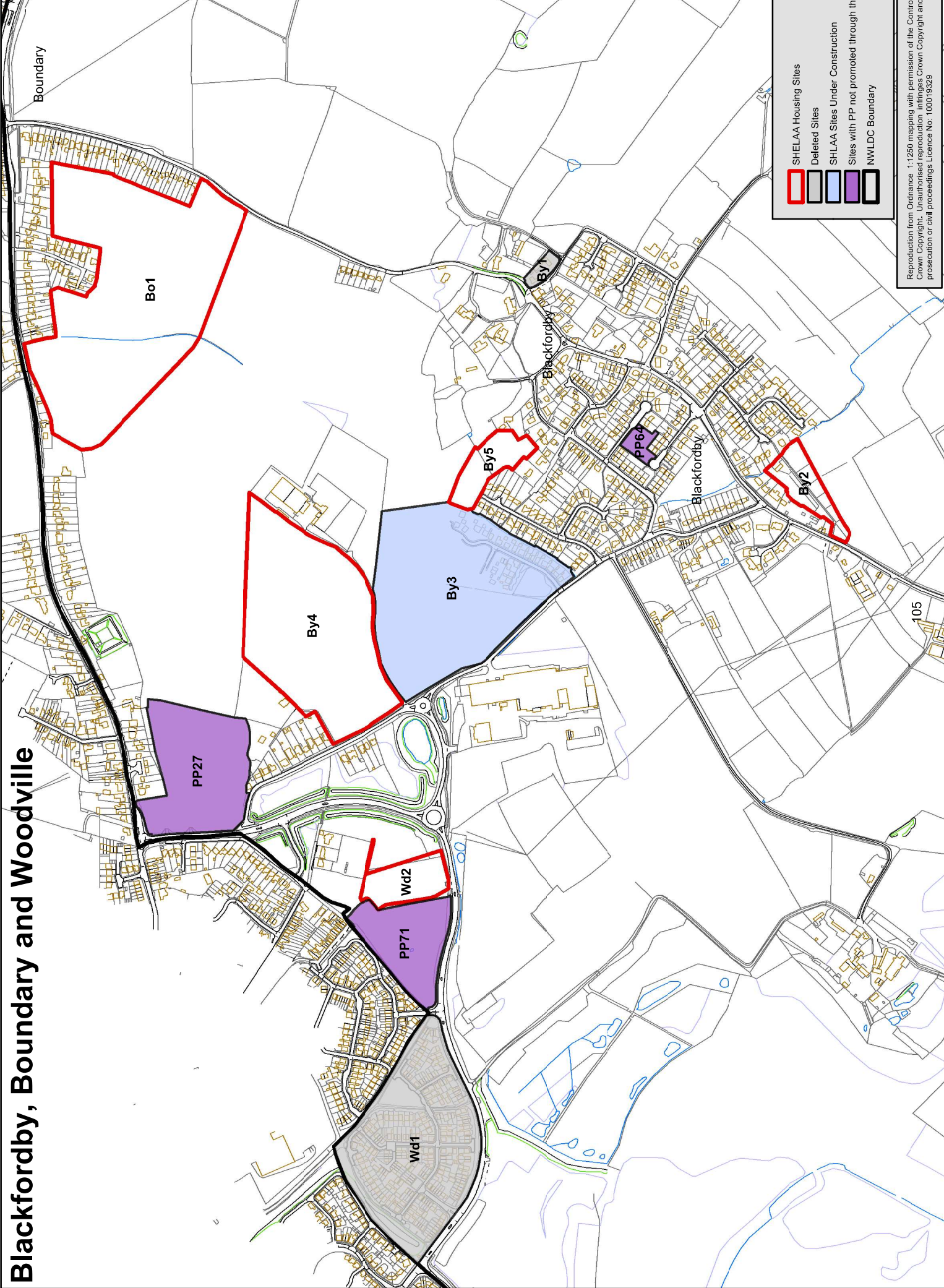
Eleanor Dukes
Senior Planner
rg+p Ltd.

c.c. Mr and Mrs G Mansfield

encs.

- Enclosure 1 - Area map SHELAA Assessment
- Enclosure 2 - Blackfordby (By4) SHELAA Assessment
- Enclosure 3 - Boundary (Bo1) SHELAA Assessment

Blackfordby, Boundary and Woodville



Legend

- SHELAA Housing Sites
- Deleted Sites
- SHLAA Sites Under Construction
- Sites with PP not promoted through the process
- NWLDC Boundary

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By4 – Land at Butt Lane, Blackfordby

Site Description: The site is part of a larger agricultural field and is located to the west of Butt Lane. The site slopes upwards from the road and also from south to north. The western boundary adjoining Butt Lane is bound by mature hedgerows and trees. There is agricultural land to the north of the site and residential properties to the north-west boundary. There is a single-track access road along the south-eastern boundary of the site which leads to a residential dwelling and large agricultural outbuilding which adjoins the far western boundary of the site. The site to the south of the access is currently being developed for housing. The site is Grade 3 Agricultural Land (Natural England regional records) and is in the National Forest.. There are several overhead cables crossing the site: along the site's boundary with Butt Lane; along the route of the single-track access road and across the site's north-western corner. There are two public rights of way (P12 and P13) that cross the site from the north-west which join and then continue on to the south-east of the site and beyond. The site is within the hazardous materials storage area associated with substances stored at the nearby Hepworth Building Products site.

Suitability:

- **Planning Policy:** The site is outside of (but adjoining) the Limits to Development and is identified as countryside (Policy S3) on the adopted Local Plan Policies Map (2017). The adopted Local Plan identifies Blackfordby as a sustainable village (Policy S2). The affordable housing requirements are set out in Appendix One of this document.
- **Highways:** There are no apparent fundamental reasons for this site to be excluded from consideration at this stage. However, more detailed consideration, as part of the usual Development Control process, may lead to the site being viewed less favourably.
- **Minerals:** The site is within the Minerals Consultation Area for the potential presence of at or near surface coal resources. The County Council would need to be contacted regarding the potential sterilisation of this mineral resource. It is in a High Risk Coal Development Area meaning a Coal Mining Risk Assessment would be required.
- **River Mease:** The site is located within the River Mease catchment. The Mease is identified as a Special Area of Conservation (SAC) due to the importance of the species and habitats it supports. In accordance with the Conservation Objectives for the SAC, for development to be considered acceptable there will be a need for appropriate mitigation to be in place to protect the water quality in the catchment
- **Ecology:** There are Great Crested Newts (GCNs) close by. The hedges and trees on site are potential BAP habitats. The arable nature of the site is a poor quality environment for wildlife. The site is considered acceptable with mitigation and there are opportunities for enhancement based around the ditch through the centre of the site. The presence of off-site GCNs will require mitigation/entry into the GCN District Licencing scheme.

The site is outside the Limits to Development and located some distance from the services and facilities of Blackfordby. There would need to be a change in the Limits to Development for the site to be considered suitable, although there are issues regarding the coalescence of Blackfordby, Woodville and Boundary. It would also need to be demonstrated issues relating to minerals/geo-environmental factors, the River Mease and ecology could be satisfactorily addressed. The site is considered **potentially suitable**.

Availability: The site is being promoted by an agent on behalf of the landowner. The landowner has indicated support for the development of the site. There aren't any housebuilders involved with the site. The site is considered to be **potentially available**.

Achievability: Due to the potential River Mease constraints described above, the site is considered to be **potentially achievable**.

Site Capacity:

Total Site Area Available for Development (hectares)	6.6
Gross to Net Development Ratio	62.5%
Density Applied (dwellings per hectare)	30
Estimated capacity	124
Timeframe for Development	Years 11-20
Estimated Build Rate (dwellings per year)	n/a

Bo1 – Land at Heath Lane, Boundary

Site Description: The site is agricultural land located to the south of Ashby Road and west of Heath Lane. There are agricultural accesses onto the site off both Ashby Road and Heath Lane. The topography of the site is undulating. There is a hedgerow running north to south through part of the site. The majority of the northern boundary of the site is bound by residential properties which front onto Ashby Road or are part of the small cul-de-sac of Field Lane. There are also residential dwellings along much of the eastern boundary of the site which front onto Heath Lane. The western half of the site is Grade 3 Agricultural Land and the eastern half of the site is Grade 2 (Natural England regional records). The site is in the National Forest.

Suitability:

- **Planning Policy:** The site is outside the Limits to Development and is identified as countryside (Policy S3) on the adopted Local Plan Policies Map (2017). In terms of the settlement hierarchy (Policy S2) Boundary would be classed as a hamlet. The affordable housing requirements are set out in Appendix One of this document.
- **Highways:** Despite the site's proximity to frequent bus services, the site is somewhat detached from local services such as shops, schools etc. which limits the opportunities for sustainable travel. Apart from this, there are no other apparent fundamental reasons for this site to be excluded from consideration at this stage. However, more detailed consideration, as part of the usual Development Control process, may lead to the site being viewed less favourably. Access to the A511 may be resisted by the County Highways Authority.
- **River Mease:** The site is located within the River Mease catchment. The Mease is identified as a Special Area of Conservation (SAC) due to the importance of the species and habitats it supports. In accordance with the Conservation Objectives for the SAC, for development to be considered acceptable there will be a need for appropriate mitigation to be in place to protect the water quality in the catchment.
- **Minerals:** The majority of the site is within the Minerals Consultation Area for the potential presence of at or near surface coal resources. The County Council would need to be contacted regarding the potential sterilisation of this mineral resource. It is in a Coal Development Low Risk Area meaning the area may contain unrecorded coal mining related hazards which would need to be reported if encountered during development.
- **Ecology:** The ditch and trees are potential BAP habitats. The arable nature of the site is a poor quality environment for wildlife. The site is considered acceptable in ecology terms and there are opportunities for enhancement to the sites ecology based around ditch through the centre of the site.

The site is outside the Limits to Development. There would need to be a change in the Limits to Development and as well as a reclassification of Boundary up the settlement hierarchy for the site to be considered suitable (although the scale of development in relation to the existing settlement would still be an issue). It would also need to be demonstrated that issues relating to highways/access, the River Mease and minerals/geo-environmental factors could be satisfactorily addressed. The site is considered **potentially suitable**.

Availability: The site is promoted by an agent on behalf of the landowner. The landowner has indicated support for the development of the site. There is no housebuilder involvement in the site. The site is considered **potentially available**.

Achievability: Due to the potential River Mease constraints described above, the site is considered to be **potentially achievable**.

Site Capacity:

Total Site Area Available for Development (hectares)	10.7
Gross to Net Development Ratio	62.5%
Density Applied (dwellings per hectare)	30
Estimated capacity	200
Timeframe for Development	Years 11-20
Estimated Build Rate (dwellings per year)	n/a

From: [REDACTED]
To: [PLANNING POLICY](#)
Cc: [REDACTED]
Subject: FW: Isley Walton New Town.
Date: 14 March 2022 09:22:53

Hi team,
Please find below a representation re the Local Plan review.
James White
Senior Conservation Officer
Planning & Development

From: Delia Richards [REDACTED]
Sent: 13 March 2022 15:54
To: JAMES WHITE [REDACTED]
Subject: EXTERNAL: Isley Walton New Town.

Dear James,
I am sorry to trouble you, but I would be most grateful if you could ensure that this response to the planning proposal is delivered to the appropriate people.

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

As a member of the Melbourne Civic Society and a resident of Castle Donington I wish to endorse the whole of the response sent on the above subject by Melbourne Civic Society.

In addition I would like to point out that much more consideration must be paid to the subject of destruction of natural habitat of badgers, foxes, deer, amphibians and other smaller creatures than you have demonstrated in the past, not to mention the destruction of trees and hedges. The fact that there may not be protected species populating a proposed site, does not mean that those that are there are of no consequence – your dismissal of the wildlife in the planning of EMG was abysmal. On seeing the damage caused by badgers in Castle Donington churchyard one of your officers commented ‘unforeseen consequences’. I beg to differ. Those consequences are a direct result of your decision and should have been mitigated – a hungry animal will forage for food. Consider that the East Midlands Gateway has taken half the land of both the parish of Hemington and the parish of Lockington; the extensive housing development to the north of Park Lane has diminished the small area of land left in Castle Donington and you now consider that it is acceptable to develop most of the parish of Isley Walton. Simply at the whim of a greedy landowner. These animals search our gardens and allotments and are condemned to a long and painful death by starvation. You have a responsibility to provide habitat areas, access corridors to open land and natural spaces.

Delia Richards.

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

Local Plan Review. Consultation Response

Name Arabella S Leggat

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,

Arabella Leggat



Date: 14/03/22

Your ref: North West Leicestershire: Local Plan: Our Ref: SD

Contact Mr Stephen Day-Designing out Crime Officer

Email: [REDACTED]

Mobile No: [REDACTED]

Dear Sir/Madam,

I am writing to you in my capacity as the Leicestershire Police Designing out Crime Officer (DOCO). I have been requested to comment on behalf of Leicestershire Police in relation to the proposed Local Plan as proposed by North West Leicestershire Council covering the period 2022-2039.

Leicestershire Police support the creation of safe environments which is a primary goal of any new development. Paragraph 91(b) of NPPF 2019 specifically provides that "Planning policies and decisions should aim to achieve healthy, inclusive and safe places which: ...

b) Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion..."

Hence the inclusion of a police contribution to Leicestershire Police in Priority 2c.

Policing is a 24/7 service resourced to respond and deploy on an "on demand" and "equal access" basis and is wholly dependent on a range of facilities for staff to deliver this. A primary issue for Leicestershire Police is to ensure that new large-scale developments make adequate provision for the future policing needs that it will generate.

At present North West Leicestershire Council has Policing facilities where much of the policing activity for the Town is based. However, where additional development is proposed Leicestershire Police may seek to deploy additional staffing and additional infrastructures to ensure quality community based policing. It would be complacent not to do this because without additional support, unacceptable pressure will be put on existing staff and our capital infrastructures which will seriously undermine their ability to meet the policing needs of the development and maintain the current level of policing.

Therefore, North West Leicestershire Council are requested to work with Leicestershire Police by consulting with them on large-scale applications, firstly to gain their perspective from a design front and secondly to understand whether the associated growth would produce a need for additional policing infrastructure. If this is the case then Leicestershire Police will assess each application on an individual basis, by looking at the current level and location of available officers and then the demand associated with that development.



A request for developer contributions may then be submitted to go towards the additional infrastructure needed to maintain a sustainably high level of policing within the areas covered by North West Leicestershire Council. This will include operational and neighbourhood policing.

For Your Information

Policing aspirations for the North West Leicestershire Council areas continue to be to provide a high-quality service including continued investment in existing estate and resources. Also included will be aspirations to maintain our efforts to protect the public in high foot fall public areas or areas where higher risk is considered. Section 17 of the Crime and Disorder Act 1998 states all relevant authorities have a duty to consider the impact of all their functions and decisions on crime and disorder. Leicestershire Police will work closely with our partners to design out these risks wherever possible.

Areas including public space, shop frontages and appropriate security such as shutters should include sympathetic design and be in keeping with local architecture, whilst still providing effective security. Other key areas where planning can support the local businesses includes the night time economy. Effective planning including lighting and use of CCTV, if required will reduce the risk of crime and disorder.

In support of managing these requirements providing a 24/7 service, Leicestershire Police will continue to review our existing estate. Leicestershire Police would be keen to work in partnership with North West Leicestershire Council to identify enhanced potential Police estate including staff parking. This would allow Leicestershire Police to be appropriately resourced during this period of proposed expansion of population and associated activity.

S106 Agreements and CIL (Community Infrastructure Levy)

Currently North West Leicestershire Council have a number of S106 Agreements in respect to new developments within the North West Leicestershire Council area in support of Policing. Also, no CIL funding is provided towards Policing resulting in only statutory funding via the Policing precept and Government and S106 obligations. Where new demand is placed on Policing resources due to expansion Leicestershire Police, North West Leicestershire Council and people within North West Leicestershire would benefit from support of the provision of S106/CIL and future S106 bids will be considered in support of Policing provision within the North West Leicestershire Council area.



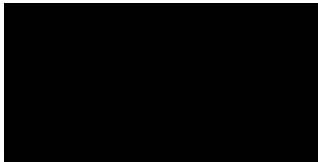


Consultations on Planning Applications

Current planning consultations referred to Leicestershire Police have provided the opportunity to comment on a number of applications. It would be beneficial if further comment continued to be referred in respect to large developments either residential or commercial. Also where there is an increased risk of public safety via open space and large footfall as well as areas relating to changes to the night economy would be appreciated (Section 17 of Crime & Disorder Act 1998). Traveller provision is another area where Policing considerations are recommended wherever possible for comment.

Should you require any further information please do not hesitate to contact me.

Kind regards



Mr Stephen Day,
Designing out Crime Officer,
Leicestershire Police.



Local Plan Review. Consultation Response

Name Ian Ward

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 of the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechinons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

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

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

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

greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

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

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

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

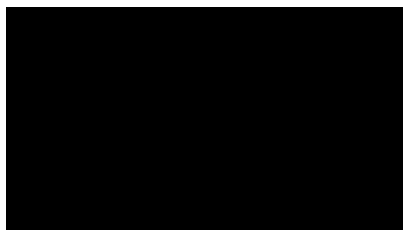
17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies "... an immediate need for additional employment land". It is merely a glint in the eyes of the landowners and the developers.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

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

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

Yours Faithfully

Ian Ward



From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Planning permission for Diseworth and Long Whatton Objection
Date: 14 March 2022 09:46:33

Local Plan Review. Consultation Response

Name Elizabeth S Leggat

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,

Elizabeth Leggat

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

Local Plan Review. Consultation Response

Name Chris Howell

Address [REDACTED]

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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.

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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 have lived in Diseworth for 10 years it is a lovely village much loved by all the residents. There is a great community spirit within Diseworth which will be lost if the village becomes swamped by housing and Industrial Units. The village is a conservation area with many listed properties. Building of Hugh warehouses on the adjoining fields is totally out of keeping with the area. This area is an area that is used by locals and other visitors for walking. It is a safe area to walk, with beautiful views. There are not too many safe places to walk locally. All of this will be lost if this development is allowed to proceed. The village also has to contend with traffic racing through the village as means of a shortcut. The roads through Diseworth are simply not suitable for any additional traffic. There are times when the village becomes gridlocked with traffic when events are being held at Donington. Of particular concern is the flooding. As residents we are always on alert when there is rain. The brook already can't cope with heavy rain and the pond release from the airport. As victims of former flooding this makes us very fearful. The village is already going to be affected by HS2 and further development will completely ruin the surrounding countryside, causing more noise, more pollution.

Yours Faithfully

Sign. 



Mr J.S. Coulson & Ms C.E. Leadbetter



NW Leicestershire District Council
Planning Department
By Email: planning.policy@nwleicestershire.gov.uk

Monday 14th March 2022

Dear Sir or Madam,

Ref. Local Plan Review. Consultation Response

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

We strongly object to both proposals and our 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’s wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc. 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 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 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 all at least 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. The development of Langley Close just a few years ago now causes my land to become waterlogged near to my house during the winter

months and heavy periods of rain. The drainage of that small area was poorly thought out and relied on the basic drainage that already exists on Clements Gate. This does not enter the sewerage system, but drains onto my land indirectly through a failing soakaway, which is frequently blocked and needs pumping out. It has been damaged at the far end so the water exits onto my land and floods the garden. Reducing the area's capability to soak up rainfall by concreting over large swathes of the country side will only exacerbate the situation and will potentially affect all the properties along Clements Gate and Langley Close.

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 and 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 HS2. This will run to the south of the site, will be many years in the build and will generate noise. In respect if the EMP90 site, it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the never ending supply of articulated lorries, the VERY loud reversing warnings, horns, forklift trucks driving to and fro, loud speakers that shout out instructions from the

offices to the yard staff – 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. It only takes a race weekend at Donington Park Race Circuit to see that the road system grounds to a halt for the duration of the event. 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 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. 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*". 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 opportunistic landowner/owners and 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,

Stuart Coulson & Claire Leadbetter

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

Local Plan Review. Consultation Response

Name Anne Howell

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 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. 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 have lived in Diseworth for 10 years it is a lovely village much loved by all the residents. There is a great community spirit within Diseworth which will be lost if the village becomes swamped by housing and Industrial Units. The village is a conservation area with many listed properties. Building of Hugh warehouses on the adjoining fields is totally out of keeping with the area. This area is an area that is used by locals and other visitors for walking. It is a safe area to walk, with beautiful views. There are not too many safe places to walk locally. All of this will be lost if this development is allowed to proceed. The village also has to contend with traffic racing through the village as means of a shortcut. The roads through Diseworth are simply not suitable for any additional traffic. There are times when the village becomes gridlocked with traffic when events are being held at Donington to the extent that when those events are on that we simply do not bother to leave home. Of particular concern is the flooding. As residents we are always on alert when there is rain. The brook already can't cope with heavy rain and the pond release from the airport. As victims of former flooding this makes us very fearful. The stress of worrying about flooding to our properties is considerable and causes great anxiety to those of us who have been affected by flooding. The village is already going to be affected by HS2 and further development will completely ruin the surrounding countryside, causing more noise, more pollution. If this proposal goes ahead the village will be ruined by noise and pollution. We already have to contend with the pollution from the airport it was noticeably during the lockdown when planes weren't flying how much noise levels and the quality of the air improved. This development is causing great anxiety amongst the local community.

Yours Faithfully,

Sign.....

From: [REDACTED]
To: [PLANNING POLICY](#)
Cc: [IAN NELSON](#)
Subject: EXTERNAL: RE: North West Leicestershire Local Plan Review: Development Strategy Options and Policy Options (Reg 18) Jan 2022 - Leicestershire County Council officer response
Date: 30 March 2022 17:26:20
Attachments: [queens_platinum_jubilee-small-2.png](#)

Dear Planning Policy,

The County Council's Cabinet (29 March 2022) approved the submitted response (14 March 2022) to NWLDC's Development Strategy and Policy Options consultation and there were no amendments to the content (See item 15 for information - <https://politics.leics.gov.uk/ieListDocuments.aspx?MIId=6774>).

Please can you however, note additional comments from our Ecology colleagues for consideration in future iterations of the emerging Local Plan:

- There will need to be 10% minimum BNG as policy, in case the legislation to make it mandatory gets delayed.
- Ensure that there are policies protecting local/national sites and irreplaceable/priority habitats, and that the mitigation hierarchy (Avoidance first, then Mitigation, then Compensation for impacts) is enshrined in the policy.
- BNG isn't cart blanche to go straight to compensation for loss.

Kind regards,

Tim

Tim Smith

Strategic Planning and Policy Officer

Growth Unit

Chief Executives Department

Leicestershire County Council

County Hall

Glenfield, Leics

LE3 8RA

[REDACTED]
www.leics.gov.uk

From: Sharon Wiggins [REDACTED]

Sent: 14 March 2022 10:55

To: planning.policy@nwleicestershire.gov.uk

Cc: IAN NELSON [REDACTED]; Simon Lawrence

[REDACTED] Peter McLaren [REDACTED]; Tim Smith

Subject: North West Leicestershire Local Plan Review: Development Strategy Options and Policy Options (Reg 18) Jan 2022 - Leicestershire County Council officer response

Dear Planning Policy,

Please find attached the Leicestershire County Council officer response to the above consultation which forms our duly made representations.

As you are aware the response is to be considered by the County Council's Cabinet on 29 March 2022 and any amendments arising from the Cabinet's consideration of the response will be sent to you.

Please confirm receipt and if you wish to discuss any aspect of the response please get in touch.

Regards

Sharon

Sharon Wiggins
Strategic Planning Manager
Growth Unit
Chief Executive's Department
Leicestershire County Council

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[Celebrating Her Majesty's Platinum Jubilee in Leicestershire](#)



APPENDIX

North West Leicestershire District Council Development Strategy and Policy Options Regulation 18 Local Plan Consultation Leicestershire County Council Officer Comments (March 2022)

Note: The composite views from the Children and Family Service are contained in their entirety in Question 26 and should be noted in conjunction with all other comments.

	Questions	Comments
Local Plan Review Objectives		
1.	Do you agree with these Local Plan Review Objectives? If not, why not?	<p>Broadly speaking there are no significant issues with the proposed objectives and they provide the basis of a positively prepared policy compliant plan, however there is scope for expansion.</p> <p>Given that this Local Plan has the potential to be key in the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, it is surprising that there is no Strategic Objective relating to achieving this transition and what that entails. Additionally, it would be beneficial to include a further objective related to ensuring the coordinated delivery of infrastructure required to support growth. E.g. <i>“Ensure the coordinated delivery of infrastructure required to enable the delivery of new development, including to help to mitigate the cumulative impacts of growth (which may in some cases be cross-boundary).”</i></p> <p>There are a range of objectives covering social, economic and environmental elements, however it is suggested that the objectives should be stronger in respect of the climate emergency and decarbonisation agenda. Whilst there should also be reference to the importance of tourism and hospitality and increasing the number of assets to attract more visitors. It is also queried as to why there is no mention of policies to deal with expansion of the Airport and proposed Freeport.</p> <p>More specifically, the wording of Objective 1 is unclear and should be more aspirational. Using ‘promote’, ‘improve’ or ‘enhance’ instead of ‘enable’ is suggested and there could be additional text around improving health and/or reducing health inequalities - there are sizeable inequalities within NWL based on deprivation around life expectancy (almost 10 years): https://fingertips.phe.org.uk/profile/health-profiles/data#page/7/gid/1938132696/pat/6/par/E12000004/ati/201/are/E07000134/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1/page-options/car-do-0_ine-yo-3:2018:-1:-1_ine-ct-71_ine-pt-0</p> <p>Regarding Objective 7, is there an opportunity for the district to become carbon neutral by 2045, rather than 2050, in line with the County Council?</p> <p>Objective 10 could be expanded to refer to the efficient use of resources and minimising waste in a much wider sense e.g. the circular economy which captures all materials within its scope and not just those in the context of waste linked with minerals and land development.</p>

	Questions	Comments
		<p>Within Objective 11 <i>'Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way'</i>, this List could be expanded to include libraries.</p> <p>There may also be an opportunity to include a 'best start in life/childhood' type objective into one these 11 objectives. This would align to the new Leicestershire Joint Health and Wellbeing Strategy. Key areas of focus for child health in this district include:</p> <ul style="list-style-type: none"> • increasing the levels of GCSE attainment rates – currently 43.9 % attainment (average attainment 8 score) lower than the regional and national average. • Percentage of breastfeeding initiation currently 65.7% lower than regional value (69.7) and national (74.5) <p>https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000134.html?area-name=North%20West%20Leicestershire)</p> <p>Finally, paragraph 2.2 could reference that since the North West Leicestershire Local Plan was adopted in November 2017 the Leicestershire Minerals and Waste Local Plan was adopted in 2019.</p>
Settlement Hierarchy		
2.	Do you agree with the proposed settlement hierarchy? If not, why not?	<p>Given that this Plan has the potential to be key to the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, it is surprising that there appears to be no alignment of the proposed hierarchy with the Strategic Growth Plan 'International Gateway' (IG).</p> <p>Development in the IG area is likely to transform the nature of the area and the economic /transport connectivity relationships within in it and likewise such relationships more widely across Leicestershire and south Derbyshire and Nottinghamshire. (The relationship with place of living and place of work being one example.) From a transport infrastructure/service provision and connectivity perspective, the understanding of economic and wider relationships is critical from a planning point of view as is the understanding as to how the roles of settlements might transition throughout the lifetime of the Plan.</p> <p>There should be consideration of whether Ashby-de-la-Zouch should have a higher role in the settlement hierarchy (either as a Principal Town or Main Key Service Centre) given the high level of services and facilities that exist in Ashby are more akin to that of Coalville than Castle Donington, and its accessibility off J13 of A42 with linked ability to access key services and facilities in Tamworth, Derby and Nottingham.</p> <p>For the avoidance of doubt, where a settlement is classed as a 'Sustainable Village' this does not necessarily mean that it is a location suitable for all types of development from a highways and transport perspective, nor that developer contributions would not be required towards the enhancement of sustainable transport measures.</p> <p>A clear hierarchy is beneficial in continuing feelings of settlement and attachment to a particular area – more invested in creating links with the community. When people feel settled in an area it creates ontological security – this has a positive impact on a person's psycho-social wellbeing. Hiscock et al argues that people need ontological security 'in order to live happy and fulfilled lives' (Hiscock et al 2001). This is also</p>

	Questions	Comments
		useful in terms of community cohesion and sense of 'belonging' which is associated with self-rated health at all ages and reducing mental health inequalities (Camilla et al 2020, Green et al 2019).
3.	Do you agree with the approach to Local Housing Needs Villages? If not, why not?	<p>With regards 'Local Housing Needs Villages', the intent is understood but this needs careful consideration. For example, with the growth in employment land and the associated increase in number of jobs, families and individuals are likely to relocate into the area and could bring fresh energy and support into a local community.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>The proposals limiting development to specific local needs criteria are acceptable but should be caveated in a way that allows small scale infill development within the limits of development to be brought forward on an opportunity basis where no local identifiable local need exists.</p>
Development Strategy Options for Housing		
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.	<p>The interim conclusions that the district has come to for housing growth under the High 1 and High 2 scenarios, in the absence of certainty in respect to the unmet need of Leicester City's housing seems reasonable and considered.</p> <p>From a point of view assessing requirements for and planning for the delivery of future highways and transport needs, it is easier to develop transport evidence and to identify required infrastructure and measures based on figures that provide for the City's unmet need from the outset, relative to undertaking assessment and planning work on an initial set of housing numbers which, at some future date, have to be updated to provide for the unmet need.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>For the scale of housing to be planned for over the plan period to 2039, options considered range from 368 dwellings a year as the low scenario based on the standard method, to 730 dwellings a year as the 'High 2' scenario. The low scenario makes no provision for Leicester's unmet needs. For the 'High 2' scenario, a buffer of 362 dwellings a year above the standard method figure would be potentially available for unmet needs, with a need to allocate sites for an additional 5,000 dwellings. Under the 'High 1' scenario of 512 dwellings a year there would be a buffer of 144 dwellings per annum and a need for further allocations to provide 944 dwellings.</p> <p>For housing growth the preferred options are the High 1 or High 2 scenarios as they cover the most likely future requirements until such time as the redistribution of Leicester's unmet needs has been agreed. Accordingly, in terms of the level of housing growth, given the potential scale of shortfall for Leicester City amounting to some 18,000 dwellings, the 'High 2' scenario of 730 dwellings a year would appear to represent the most appropriate option at this stage, making suitable provision to enable the plan to deal with unmet needs when the distribution is agreed between the HMA authorities. It is also important that the plan allows for general flexibility to deal with changing circumstances and this allowance for flexibility should be reflected in the level of housing proposed.</p>

	Questions	Comments
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>	<p>There is broad agreement with this approach and the logical, well-reasoned and clear explanation given. Option 7b represents a continuation of the existing strategy (with strong track record) with the addition of a new settlement and offers most flexibility when taking into account possible redistribution of unmet need from Leicester City.</p> <p>As a general comment, given the various references in the consultation document to the Strategic Growth Plan, it is perhaps surprising that no consideration is given to the 'International Gateway' (IG) in developing and assessing the potential options of future housing distribution.</p> <p>It will be important to ensure an overall, coordinated strategy-led approach to the consideration of and planning for growth in the IG, including to seek to ensure a coordinated and balanced approach to the provision of housing, jobs, services and facilities across the area. This is in the best interests of seeking to deliver growth that is as sustainable as possible (in transport terms); as self-contained (from a travel perspective) as possible; and in seeking to coordinate the identification, funding and delivery of the transport measures and infrastructure required to enable the growth. Considering a particular site in isolation (whatever its scale) would otherwise make it challenging to assess likely levels of sustainability and self-containment other than based on its current locational context (e.g. it's assessed as a 'remote' location because in the present circumstances there is a lack of nearby jobs, services and facilities and/or sustainable transport provision) and is likely to result in a fragmented and disjointed approach to the identification and delivery of transport measures and infrastructure. In other words, a site that might be considered to be unsuitable from a transport perspective when viewed in isolation, might be considered more favourably when viewed in the context of an overall strategy for growth in or across a particular area, such as an overall strategy for growth in the IG area.</p> <p>More specifically, it is noted that the Option 7b to be taken forward includes a 'New Settlement' of 1785 dwellings. It is recognised that this might be of a scale that is appropriate to the timeframe of the Local Plan (i.e. in terms of housing requirement numbers and what is likely to be practically delivered with the new Plan's lifetime), but nevertheless it will be important that any new settlement is of a scale that ensures it will contain a range of economic and social services and facilities that means it is likely to function as a true 'free standing'/largely self-contained community; a development of 1785 dwellings is unlikely to be of sufficient scale in this regard. If of smaller scale, any new settlement should be located close to existing urban areas (and associated services and facilities) in locations accessible via sustainable modes of travel, as opposed to becoming a car-oriented dormitory housing estate.</p> <p>Bringing together the comments about the IG and the scale of any 'New Settlement', it may be appropriate to consider whether a separate Supplementary Development Plan (SDP) document is required, providing a strategic framework that sets out the overall vision and strategic masterplan for the IG area. Within the framework provided by any such SDP, the new Local Plan and its successors could then bring forward allocations and policies that deliver their own respective elements of the overall strategy. Whilst such an approach would not fully address the risk of early phases of development in the IG area perhaps not being as 'sustainable' and 'self-contained' as might ultimately be possible, nevertheless it would provide a robust platform: for the identification of the overall service and infrastructure needs of the IG area; for seeking to deliver the required infrastructure in 'one go' wherever possible; and for maximising opportunities for securing developer contributions and ensuring their most effective use.</p>

	Questions	Comments
		<p>Regarding Para 4.27, the Sustainability Appraisal has regard to minerals and waste safeguarding under SA17 which states, 'Ensure minerals deposits and sites allocated for waste management are not sterilised through inappropriately located development'. However, the traffic lighted criteria only have regard to mineral safeguarding areas and not those waste sites which are safeguarded in the Leicestershire Minerals and Waste Local Plan (adopted 2019). Whilst we are working on the production of a waste safeguarding layer for GIS use, the criteria should still refer to waste safeguarding as it is spatially assessable from our Local Plan. This would ensure that sustainable waste management within the county is not compromised by other forms of development or that any new residential, or other, development is adversely affected by existing waste management facilities.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>The approach of considering a number of delivery options that can be tested through the Sustainability Appraisal is supported.</p> <p>Coupled with the High 2 scenario, the 'Option 7b' locational strategy proposes to distribute development to the Coalville Urban Area (1,785 dwellings) a new settlement (1,785 dwellings), Key Service Centres (765 dwellings), Local Service Centres (510 dwellings) and Sustainable Villages (255 dwellings). This distribution option provides the greatest potential for some additional housing growth in a range of settlements, supporting the ongoing delivery of services and sustainability and therefore should be supported as the most appropriate distribution option.</p>
Housing		
6.	Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?	<p>There is agreement with inclusion of specific policy but there could be an opportunity to specify the provision for self-build and custom housebuilding plots.</p> <p>If significant quantities of custom/self-build plots are to be included as part of wider allocations/permitted development sites (as proposed through the draft policy), it will be important to ensure that this is taken into account in setting trigger points for infrastructure delivery and/or contributions – i.e. if reaching a trigger point is reliant on delivery of at least some self/custom build housing, there could be an increased risk that this will never happen? Conversely exclusion of self/custom build housing from the setting of trigger points could mean a considerable number of new homes coming forward without the delivery of the necessary infrastructure/contributions being triggered for the site as a whole.</p> <p>It is suggested that it would also be beneficial if either via this policy or via the general carbon reduction policy it is stipulated that custom built houses are sustainable and include infrastructure necessary for the future such as electric charging points.</p> <p>The District Council also needs to be aware that such schemes may still generate the need for a contribution towards the provision of new school places.</p> <p><u>Comments from the County Council as a landowner</u></p>

	Questions	Comments
		<p>The delivery of self-build and custom houses is accepted. It is noted that the draft policy appears positive in its approach but importantly incorporates the proviso that deals with a lack of demand on larger sites enabling market housing to be delivered after a suitable period of marketing.</p>
7.	<p>Do you agree with the proposed policy on Space Standards? If not, why not?</p>	<p>It is agreed that there should be the inclusion of a specific policy but policy wording could include ‘change of use’ as well as conversions.</p> <p>This approach is important as a lack of internal space and overcrowding is associated with negative implications on mental wellbeing, psychological safety (due to a lack privacy/personal space) and health outcomes (https://www.hatc.co.uk/wp-content/uploads/GLA_Space_Standards_Report.pdf) Space shortage is also linked to lower educational attainment (overcrowding impacts on concentration levels, increase noise, lack of space to study). An Increase in internal space is linked to significantly reduced family tensions (University of Glasgow SHARP project) working from home more likely than ever before due to Covid-19. Maintaining the space standard will alleviate the negative health consequences associated with lack of space (<i>Ade Kearns (2022) Housing space and occupancy standards: developing evidence for policy from a health and wellbeing perspective in the UK context, Building Research & Information, DOI: 10.1080/09613218.2021.2024756</i>)</p> <p>It is important to note that there are likely to be other factors also that could impact on land supply, including the impacts of the Government’s most recent cycle infrastructure design guide, Local Transport Note 1/20 and its general encouragement for segregated cycle routes. A reference to this would be good.</p> <p><u><i>Comments from the County Council as a landowner</i></u></p> <p>It is agreed that housing should meet NDSS Standards as a minimum subject to the proviso that any impact on the viability of the scheme does not act as a constraint on delivery. Equally, the introduction of space standards could be phased in a way that allows market forces to determine land values that take account of their introduction.</p>
8.	<p>Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?</p>	<p>The proposed policy on accessible and adaptable housing is agreed.</p> <p>Ensuring that future housing stock in the district is able to accommodate the increase in demand for accessible and adaptable housing has obvious public health benefits, if people are able to stay in their own (suitable) homes for longer it positively impacts on physical and mental health. To expect this of all housing will therefore positively impact health and wellbeing across the lifecourse and support healthy ageing, one of the priorities within the new Leicestershire Joint Health and Wellbeing Strategy.</p> <p><u><i>Comments from the County Council as a landowner</i></u></p> <p>The draft policy of ensuring all housing meets current Building Regulation standards is logical as is the need for a proportion of the dwellings to be wheelchair friendly.</p>

	Questions	Comments
9.	Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?	<p>M4(3)(a) wheelchair adaptable dwellings should also apply to market housing given the anticipated rise in persons requiring such adaptability in homes in future years.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>In respect of market housing the proportion of housing that is required to meet M4(3)(a) should be no greater than the need identified within the housing needs assessment for the District and take account of the level of provision delivered through affordable housing and supported housing schemes delivered across the overall scheme.</p>
Development Strategy Options for Employment		
10.	Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?	<p>Prefer Option 1 to identify reserve employment site/s as it would help to provide certainty and would provide NWLDC with control over site selection rather than leaving to the market.</p> <p>It could also be appropriate to consider a combination of options, so identify reserve employment site/s plus increase employment requirement figure given we understand the Freeport proposal is highly likely to accelerate demand for and delivery of employment sites. Given that this Local Plan has the potential to be key to the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, employment land provision should be considered in that context (regardless of whether it is to meet solely the district's needs or to meet wider HMA needs).</p> <p>Additionally, the drive to decarbonise transport will, to some degree, be an influencing factor on delivery and sites, too. The electrification of Light, Medium and Heavy Goods vehicle fleets during the lifetime of the Local Plan could, potentially, render some existing employment locations as obsolete (e.g. because of an inability to provide sufficient power supply/charging facilities and/or the 'last mile' is too long for an electric HGV once it has left the Strategic Road Network) or temporarily redundant (e.g. whilst issues of power supply, 'last mile' HGV operation are addressed).</p> <p>How the provision of appropriate power infrastructure is provided to enable growth may need to be a consideration in the new Local Plan in this regard.</p> <p>In addition, it is not clear how the Freeport proposals have influenced thinking in respect of the new Local Plan.</p> <p>With regard to each of the specific potential policy options:</p> <ol style="list-style-type: none"> 1. Identify reserve site(s): If this approach is adopted, it is important that any 'reserve sites' are assessed from a transport perspective as if they are full allocations, to ensure that any site specific and/or additional cumulative transport impacts/infrastructure requirements arising as a result are identified and addressed through the Local Plan. 2. Increase requirement figures by a factor: No particular comments from a strategic transport perspective.

	Questions	Comments
		<p>3. Await the next review of the Local Plan: Potentially misses the chance to identify any additional cumulative transport impacts/infrastructure requirements arising as a result and to build this into the Local Plan at the earliest opportunity. Having to ‘retrofit’ for such additional requirements at a later stage could prove more costly and disruptive in the long run.</p> <p>4. Rely on Policy Ec2(2) or its equivalent: This does not appear to be a preferable approach, for the reasons given in the document and also with regards to our wider comments in response to this question.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>Subject to there being sufficient land supply available to meet the next 5 years requirements the final choice of option could be delayed until the Statement of Common Ground has been agreed identifying the level of Leicester City’s unmet need that will be delivered within NWL.</p>
11.	Which general employment land strategy option do you prefer? Is there a different option which should be considered?	<p>See also response to Q10.</p> <p>Additionally, as a general comment given that the East Midlands Gateway Strategic Rail Freight Interchange (SRFI) facility is now complete and open for business, it would seem sensible to consider whether a policy approach should be adopted that supports the further expansion of employment provision in that area that is <i>genuinely able</i> to be served by the SRFI as part of its logistic chain. This would help to maximise sustainability/ minimise additional HGV trips on the wider highway network. Should further growth in this area be considered, then the comments in respect of the Strategic Growth Plan International Gateway (IG) made in response to Q5 apply, i.e. It will be important to ensure an overall, coordinated strategy-led approach to the consideration of and planning for growth in the IG.</p> <p>Option 1 – No particular comments from a strategic transport perspective.</p> <p>Option 2 – M42 J11 is much more isolated/remote from major settlements than established major employment areas across the district, and therefore likely to be significantly more car dependent/less ‘sustainable’ in transport terms. It also lacks the established infrastructure/benefits of the East Midlands Gateway area for strategic logistics, including the SRFI facility, meaning any additional logistics operations in the J11 area would be entirely HGV dependent. Finally, the specific opportunities for development in and around the M42 J11 are likely to be restricted by the planned HS2 Phase 2B ‘East Midlands Spur’, the preferred route of which is immediately to the east of the M42/A42, cutting across a number of potential employment sites that have previously been put forward through the SHELAA. Having said that, conversely this location may be suitable for consideration of a ‘lorry park’ (see response to Q26).</p> <p>Option 3 – This does not appear to be a particularly attractive option in transport terms – a scattered/ piecemeal approach is likely to result in impacts on less suitable parts of the highway network which could be harder to mitigate in transport terms and provide fewer opportunities for sustainable travel.</p> <p>Option 4 – No particular comments from a strategic transport perspective.</p>

	Questions	Comments
		<p>All options should have regard to mineral and waste safeguarding areas as set out in the Leicestershire Minerals and Waste Local Plan (adopted 2019). This would ensure that sustainable mineral and waste management within the county is not compromised by other forms of development or that any other development is adversely affected by existing minerals or waste management facilities.</p> <p>Overall preference for Option 1 concentrating development in Coalville, Castle Donington and Ashby or Option 2 but include Measham/Appleby. Issues are already being faced with getting employees to site by limited public transport and if locations are dispersed beyond the main settlements this will make it worse.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>For employment options, whilst not consistent with the Stantec Study, the Option 3 land strategy would provide greater opportunities for employment development across a range of settlements and is therefore supported. Provision should also be made for start up and business development space to be provided in order to stimulate the local economy. As occupiers are often unable to provide a significant track record this sector relies on niche providers willing to deliver dedicated schemes for the delivery of smaller starter units as well as a requirement within larger schemes.</p>
12.	Do you agree with the initial policy option for strategic warehousing? If not, why not?	<p>See also response to Q.10 and Q.11 but agree and consider it an appropriate response given the role of strategic warehousing in NWL.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>From a strategic property perspective, the proposed policy is seen as very much an interim measure until such time as current needs have been accurately assessed. However, when determined, the needs figure should be increased by a minimum of 10% to reflect the attractiveness of the district for strategic warehousing and provide the plan with</p>
Employment		
13.	Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?	<p>See also response to Q.10 and Q.11 regarding potential employment provision in the vicinity of the East Midlands Gateway Strategic Rail Freight Interchange.</p> <p>Prefer Option 4 (or possibly Option 8 which is a combination of options 3 to 7) as this option ensures other suitable sites are explored with reasons given if they are discounted before an unidentified site could be deemed acceptable.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>Option 1 is preferred as it provides the plan with greater flexibility</p>

	Questions	Comments
14.	<p>Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?</p>	<p>Support Option 4, but if this is unlikely to result in significant additional start up floorspace prefer Option 5 to allow start up premises as an exception on sites where development would normally be restricted</p> <p>If a new settlement is to be favoured as a development option, then some specific ‘start up’ provision may be needed as part of the employment provision for such a site, to ensure residents looking to start a business have ‘on site’ options rather than being forced to look/travel further afield (which would increase car-dependence).</p> <p><u>Comments from the County Council as a landowner</u></p> <p>Options 4 and 5 are preferred as they support both start-up units and, in the case of Option 5, encourages the development of rural businesses and the rural economy.</p>
15.	<p>Which policy option for local employment do you prefer? Is there a different option which should be considered?</p>	<p>Option 2 ideally, as it provides the opportunity to engage with and influence employers at the early planning application stage, though acknowledge the difficulties with policy implementation. Recommendations and encouragement will only hold so much sway. Local employment is important to the prosperity of the local area, and due to reduced travel miles and therefore increased active travel options, can also impact on air quality and physical and mental health, if planned and executed well.</p> <p>Skill development is also a key wider determinant of health and contributes to a concept known as ‘Good Work’. Good Work contributes to the health of employees, and healthy employees are more productive, improving economic prosperity of the area. A positive cycle for both residents and employees. There may be opportunity for wording to be added in regard employers who promote health and wellbeing of their staff, as well as skill development. Public Health are developing and widening the current offer to allow for more areas of support (i.e. financial wellbeing, wider mental health offer) and also so it supports more sizes of businesses in more sectors.</p> <p>As stated, option 2 also offers the potential for commuting incentives and potentially could bring down the 92% of commuting journeys by car to be in the line with the national rate of 78%.</p> <p>(Nb NWL has the lowest employment average rank vs other 6 districts when reviewing IMD data)</p> <p>From a strategic transport perspective, aside from economic and general benefits to peoples’ lives, a policy that seeks to encourage/support the employment of people local to business brings about the greatest opportunities to minimise the need to travel by private car, with potential environmental benefits.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>On the basis that large scale housing sites should be collocated with employment potential allocations should be considered on an individual basis taking account of the availability of employment nearby or the need to travel if none exists with appropriate site specific requirements linked to any allocation.</p>

	Questions	Comments
Health and Wellbeing		
16.	Do you agree with the proposed health and wellbeing policy? If not, why not?	<p>Yes. The previous feedback from emerging options consultation that “<i>such a policy could lead to the duplication of policy as this matter as dealt with throughout the Local Plan</i>” has weaknesses as an argument. If embedded throughout the plan in small parts rather than as a standalone policy it provides opportunity for health, as a key component especially important to NWL and its aims, to be diluted or weakened. A standalone policy will allow you to explore need, evidence-based action and recommendations clearly and concisely for the those assessing the plan and the community that it serves.</p> <p>The policy could also make reference to access to healthy food. This can take the forms of restricting access to unhealthy choices, or also promoting access to sustainable, healthy food through design and the built environment.</p> <p><i>Other suggestions:</i></p> <p>Could the policy include a sentence about creating opportunities for social interactions? As per 92: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities</p> <p>Consider anything around improving opportunities (reference made in above document) around ‘All children get the best start for life’, a key priority within the New Leicestershire Joint Health and Wellbeing Strategy, and so have access to a good quality education, and everyone has the opportunities they need to fulfil their potential. This could contribute to increasing the levels of GCSE attainment rates – currently 43.9 % attainment (average attainment 8 score for NWL), lower than the regional and national average. Education and skills are key wider determinants of health.</p> <p>Add in a demonstratable outcome that relates to health priorities for the area. For example, reduce the gap in percentage of physically active adults in North West Leicestershire – currently 61.1% which is significantly lower than the regional value of 65.7% and national value of 66.3% (https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000134.html?area-name=North%20West%20Leicestershire)</p>
17.	Do you agree with the proposed Health Impact Assessment policy? If not, why not?	<p>There is agreement that option 3 is the most viable and will result in potential improvements in health inequalities and healthy life years and a reduction in health inequalities within North West Leicestershire, however there needs to be a clear policy on how the proposals are determined.</p> <p>A line could be added around “....any other proposal considered by the council to require one” as it covers other eventualities. There could be additional clarify around some points - Is there anything in place which would prevent the same builder put in multiple applications to come under the 30 limit to avoid HIA? What if multiple <30 applications came in but all concentrated in one area? What if an application came in with a certain proximity to HS2/trainline, or where a health facility had just closed/stopped taking on new patients, or close to a new AQMA?</p>

	Questions	Comments
		<p>There is a simple, accessible solution for screening for a HIA that has been built on the LLR Healthy Placemaking Portal: https://www.healthyplacemaking.co.uk/health-impact-assessment/ developed by Active Together, with content provided by the Leicestershire Public Health Team.</p> <p>The screening tool is a simple form to be filled out based on a DoH template and is fully embedded into the website for ease of use. It has clear sections around what to consider, so that would negate the need to explore this within the Local Plan further, unless you would like to. There is also a set of slides and audio commentary on the why, what's and how's of HIA, recorded by a Consultant in Public Health.</p> <p>Use of the screening tool can take away some ambiguity, such as around the statement 'for developments where the screening assessment indicates more significant health impacts, a more comprehensive, in-depth Health Impact Assessment will be required ', which could allow subjectivity. The tool allows a more rigorous approach, less open to bias.</p> <p>Screening is a key stage of HIA, it just needs to be managed as some feedback from other areas has been that screening has shown no health impacts from a wide range of developments. If we are also looking at positives in HIA, even these could be recorded and impacts on health and wellbeing explored. This would be a clear way to capture and positives to the community.</p>
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?	Agree, could also seek to provide guidance on what these other circumstances could be and more simpler assessments could be used that reflect scale of development
Renewables and Low Carbon		
19.	Do you agree with the proposed renewable	<p>It is suggested that NWLDC strive for option 3 rather than option 2 (2045 rather than 2050 target?) to align with the County Council ambition.</p> <p>It might be appropriate to cover accessibility to a site for construction (including for 'abnormal loads' as necessary) and future maintenance purposes in the proposed criteria under item 2, especially in respect of sites for wind turbines.</p>

	Questions	Comments
	energy policy? If not, why not?	<p>The policy should also refer to avoidance of harm to habitats or species, not just mitigation and enhancement.</p> <p>From a public health perspective, there is concern around fuel poverty, which is associated with poor physical and mental health outcomes- energy efficiency measures can reduce financial outgoings – most beneficial for people on lower incomes (Liddell C., C. Morris and S. Langdon (2011), <i>Kirklees Warm Zone. The Project and its Impacts on Well-being</i>, www.kirklees.gov.uk/community/environment/energyconservation/warmzone/ulsterreport.pdf).</p> <p><u>Comments from the County Council as a landowner</u></p> <p>The document should be updated to say that it would support opportunities to exceed these targets should the opportunity arise rather than stopping if the targets were met. I think more could be done to look into low-carbon heat forms too and this should be included in the document.</p>
20.	Do you agree with the preferred policy approach for energy efficiency? If not, why not?	<p>Agree with the preferred policy approach for energy efficiency as the target demonstrates a proactive approach.</p> <p>Energy efficient policies can positively affect health and wellbeing through reducing the negative impact of fuel poverty. The cost of electricity and gas is rising, due to the global wholesale price of gas increased in 2021, the default energy tariff on gas and electricity has been lifted. Energy bills on average will increase by around £700 per household from April 2022 and could continue to increase going forwards. People are more likely to be working from home and in the house more but due to the increased costs may be at risk of not being able to adequately heat their home.</p> <p>Fuel poverty is associated with negative effects on mental wellbeing and stress. <i>“National Institute for Clinical Excellence (NICE) recognise the profound effects that cold housing can have on health and cite links to health problems, excess winter deaths and reduced quality of life, with the impacts being most acutely felt amongst the vulnerable including the elderly, children, and those with chronic conditions.” (Ambrose et al 2021).</i></p> <p><u>Comments from the County Council as a landowner</u></p> <p>it is far more effective to have mandatory energy requirements for buildings so that this forces higher standards. When voluntary it is too easy for these to be excluded for various reasons.</p>
21.	Do you agree with the preferred policy approach for Lifecycle Carbon	<p>The sentiment of the preferred approach is understood. However, if the intention is that Lifecycle Carbon Assessments should include highways and transport infrastructure associated with new developments, then this would become very wide ranging and complex; it is not clear how and where this would align with the planning application process nor current ‘traditional’ highway adoption processes; and would likely require additional training for Local Highway Authority officers.</p> <p>The policy needs to recognise that new methods of assessing carbon may come forward in the future as this becomes more mainstream.</p>

	Questions	Comments
	Assessment? If not, why not?	
22.	Do you agree with the preferred policy approach for overheating? If not, why not?	Agree with the preferred policy approach as it covers both small and large developments and will become more important in the future as climate change comes into play.
23.	Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?	Agree with the preferred policy approach for the climate change assessment of development and seems appropriate and in-line with Q.21 and Q22.
24.	Do you agree with the proposed policy for reducing carbon emissions? If not, why not?	<p>Agree with the policy on carbon emissions with funding being provided as the last resort option and that other methods are utilised first.</p> <p>Matters under Q.21 also apply here to a certain extent, and there should be reference within the policy to incorporating infrastructure/technology required to support decarbonisation of transport, including electric vehicle charging points.</p> <p>Point 3: <i>'demonstrate actions taken to reduce embodied carbon and maximise opportunities for reuse of materials'</i>; the reduction of carbon is an element of a much larger model, the 'circular economy' of which there is no mention. Any reference to carbon and material efficiency can be strengthened and expanded upon through reference to (for example); the reduction in the volume of materials brought onto site reducing material use, raw material extraction, associated environmental impacts ('externalities') and the transportation of materials to site. A considered supply chain approach by developers could be used to evidence this. There should be greater emphasis on the use of materials already on site or from the deconstruction of buildings/elsewhere; considered material choices to enable materials to stay in use ('cycle') for longer and be passed ('cascaded') to other uses (a second and third life cycle) after they come to the end of their first life cycle. Life cycle design is crucial in facilitating this and ensuring materials can be easily recovered through modular design and the inclusion of less hazardous materials etc.</p> <p>There are sections on water efficiency etc. but not enough on resource efficiency which is a topic in its own right.</p> <p>The wider role of green spaces and ecosystem services for carbon sequestration should have a stronger emphasis, in helping to offset carbon emissions. For e.g. hedgerows, trees etc</p>

	Questions	Comments
		<p>The Low Carbon Energy Study by AECOM doesn't mention the need to integrate habitat into housing design in relation to achieving Net Zero.</p> <p>Agree with the proposed policy for reducing carbon emissions and would wish to take the opportunity to adjust carbon net zero target to 2045.</p> <p><u><i>Comments from the County Council as a landowner</i></u></p> <p>It is far more effective to have mandatory energy requirements for buildings so that this forces higher standards. When voluntary it is too easy for these to be excluded for various reasons. Concern that by mentioning that off-setting is an option when renewable energy generation is not viable; it can provide an easy way out for builders. This should be strengthened and made more specific to really enforce the use of on-site renewables. Offsetting should only be an option when renewables are not technically feasible. Leaving economic feasibility as a reason leaves it open to interpretation and many will opt to offset instead.</p>
25.	Do you agree with the proposed policy for water efficiency standards? If not, why not?	<p>The proposed policy for water efficiency standards is agreed but there is also scope to consider water efficiency in change of use and conversions and ambition for water efficiency standards to extend beyond new stock to existing stock (beyond the planning function).</p> <p>From a public health perspective, the policy should ensure it enables opportunity to help lower energy bills and as noted above fuel poverty is associated with negative effects on mental wellbeing and stress. Section 9.67 NWL classification of a 'seriously water stressed' area has obvious concerns around health and wellbeing in long, dry, hot periods, especially for our more vulnerable populations.</p>
Next Steps		
26.	What additional comments do you have about the Local Plan Review not covered by the preceding questions?	<p>The Local Highway Authority (LHA) is supportive of the Development Plan process; whilst providing for the future growth of Leicester and Leicestershire will be challenging in many regards (including in respect of highways and transport), a Plan-led approach offers the greatest opportunities to address those challenges as compared to seeking to deal with the impacts of ad-hoc, 'unplanned' growth.</p> <p>The LHA would therefore wish to see the successful adoption of a new Local Plan for the district. However, it has had a relatively limited opportunity to input into the Plan's development to date. For example, whilst noting that this draft of the Plan contains no site allocations, the future housing numbers and employment land provision are/will be, presumably, informed by some considerations of potential sites available. It is unclear at this time how the LHA's comments on NWLDCs SHELAA sites might have informed the district council's decisions to date.</p> <p>The LHA looks forward to closer working with the district council going forward, including to develop an appropriate transport evidence base and to identify any highways and transport measures and infrastructure required or enable the district's future growth, including to address cumulative impacts of growth (within and without the district). The LHA will expect the new Local Plan to provide a robust policy basis, one that links growth to the provision of highways and transport measures and infrastructure as appropriate and provides for the securing of developer contributions towards the delivery of such.</p>

	Questions	Comments
		<p>It is likely to be appropriate for the new Local Plan to reference the Interim Coalville Transport Strategy. Dependent on the outcome of the Local Plan evidence work, it may be necessary to reconsider the level of contributions paid by developers towards the Strategy's delivery under the Policy position previously adopted by NWLDC and to consider whether the scope of its Policy position should be extended in geographical and/or development type scope.</p> <p>Given the significance of the logistics sector in the district and the lack of available service facilities on the Strategic Road Network (SRN) in the area, it is suggested that consideration should be given through the development of the Local Plan as to whether land should be identified for a 'lorry park'.</p> <p>It is to be hoped that Government will soon make a decision on proposals for reopening the Ivanhoe Line to passenger traffic, and that this can be appropriately reflected in the new Local Plan.</p> <p>It is expected that the Local Plan will need to contain at least reference commentary to the HS2 Eastern Leg, but policies might also be required.</p> <p>It is also suggested that the Plan should acknowledge early in the document the ongoing Covid-19 pandemic and current uncertainties over the long-term implications this will have on society, including on transport provision and travel behaviour (encompassing trends such as increased home working). It should also look at the roll that the Local Plan has in aiding the area's recovery.</p> <p>More emphasis could be placed on the provision of future emerging transport technologies within the document to support decarbonisation.</p> <p>With regards Page 55, Some of the Public Health data has been updated in Feb 2022 (i.e. childhood obesity https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/8000073/pat/6/par/E12000004/ati/201/are/E07000134/yr/3/cid/4/tbm/1). It might also a good idea to give specifics of percentages as it helps with accurate comparisons to other areas when using as evidence to back up decisions or potential policies.</p> <p>It isn't clear what this text means, <i>"Increasing levels of physical activity – Approximately one quarter of adults are not physically active and a further 11% are not meeting Chief Medical Officer guidelines of 150 minutes of physical exercise per week."</i> If this data is being used: https://www.active-together.org/researchandvidence/active-lives-adult-survey-may-202021-llr-headlines/download</p> <p>It is positive to read that "The Local Plan itself will be the subject of a HIA". The Leicestershire Public Health team will be delighted to help with this as part of the pilot work with NWL and Blaby to embed health into Planning processes within Leicestershire.</p> <p>With regards Page 60, there is reference to PHE <i>"It is anticipated that the work currently being undertaken with Public Health England, would also provide some form of guidance to assist with the application of the policy."</i> It needs to be clarified whether this is the Leicestershire Public Health Team? Or if it is PHE they are now a new organisation (OHID).</p>

Questions	Comments
	<p><u>The following paragraphs set out the Children and Family Service response to the North West Leicestershire Local Plan Review consultation.</u></p> <p>Given that there is little reference to Education provision from new housing development, it is difficult to comment on the specifics of what we would require. We expect to be able to provide a more detailed response when the allocated sites list is circulated by NWLDC. Therefore at this stage we wish to highlight to the district education matters that need to be taken into consideration as the Local Plan develops and potential sites evolve.</p> <p>It is of paramount importance that early engagement and close working is undertaken between the County Council and other partners in the delivery of infrastructure and related proposals to help to mitigate some of the risks that the provision of new school places may bring.</p> <p>Good schools have a significant impact on the communities which they serve. They are at the heart of the community and contribute towards thriving and sustainable areas of housing. Therefore, it is imperative that any new housing developments contribute to the provision of new school places.</p> <p><u>Developing additional school places</u></p> <p>In accordance with the Education Act 1996 the County Council has a statutory duty to ensure a sufficient supply of primary, secondary and post 16 school places. This may be interpreted as a duty to ensure that a school place is available in all localities for every child that needs one and mindful of their specific needs. The County Council also has a duty to ensure the sufficiency of early years and childcare provision under the Childcare Act 2006 and 2016.</p> <p>In the context of the above duty it should be noted that a number of existing schools within the District are currently operating at the upper limit of their site capacity and may not be readily able to provide school places which would arise from the allocation of substantial housing growth, particularly some of the schools in small, villages or rural centres. This might suggest that the Plan should make provision to either secure land for the expansion of schools, if available next to the school site or alternatively consider relocating housing development elsewhere, or in certain circumstances the development of a new school. The District Council are advised to exercise caution when considering the development of new schools as the cost for these may be disproportionate to the scale of development (it should be noted that the County Council is unlikely to be able to meet any funding gaps, unless there is evidence of increasing 'basic need' in the area for which DfE grant may have been secured. Developing new schools may also introduce surplus place capacity if not carefully planned, which will have a bearing to other developments, speculative or otherwise, in the given area.</p> <p>For the avoidance of doubt singular or multiple developments of collectively 700 homes would ensure the viability of a 1 form entry, 210 place primary school, whereas for secondary schools developments would need to comprise circa 4500 homes to justify a 750 place school (excluding post 16 provision).</p> <p>It is noted within the consultation document 4.67 Table 6 that there are two preferred options to be taken forward. Option 3a High 1 scenario of 1,000 dwellings and Option 7b High 2 scenario of 5,100. However, developments of the size described, split over numerous sites may not</p>

	Questions	Comments
		<p>sustain a new secondary school provision but would have a major impact on existing secondary provision in the NWLDC area. Early discussion regarding potential location of any new settlement would therefore be welcomed to identify potential secondary education and Post 16 requirements and solutions.</p> <p>In terms of SEND provision for pupils having an Education Health and Care Plan (EHCP) it is expected that provision will be attached to existing or new primary or secondary schools in the locality, accepting there will be circumstances where pupils with specialist needs may need to attend schools further afield, and which in some circumstances may be outside of the District.</p> <p>From an Early Years perspective, the DfE encourage provision to be developed as part of new school and placed in each locality to minimise travel and disruption to families. Where such provision cannot be developed on existing or new school sites, or where demand exceeds that which could be met via a school based solution then early years provision should also be considered for community hubs or similar infrastructure.</p> <p>Where new school sites are proposed it is important to ensure that they are placed central to developments they will serve (or at the centre of a single development), in locations that are fully accessible and on sites that are of suitable gradient (avoiding excessive slopes/inclines), well drained, free from excessive noise, light, or air pollutants, so and take maximum benefit from their environments. Further details on site suitability for new or expanded schools can be found within the Leicestershire Planning Obligations Policy.</p> <p>Any sites identified for the expansion of existing, or the construction of new schools will need to reflect statutory guidance from the Department for Education regarding statutory available walking route distances from home to school of two miles for primary pupils and three miles for secondary pupils, and County Council policy relating to safe/available routes.</p> <p>It should be noted that introducing further development sites not identified within the Local Plan can sometimes tip the balance when it comes to provision of new schools rather than the provision of additional school places at existing schools, therefore some flexibility should be built into the plan to address this should it occur.</p> <p>It is also crucial that there is flexibility wherever possible around timing of spend from developer contributions to ensure that all monies are spent on the required infrastructure to ensure that school places are delivered in an equitable and coordinated manner.</p> <p><i><u>Proposal 1:</u> It is suggested that NWLDC consider the introduction a policy statement(s) within the Local Plan to deal with the provision and placement of new schools and acquisition/reservation of land for either new schools or the significant expansion of existing schools to provide the required additional places from housing developments.</i></p> <p><u>Delivery of additional school places</u></p> <p>In terms of providing additional school places a number of issues may arise:</p>

	Questions	Comments
		<ul style="list-style-type: none"> • New schools or significant expansion works will be expected to be progressed in parallel with new housing developments, to ensure that school places are available as new homes are occupied. The County Council will not have capacity to forward fund all new infrastructure works, this therefore places emphasis on developers not only meeting the full cost of all new schools or expansions but ensuring that S106 funds are released at a sufficiently early stage to allow works to progress. If this cannot be achieved then this may introduce a requirement for pupils from new developments to be transported to other schools nearby, in such circumstances the developer would be required to meet not only the costs off transport to alternative schools, but potentially also the costs of additional temporary accommodation if surplus places were not available. The County Council would seek to avoid such circumstances arising given the disruptive impact this will have to families and the continuity of a pupil’s education. • It is expected that some new schools or expansions will be dependent on S106 funding drawn from several developments, this could introduce a significant funding risk that either developments do not progress simultaneously or consecutively, or possibly that a particular development does not progress at all introducing a funding gap. • It is known that delivery of the Local Plan will be contingent on the expansion of schools in rural locations, often conservation areas, or on constrained sites, where normal design solutions cannot be applied. In such circumstances it is expected that developers will be required to meet the full costs of construction, and any additional works necessary to mitigate any other planning requirements rather than the just the cost multiplier. • The Local Plan consultation makes no reference to the impact of EU exit or the Covid-19 pandemic both of which have contributed towards significant construction cost increases related to labour shortages, materials availability and transport costs. It is too early to say how the construction market may be impacted longer term, this places an emphasis on the importance of frequent review and dialogue between the County and District Councils and other delivery partners to ensure that the full costs of schools development and any expected change to these are fully understood and mitigated for <p><i><u>Proposal 2:</u> In view of the above it is suggested that the District Council consider including within the Local Plan a policy setting out expectations specifically in relation to the funding of additional school places and other education infrastructure, such that this mitigates financial risk to the County Council.</i></p> <p><u>Community use of school facilities and sites</u></p> <p>The County Council recognises the value of schools as a focus for community use (predominantly outside of school hours and during school holidays). All new schools to be developed as part of the Local Plan delivery will be established as academy (free) schools meaning they will be operated by Multi Academy Trusts (as charitable companies/commercial entities) directly controlled by the DfE. In practice schools will seek to make their facilities available to the community via a standard letting procedure.</p> <p><i><u>Proposal 3:</u> The District Council are therefore advised that is very unlikely that academies will be able to enter into agreements with the District or other organisations regarding shared use or joint management agreements for facilities located on school sites, where such are</i></p>

Questions	Comments																								
	<p><i>deemed to present (in view of the Trust, the County Council or the DfE) a financial risk to the effective operation of any school. Such arrangements should therefore be avoided.</i></p> <p><u>Renewables and low carbon</u></p> <p>The County Council policy on Zero Carbon outlines how we will achieve energy efficiencies and our carbon reduction targets.</p> <p>It is therefore expected that the County Councils policy on zero carbon should adequately meet the requirements set out in the Local Plan option 9.54.</p> <p><u>Specific Site Allocations</u></p> <p>Although specific site details are not referenced in the Local Plan, it is noted that the preferred options provided in the Local Plan consultation in Table 6 under point 4.67 provide enough high-level information for us to provide an indication of the number of new school places that may be required. However, at this early stage without further detail on site specifics and type of dwellings we can provide no further information with regard to capacities in existing schools, whether solutions would be expansions and/or new schools and the developer contributions we would require from housing developers to provide the new school spaces.</p> <table border="1" data-bbox="445 767 1628 1321"> <thead> <tr> <th data-bbox="445 767 748 971"><i>Phase</i></th> <th data-bbox="748 767 994 971"><i>Pupil Yield Per 100 Dwellings</i></th> <th data-bbox="994 767 1314 971"><i>Option 3a 1,000 Dwellings School Places Generated</i></th> <th data-bbox="1314 767 1628 971"><i>Option 7b 5,100 Dwellings School Places Generated</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="445 971 748 1042">Primary</td> <td data-bbox="748 971 994 1042">0.3</td> <td data-bbox="994 971 1314 1042">300</td> <td data-bbox="1314 971 1628 1042">1,530</td> </tr> <tr> <td data-bbox="445 1042 748 1112">Secondary</td> <td data-bbox="748 1042 994 1112">0.2</td> <td data-bbox="994 1042 1314 1112">200</td> <td data-bbox="1314 1042 1628 1112">1,020</td> </tr> <tr> <td data-bbox="445 1112 748 1182">Primary Special</td> <td data-bbox="748 1112 994 1182">0.00363</td> <td data-bbox="994 1112 1314 1182">3.63</td> <td data-bbox="1314 1112 1628 1182">18.51</td> </tr> <tr> <td data-bbox="445 1182 748 1252">Secondary Special</td> <td data-bbox="748 1182 994 1252">0.004</td> <td data-bbox="994 1182 1314 1252">4</td> <td data-bbox="1314 1182 1628 1252">20.4</td> </tr> <tr> <td data-bbox="445 1252 748 1321">Early Years</td> <td data-bbox="748 1252 994 1321">0.085</td> <td data-bbox="994 1252 1314 1321">85</td> <td data-bbox="1314 1252 1628 1321">433.5</td> </tr> </tbody> </table> <p>All information on how we calculate developer contributions can be found in the Leicestershire Planning Obligation Policy published by the County Council in July 2019:</p>	<i>Phase</i>	<i>Pupil Yield Per 100 Dwellings</i>	<i>Option 3a 1,000 Dwellings School Places Generated</i>	<i>Option 7b 5,100 Dwellings School Places Generated</i>	Primary	0.3	300	1,530	Secondary	0.2	200	1,020	Primary Special	0.00363	3.63	18.51	Secondary Special	0.004	4	20.4	Early Years	0.085	85	433.5
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		<p data-bbox="427 140 1697 167">https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/8/16/Planning-Obligations-Policy.pdf</p> <p data-bbox="427 209 2101 320">School forecast data complete with a narrative summary is provided to the District Council on an annual basis. This information gives details about school capacities, predicted numbers on roll and school sites. When sites for the Local Plan are identified we can provide updated forecast information and discuss further what the likely education provision will need to be to provide new school places.</p> <p data-bbox="427 360 965 387"><u>Consultation Question Education Responses</u></p> <p data-bbox="427 427 1921 454">Please find below the County Council’s responses to the specific questions set out in the consultation that apply to education:</p> <table border="1" data-bbox="427 491 2143 1436"> <thead> <tr> <th data-bbox="427 491 495 526"></th> <th data-bbox="495 491 1104 526">Questions</th> <th data-bbox="1104 491 2143 526">Comments</th> </tr> </thead> <tbody> <tr> <td data-bbox="427 526 495 600">27.</td> <td data-bbox="495 526 1104 600">Do you agree with these Local Plan Review Objectives? 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	Questions	Comments	
			proposal considered by the council to require one? If not, why not?
	36.		Do you agree with the proposed renewable energy policy? If not, why not? See Section 5 above.
	37.		Do you agree with the preferred policy approach for energy efficiency? If not, why not? See Section 5 above.
	38.		Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not? See Section 5 above.
	39.		Do you agree with the preferred policy approach for overheating? If not, why not? See Section 5 above.
	40.		Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not? See Section 5 above.
	41.		Do you agree with the proposed policy for reducing carbon emissions? If not, why not? See Section 5 above.
	42.		Do you agree with the proposed policy for water efficiency standards? If not, why not? See Section 5 above.
	43.		What additional comments do you have about the Local Plan Review not covered by the preceding questions? See Section 8 below.
		<p>8. <u>Next Steps</u></p> <p>To provide an accurate calculation of education provision needed to meet NWLDC's Local Plan the following information will be required:</p> <ul style="list-style-type: none"> • Where are the expected development sites? <ul style="list-style-type: none"> - Please provide a map to illustrate locality • Exactly what type of houses will be built? <ul style="list-style-type: none"> – Please provide numbers and types of dwellings that will be included. • What is the likely commencement date and time frame for completion? <ul style="list-style-type: none"> – Please provide dates and likely annual build rate. 	

Page/Section (if relevant)	Comments
Table 3.1: RAG Assessment Criteria, page 17.	The Sustainability Appraisal has regard to minerals and waste safeguarding under SA17 which states, 'Ensure minerals deposits and sites allocated for waste management are not sterilised through inappropriately located development'. However, the traffic lighted criteria only have regard to mineral safeguarding areas and not those waste sites which are safeguarded in the Leicestershire Minerals and Waste Local Plan (adopted 2019). Whilst we are working on the production of a waste safeguarding layer for GIS use, the criteria should still refer to waste safeguarding as it is spatially assessable from our Local Plan. This would ensure that sustainable waste management within the county is not compromised by other forms of development or that any new residential, or other, development is adversely affected by existing waste management facilities.
Table 4.1	It is noted that only one option (Option 8) has an effect for SA17 in relation to efficient use of natural resources and the rest are scored as 'uncertain'. For Option 8, we would welcome the reasons for the positive effect to be noted. It is understandable that other options cannot yet be allocated effects for SA17 owing to the unknown location and magnitude of development sites. We welcome further consultation once options and locations for potential development are narrowed further.

NWLDC Local Plan Review. Consultation Response

To: NWLDC Head of Planning planning.policy@nwleicestershire.gov.uk

Cc: Nick Rushton, Cllr NWLDC [REDACTED]

Andrew Bridgen MP [REDACTED]

WINGS [REDACTED]

Long Whatton & Diseworth Parish Council [REDACTED]

From: Diseworth Flooding Working Group. 13th March 2022

Dear Sirs,

We wish to draw your attention to an area of concern regarding the proposed Local Plan [LP] Review, specifically the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1], whose boundary is adjacent to the village of Diseworth. Also, the potential industrial development of land south of the A453, bordering the north and east of Diseworth [SHELAA 2021. EMP90].

Diseworth Flood Working Group, recognised by the Parish Council, is a local volunteer group of residents who work to take direct, positive, action to reduce the risk of flooding to homes in the village.

Over the last 12 months we have successfully cleared, by hand, many tons of debris along over half a mile of the brooks running through the village and on to Long Whatton and so have made a considerable improvement in reducing flood risk. We have also installed remote monitoring of water levels in the brooks with early warning alert for the residents. We are also, looking into natural water slowing mitigation mechanisms upstream of Diseworth, covering the catchment land for the brooks, on which the potential housing development is to be sited.

Thus, as a group, we have a significant objection to both the proposed housing development at Isley Walton and the proposed industrial estate on the North East boundary of the village.

Both development proposals will together cover over 1000 acres of agricultural land which currently absorbs rain water for slow and natural release into the brooks. In addition, these proposed developments are right across the catchment areas for the brooks. Without truly significant mitigation, the combined hard standing and concreting over of the land will drastically increase risk of flooding in the village. The successful endeavours of our self-help Flood Working Group will then be undone and destroyed.

We have been assured over the years that the water released from the hardstandings across EMA would be carefully managed so as not to exacerbate the risk of flooding. This just does not happen. We have evidence that the controlled releases from EMA have occurred during peak flow of the brooks and these have positively contributed to flooding outcomes.

We also know the brook back fills due to storm release from Severn Trent sewer pipes directly into the Diseworth Brook, as well as, water level rising due to overcapacity limits at the Long Whatton sewer treatment facility. These both contribute to rising water levels.

It is extremely alarming to us as a group to know that the proposed developments will put Diseworth back into the high risk of flooding category, with all the misery and expense that flooded homes entail.

These developments are a significant threat to our village and we wish to protest against their implementation in the strongest terms.

Yours Faithfully,

Diseworth Flood Working Group

Local Plan Review. Consultation Response

Name Owen Hender.....

Address [REDACTED].....

Dear Sirs,

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

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

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

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

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

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

year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

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

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

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

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

local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. 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 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. 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

Owen Hender



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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Stuart
Last Name		Wells
[Job Title]		Planning Director
[Organisation]	Cameron Homes	Evolve Planning
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... to:

**Q1,2,3,4,5,6,7,8,9,10,11
16,17,18,20,23,24,25,26**

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

All answers to the above are set out in the supporting representations submitted alongside these forms.

(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

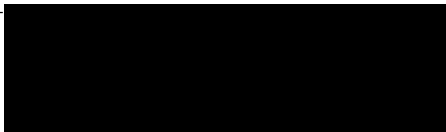
Declaration

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

14/03/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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.

NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW

DEVELOPMENT STRATEGY & POLICY OPTIONS

ON BEHALF OF CAMERON HOMES



TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

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1. Introduction

1.1 This representation, submitted on behalf of Cameron Homes, responds to the Regulation 18 'Development Strategy Options and Policy Options' consultation document and accompanying published evidence, having regard to the national and local planning policy context.

1.2 The representations are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Development Plan to be sound it must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.

1.3 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. Planning Policy Context

2.1 Cameron Homes supports North West (NW) Leicestershire District Council in progressing with a substantive review of the current adopted Local Plan as required by the recently reviewed and updated Policy S1. This provides the opportunity for the Council to comprehensively review the following matters:

- NW Leicestershire's own objectively assessed housing need over an extended plan period and the potential for housing supply within the District to meet this need.
- The potential role of housing supply options within the District to meet unmet cross boundary needs from the wider Leicester and Leicestershire Housing Market Area (HMA).
- Employment land requirements for NW Leicestershire.
- NW Leicestershire's potential role in meeting any wider unmet employment needs through the Duty to Co-operate.
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing and employment needs.

2.2 The National Planning Policy Framework (NPPF 2021) requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years.

2.3 Cameron Homes supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists within the District to guide growth to 2039 and to ensure that development is genuinely plan-led.

2.4 Cameron Homes supports the collaborative approach that has been taken through the preparation of the Leicester and Leicestershire Strategic Growth Plan (SGP) (Dec 2018) to consider the overall distribution of housing need across the HMA. Given the arising housing needs across the HMA, Cameron Homes endorses the continued need for joint-working between authorities to address future housing needs and determine appropriate LPA housing requirements.

3. Local Plan Review Objectives

3.1 Cameron Homes supports the approach taken by NW Leicestershire District Council in reviewing the overarching objectives contained within the adopted Local Plan and agrees with the approach of consolidation.

Question 1: Do you agree with these Local Plan Review Objectives? If not, why not?

3.2 Cameron Homes generally supports the proposed Local Plan Review Objectives, however the following comments are offered:

- **Objective 2** – In addition to local housing needs this objective should also recognise the role of the District in meeting unmet needs from elsewhere within the wider HMA.
- **Objective 4** – This objective should also recognise the need to protect and maintain services and facilities within settlements to ensure continued levels of sustainability within communities, rather than specific reference to the delivery of dedicated new infrastructure.
- **Objective 5** – This objective should also recognise the importance of a joined-up strategy in balancing the delivery of housing and job creation to assist in achieving sustainable travel patterns.
- **Objective 6** – Whilst the importance of regeneration within Coalville is supported, the vitality and viability of the District's lower level settlements, including the identified sustainable villages, should be recognised as being of importance.
- **Objective 11** – This objective should seek to maintain and also 'protect' access to services and facilities.

4. Settlement Hierarchy

- 4.1 Cameron Homes notes that the only minor change to the categorisation of settlements in the proposed hierarchy is the renaming of Small Villages and Hamlets. It is also acknowledged that the evidence base includes an up-to date assessment of services and facilities to inform a revised settlement hierarchy.

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

- 4.2 Cameron Homes supports the settlement hierarchy which is informed by the relative sustainability of villages within NW Leicestershire.

- 4.3 Cameron Homes supports the identification of Appleby Magna and Breedon on the Hill as a Sustainable Villages which are served by a range of services and facilities.

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

- 4.4 Paragraph 78 of the NPPF emphasises that “where there are groups of smaller settlements, development in one village may support services in a village nearby”; with paragraph 79 adding that planning policies should avoid the development of isolated homes in the countryside, subject to a number of exceptions.

- 4.5 Cameron Homes wishes to raise concerns with the identification of Local Housing Need Villages on the basis these represent unsustainable locations that would not ordinarily be appropriate for open market housing. Focus instead should be placed on securing the vitality and viability of services and facilities contained within the Sustainable Villages where existing services and facilities are most susceptible to being lost through a lack of modest growth.

5. Development Strategy Options for Housing

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.

- 5.1 The High 2 growth scenario is supported by Cameron Homes at this stage, in advance of further evidence being published to determine unmet need across the HMA, notably within Leicester City, and an agreed approach to apportioning any unmet need within the HMA, including within NW Leicestershire.
- 5.2 The High 1 growth scenario of 512 dwellings per annum is based upon the Leicester and Leicestershire Strategic Growth Plan 2018 (SGP). This was published prior to the changes to the Government's 'standard method' for calculating local housing needs. The revised standard method introduces an uplift of 35% to urban centres, including Leicester. As a result this uplift increases the annual housing need in Leicester City to 2,341 dwellings per annum. By comparison the 2018 SGP identified a notional housing need for Leicester City of 1,668 dwellings per annum.
- 5.3 It is also worthy to note that past annual completion rates in NW Leicestershire have been higher than the need identified through the High 1 growth scenario. On this basis, High 1 is not considered reflective of the current demand or increased local housing needs across the wider HMA introduced as a result of changes to the Governments standard method.
- 5.4 The High 2 growth scenario of 730 dwellings per annum is derived using the latest 2018 household projections which represents the most up to date evidence for determining local housing needs. Notably the figure of 730 dwellings per annum reflective of past rates of housing delivery over the last few years, as evidenced by the latest Housing Delivery Test (HDT) (2021) which concludes, for NW Leicestershire, an average delivery of 723 dwellings per year over the past 3 years. Furthermore, the HEDNA estimates the annual need for affordable housing in NW Leicestershire to be 199 dwellings per annum (2011-2031) representing 41% of the total housing requirement (481 per annum). In reality affordable housing completions have been significantly below this requirement for the past 8 years.
- 5.5 The uplift to the standard method for Leicester has resulted in an unmet need across the HMA of approximately 18,000 homes (an increase of 10,000 to previously identified unmet needs). How this figure is to be distributed between the authorities remains undecided at this stage, however it is clear NW

Leicestershire will be required to meet some of this additional need and the High 2 growth scenario provides a level of headroom and flexibility to appropriately accommodate this, subject to the outcome of further discussions across the HMA and evidence (High 2 would give a buffer of 362 dwellings per annum above the minimum local housing need).

- 5.6 NW Leicestershire is a net importer of labour; a trend which is expected to continue into the future. Cameron Homes considers that the imbalance between out and in-commuting to and from the District is further justification for upward adjustments to the housing requirement to assist in achieving a sustainable balance between jobs and the number of economically active residents within the District to create a greater degree of self- containment and achieve sustainable travel patterns.
- 5.7 Cameron Homes would wish to make further comment upon publication of any future evidence in respect to unmet needs within the HMA. However, based on current evidence, High 2 growth scenario is preferred over High 1 as it is considered to be the most representative of the current needs and demand in NW Leicestershire whilst being consistent with previous levels of delivery. Again, based upon existing evidence, Cameron Homes considers the High 2 growth scenario is the only growth option identified that would demonstrate the plan is effective and positively prepared.

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.

- 5.8 Cameron Homes welcomes the Council's approach to testing reasonable alternative spatial distribution options in line with the identified settlement hierarchy, including review through the Interim Sustainability Appraisal Report (ISAR) (Sept 2021). However, Cameron Homes considers that the Council has not fully tested all reasonable alternatives, with insufficient justification in relation to the options and preferred options identified.
- 5.9 It is accepted that there is the potential for further options to be developed once the unmet needs arising within Leicester has been established and the redistribution of this unmet need is agreed across all HMA authorities. Notwithstanding this, Cameron Homes wishes to make the following comments to ensure that the approach being taken is sound.
- 5.10 The ISAR has considered 9 spatial distribution options under the High 1 and High 2 growth scenarios. These options were identified through a number of assumptions to guide the choice of 'reasonable alternatives', which are set out

within the ISAR. This report also explains that consideration has been given to a possible new settlement following the findings of the SGP which identified a very broad area known as the 'Leicestershire International Gateway', with reference to 3 large scale sites in the vicinity of East Midlands Airport and Castle Donington that have been promoted through the Council's 2019 SHELAA as possible options for a new settlement of around 5,000 dwellings.

- 5.11 There appears to be some level of disparity between the ISAR 'assumptions' contained at section 2.1 and the distribution options identified. The assumptions place little emphasis on the delivery of a new settlement, instead placing emphasis on dispersed growth across the District. However, there is heavy reliance upon a new settlement throughout the majority of the options tested and where options do not include a new settlement (Options 2 and 3), these do not reflect the assumption of dispersed growth across the whole settlement hierarchy. Option 1 is a continuation of the adopted Local Plan but is clearly ruled out due to low and medium scenarios being inappropriate.
- 5.12 In summary, no option has been tested under the High 1 and 2 growth scenarios that disperses growth across the whole settlement hierarchy without reliance upon a new settlement.
- 5.13 Given the typical lead-in times associated with the delivery of new settlements, the option of a new settlement should not be overly relied upon to assist in meeting needs within the plan period. Cameron Homes agrees that any strategy should not be wholly reliant on a new settlement to meet residual needs (Option 8), but rather any new settlement must form part of a wider distribution of growth with primary focus on existing settlements in order to ensure delivery of the housing requirement and to assist in meeting housing needs prevalent across the District.
- 5.14 Paragraph 22 of the NPPF is clear that *"where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery"*.
- 5.15 There is currently little justification to rely on the delivery of homes from a new settlement within the emerging plan period. Whilst the SGP does identify that the Leicestershire International Gateway (LIG) has the potential to accommodate 11,000 new homes (spanning a number of local planning authority areas), there is no justification that this should translate to the delivery of a new settlement within NW Leicestershire. The Council, in conjunction with Charnwood District, prepared a Joint Topic Paper to inform

the Charnwood Local Plan on the LIG, which does not suggest a new settlement, rather that *“growth in the LIG sub-area should deliver new jobs and affordable homes and infrastructure to support both existing and new residents.”* The Topic Paper also states that growth in the LIG area *“should support regeneration in Shepshed (Charnwood) and Coalville (NW Leicestershire) and will be supported by sustainable means of travel to create a network of linked settlements benefitting from not only employment opportunities but an extensive range of services and facilities.”*

- 5.16 With regards to the LIG, the SGP itself recognises that *“the provision for strategic new housing developments in Ashby, Coalville and Loughborough need to be completed as a matter of priority to provide the opportunity for people to live close to their places of work. At the same time, some parts of the LIG area (e.g. the centres of Coalville and Shepshed) are in need of regeneration and the physical fabric needs to be improved”*. There is no suggestion that the appropriate approach for the LIG relates to the delivery of homes through a new settlement.
- 5.17 Cameron Homes accepts that the LIG sub-area does have the potential to accommodate new housing over the longer-term in conjunction with the wider economic proposals for the area, notably a Freeport in association with East Midlands Airport. However, given the embryonic position of the LIG, any aspirations for the delivery of a new settlement within this location should be a matter for a future Local Plan review as there is insufficient justification to specifically rely upon a new settlement within the LIG as part of the spatial distribution for NW Leicestershire within the proposed plan period at this stage.
- 5.18 Turning to the identified spatial options under the High 1 growth scenario, which seeks to meet a residual requirement of 1,000 dwellings, Option 3a represents the Council’s preferred spatial distribution. Option 3a sets out a distribution of 500 dwellings to the Principal Town (Coalville), 300 dwellings to the two Key Service Centres (Ashby de la Zouch and Castle Donington) and 200 dwellings to the three Local Service Centres (Ibstock, Kegworth, Measham). Option 3a proposes to focus no growth to the Sustainable Villages, nor to the Small Villages.
- 5.19 Under the High 1 growth scenario the Council rules out Options 4a – 9a on the basis that they would include a new settlement option which would not be appropriate or viable given the limited scale of growth at 1,000 dwellings. Whilst this is agreed, removing these options leaves 2a and 3a, with 2a seeking a less disbursed strategy restricted to 600 dwellings to the Principal Town and 400

dwellings to the Key Service Centres. The Council sets a preference for Option 3a over 2a given additional benefits new development could offer to the Local Service Centres.

- 5.20 No option within the High 1 growth scenario excludes a new settlement and includes an element of growth focused to the Sustainable Villages. Options 7a and 9a include an element of growth within the Sustainable Villages (and Small Villages in the case of 9a) yet were excluded on the basis that both options included a new settlement. Whilst Cameron Homes does not consider that the High 1 growth strategy should be preferred, as suggested earlier in this representation an additional option should have been tested which focused modest growth to the Sustainable Villages as part of an option that excluded reliance on a new settlement.
- 5.21 The High 2 growth scenario is considered at this stage to represent the most appropriate growth option by Cameron Homes. Out of the six options tested under High 2, four include reliance on a new settlement.
- 5.22 It is noted that Option 7b, which is the Council's preferred option under the High 2 growth scenario, apports a lesser amount to a new settlement, yet this still represents 35% of the total residual requirement under this option and therefore remains a significant proportion of the proposed growth. Reliance on a new settlement would restrict the potential for wider distribution of growth across the District, to include development focused towards the Sustainable Villages to assist in retaining and strengthening their future sustainability and vitality.
- 5.23 Option 7b only allocates 255 dwellings to the Sustainable Villages. This figure is insignificant on the basis it would be distributed between the 18 Sustainable Villages identified within the proposed settlement hierarchy i.e. this represents, on average, 14 dwellings per village over the 20 year plan period. This compares to 510 dwellings allocated to the Local Service Centres, which if evenly spread across each of the 3 LSVs, would equate to 170 dwellings per settlement.
- 5.24 The Sustainable Villages are considered by Cameron Homes to be the most at risk category of settlements within the identified hierarchy for diminishing sustainability. The Plan should be effective by seeking greater opportunities to support the viability and vitality of services and facilities that support general day to day needs of residents through additional proportionate housing growth. In this regard 255 homes distributed across 18 Sustainable Villages over a 20 year plan period would not go far enough to support the important role these villages play in respect of the services and facilities they offer, meeting affordable needs and supporting a balanced housing market through

the provision of open market choice and consequently additional homes for younger people, an ageing population and families.

- 5.25 This is represented by the Council's Local Housing Needs Assessment (Oct 2019) which considered the demographic trends and projections for each sub-area in the District over the 2020-2039 period. This identified a policy off apportionment of growth of 134 dwellings to Appleby Magna and 95 dwellings to Breedon on the Hill over this plan period based upon a lower housing requirement of 480 dwellings per annum. In addition, it was found that there was a net need for 22 net additional affordable homes within Appleby Magna and 38 net additional affordable homes within Breedon on the Hill over the same period. The Assessment also found that both Appleby Magna and Breedon on the Hill have a high level of detached and larger properties (53% and 46.7% respectively- Census 2011).
- 5.26 The figures of 134 and 95 dwellings for Appleby Magna and Breedon on the Hill are based on a lower housing requirement of 480 dwellings which is now superseded by latest evidence on housing needs across the District; notably under the High 1 and 2 growth scenarios, which seek to plan for 512 and 730 dwellings per annum respectively. In this regard the Council's Local Housing Needs Assessment should be updated to reflect these high growth scenarios.
- 5.27 These examples demonstrate the position of just 2 of the 18 Sustainable Villages, highlighting that the need for growth within the Sustainable Villages has not been sufficiently tested through any of the spatial distribution options.
- 5.28 The benefits associated with the principle of increased distribution is recognised in the ISAR through Objective SA4; providing good quality homes that meet local needs in terms of number, type and tenure in locations where it can deliver the greatest benefits and sustainable access to services and jobs. In assessing Option 7b (the most dispersed strategy that was considered) the Interim SA finds that there is a *"potential significant positive as under this option development is spread across the entire District rather than in a limited number of locations, ensuring that there is an increase in the number and mix of housing whilst also providing an element of affordable housing to meet the needs of the population particularly at this higher quantum of growth."*
- 5.29 In seeking to address this issue a spatial option should be identified that focuses a greater level of housing growth to the Sustainable Villages. It is noted that Option 9b was tested through the ISAR which focused 27% of the growth (1,377 dwellings) to the Sustainable Villages as well as 1,785 dwellings to a new settlement, 459 dwellings to the Key Service Centres and 255 dwellings to the Local Service Centres. The ISAR recognises that this option would provide a

significant number, mix and proportion of affordable housing across the District. It is noted that the ISAR found that Option 9b, along with 7b tended to perform better and have more significant positive effects compared with other options.

- 5.30 It is noted that Table 5 of the Local Plan Review: Development Strategy Options and Policy Options document excludes Option 9b. However, Option 9b is discussed at paragraph 4.56, being *“a significant departure from the current strategy given it focusses more development on lower order settlements”*. The Council considers that Option 7b can also do this but to a lesser extent and with greater benefit to existing town and local centres.
- 5.31 Whilst Option 7b can achieve this, there is a great disparity between the proportion of dwellings tested for the Sustainable Villages between Options 7b and 9b. Option 7b identifies only 255 dwellings to the Sustainable Villages (5% of total growth) compared with Option 9b which identifies 1,377 dwellings to the Sustainable Villages (27%). Given both Options 7b and 9b perform better than other options through the ISAR, it would be appropriate for the Council to test these options further by identifying further ‘middle ground’ options that would also direct development to the lower order settlements. As discussed above, the limited focus of 255 dwellings to the Sustainable Villages through Option 7b is considered insufficient.
- 5.32 The effects of each option are assessed against the ISAR objectives. Regarding climate change (SA11) both Options 7b and 9b are assessed as having a potential significant negative effect due to the *“likely higher level of growth in potential areas at risk of flooding.”* However, Cameron Homes raise concerns with this blanket negative assessment as opportunities are available in villages such as Breedon on the Hill and Appleby Magna that would pose no additional flood threat. The Council should recognise that development in the Sustainable Villages can bring opportunities for wider flood risk protection and improvements works to the benefit of the whole settlement. This was achieved by Cameron Homes on a recent development at Breedon on the Hill where significant new attenuation capacity was delivered to reduce flood risk to the benefit of the village as a whole.
- 5.33 Options 7b, 9b and 6b all include reliance upon a new settlement to deliver 1,785 dwellings within the 20 year plan period. As explained earlier, there is currently little justification for a new settlement as informed by the SGP and LIG. Furthermore, new settlements, by their nature, have significant lead-in terms with many challenges to delivery, notably relating to infrastructure provision. Whilst this Local Plan review could establish aspirations for a new settlement to

assist in meeting longer-term growth requirements, it should not be relied upon within the plan period and should be a matter for further consideration through a future review if further evidence becomes available.

- 5.34 Cameron Homes considers that the residual need of 5,100 dwellings under the High 2 growth scenario could more appropriately be met across a range of existing settlements rather than the need to place reliance upon the delivery of a new settlement which is not justified at this stage. A range of sites, with a greater distribution of sites across sustainable settlements, including Sustainable Villages would provide greater flexibility and a more resilient approach to delivery. Cameron Homes recommends testing additional variants around Option 9b given the significant positive effects identified through the ISAR and its ability to meet needs across a greater range of settlements.
- 5.35 In summary, Cameron Homes considers that the Council through the ISAR should test an additional option(s) under growth scenario High 2 which seeks the delivery of housing distributed across the Principal Town, Key Service Centres, Local Service Centres and Sustainable Villages with increased growth to the lower order settlements above that within Option 7b, notably to the 18 Sustainable Villages. Additional growth is required within the Sustainable Villages above that preferred by the Council through Option 7b in order to maintain services and facilities. The positives of this are recognised through the findings of Options 7b and 9b in the ISAR. In addition, evidence demonstrates that there remains strong level of need, including affordable needs, within the Sustainable Villages, including Appleby Magna and Breedon on the Hill, with a need for smaller homes to create a balanced housing market and respond to demographic change.

6. Housing

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

- 6.1 National Planning Policy Guidance notes a responsibility for 'relevant authorities' to maintain a self-build and custom housebuilding register. In understanding the need for self and custom build the PPG recognises the role of the Strategic Housing Market Assessment in understanding the size, type and tenure of housing needed for different groups including people wishing to self-build or custom build their own homes.
- 6.2 The Council's Local Housing Needs Assessment does not consider the needs associated with self and custom build properties.
- 6.3 The Council maintains a Self and Custom Build Register, and as of 30th October 2021 there were 72 individuals on the list. The self-build register only needs to include the name and address of the lead contact and the number of serviced plots of land they are seeking to acquire - no information is requested on the financial resources. 'Demand' could be an expression of interest rather than actual demand.
- 6.4 Turning to supply, outline planning permission has been granted for 30 self and custom build plots at Land off Hepworth Road, Woodville. A subsequent reserved matters application was approved in December 2021 which determines these 30 plots will comprise custom build plots.
- 6.5 The policy direction does not suggest a specific percentage of self and custom build homes will be required on allocated sites, instead seeking the provision of serviced plots for self-build and custom housebuilding as part of an appropriate mix of dwellings on all major developments.
- 6.6 If custom and self-build requirements are to be set out in policy, Cameron Homes agrees there needs to be a mechanism identified to allow for such plots to come forward for market housing if demand is not present. Cameron Homes supports the proposed policy approach that if serviced plots for self-build and custom housebuilding have been made available and marketed for 12 months and have not sold, plots can be used for delivery of general market housing.
- 6.7 Practical difficulties of facilitating self and custom-build plots on larger sites should also be recognised, creating issues with health and safety and the need for independent construction access point.

6.8 In light of the above, if demand does increase, it would be preferable for specific sites to be identified which are more suitable for self and custom build plots. Such sites would appear to be supported by the market as the proposal in Woodville demonstrates.

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

6.9 Cameron Homes wishes to object to the internal floorspace policy direction.

6.10 The Nationally Described Space Standards (NDSS) were published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.

6.11 In introducing the standards, the Written Ministerial Statement outlines:

"New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes."

6.12 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

"From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy."

6.13 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

"The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been

considered, in accordance with the National Planning Policy Framework and Planning Guidance."

- 6.14 The reference to the National Planning Policy Framework relates to paragraph 130 which states planning policies should:

"create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users."

- 6.15 Footnote 49 makes it clear that use of the Government's optional technical standards should be used where this would address an identified need for such properties and the need for an internal space standard can be justified.

- 6.16 National Planning Guidance states:

"Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

viability – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions."

- 6.17 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability.

- 6.18 The Local Housing Needs Assessment and the Leicester and Leicestershire HEDNA prepared in 2017 provide no commentary or evidence in respect of NDSS.

6.19 It is clear current evidence does not provide justification for the imposition of the optional NDSS within North West Leicestershire. The Council must provide adequate evidence of need if it is to require the application of NDSS through the Local Plan review.

Question 8: Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?

6.20 The Preferred Option pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements. M4(2) dwellings are described as making:

"reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users."

6.21 The Local Housing Needs Assessment includes a high-level assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing and technical standards.

6.22 The LHNA concludes that, in general, North West Leicestershire District has an ageing population. Figure 4.1 demonstrates that the District has a slightly younger age structure (in terms of older people) compared with Leicestershire as a whole and a lower percentage of those aged 75 and over than the wider East Midlands region and England. It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to North West Leicestershire. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

6.23 The LHNA identifies a need for around 420 dwellings to be for wheelchair users (meeting optional technical standard M4(3)). No figure is stipulated in respect of accessible and adaptable homes (optional technical standard M4(2)). Cameron Homes considers that whilst there is justification for 5% of the affordable supply to meet the optional M4(3) standards, the evidence provided does not establish the necessary justification for implementing optional M4(2) standards to all remaining homes to be delivered.

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

6.24 Cameron Homes considers that the requirement for optional M4(3) dwellings should be restricted to those properties where nomination rights will be in place. Therefore, this requirement should not apply to open market provision.

7. Development Strategy Options for Employment

Question 10: Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?

- 7.1 Cameron Homes recognises the importance to ensure that sufficient jobs are provided in the right locations alongside the delivery of new homes. The Plan should continue to pro-actively support jobs growth by allocating sufficient employment land to meet necessary requirements over the plan period. By providing a greater level of certainty for the delivery of employment land this ensures a joined up and effective strategy to balance homes and jobs in line with the need to achieve sustainable patterns of travel.

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

- 7.2 It is considered that in light of the answer to Question 10, Options 1 and 2 would provide the greatest level of certainty to the delivery of employment land.

8. Health & Wellbeing

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

- 8.1 Cameron Homes recognises the need for development to address unacceptable impact on health infrastructure. It is recommended that engagement with the CCG informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

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

- 8.2 Cameron Homes agrees with the need to include a policy relating to Health Impact Assessments (HIA). It is recognised that HIAs play an important role in addressing health impacts of planning decisions on communities in line with the social objective of sustainable development as set out in the NPPF.

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?

- 8.3 Cameron Homes considers that the policy must be clear on which development proposals an initial Health Impact Screening Statement will be required. The option for 'any other proposal considered by the Council' is too ambiguous. Government guidance on Health Impact Assessments in spatial planning leaves much of the policy and guidance to the discretion of the LPA, however, the policy must be clear on local triggers for a HIA.

9. Renewables & Low Carbon

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

- 9.1 Cameron Homes supports the direction of travel in respect of carbon reduction and consider that planning has an important role in the delivery of new renewable and low carbon energy infrastructure. However, policies should ensure that they follow nationally consistent set of standards/timetables and are implementable. Cameron Homes considers the success of achieving a low carbon future is by standardisation rather than individual council's specifying their own policy approach to energy efficiency.
- 9.2 Changes to building regulations (Part L) to deliver the Government's 'Future Homes Standard' means that from mid-2022, new homes will have a 31% reduction in CO² when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO² when compared to today, along with a new focus on rating primary energy efficiency as well as CO².
- 9.3 Cameron Homes applies a 'fabric first' approach. The fabric first approach has a number of clear benefits, notably that it is built into the property for its whole life ensuring that every occupier benefits from energy savings and CO² emissions are reduced.

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

- 9.4 Whilst it is commendable to deliver renewable and low carbon energy, Lifecycle Carbon Assessments and policy approaches to overheating as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.
- 9.5 The ability for large developments to source a certain percentage of their energy supply from on-site renewables will need to be balanced with the burden of delivering other infrastructure requirements that will be required to support the chosen spatial strategy to ensure the delivery of sustainable communities.

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

9.6 Cameron Homes agree with the need for reducing carbon emissions and that this should be a clear objective of the NW Leicestershire Local Plan. However, it is important that local planning policies do not accelerate beyond requirements of building regulations, setting onerous requirements on development particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. This would need to be considered through viability evidence.

9.7 As a general observation, the Plan should limit the number of policies relating to climate change. Rather than individual separate policies relating to energy efficiency, overheating, Lifecycle Carbon Assessment and reducing carbon emissions, these could all be condensed into one policy with clear criteria on each matter for developments to be assessed against.

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

9.8 Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the PPG. This evidence does not appear to be present.

9.9 The policy approach should be informed by a Water Cycle Study to determine whether the scale, location and timing of planned development within the District would give rise to issues from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.

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

9.10 Cameron Homes consider that in parallel to identifying the appropriate housing requirement for the District across the Plan period, the Local Plan should also be giving consideration to the components of housing supply to meet such requirements.

- 9.11 The consultation document focusses upon the distribution of development, however is silent on the components of housing supply to ensure that future requirements can be effectively met. With regards to housing supply consideration needs to be given to an appropriate buffer coupled with rates of non-implementation across the District.
- 9.12 Furthermore, the Local Plan should be considering the role of reserve sites as part of the overall strategy, particularly where there is heavy reliance on larger strategic sites and any new settlement(s). Reserve sites are capable of releasing land for immediate development where there is a need to address housing land supply issues and to ensure that a robust rolling five year housing land supply can be maintained through the plan period. Cameron Homes consider that the identification of reserve sites would ensure that the plan is positively prepared and effective.
- 9.13 It is recognised that policies for affordable housing, housing mix and sites for allocation will be covered in future consultations, however Cameron Homes consider that it would also be helpful if the future consultations include consideration of a housing trajectory to ensure that the requirements of the District can be effectively met by way of a robust housing supply and monitored accordingly.

10. Conclusion

- 10.1 This representation is made by Evolve Planning on behalf of Cameron Homes to the North West (NW) Leicestershire Local Plan Review, Development Strategy & Policy Options (Regulation 18) consultation.
- 10.2 These representations are framed in the context of the requirements of Local Plans to be legally compliant and sound in line with the tests of soundness within the NPPF. Cameron Homes supports NW Leicestershire District Council in progressing with a substantive review of the current adopted Local Plan.
- 10.3 Cameron Homes supports the settlement hierarchy which is informed by the relative sustainability of villages within NW Leicestershire, including the identification of Appleby Magna and Breedon on the Hill as Sustainable Villages.
- 10.4 Regarding the amount of housing growth, the High 2 growth scenario is supported by Cameron Homes at this stage, in advance of further evidence being published to determine unmet need across the HMA, notably within Leicester City, and an agreed approach to apportioning any unmet need within the HMA, including within NW Leicestershire.
- 10.5 Cameron Homes reserve the right to make further comment upon publication of any future evidence in respect to unmet needs within the HMA. However, based on current evidence, the High 2 growth scenario is preferred over other growth scenarios as it is considered to be the most representative of the current needs and demand in NW Leicestershire whilst being consistent with previous levels of delivery. The High 2 growth scenario is the only growth option identified that would demonstrate the plan is effective and positively prepared.
- 10.6 Cameron Homes welcomes the Council's approach to testing reasonable alternative spatial distribution options in line with the identified settlement hierarchy, including review through the Interim Sustainability Appraisal Report (ISAR) (Sept 2021). However, Cameron Homes consider that the Council has not fully tested all reasonable alternatives, with insufficient justification in relation to the options and preferred options identified, particularly its reliance on a new settlement coming forward within the plan period.
- 10.7 The Council should test an additional option(s) under growth scenario High 2 which seeks the delivery of housing distributed across the Principal Town, Key Service Centres, Local Service Centres and Sustainable Villages with increased growth to the lower order settlements above that within Option 7b, notably to

the 18 Sustainable Villages. Additional growth is required within the Sustainable Villages above that preferred by the Council through Option 7b in order to maintain existing services and facilities. The positives of this are recognised through the findings of Options 7b and 9b in the ISAR. In addition, evidence demonstrates that there remains strong level of need, including affordable needs, within the Sustainable Villages, including Appleby Magna and Breedon on the Hill, with a need for smaller homes to create a balanced housing market and respond to demographic change.

- 10.8 Cameron Homes also provides response to draft policies and questions relating to housing standards, employment land, health and well being and renewables and low carbon.
- 10.9 In particular, Cameron Homes objects to the policy direction suggested with regards to internal floorspace as current evidence does not provide justification for the imposition of the optional NDSS within North West Leicestershire. The Council must provide further evidence of need if it is to require the application of NDSS through the Local Plan review.
- 10.10 Cameron Homes consider that the Local Plan should be giving consideration to the components of housing supply to ensure that future housing requirements can be effectively met across the Plan period. This includes the consideration of reserve sites

From:

To:

Subject:

Date:

██████████
[PLANNING POLICY](#)

EXTERNAL: Local plan Consultation Response for development of land around Diseworth and Isley Walton
14 March 2022 11:34:52

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 very clearly illustrated in the specific points below.

However, from a broader perspective I find myself increasingly frustrated that as a country focused on a 'Net Zero' goal through delivering the outputs of the high profile COP26 conference, it deemed acceptable to once again destroy open countryside. These proposals will destroy fields, hedgerows, wildlife and in their place drive pollution (noise, air and light) and likely contribute to the growing flooding issues previous developments have caused for Diseworth.

There is copious Brownfield land in and around the local cities to deliver ample housing for individuals and families who would surely prefer to live close or amidst the facilities that a city can provide. In addition, given the reducing role of the traditional high street, city centres are ripe for redevelopment.

With reference to the potential industrial development, in the immediate area to this development we have 'full' employment. Why then is it appropriate to create employment distanced from any potential workforce? This will result in additional commuter miles or green field developments (see my comments above). Is it more environmentally friendly to have thousands of commuter miles or to locate the work near to the available workforce and find environmentally friendly ways to move any product produced or stored?

I appreciate the economic implications of my points above for any developer, however, the environment should surely take priority over costs to develop and costs to operate? It is up to the government and local councils to do the right thing not the cheapest.

My specific objections based on the objectives of the local plan are as follows:-

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, 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 and the prospect of increasing flooding in Diseworth due to these 2 developments are having a major impact on my mental health.

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 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. 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 opportunistic landowner/owners and 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

Tony Wilson





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Dear Ian

North West Leicestershire Local Plan Review – Development Strategy Options and Policy Options

Thank you for inviting our comments on the Development Strategy Options and Policy Consultation that is the latest stage of the North West Leicestershire Local Plan Review. This letter provides an update on our previous comments to the Issues, and Emerging Options consultations alongside a response to the relevant questions posed in the consultation document.

East Midlands Airport

East Midlands Airport (EMA) is a significant UK airport and in 2019 handled some 4.7 million passengers travelling to around 100 destinations in Europe and North America. It is also a nationally important cargo airport (second only to London Heathrow) and handled some 406,000 tonnes of cargo in 2021. East Midlands Airport is the UK base for global express freight carriers DHL and UPS who rely on its available airport capacity, the central location and direct access to the Strategic Road Network. DHL has recently completed a major extension to its facility and UPS completed a new express freight unit to support the operation of their major UK base in 2021.

The Airport site and the surrounding area is an important national and regional economic and employment asset. Recent studies have estimated that the Airport generates some £500m of direct and indirect GVA in the East Midlands and the 2019 on-site employment survey showed that there are 9,448 people working on the Airport site. East Midlands Airport is the largest single employment site in Leicestershire and it is an important component and asset to the local economy. The 2019 survey showed that 1,081 on-site employees live in North West Leicestershire, with 1 in 43 of the District's working age population employed at the Airport. The Airport is therefore a significant employer of the District's residents and an important component of the local economy.

East Midlands Airport provides important international connectivity for passengers and cargo, it generates significant economic value, and it is a major employer. The Airport is forecast to grow, and it is therefore important that planning policy at all levels recognises this value and that it enables and provides for its future development. The opportunities for growth and development are set out in the Airport's Sustainable Development Plan that was published in 2015 following a period of public consultation. The overall aim is to deepen the role that the Airport plays in the East Midlands region, driving growth through better connectivity; creating jobs; attracting investment; and widening the range of services and destinations that are operated by the passenger and cargo airlines.

The 2015 Sustainable Development Plan (SDP) set out the Airport's ambition and capability to grow to handle 10 million passengers a year and 1 million tonnes of cargo over the period to 2035 – 2040. This is consistent with the overall Local Plan timescale; however, the SDP is currently being updated and will shortly be published for



consultation. The development of East Midlands Airport will also reinforce and further strengthen the surrounding area and the wider North West Leicestershire district as a significant regional economic powerhouse. Locally there are existing employment land allocations at the East Midlands Gateway, the East Midlands Distribution Centre at Castle Donington, land at Sawley Crossroads, and at Donington Park. The economic and employment opportunity that this area, including the Airport, offers should continue to be recognised and provided for in planning, transport, and economic policy.

The Government is in the process of reviewing national aviation policy and in December 2018 published a consultation document, Aviation 2050 – The Future of UK Aviation, following the Making Best Use of Existing Runways document in April 2018. This is the latest stage of the process to review the existing national policy set out in the Aviation Policy Framework (2013), the Airports Commission Final Report (2015) and the Airports National Policy Statement (2018). The Aviation 2050 document recognises that aviation has an important role in the future of the UK and that it is key to helping build a global Britain that reaches out to the world. Aviation also underpins the competitiveness and global reach of the UK's national and regional economies. Overall, the Government supports the growth of aviation, provided that this is done in a sustainable way. The emerging aviation strategy has six objectives:

- To help the aviation industry work for its customers
- To ensure a safe and secure way to travel
- To build a global and connected Britain
- To encourage competitive markets
- To support growth while tackling environmental impacts
- To develop innovation, technology and skills

The strategy also has a theme that is to support regional growth and connectivity, and in particular it recognises that increasingly airports are becoming regional transport hubs which support multiple businesses, labour markets and population centres. Their development needs to be planned in that context and included in relevant regional, spatial, and economic development strategies. The review of the District's Local Plan will need to take account of the development of national policy and the implications and requirements to support and enable the growth of East Midlands Airport. This would be particularly relevant in the review of the existing policy relating to the Airport (Ec4). It is expected that the Government will issue a policy statement on aviation later in 2022.

Additionally, East Midlands Airport is located within the newly designated East Midlands Freeport (March 2022), the UK's only inland Freeport. East Midlands Airport is the Freeport's primary port with a potential Tax Site within and to the south of the Airport, alongside plots on the SEGRO Logistics Park East Midlands Gateway to the north east of the Airport. The Freeport aims to 'fulfil the Government's goal to create national hubs for global trade and investment, promote regeneration and job creation and create hotbeds for innovation¹'. The East Midlands Freeport has the ambition to:

- Drive significant new job growth in the region
- Support regeneration and social mobility
- Boost skills and opportunities
- Drive local, regional and international trade
- Support the 'levelling up' agenda
- Harness innovation and enterprise
- Position the region as a 'green tech' trailblazer
- Reduce greenhouse gas emissions in pursuit of Net Zero.

East Midlands Airport continues to be an important asset in Leicestershire and the wider East Midlands region and the growth of development around it should be cognisant of its operations and ambition to grow providing significant economic benefit to the region.

Local Plan Objectives

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

East Midlands Airport generally supports the Local Plan Review Objectives, particularly 7 (Climate Change) and 11 (access to services). The Airport has a target to achieve Net Zero Carbon by 2038 at the latest that is 12 years ahead of the Government's target for the UK aviation sector as a whole. As well as setting out an overall approach to Net Zero Carbon, the Airport is also reviewing and developing its strategic approach to surface access and sustainable transport.

Environmental management is integrated into the Airport's business to ensure the best environmental practice. In 2007, East Midlands Airport made a commitment to make its airport operations carbon neutral. The Airport's 2007 Master Plan set a target to reach carbon neutral operations by 2012. This target was met and continues to be met with the Airport being independently certified as carbon neutral. This is achieved through only buying electricity from renewable sources, and reducing the energy consumption in the buildings, on the airfield, and across the Airport site.

Sustainable Aviation is a coalition of the UK's major aviation and aerospace companies who are working together to deliver a long-term and sustainable aviation industry. MAG (the Airport's parent company) was a founding member of Sustainable Aviation, who published its Decarbonisation Road-Map in 2020. This was a commitment to work with Government and international partners to reduce aviation emissions to net-zero by 2050 and it sets out the measures to be taken, these are:

- Aircraft operational improvements and airspace modernisation
- Aircraft fleet modernisation
- Sustainable aviation fuels
- Future aircraft technologies
- Market-based measures

Further detail on these aspects will be set out in the Airport's revised Sustainable Development Plan that is to be published in 2022.

Development Strategy Options for Housing

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

The consultation document sets out a number of housing growth scenarios which have been considered by the Local Planning Authority (LPA), with option 3a of High 1 scenario and option 7b of High 2 scenario being the preferred options to take forward to the next stage of the Local Plan preparation. Both of these options / scenarios propose distributing housing needs across the Principal Town of Coalville, Key Service Centres, and Local Service Centres, an extract from the consultation document is provided below.

Table 6 - options to be taken forward

Option	Description
High 1 scenario (1,000 dwellings)	
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
High 2 scenario (5,100 dwellings)	
Option7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

The Key Service Centres (KSC) of Ashby-de-la Zouch and Castle Donington are located in close proximity to the airport, with Ashby-de-la Zouch being below an existing departing flight path, and land to the south of Castle Donington being within an identified noise impact area.

Similarly, a number of these options apportion housing growth to Local Service Centres, of which Kegworth is one. Kegworth is identified as an area where there is likely to be noise disturbance from arrivals and departures from East Midlands Airport. Potential housing allocations in Castle Donington and Kegworth should be avoided as these are areas that are affected by aircraft noise, particularly at night.

Whilst the sustainable benefits of these locations in terms of access and services are understood, the LPA should be mindful of the associated impacts from the Airport upon residential amenity. Aircraft noise is an important issue and the operation of East Midlands Airport, particularly at night can cause disturbance in local communities, particularly those that are closest to the Airport. The Airport therefore works hard with its airline partners to minimise noise nuisance and to keep the numbers of people affected by aircraft as low as reasonably possible. The long-term aim is to 'limit and reduce where possible, the number of people affected by noise as a result of the Airport's operation and development'. There is a commitment to minimising the number of people affected by aircraft noise by routinely reviewing noise policies and targets.

Therefore, the preference is that further residential development is avoided in the most sensitive parts of these locations, to ensure that the number of people affected by aircraft noise is kept to a minimum. It would be remiss of the LPA to allocate housing in these locations without due regard to the impact of existing operations upon potential residential uses. These areas are likely to be subject to higher levels of noise, particularly at night, and a residential use is likely to be incompatible with the adjacent airport operations with the potential for a reduction in residential amenity which could be avoided.

At present, the considerations in the Sustainability Appraisal prepared with the consultation document identifies constraints associated with development of land to the south of the Airport as one reason for not progressing a new settlement in this location (promoted through the call for sites consultation), the conclusions of which are not disputed. However similar considerations should be had for those settlements around the Airport, including Kegworth and Castle Donington, which could also be subject to noise disturbance, particularly at night.

Development Strategy Options for Employment

This consultation document does not make reference to the update of any employment policies relating to the Airport (e.g. EC4, EC5 and EC6 of the adopted Local Plan). In the Airport's response to the Issues consultation in March 2018, the importance of updating the airport policies was highlighted. To enable the Airport to grow, providing economic and social growth in the region, alongside enabling it to fulfil its role within the East Midlands Freeport, a strong positive policy direction is needed for East Midlands Airport.

A safeguarding policy (policy EC5 in the adopted Local Plan) should be retained and evolved to ensure that the Airport's safe operation is protected. Aerodrome safeguarding includes protecting the airport and aircraft operations from tall structures in the vicinity, from developments and activities that could increase the bird hazard in the local area and from developments and activities that have the potential to interfere with aircraft and air traffic control systems and communications. The policy approach to the safeguarding of East Midlands Airport should also include protecting the Airport and aircraft operations from the adverse effects of large-scale solar PV installations that have the potential to generate sunlight glint and glare that can affect aircraft pilot and ATC visibility.

Biodiversity net-gain will be an important consideration for the Local Plan review. Developments will need to demonstrate how they will achieve the set targets. The ongoing review of the Airport's Sustainable Development Plan will set out the Airport's approach to nature and biodiversity net gain, as well as how it relates to the Airport's aerodrome safeguarding requirements.

Whilst access to the Airport for residents in North West Leicestershire is important (for work and travel), new residential development should be avoided within the locations around the Airport discussed in the response to Q5. This will ensure that both residential amenity is protected (i.e., new residents would not be subject to noise and other impacts of the Airport's current operations and future growth).

Proposed employment sites should be situated where there are strong transport links, recognising the importance of access locally, regionally, nationally and internationally by multiple modes. Such locational opportunities will spread and capitalise on the economic benefits of the region, especially around East Midlands Airport with access to all markets enabling goods to be transported by multiple means. Not only are locational advantages realised around East Midlands Airport possible for the movement of goods, but also for local people arriving and departing via public transport enabling employment at the Airport to be accessible to all. Policies that support the enhancement of public transport across the region would also be supported.

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

The Airport is supportive of compatible development such as strategic warehousing, with specific locational requirements (e.g., for connections with road (M1), air (airport) and rail (EMG)) in the local area. Such uses would support regional, national and international economic growth and capitalise on the East Midlands Freeport opportunity. Land to the north and south of the Airport would be suitable for strategic warehousing and logistic uses, subject to the appropriate management of road traffic and local environmental impacts. These areas should be favoured over residential uses for matters already raised in this response.

East Midlands Airport and SEGRO put forward a site to the south east of the Airport that is potentially suitable for strategic warehousing in the Call for Sites process in November 2020. This location has advantages and opportunities given the existing connections to the Airport (for air freight / cargo), East Midlands Gateway (for rail freight) and the M1 (for road freight). This is a strategic opportunity which would form a valuable part of the region's Freeport opportunity, especially in respect of high-tech freight and logistics. In March 2022, the East Midlands Freeport secured Government approval to deliver new incentives for business growth, further establishing this location as important for the region.

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

It is recognised that the employment land market will likely fluctuate over the plan period, and a policy is supported which addresses proposals for employment use on unallocated sites. The policy should be expanded to allow employment development that requires specific uses, such as around air (airport), road (M1), and rail (EMG)

locations that cannot be located elsewhere in the region on allocated sites. This should also include any extensions to existing employment sites in these locations.

Renewables and Low Carbon

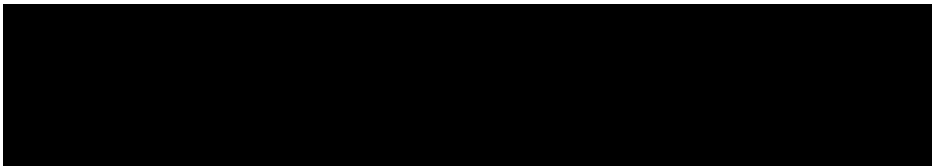
Q24 - Do you agree with the proposed policy for reducing carbon emissions? If not, why not?

The proposed new policy focusing on reducing carbon emissions across the District by 2050 is supported. In 2007, East Midlands Airport made a commitment to make its airport operations carbon neutral. In the 2007 Master Plan the Airport set itself a target to reach carbon neutral operations by 2012. This target was met and continues to be met with the Airport being independently certified as carbon neutral. This is achieved through only buying electricity from renewable sources, along with reductions in energy consumption in the Airport's buildings, on the airfield, and across the site.

The approach now is for the Airport to reach net-zero carbon emissions by 2038 at the latest, some 12 years ahead of the national target. This can be achieved through innovation, new technologies and investment from airports, airlines and aircraft manufacturers, and the whole of UK's commercial aviation sector can achieve net-zero by 2050.

We trust that these comments are helpful as the Local Plan Review progresses and are committed to engaging in all future stages of the Plan preparation. We are happy to continue to work with the Council to provide material and development the evidence base during this time. However, if at this stage you require any further information or wish to discuss our comments in further detail, then please contact me.

Yours sincerely

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Jon Bottomley
PLANNING MANAGER



North West Leicestershire Local Plan Review

Development Strategy Options and Policy Options

March 2022



gladman.co.uk



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1 INTRODUCTION

1.1 Context

- 1.1.1** Gladman welcome the opportunity to comment on the North West Leicestershire Local Plan Review Development Strategy Options and Policy Options consultation and request to be updated on future consultation and the progress of the emerging Local Plan Review going forward.
- 1.1.2** Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.
- 1.1.3** The Council will need to carefully consider its policy choice and ensure that the proposed approach positively responds to the revised National Planning Policy Framework (2021). There will also be a need to take consideration of changing circumstances associated with national planning policy and guidance over the course of the plan preparation period, including the Government’s emerging proposals for the planning system, as set out in the (former) Ministry for Housing, Communities and Local Government (MHCLG) consultations on “Changes to the Current Planning System, August 2020”, “Planning for the Future, August 2020” and “National Planning Policy Framework and National Model Design Code: consultation proposals”.
- 1.1.4** Gladman wishes to promote three land interests in North West Leicestershire through the Local Plan Review process. These include:
- Land off Thornborough Road, Coalville;
 - Land off Wash Lane, Coalville; and
 - Land off Blackfordby Lane, Moira
- 1.1.5** All of the above sites are available, suitable and deliverable for housing as outlined in more detail within Section 5 (Site Submissions) of this representation. Gladman look forward to engaging further with the Council as the plan preparation process progresses.

1.2 Plan Making

1.2.1 The National Planning Policy Framework sets out four tests that must be met for Local Plans to be considered sound. In this regard, we submit that in order to prepare a sound plan it is fundamental that it is:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

2 LEGAL COMPLIANCE

2.1 Duty to Cooperate

- 2.1.1** The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2020 Sevenoaks District Council Local Plan examination and subsequent Judicial Review, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 2.1.2** Whilst Gladman recognise that the Duty to Cooperate is a process of ongoing engagement and collaboration, as set out in the Planning Practice Guidance it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard, North West Leicestershire District Council must be able to demonstrate that it has engaged and worked with neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross-boundary strategic issues, and the requirement to meet the unmet housing needs of Leicester City. This is not simply an issue of consultation but a question of effective cooperation.
- 2.1.3** The revised Framework introduced a number of significant changes to how local planning authorities are expected to cooperate including the preparation of Statement(s) of Common Ground (SoCG) which are required to demonstrate that a plan is based on effective cooperation and has been based on agreements made by neighbouring authorities where cross boundary strategic issues are likely to exist.
- 2.1.4** The NPPF also sets out that local planning authorities should produce, maintain, and update one or more SoCG, throughout the plan making process¹. The SoCG(s) should provide a written record of the progress made by the strategic planning authorities during the process of planning for strategic cross-boundary matters and will need to demonstrate the measures local authorities have taken to ensure cross boundary matters have been considered and what actions are required to guarantee issues are proactively dealt with e.g. unmet housing needs.

¹ PPG Reference ID: 61-001-20180913

- 2.1.5 It is evident that for some time the Council has held an active role in cross-boundary planning matters for instance coming together with other nearby local planning authorities to create and agree on the Leicester and Leicestershire Strategic Growth Plan.
- 2.1.6 Evidently, the principal cross-boundary issue to be grappled within in Leicestershire is the unmet housing and employment need arising from the Leicester City Council administrative area. A SoCG is being advanced between the individual Leicestershire authorities, setting out the process by which the unmet need will be distributed across the housing market area.
- 2.1.7 A Joint SoCG was agreed by all Leicestershire authorities in June 2021 which sets out; need; potential supply (subject to further evidence testing); the scale of unmet need from Leicester City; and the process by which unmet need will be dealt with. Whilst welcomed, this SoCG did not apportion and / or distribute unmet housing or employment need to Leicestershire local authorities. The SoCG made clear that the authorities agreed to carry out an additional programme of work to inform the apportionment of unmet need from Leicester City to the Leicestershire local authorities.
- 2.1.8 Gladman note from recent committee meetings and the consultation documents that North West Leicestershire and the other individual Leicestershire local authorities are still corresponding and negotiating with Leicester City Council and other relevant authorities to address the issue of Leicester city's unmet housing need. Charnwood Borough Council's response to the Inspectors initial questions² sets out that a new Housing Economic Needs Assessment (HENA) is anticipated to be published in May 2022 which will consider amongst other things "**the optimum locations for meeting unmet housing needs arising from Leicester City**". The apportionment distributed to North West Leicestershire will be key to determining the overall housing requirement for the district.
- 2.1.9 Gladman acknowledge that Government changes to the standard method in December 2020 were of such significance that additional work on the SoCG was required. Nevertheless, the apportionment of the unmet housing need across the Leicestershire authorities has been a protracted process. It has been over five years since the HEDNA was published and yet the authorities have not once agreed how Leicester's unmet needs should be addressed within the surrounding districts.

² Charnwood Borough Council – Response to Inspectors Preliminary Matters 21/02/2022. Appendix B.

- 2.1.10 It is imperative that North West Leicestershire DC and the other Leicestershire local authorities move expeditiously to agree and publicise a SoCG which sets out precisely where Leicester City's unmet housing needs will be met by neighbouring authorities.

3 NATIONAL PLANNING GUIDANCE

3.1 National Planning Policy Framework

3.1.1 On 24th July 2018, the (former) Ministry of Housing, Communities and Local Government (MHCLG) published the Revised National Planning Policy Framework which was subsequently updated in February 2019. These publications formed the first revisions of the Framework since 2012 and implemented changes that were informed through the Housing White Paper, The Planning for the Right Homes in the Right Places consultation and the draft Revised Framework consultation.

3.1.2 In July 2021, a further revised version of the Framework was published. The Framework (2021) places greater emphasis on beauty, place-making, the environment, sustainable development and underlines the importance of local design codes.

3.1.3 The revised Framework introduced several major changes to national policy which provide further clarification to national planning policy as well as new measures on a range of matters. Crucially, the changes to national policy reaffirm the Government's commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future local communities for future generations. In particular, paragraph 16 of the Framework (2021) states that Plans should:

"a) Be prepared with the objective of contributing to the achievement of sustainable development;

b) Be prepared positively, in a way that is aspirational but deliverable;

c) Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;

d) Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;

e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and

f) Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)."

- 3.1.4 To support the Government's continued objective of significantly boosting the supply of homes, it is important that the Local Plan Review provides a sufficient amount and variety of land that can be brought forward, without delay, to meet housing needs.
- 3.1.5 In determining the minimum number of homes needed, strategic plans should be based upon a local housing needs (LHN) assessment defined using the standard method. The LHN sets the **minimum** number of homes required and this is the starting point for determining the amount of homes in any local planning authority area, unless there are exceptional circumstances to justify an alternative approach.
- 3.1.6 Once the minimum number of homes that are required is identified, the strategic planning authority should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. In this regard, paragraph 67 sets out specific guidance that local planning authorities should take into account when identifying and meeting their housing needs. While Annex 2 of the Framework provides updated definitions for the terms "deliverable" and "developable".
- 3.1.7 Once a local planning authority has identified its LHN, these needs should be met as a minimum, unless any adverse impacts would significantly and demonstrably outweigh the benefits of doing so. This includes considering the application of policies such as those relating to Green Belt and giving consideration as to whether or not these provide a strong reason for restricting the overall scale, type and distribution of development (paragraph 11b)i.). Where it is found that full delivery of housing needs cannot be achieved (owing to conflict with specific policies of the NPPF), Local Authorities are required to engage with their neighbours to ensure that identified housing needs can be met in full (see paragraph 35 of the Framework).
- 3.1.8 The July 2021 revision to the NPPF provides greater focus on the environment, design quality and place-making alongside providing additional guidance in relation to flooding setting out a Flood Risk Vulnerability Classification at Annex 3, the importance of Tree-lined streets and amendments to Article 4 directions. Additionally, Local Plans which have not yet progressed to Regulation 19 stage should ensure that where strategic developments such as new settlements or significant extensions are required, they are set within a vision that looks ahead at least 30 years (See paragraph 22 of the Framework).
- 3.1.9 The amendments coincide with the publication of the National Design Guide and National Model Design Code, a toolkit which helps local communities to shape local design needs

and provide guidance for creating environmentally responsive, sustainable and distinctive places with a consistent and high-quality standard of design.

3.2 Planning Practice Guidance

- 3.2.1 The Planning Practice Guidance (PPG) was first published by the Government to provide clarity on how specific elements of the NPPF should be interpreted. The PPG has been updated to reflect the changes introduced by the revised NPPF to national planning policy. The most significant changes to the PPG relate to defining housing need, housing supply and housing delivery performance.
- 3.2.2 The Standard Method was introduced by the Government to simplify the process of defining housing need, avoid significant delay in plan preparation and ultimately facilitate the Government's ambition to achieve 300,000 new homes annually.
- 3.2.3 Revisions to the PPG on 20th February 2019 confirmed the need for local planning authorities to use the 2014-household projections as the starting point for the assessment of housing need under the standard method³.
- 3.2.4 It is also vital to consider the economic impact of COVID-19 and the long-term role that housing will play in supporting the recovery of the economy, both locally and nationally. We support the Council in its positive approach to plan for above the minimum requirement, which will enable North West Leicestershire to capture a larger proportion of the £7 billion yearly housebuilder contributions⁴. With 218,000 homes predicted not to be built due to COVID-19 from now to 2024/25⁵, it is also imperative that the emerging North West Leicestershire Local Plan identifies sufficient land to support the delivery of homes.
- 3.2.5 In order for the housing needs for the whole plan period to be met, it will also be essential to provide sufficient headroom within the housing supply. In this regard, it is generally accepted by many professionals that local plans should seek to identify sufficient deliverable sites to provide a 20% buffer between the housing requirement and supply.

³ PPG Paragraph: 005 Reference ID: 2a-005-20190220

⁴ MHCLG (2020). 'Planning for the Future'. Available at: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/907647/MHCLG-Planning-Consultation.pdf

⁵ Shelter & Savills (2020). 'Over 80,000 new homes will be lost in one year due to COVID chaos'. Available at: https://england.shelter.org.uk/media/press_releases/articles/over_80,000_new_homes_will_be_lost_in_one_year_to_covid_chaos

4 NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW

4.1 Context

4.1.1 This section is in response to the North West Leicestershire Development Strategy Options and Policy Options consultation document and its supporting evidence base. Herein, Gladman will provide comments covering a range of topics and questions which have been raised within the consultation document.

4.2 Vision and Objectives

Q1) Do you agree with these Local Plan Review Objectives?

4.2.1 Gladman are supportive of the Local Plan Review's objectives which seek to plan positively and sustainably for future development. In particular, Gladman are supportive of the following Objectives:

- Objective 2 - Ensuring the delivery of new homes, including affordable housing, which meet local housing needs;
- Objective 3 - Achieving high-quality development which is sustainable, responds positively to local character and which creates safe places to live, work and travel;
- Objective 4 – Reducing the need to travel and the promotion of the increase of opportunities of sustainable transport methods; and
- Objective 7 – Ensuring that new development proposals mitigate and adapt for climate change and contribute to the reduction of greenhouse gases.

4.2.2 Indeed, such an approach is critical to the success of the Local Plan Review and it is important that the Council does not lose site of the plan's overarching Objectives over the local plan period.

Q2) Do you agree with the proposed settlement hierarchy?

4.2.3 Gladman are supportive of the proposed settlement hierarchy outlined within the consultation document. The settlement hierarchy virtually aligns with the settlement hierarchy set out in Policy S2 of the adopted North West Leicestershire Local Plan (2017) save for a few of the smaller villages moving into the 'Local Housing Needs Villages' or Other Villages / Settlements tiers. It is also proposed to rename tiers such as 'Small Villages' and 'Hamlets' in the adopted Local Plan to 'Local Housing Needs Villages' and 'Other Villages/Settlements' respectively in the Local Plan Review.

- 4.2.4 In the event the High 2 scenario growth option (5,100 dwellings) is progressed with by the Council, which includes the potential for a new settlement of 1,785 dwellings, this would need to be allocated to the 'Sustainable Villages' tier or allocated its own separate tier within the settlement hierarchy between the 'Local Services Centres' and 'Sustainable Villages' tiers.

Q3) Do you agree with the approach to Local Housing Needs Villages?

- 4.2.5 The policy must retain a level of flexibility to enable the Council to significantly boost the supply of housing and enable the development of sustainable and suitable development proposals at the Local Housing Needs Villages.
- 4.2.6 Although it is anticipated that only small residential scheme (<15 dwellings) are likely to come forward at this tier of settlement, this should not completely preclude people who currently reside outside the villages with no previous association with the village from having the opportunity to purchase a new home. The local connection criteria outlined in paragraph 3.10 of the consultation document does not provide clarification about what would happen to a new home(s) if no-one who met criteria a)-e) did not take up the option to purchase a new home. This should be recognised as an aspiration in the supporting text to the policy rather than as part of the policy wording.

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

- 4.2.7 Paragraph 11 of the NPPF states that "*strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*

i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or

ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."

- 4.2.8 Moreover, the NPPF makes it clear that, for the Local Plan to be sound, it must be "*deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters **that have been dealt with rather than deferred.***". (Our emphasis)

- 4.2.9 PPG clearly states that the standard methodology is merely the starting point for calculating housing need and only provides the minimum number of homes needed to meet the demographic baseline of housing needs. It does not produce a housing requirement figure and it is therefore crucial that the housing needs of North West Leicestershire are not under-estimated. The latest Five-Year Housing Land Supply Statement published in July 2021 demonstrates that the Council have completed 6,192 dwellings in the district against a target of 4,810 dwellings (a surplus of +1,382 dwellings) in the first eleven years of the plan period (1st April 2011 – 31st March 2021). This demonstrates that the Council have consistently strong housing delivery rates, which we conclude demonstrates that a higher annualised housing requirement is clearly achievable in this local authority. This is expressed in more detail within paragraph 010 Ref ID: 2a-010-202012 of the PPG.
- 4.2.10 This can only be done through further consideration of the local circumstances of the area and the aspirations the Council wishes to achieve should be considered. This can include resolving historic housing under delivery, increasing economic output of the area, boosting affordable housing supply and the delivery of key infrastructure projects. Consideration should also be given as to whether the local authority is able to assist neighbouring authorities with their unmet housing needs, and if so, all of these factors should ultimately inform the final overall housing requirement for the Plan.
- 4.2.11 Gladman are in agreement with the Council that the High 2 scenario (730 dwellings per annum) is the best approach for housing growth across the district, as it would provide the Council with the best opportunity to meet its current and future housing needs of not just the district but it would also provide the flexibility required to help address the issue of the unmet housing needs of Leicester City.
- 4.2.12 In addition, the High 2 Scenario would enable the Council to deliver a greater amount of affordable housing across the district. As demonstrated in the Council's latest Authority Monitoring Report 2020-21 (published in December 2021), the Council have persistently delivered below its annual affordable housing target of 199 dwellings per annum in all of the first 10 years of the adopted Local Plan period. By delivering a higher overall housing requirement, a significant proportion of these will comprise affordable housing which would result in a higher delivery of affordable housing across the district.

First Homes

- 4.2.13 In May 2021, the Government published a Written Ministerial Statement and updated Planning Practice Guidance setting out details of their First Homes policy and procedures

and confirmed an implementation date of 28th June 2021. First Homes are a specific kind of discounted market sale housing and should be considered to meet the definition of affordable housing for planning purposes.

4.2.14 As the Local Plan Review will be submitted for examination after 28th December 2021, the Local Plan will be required to include a policy requiring First Homes and they should be delivered on sites throughout the district. This is referred to at paragraph 10.1 of the consultation document.

4.2.15 At least 10% of total homes on developments sites should be available for affordable home ownership in accordance with paragraph 65 of the Framework. This 10% requirement was first introduced in the 2018 Framework and included property tenure types such as Intermediate Shared Ownership.

Unmet Housing Need

4.2.16 The consultation document acknowledges that Leicester City Council is not going to be able to accommodate the housing needs arising in its area and that a very substantial number of new homes are going to have to be delivered in neighbouring authority areas in order to address what would otherwise be unmet needs.

4.2.17 Following the Government's update to the standard methodology in December 2020, the unmet housing need arising from Leicester City Council now stands in the region of 18,000 homes up to 2036.

4.2.18 It is Gladman's understanding, and confirmed within a recent letter submitted by Charnwood DC in response to the Inspectors Initial Questions to its recently submitted local plan, that a SoCG apportioning the unmet housing and employment need will be published in May 2022, informed by an updated HENA that will, inter alia, "*understand the optimum locations for meeting unmet housing needs arising from Leicester City*⁶". This will determine the level of unmet housing need which will be required to be accommodated in North West Leicestershire as well as other Leicestershire authorities. Given the physical and functional relationship between North West Leicestershire and the City of Leicester, it is highly likely that a significant proportion of this unmet housing need will need to be accommodated in

⁶ Charnwood Borough Council – Response to Inspectors Preliminary Matters 21/02/2022. Appendix B.

the district, in a manner that is consistent with achieving sustainable development in line with the Framework.

- 4.2.19 The extent of the unmet housing need to be distributed across North West Leicestershire is undoubtedly going to be influential during the preparation of the Local Plan Review. However, it is accepted that further delays to the publication of the SoCG and its apportionment of the unmet need may occur. Should this occur, Gladman would have slight reservations with the proposed Local Plan Review timescales.

Buffer

- 4.2.20 It is essential that sufficient flexibility is built into the Local Plan Review to ensure that the Council is able to respond positively to changes in circumstance over the plan period. Indeed, there must be sufficient capacity to ensure all needs are met in full in order to deliver the minimum number of homes needed to be delivered.
- 4.2.21 There is no hard and fast rule for the flexibility that should be built into the plan to deliver the housing requirement, but many experts often advocate 20%. It is Gladman's view that the housing requirement for the district will ultimately comprise three elements. The starting point is the base level indicated by the standard methodology. This will be followed by consideration of an uplift to respond to economic ambitions, affordability pressures and unmet housing need of Leicester city. Once this housing requirement has been determined, it will be essential to provide an ample buffer to enhance the deliverability of the Local Plan and provide sufficient contingency to changing circumstances. Gladman recommended that this buffer is set at 20%.

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

- 4.2.22 The Council have undertaken a thorough and detailed assessment, evaluating a wide-range of potential options to accommodate; the Low scenario (368 dwellings per annum), Medium scenario (448 dwellings per annum), High 1 scenario (512 dwellings per annum) and High 2 scenario (730 dwellings per annum). 16 options in total were subject to the Sustainability Appraisal, with Table 6 on page 26 of the consultation document concluding that Option 3a (High 1 scenario) and Option 7b (High 2 scenario) were the two best performing options to accommodate the future housing growth in the district.
- 4.2.23 Gladman support the two Options (3a and 7b) being carried forward by the Council at this time, however, we would highlight to the Council that these figures may be subject to

change with new figures from the Government. Therefore, it may be preferable to identify percentages of the overall housing requirement which the settlement hierarchy would accommodate which would provide for any future flexibility.

- 4.2.24 The Council's preferred growth distribution Options do appear to demonstrate a balanced spread of development; however the Council must bear in mind the infrastructure costs of delivering a potential new settlement. New settlements typically take a number of years to come forward between preparation work on an outline planning application and the completion of the first dwelling on the site. As outlined in paragraph 4.39 of the consultation document, research published by Lichfields (2020) found that large schemes can take 5 or more years to start, with sites of 2,000 or more dwellings taking on average 8.4 years from validation of the first planning application to the first dwelling being completed. Therefore, the Council would need to be confident that any new potential settlement could be fully delivered prior to the end of the plan period. As such, a range of sites that would provide the housing numbers needed by the Council.

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

- 4.2.25 Gladman seeks greater clarity with regards to this policy. The first part of the policy appears to revolve around applications for the sole provision of self-build and custom build development. However, it then appears to state that the Council will seek the provision of land for self-build and custom housebuilding plots on housing sites capable of providing 50 or more dwellings as part of an appropriate mix of dwellings.
- 4.2.26 This appears to indicate that the Council will expect development proposal to deliver a level of self-build and custom housebuilding plots alongside other dwellings. If this is what the policy seeks to do, Gladman would request that a percentage/number of plots is identified as this leaves a level of ambiguity for developers that may cause both confusion before and during the application stage, as developers are forced to redesign and include more or less self-build and custom housebuilding plots on the site which could have wider implications.
- 4.2.27 Gladman fully support the inclusion of the second part of the draft policy on page 31 of the consultation document which includes states the following:

"Where self-build and custom housebuilding plots are included as part of a larger scheme which also includes plots or dwellings available on the open market, and where the self-build and custom housebuilding plots have been made available and marketed appropriately for a period of at least 12 months but have not been sold, then the plots

may either remain available for purchase on the open market or be built out by the developer for sale on the open market.”

Q7) Do you agree with the proposed policy on space standards?

4.2.28 The draft policy on space standards outlines that all new dwellings, including from change of use and conversion, should comply with the Nationally Described Space Standards. In this regard Gladman refer to the Written Ministerial Statement (WMS) dated 25th March 2015 which confirms that:

“The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG”.

4.2.29 Furthermore, with particular reference to the NDSS the PPG confirms:

“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies”.⁷

4.2.30 If the Council wishes to adopt this standard it should be justified by meeting the criteria set out in the PPG, including need, viability and impact on affordability.

4.2.31 The Council will need to provide robust evidence to justify the inclusion of the space standards within a policy in the Local Plan review. Similarly, in respect of the accessibility standards, if it had been the Government’s intention that all properties were built to these standards then these standards would have been made mandatory rather than optional.

4.2.32 Gladman’s concerns regarding the optional national space standards relates to the additional cost and the implications for affordability. Where, for example, a housebuilder would normally build a standard 2-bedroom unit at 72sqm, the national space standards would require the dwellings to have certain dimensions which would mean they could only be built at a minimum of 79sqm, which could add significantly to the cost of the property and in turn increase the cost of an entry level 2-bedroom house, further exacerbating the affordability issues in the area.

4.2.33 The Council need to take these factors into account and will need robust evidence on both need and viability to support the proposed policy requirements outlined in the draft policy.

⁷ PPG ID: 56-020-20150327.

Q8) Do you agree with the proposed policy on accessible and adaptable housing?

4.2.34 The policy drafted within the consultation document states that 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). Gladman would highlight to the Council that the section of the PPG which provides guidance on optional technical standards identifies that in order for the M4(2) requirement to be applied the Council will need to demonstrate through robust evidence the justification and rationale for this requirement. This will include being clear as to how the proposed requirement relates to the future needs within the area and whether the adaptability of existing housing has been considered whether the needs across different tenures have been taken into account and whether consideration has been given to the impact that this requirement may have on the viability implications for development. While this section does provide some limited rationale behind the policy Gladman considers that further work will be needed to justify this requirement and feels that a 100% requirement for an optional housing standard on all development is both too broad and too onerous on future housing development.

g) Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing?

4.2.35 Whilst Gladman are generally supportive of providing homes which are suitable to meeting the needs of older people and disabled people, any draft policy requirement must be based on appropriate evidence.

4.2.36 Should the Council wish to include M4(3) for market housing and the evidence supports its application, the Council will need to provide evidence, setting out the specific case for Optional Technical Standards in North West Leicestershire. Limited evidence with regard to the 5% requirement, particularly in relation to size, accessibility and adaptability of existing housing stock, location and quality of dwellings needed to meet identified needs has not been undertaken.

Q17) Do you agree with the proposed Health Impact Assessment policy?

4.2.37 Gladman has some reservations about the policy as currently drafted and would highlight the importance of setting out clearly both the substance and the requirements of both the Health Impact Screening Statement and subsequent Health Impact Assessment (HIA). This should include clear information as to when a screening letter needs to be submitted in the applications lifecycle.

- 4.2.38 It may be necessary to create a Health Impact Assessment SPD to support the policy and the Local Plan Review. This would in turn provide a greater level of detail as to what will be required of the screening statement and assessment and how it will be carried out. It will be for the Council to set out the relevant background and issues faced by the district so that HIAs, be they either comprehensive, rapid or desktop, can assess the impacts that schemes will have on these issues. Indeed, other local planning authorities have created specific guidance and tools to assist those submitting applications in undertaking HIAs.
- 4.2.39 It is important for any HIA policy to take into account the different levels of information available to different planning applications, be they outline, reserved matters or full and so correspondingly their HIAs will be able to provide different level of detail.

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?

- 4.2.40 Gladman would reiterate the Council's supportive text that by requiring a Health Impact Screening Statement on what is essentially an ad hoc basis is likely to prove both confusing and a hindrance. It is Gladman's opinion that the Council should set out clearly which application types would require a screening statement, this may mean that all developments have to propose a screening statement to some degree. Again, if the Council were to pursue such an approach, a separate standalone SPD would be able to provide the detail to give applicants certainty as to what is required.

Q19) Do you agree with the proposed renewable energy policy?

- 4.2.41 Gladman wish to highlight their concerns with sub-section 5 of the draft Renewable Energy policy which concerns the incorporation for on-site electricity and heat production from solar, wind and other renewable technologies for all new developments. This requirement will need to be supported by viability evidence, which ensures that any measures implemented recognises the need to balance the shift to renewable energy development protocols with the costs this leads to. Without this consideration, renewable policies which require significant developer cost are unlikely to come forward and be effective, as they will often be challenged on the grounds that they do not allow the developer sufficient profits for the time spent, and are likely to discourage renewable implementation rather than encourage it.

Q20) Do you agree with the preferred policy approach for energy efficiency?

- 4.2.42 Gladman would wish to reiterate previous points that if the Council wish to set targets higher than the intended Governmental targets this will have to be evidenced and the viability of such a measure taken into account so as not to take negatively impact the delivery of housing.

Q25) Do you agree with the proposed policy for water efficiency standards?

- 4.2.43 Gladman agree with the Council of the need to imbed water efficiency into new development, however as identified by the Council, in order to require water efficiency greater than that already identified within the Building Regulation (125 litre/person/day), the Council will need to continue to establish the clear need for such measures and demonstrate that this has been taken into account with regards to viability.
- 4.2.44 Whilst Gladman are not adverse to the Council targeting a policy which results in improved water efficiency standards, it is important that the Council provides sufficient justification by applying the criteria set out in the Planning Practice Guidance⁸. In this regard, the Council will need to demonstrate a need for applying the tighter water efficiency standards in order to demonstrate that the district is classed as water stressed. Notwithstanding this, all new dwellings achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than what is achieved by much of the existing housing stock.

⁸ PPG Reference ID: 56-013-20150327 – 56-017-20150327

5 SITE SUBMISSIONS

5.1 Land off Thornborough Road, Coalville

- 5.1.1** Gladman are promoting land off Thornborough Road, Coalville for residential development. The location and extent of our land interest is outlined in red on Figure 1 below.

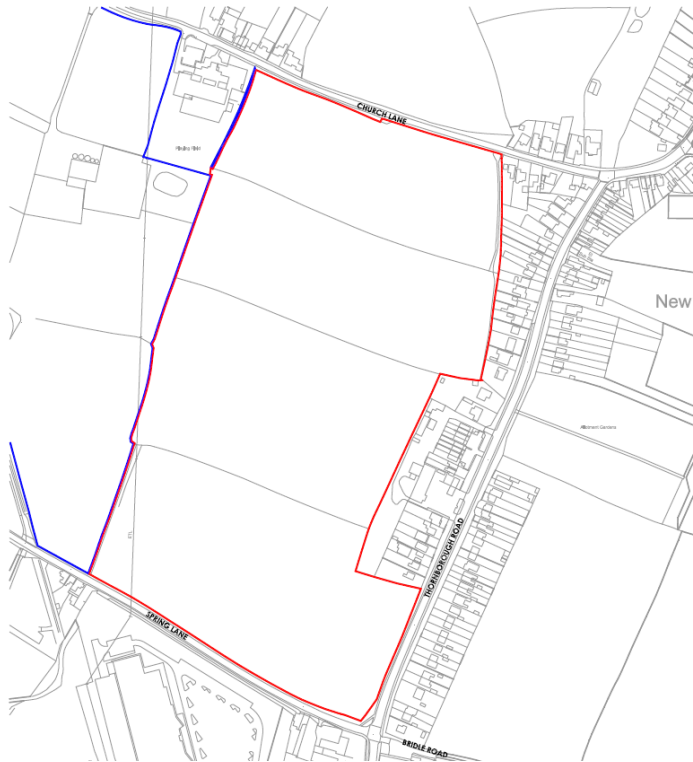


Figure 1: Land at Thornborough Road, Coalville - Site Location Plan

- 5.1.2** The 15.08 hectare site lies to the north of the town of Coalville, within the suburb of New Stephenson. It comprises of four fields in agricultural use and is considered to hold a capacity for up to 260 dwellings.
- 5.1.3** The site is located close to the principal town of Coalville. New Swannington Primary School is located at the north western corner of the site. Stephenson College is located to the south of the site. There are a wide range of retail facilities located within 10 minutes walking distance of the site at the retail park located on Thornborough Road. Coalville town centre is roughly a 15-minute walk from the site. In addition, there is a good range of employment opportunities available within walking distance of the site at Stephenson Industrial Estate and the Coalville employment area.

- 5.1.4 The site is also well served by public transport. The nos. 29 and 29A bus services operate half hourly along Thornborough Road between Leicester and Coalville. The SKYLINK bus service operates hourly to East Midlands Airport and Nottingham.
- 5.1.5 Gladman can confirm the availability and suitability of the site for housing. Gladman previously prepared and submitted an outline planning application on the site for up to 270 dwellings in November 2016 (application reference: 16/01407/OUTM). The application was supported by a detailed range of technical information which remains valid and publicly available which illustrates the deliverability of the site for housing, including information on highways, landscape, ecology and drainage. The application was refused by North West Leicestershire District Council in August 2017.
- 5.1.6 Gladman consider that the site is deliverable within the local plan period. As previously set out, Gladman hold a strong track record of securing the delivery on housing on the sites it secures planning permission on. Gladman estimate that the site would take approximately 6-7 years to complete from commencement.
- 5.1.7 Development within this site will comprise a balanced mix of market and affordable dwellings providing a choice of type and size. The construction of additional market and affordable housing will provide significant community benefits. Furthermore, new housing in this location would help contribute to growth in the economy of Coalville.
- 5.1.8 Gladman consider the site to be sustainable, suitable, and deliverable and would welcome further discussions with the Council during the Local Plan Review's preparation.

5.2 Land off Wash Lane, Coalville

5.2.1 Gladman are promoting land off Wash Lane, Coalville for residential development. The location and extent of our land interest is illustrated on Figure 2 below.

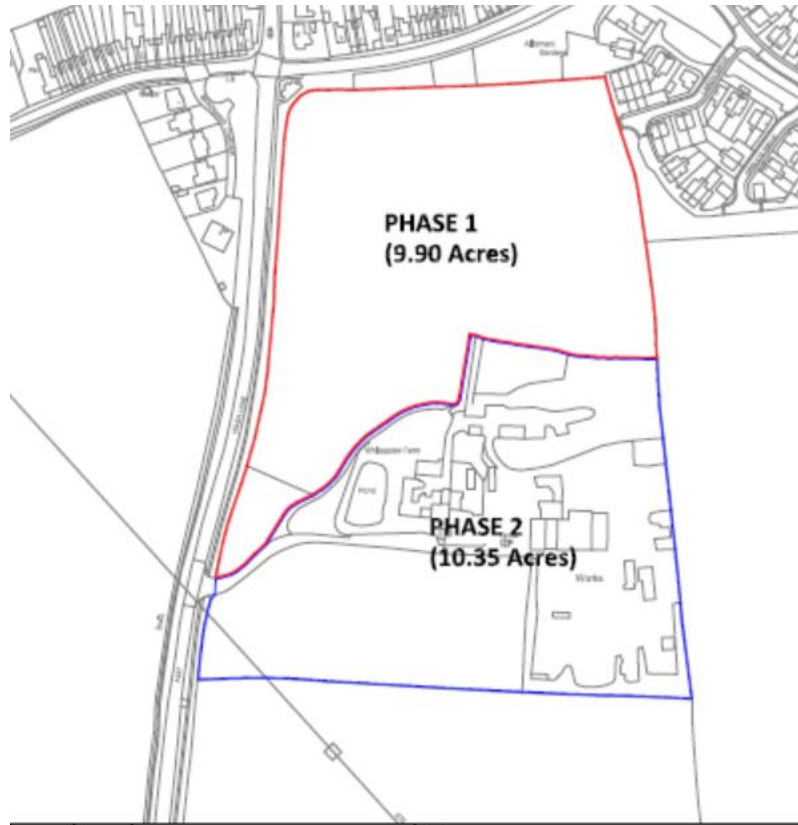


Figure 2: Land off Wash Lane, Coalville - Site Location Plan

5.2.2 The 8.18 hectare site is located to the east of Wash Lane and lies adjacent to existing built development to the north. The site is split into two phases with Phase 1 (northern parcel outlined in red in Figure 1) comprising an irregular shaped field which is currently in agricultural use with a pocket of trees located in the south western corner and measuring 9.90 acres / 4 hectares in size. Phase 2 forms the southernly phase (outlined in blue on Figure 2) and is formed of a single irregular shaped field currently in agricultural use alongside industrial units and a farm in the north and eastern part of the site and measures 10.35 acres / 4.18 hectares in size.

5.2.3 An outline planning application was submitted for the Phase 1 site (application ref: 21/00494/OUTM) on 19th March 2021, which is under determination by the Council. A wide range of expert technical reports / assessments have been prepared to support the application which provides certainty that the site is deliverable and demonstrate that this represents a sustainable site.

- 5.2.4 Both phases are intended to incorporate market and affordable housing of a variety of types and tenures helping to meet the current and anticipated future housing needs of Coalville and the wider North West Leicestershire district.
- 5.2.5 Coalville is the Principal Town within the district and is designated as a top tier settlement in the emerging settlement hierarchy within the Strategy Options and Policy Options consultation document. It is identified to accommodate a significant proportion of the overall housing requirement. As such, Coalville is clearly a sustainable location for growth comprising a wide range of services and local facilities including education, health and employment. Residents of both phases would be able to access these local facilities and services via sustainable methods of transport. There are new pedestrian and cycle links being identified within Phase 1 to Wash Lane and Coalville Lane and a bus stop located along Coalville Lane providing services to the centre of Coalville alongside Ashby-de-la-Zouch and Swadlincote.
- 5.2.6 Both phases are capable of delivery in the short term to assist the Council's housing land supply position. Phase 1 is subject to a 'live' planning application and could be delivered quickly. This could then be followed by Phase 2. The current application for Phase 1 proposes up to 100 dwellings and it is anticipated that Phase 2 would be for a similar number of dwellings. Both phases would deliver an on-site policy compliant amount of affordable housing, which would be 20% in the Coalville Urban Area, as outlined in the consultation document. The provision of additional market and affordable housing will provide significant community benefits and would assist in the viability and vitality of local services and facilities. Further, new housing at this location would help contribute to growth in the economy of Coalville.
- 5.2.7 Both phases will bring forward significant economic benefits associated with the construction of new homes such as generation of construction jobs, value added to the economy by the construction and economic activity from residents. Phase 1 is anticipated to generate approximately £3 million in annual residential expenditure and create around 85 construction jobs.
- 5.2.8 Access is currently proposed to be derived from Wash Lane, via a priority-controlled T-junction. The documentation published as part of the planning application for Phase 1 demonstrates that the required visibility splays can be achieved. It would be the intention that Phase 2 would also utilise the same access as Phase 1, with the existing access to the industrial units operating as an emergency access if required.

- 5.2.9 Formal and informal public open space will be incorporated within each phase. Phase 1 would provide 1.14 hectares of formal and informal open space including a Locally Equipped Area for Play which represents around 28% of the gross site area. There would be a similar proportion provided on Phase 2.
- 5.2.10 The two phases will bring environmental and ecological enhancements. The site would provide on-site planting in line with National Forest Guidance, with Phase 1 providing the creation of new woodland and woodland belt to reinforce the existing tree growth on site. Both sites would therefore actively contribute to the aims of the National Forest. It has been demonstrated through the reports submitted for Phase 1 that the site will avoid or minimise potential adverse impacts on habitats of ecological value and notable species. This will be replicated on Phase 2 but with the additional benefit that the current industrial units would be demolished, and the corresponding residential development would deliver positive ecological measures to benefit the area.
- 5.2.11 Whilst there are several listed buildings located in Ravenstone to the west and within Coalville to the east, they are located some distance from the whole site and separated by existing development. Therefore, it is anticipated that both phases of the site will not negatively impact upon these heritage assets.
- 5.2.12 Gladman consider the site to be sustainable, suitable, and deliverable and would welcome further discussions with the Council during the Local Plan Review's preparation.

5.3 Land off Blackfordby Lane, Moira

- 5.3.1 Gladman are promoting land off Blackfordby Lane, Moira for residential development. The location and extent of our land interest is outlined in red on Figure 3 below.

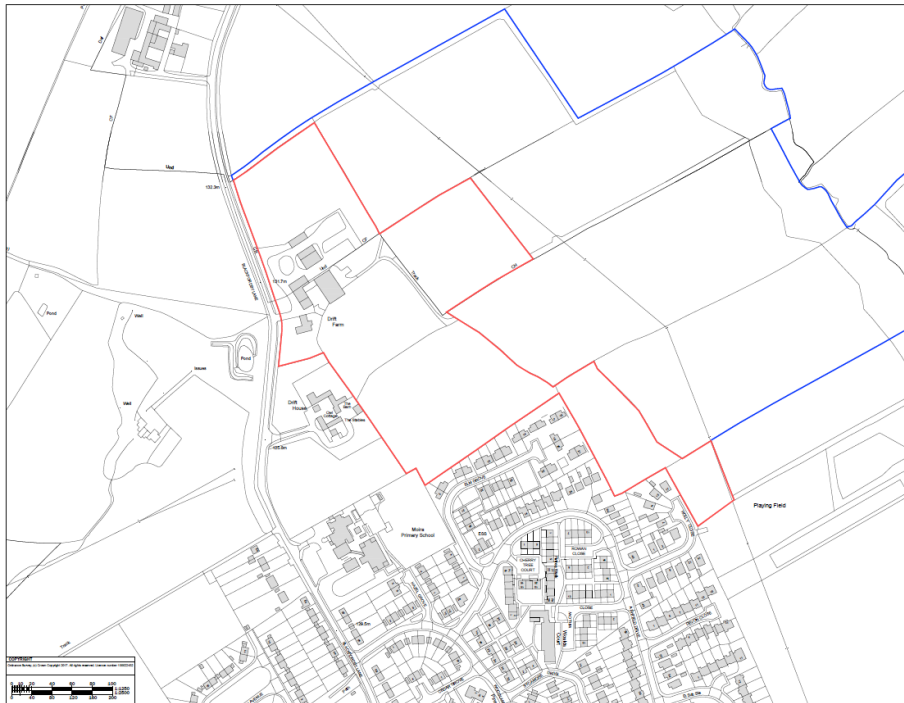


Figure 3: Land at Blackfordby Lane, Moira – Site Location Plan

- 5.3.2 The site is located to the north of Norris Hill in Moira. The site is comprised of a collective of fields in agricultural use and extends to an area of 6.72 hectares. It is considered to hold a capacity for up to 125 dwellings.
- 5.3.3 Moira is identified as a sustainable village by the Council in both its current and emerging settlement hierarchies. The village comprises a good range of services including; a local shop, Post Office, primary school, village hall, employment land, and public house. The no. 29 bus service operates through Moira on Blackfordby Lane and Ashby Road, providing a half hourly service to the towns of Coalville and Burton upon Trent. The site is therefore considered to occupy a sustainable location.
- 5.3.4 Gladman can confirm the availability and suitability of the site for housing. Gladman has previously submitted a Vision document to the Council which sets out how the site could be developed for housing following expertise advice regarding matters such as landscape, ecological, historical, highways and drainage. We have also strongly promoted the site

through the emerging Blackfordby Neighbourhood Plan. The site is capable of being delivered in the short-term, with an estimated build period of 3 years.

- 5.3.5 Development within this site will comprise a balanced mix of market and affordable dwellings providing a choice of type and size. The construction of additional market and affordable housing will provide significant community benefits. Furthermore, new housing in this location would help contribute to growth in the economy of Moira.
- 5.3.6 Gladman consider the site to be sustainable, suitable, and deliverable and would welcome further discussions with the Council during the Local Plan Review's preparation.

6 CONCLUSIONS

6.1 Summary

- 6.1.1 Gladman welcomes the opportunity to comment on the North West Leicestershire Local Plan Review (Regulation 18 consultation). These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2021) and Planning Practice Guidance.
- 6.1.2 Gladman have provided comments in response to a number of questions raised within the Council's Development Strategy and Policy Options consultation document and recommend that the matters raised are carefully explored during the process of undertaking the Local Plan Review.
- 6.1.3 In summary, Gladman support the decision by the Council to undertake a Local Plan Review in line with previous commitments. The Local Plan Review provides the opportunity to ensure that the Local Plan is consistent with up-to-date national policy.
- 6.1.4 A key issue for the Plan is how the unmet housing needs of Leicester City are going to be addressed through the Local Plan Review. It is currently anticipated that a draft Statement of Common Ground apportioning the unmet needs of Leicester City will be published in May 2022, however it is currently unknown if lengthy negotiations between the district councils will follow if any disagreement arises with the apportionment between the Leicestershire authorities.
- 6.1.5 Gladman would support the development of housing at lower order settlements to boost the Council's housing land supply and aid the longer-term sustainability of these settlements. The definition of the Coalville urban area (the principal tier of the settlement hierarchy) should be updated to consider how settlements in the wider area relate to this definition. In allocating land for housing through the Local Plan Review, the Council should adopt a diverse strategy of sites and locations to boost deliverability and ensure that housing needs are met across the local authority area.
- 6.1.6 We hope you have found these representations informative and useful towards the preparation of the North West Leicestershire Local Plan Review and Gladman would welcome any future engagement with the Council to discuss the considerations within future local plan review documents.





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

Consultation Response Form

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

Part A – Personal details

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

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	Ms
First Name	Rupert	Caroline
Last Name	Young	Chave
[Job Title]	Development Director	Director
[Organisation]	Nurton Developments Ltd	Chave Planning Ltd
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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...

Q4

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

Nurton Developments supports the preferred 'High 2' scenario for housing growth. This scenario provides a very significant degree of flexibility to help address issues of unmet need from Leicester. The High 2 scenario represents the best opportunity to address unsustainable commuting patterns and thus tackle climate change. As set out in the consultation, the North West Leicestershire district is a net importer of labour, which results in in-commuting to the district, and this trend is almost certain to continue into the future.

Ensuring that homes and workforce are matched to jobs is a key measure in reducing in-commuting and thus tackling climate change. It is therefore vitally important that the right growth strategy is pursued in order to reduce in-commuting. The High 2 scenario offers the best opportunity to work towards achieving this important balance.

The 'High 1' scenario, considered by the Council to be another potentially suitable scenario, does not perform as well as it is well below both demographic trends and build rates. There is also significant uncertainty as to whether it would provide a sufficient buffer to accommodate an appropriate apportionment of Leicester's unmet need. For these reasons alone it is right that it is not the preferred scenario. Nurton Developments consider that the High 1 scenario should be discounted because it would not match the economic performance and ambitions of the district and could potentially worsen the situation with regard to unsustainable commuting patterns.

(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

04.03.22

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

The deadline for responses is the end of Monday 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.

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	Personal Details	Agent's Details (if applicable)
Title	Mr	Ms
First Name	Rupert	Caroline
Last Name	Young	Chave
[Job Title]	Development Director	Director
[Organisation]	Nurton Developments Ltd	Chave Planning Ltd
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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...

Q5

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

Nurton Developments would wish to highlight that a proposal is emerging for a potential new settlement crossing the boundary with Hinckley & Bosworth Borough Council (HBBC). Although the bulk of the new settlement would lie within Hinckley & Bosworth, depending on the size of the settlement it could contribute between 1,500-2,000 dwellings within North West Leicestershire District. Nurton Developments is at an early stage of working with landowners and HBBC to conceptualise the new settlement proposal, so cannot confirm at this stage the precise level of growth that would be brought forward within North West Leicestershire and the timeline over which it would be brought forward, however there is good potential for development to be delivered within the plan period to 2039. The delivery plan will depend on the format of the settlement and infrastructure phasing, which are yet to be determined, but which could involve parcels of development in North West Leicestershire coming forward at an early stage. Nurton Developments would highlight this emerging proposal for the information of NWLDC and would welcome further discussion over it.

(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

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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

04.03.22

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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...

Q

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

Please see submitted representations.

(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

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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 James Clark

Date 14.3.2021

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

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North West Leicestershire Local Plan

Development Strategy Options and Policy Options (Regulation 18) Consultation

On behalf of Redrow Homes Ltd

Date: March 2022 | Pegasus Ref: P17-1667

Author: James Clark





Document Management.

Version	Date	Author	Checked/ Approved by:	Reason for revision
1	14/3/2022	JC	SLR	



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1. INTRODUCTION

- 1.1. These representations on the North-West Local Plan Review are made on behalf of Redrow Homes Ltd in relation to their interest in Land at Church Lane, Ravenstone.
- 1.2. Previous representations made in relation to this site on behalf of Redrow Homes raised concern regarding the lack of progress on the issue of Leicester City's unmet housing needs and the failure of the HMA authorities to publish a Memorandum of Understanding on the distribution of future housing needs.
- 1.3. Whilst it is understood that the Leicester City unmet need has been calculated at 18,000 dwellings, there has been no progress on the number of dwellings that will be distributed to the other authorities within the HMA. As set out in the previous representations, the HMA authorities should as a matter of urgency complete a Memorandum of Understanding to provide a clear baseline for individual authorities to for Local Authorities to make real progress in the preparation of their local plans.
- 1.4. We have set out below our response to the various questions in the Development Strategy Options and Policy Options consultation.

2. THE SETTLEMENT HIERARCHY

Q2 – Do you agree with the proposed settlement hierarchy?

- 2.1. The Consultation proposes a new settlement hierarchy which largely reflects the settlement hierarchy within the current adopted Local Plan, however changes are proposed to rename 'Small Villages' as 'Local Housing Needs Villages' and to rename 'Hamlets' as 'Other Villages/Settlements'.
- 2.2. Ravenstone remains as a 'sustainable village' within the proposed settlement hierarchy. However, Ravenstone is located within close proximity to the Coalville Urban Area which is identified as the 'Principal Town' and has a wide range of facilities and services which the residents of Ravenstone and the sustainability of the village benefits from.
- 2.3. Its therefore considered that as Ravenstone has a number of services and facilities such as convenience store, post office and primary school, as well as having an hourly bus route to Coalville and Ibstock within close proximity and is generally considered more sustainable than the other 'sustainable villages'. The settlement hierarchy should be reviewed taking these factors into account and Ravenstone's position within the hierarchy should be re-evaluated.

3. 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

- 3.1. The Options Paper sets out a number of options for housing provision that have been developed, these include:
- 368 dwellings a year as a low scenario based on the standard method;
 - 448 dwellings a year based on the 2017 HEDNA report as a medium scenario;
 - 512 dwellings a year taken from the Leicester and Leicestershire Strategy Grown Plan as a 'High 1 Scenario';
 - 730 dwellings a year based on the 2018 household projections as a High 2 Scenario.
- 3.2. The options paper provides an assessment of the above options, concluding that the High 1 and High 2 scenarios cover the likely future requirement when considering the issue of Leicester City's unmet need of 18,000 dwellings and the uncertainty surrounding the distribution of these dwellings within the wider housing market area.
- 3.3. The issue for North-West Leicestershire and the other authorities within the housing market area is the issue of Leicester City's unmet needs and the understanding of how these dwellings will be distributed. The scale of the unmet need is estimated at around 18,000 over the plan period. As raised in the introduction of this representation this is a significant number of dwellings that needs to be provided for within the remaining authorities in the HMA and there is an urgent need for the authorities to reach an agreement on the distribution of these dwellings which will have implications on the preparation of sound Local Plans.
- 3.4. The options paper considers two amounts of housing growth over the plan period, a 'high one scenario' of 512 dwellings per year and a 'high 2' scenario of 730 dwellings per year.
- 3.5. Whilst it is still unclear and uncertain how much of Leicester City's unmet need North West Leicestershire will have to accommodate, the High 2 Scenario proposed would provide a more robust basis for taking the plan forward and making allowance for the additional number of dwellings required to be accommodated.

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.

- 3.6. The options paper sets out and considers 9 spatial options, largely reflecting the proposed settlement hierarchy whilst also including and considering an option for a New Settlement following promotion of the land to the South of East Midlands Airport.
- 3.7. The 9 spatial options were considered and assessment against alternative levels of growth to present 16 further options that were then assessed through a Sustainability Assessment.
- 3.8. This culminated in two options to be taken forward presented in table 6 of the options paper and are shown below:
- High 1 Scenario (1,000 dwellings)
 - Option 3a – Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (200 dwellings).
 - High 2 Scenario (5,100 dwellings)
 - Option 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).
- 3.9. It is considered that the principles of the High 2 Scenario is the most appropriate strategy for distributing development which represents largely a continuation of the current spatial strategy in the current adopted Local Plan, which has a demonstrated strong delivery record as indicated by North-West Leicestershire’s current housing land supply figure.
- 3.10. To ensure that there is a wide range of good sites coming forward to meet the wide-ranging needs of the market and to ensure a consistent supply of housing in the early years of the plan period it is necessary to ensure that small to medium sites are provided for across the settlement hierarchy as advocated by the NPPF in paragraph 69:
- ‘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. To promote the development of a good mix of sites local planning authorities should:*
- Identify through the development plan, land to accommodate at least 10% of their housing requirement on sites no larger than one hectare.’*
- 3.11. Therefore, the principle of the High 2 option which seeks to distribute growth throughout the settlement hierarchy including the sustainable villages is considered to be an appropriate strategy that reflects the policies of the NPPF in providing for smaller sites, such as Redrow Homes interest in land at Church Lane Ravenstone, an indicative masterplan has been provided in Appendix 1.
- 3.12. The site lies to the north of Ravenstone and to the east of Church Lane and is well related to the existing settlement. It is close to the range of services and facilities in the settlement which include a convenience store and post office which are within an 800m walking distance from the site. There is also primary school provision within Ravenstone as well as a number of local play space provisions.
- 3.13. There are two bus services that serve Ravenstone. The number 15 Arriva service provides connections to and from Ibstock and Coalville, this service runs hourly and passes through



Ravenstone. A bus stop is located on Church Lane approximately 150m from the site within walking distance and provides a sustainable transport option to the principal towns.

- 3.14. Ravenstone, and the site on Church Lane should also be assessed for its close proximity to Coalville and the services and facilities provided by this principal town. The number 15 bus service provides a direct connection to Coalville High Street within 15 minutes providing access to the wide range of services and facilities within Coalville, including Doctors, Dentists, Schools, and Shopping Facilities.
- 3.15. Furthermore, Coalville has a wide range of employment opportunities with 6 industrial/business parks within 2km of Ravenstone, these parks are also accessible by public transport from Ravenstone, further promoting the sustainable credentials of this sustainable village. As inferred earlier in this representation, Ravenstone should be further assessed within the settlement hierarchy taking into account its location to the principal town of Coalville and its ability to accommodate additional housing that can benefit from the facilities and services in this town.
- 3.16. The provided indicative masterplan shows that the development proposals would provide around 60 dwellings at an appropriate density of approximately 34 dwellings per hectare. The proposals would be able to retain all existing boundary features such as trees and hedges and the development would be able to come forward without detriment to the wider landscape character.
- 3.17. Transport, Flood Risk, Ecological, Aboricultural and Agricultural land studies have been carried out which demonstrate that development can progress with little to no constraint.
- 3.18. It is therefore considered that the land at Church Lane Ravenstone represents a sustainable development opportunity that should be progressed through further consultations as an option for development that is available and deliverable within the sustainable villages.

4. HOUSING

Self-build and Custom Housebuilding

Q6 – do you agree with the proposed self-build and custom housebuilding Policy? If not, why not?

- 4.1. The self-build and custom housebuilding policy seeks to require sites capable of providing 50 or more dwellings to provide self-build or custom build housing as part of an appropriate mix of housing.
- 4.2. This is not considered to be an appropriate policy stance. Local Planning Authorities are required by Sections 2 and 2a of the Self Build and Custom Housebuilding Act to provide for enough suitable development permissions to meet the identified demand as indicated though the Brownfield Register. There is no policy basis within the National Planning Policy Framework or Planning Practice Guidance to requirement developers or landowners to shoulder this responsibility.
- 4.3. The chosen policy response only serves to change housing delivery from one form of house building company to another without any additional contribution to housing supply. The Council should be identifying suitable development opportunities to allow self-build and custom build housing to come forward within the emerging local plan.
- 4.4. There are also practical issues that should be given careful consideration including health and safety implications, working hours, length of build programme and long-term gaps in sites caused by stalled programs if the plots are not taken up by self-build or custom house builders.

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

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

- 4.5. The proposed policy approach seeks to require all new dwellings to meet at least M4(2) (accessible and adaptable) standards of the Building Regulations. The evidence presented suggests that over the period 2018-2036 the district is projected to see a notable increase in the older person population with the total number of peopled aged 65 and above increasing by 47% in this period.
- 4.6. However, it is not considered that this provides sufficient justification to require all dwellings to be built to M4(2) standard. Building homes to M4(2) standards is optional within the Building Regulations set by the Government. Should the Government be concerned that housing standards would not be sufficient in the future M4(2) would be made a required as a compulsory requirement within the building regulations.

5. HEALTH AND WELLBEING

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

- 5.1. The proposed policy requires Health Impact Assessments for all residential developments with a site size of over one hectare, or 30 dwellings.
- 5.2. It is considered that a separate policy requiring developments of a certain size to be supported by a Health Impact Assessment is not necessary. The Health Impact Assessment should be an integral part of the Strategic Environmental Assessment and health and wellbeing factors should form part of other policies within the local plan

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

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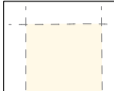



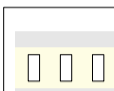
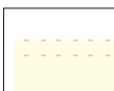



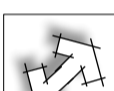

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- Key**
-  **Site Boundary**
2.69 Ha
 -  **Development Area**
1.74 Ha at 34pdh circa 60 dwellings
 -  **Illustrative Built Form Area**
 -  **Existing Trees**
 -  **Proposed Trees**
 -  **Illustrative Drainage**
 -  **Street**
 -  **Lane**
 -  **Private Drive**
 -  **Site Access**
 -  **Footpath**
 -  **Pedestrian Connectivity**
 -  **Future Development**





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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	Mr
First Name	Richard	Robert
Last Name	Hickman	Barnes
[Job Title]		Director
[Organisation]	St Modwen Developments Ltd	Planning Prospects Ltd
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 ALL

Please see responses to all questions answered attached to this form (Appendix 1) and further evidence referred to in the responses also attached (Appendix 2).

(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 Robert Barnes

Date 14th March 2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.

APPENDIX 1

North West Leicestershire Local Plan Review Development Strategy and Policy Options Comments on behalf of St Modwen Developments Ltd

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

Objective 5 seeks to support the district's economy, "by providing for a range of employment opportunities which respond to the needs of businesses and local workers." This should be more positively framed. The Local Plan should "meet", rather than "respond to", the needs of businesses and local workers. This objective should be amended accordingly.

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.

It is encouraging that the Development Strategy and Policy Options document immediately recognises that the "Low" and "Medium" scenarios are inappropriate. It is essential that an approach is taken which plans positively for housing growth consistent with longstanding Government policy objectives to boost significantly the supply of homes. The tone in the Options document helpfully steers the debate towards that position.

Of the options presented the "High 2 scenario" should be preferred. The document correctly notes (paragraph 4.19) that this is the best performing scenario, providing flexibility to help address unmet need, and assisting with establishing a better balance of labour supply. One of the challenges for North West Leicestershire as a very highly desirable location for new business is matching that opportunity to the local availability of labour to service it, and supporting a higher level of housing growth will be important in that regard.

However, the evidence suggests that a level elevated above the "High 2 scenario" would be appropriate. The proposed delivery of 730 dwellings per annum is only marginally above the principal (main) 2018 based household growth projection, and lower than the high international migration projection. It is also lower than the recent build rates (770 dpa) which have been achieved.

Moreover, whilst it is currently unknown how the unmet need from Leicester will be addressed it is understood to be a substantial requirement (about 18,000 dwellings) and will need to be accommodated somewhere in Leicestershire. Some of this will need to be directed to North West Leicestershire. This should be regarded as an opportunity for reasons again including those around achieving an improved balance and distribution of labour to meet the burgeoning demand from employers in the district. This again supports an outcome in excess of the "High 2 scenario".

The outcome of the "High 2 scenario" suggests a residual requirement for about 5,100 dwellings. Meeting even a modest proportion of the unmet need from Leicester would have

important implications for this requirement. In this context it is essential that when progress has been made between the Leicestershire authorities in terms of the potential approach to meeting Leicester's unmet need the opportunity is provided through consultation for views to be expressed on it.

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

In the Development Strategy and Policy Options document the question about continuity of employment land supply is framed around the "general" (local) requirement and the comments set out here are presented against that background. However, it should also be noted that continuity of supply is equally relevant to the further requirement for strategic employment land, and these representations should be understood accordingly. The central themes of the response to this question apply to the consideration of strategic employment land, as well as the general requirement.

Before assessing the appropriate option to ensure continuity of employment land supply it is essential properly to establish the requirement. There are qualitative and quantitative aspects to this.

In qualitative terms it is important to recognise the varied needs which exist within the industrial and logistics sector. The Development Strategy and Policy Options document alludes to this (paragraph 6.4) with commentary around the considerable market demand for industrial and smaller warehouse premises, and the extent to which that competes with demand for strategic distribution. It is important that the Plan addresses a full range of needs across all sectors, including smaller industrial and warehouse premises as well as strategic distribution and strategic industrial requirements. The question must not just be one of continuity of supply, but also making sure that supply comprises the right land in the right place at the right time to meet the full range of needs.

The full segmentation within the market must also be recognised within the Plan. The approach taken in North West Leicestershire which distinguishes between general and strategic employment land is relevant to some degree but policy must take account of the fact that these are not homogenous categories. For example, the general category includes everything from workshop and starter / incubator space, all the way through to premises capable of accommodating sizeable and locally important businesses. Equally, the strategic category includes space which might perform a district wide or sub-regional function (say, units up to about 20,000 sq m or so) and also space which might perform a regional (or wider) function (say, units of 30,000 sq m or more). It is not enough simply to identify a quantum of land sufficient in theory to meet needs; allocations and supporting policy must also be flexible enough to ensure in the real world that the whole market is catered for on an ongoing basis.

In quantitative terms it is necessary that the Plan making process is informed by an evidence base that is as up to date as possible, whilst recognising it is unavoidably the case any

evidence base will lag somewhat behind the plan making process. This is particularly pertinent in current circumstances where the recovery from the pandemic and the long-term effects of Brexit, plus a range of more routine market dynamics, combine to create a greater degree of uncertainty than might previously have been the case.

Recent evidence points to continued and very strong demand for employment land, and it is important that the Local Plan is flexible enough to accommodate this and so ensure continuity of supply. There are basic mechanisms which can be deployed to achieve this, such as expressing the need for land as a minimum and allocating a greater amount of land than that simply required to satisfy the estimated numbers derived from the evidence base. Equally, though, the Plan should explicitly recognise that this is a rapidly changing market and that any evidence base is inevitably a snapshot in time, and accept that more up to date evidence during the Plan period might well point to and support an outcome different to that anticipated through its preparation.

The Development Strategy and Policy Options document rightly notes (paragraph 6.11) the national policy position that needs must be met over the plan period. It also recognises the real-life consequences of failing to do this, which include frustrating business growth. Again, the approach must be to plan positively to ensure all needs can be met across the plan period.

In the case of general employment land the evidence is provided by, “The Need for Employment Land” report (Stantec for NWLDC, November 2020). The date of publication of this report and the nature of the period during which it was prepared immediately mean that a degree of caution should be exercised in its application. This is not a criticism; it simply speaks to the point made above that the Plan (through its preparation and following its adoption) must be open to and accommodate a response to a rapidly changing market where evidence supports it. The outcome of the new HEDNA may well also have a bearing on this.

In terms of the Stantec report, and its interpretation in the Development Strategy and Policy Options document in relation to non-strategic employment space, a number of observations should be made.

First, the assumed plot ratio of 40% is only appropriate if it is intended to relate to net developable area. Sites will often be constrained by (for example) their shape, topography, or a range of other features which restrict the area that can be developed. There may be a requirement for land to be given up to (for example) SUDS features, structural landscaping, and buffer zones, and likely to estate roads. For such reasons an average plot ratio of 40% is unachievable if used as a conversion factor to arrive at a gross requirement. If it is to be applied, then it must be made clear it yields a net land requirement, what that requirement represents (i.e. specifying what is excluded), and allocations made accordingly. This will require an assessment of the likely net developable area of allocations to ensure this net requirement can be met, or there will be a significant risk of insufficient provision being made.

Second, and this notwithstanding, there appears to be an error in Table 7 of the Development Strategy and Policy Options document. It converts a residual requirement for industrial and smaller warehousing space of 165,744 sq m to a land requirement of 33.18ha, which is then reflected in paragraph 6.8. However, this equates to a ratio of 50%. Applying a ratio of 40% this would yield a much larger requirement of 41.44ha. Again, for the reasons set out above this should be understood as representing a requirement for net developable area, not gross site area. In any event, it is obviously essential that the calculations are correct.

Third, Table 7 places reliance on the outstanding allocation at Money Hill for 5.33ha of offices and 10.66ha of industrial and smaller warehousing space. This allocation was made through the adopted Local Plan but to date there does not appear to have been progress with its implementation. The masterplan (now approved) for the site has evolved since 2016 and includes areas for employment use. However, whilst progress has been made since 2014 with permissions for well over half (about 830) of the 1,400 dwellings anticipated here, there is no comparable evidence of the employment element being advanced, despite the wider site being identified and developed during a period of very strong demand for employment space. The likelihood of this allocation ever coming forward for employment should be reviewed, and reliance should not be placed on it unless that can be demonstrated.

Fourth, as the Development Strategy and Policy Options document correctly observes (paragraph 6.9) there is a sizeable unmet need for employment from Leicester and North West Leicestershire will have to accommodate part of it. Any such apportionment is not reflected in the requirement as expressed to date.

Fifth, the Stantec report shows that for a range of reasons in North West Leicestershire there has been significant historic variation in the balance between the provision of general (non-strategic) and strategic employment space. Any analysis which seeks to apportion a requirement between these two categories must be approached with a considerable degree of caution. They must not be treated in absolute terms. This speaks to the observation above in terms of the necessity for the Plan to be flexible in its approach to the provision of employment land so that the full range of needs can be met.

Sixth, whilst the Stantec report makes an adjustment (paragraph 3.34) at a specific point (2017) through a “stock vacancy adjustment” (i.e. an allowance for a “normal” or healthy amount of empty space to support choice, variety and churn in the market in the context of otherwise at that time almost full occupation in the district) it makes no allowance for any pent up or “suppressed” demand that might have accrued over a more extended period.

This effect is recognised in the comment at paragraph 3.36 of the Stantec report that, “We have compared our forecasts with the past delivery of net additional floorspace, since 2012/13, as shown in the Council’s main monitoring dataset...The floorspace completed varied greatly from year to year, with an average of 2,941 sq m p.a. The demand in our main forecast is more than twice this annual average. This is not surprising, since our analysis suggests that in the period covered by the Council data supply has failed to meet

demand.” This points to suppressed demand over an extended period which is not allowed for in the specified requirement; there is no attempt to make up this shortfall. This applies to the (non-strategic) focus of the Stantec report, but importantly the same is also true of the wider market including the strategic element.

The pent-up demand is also reflected in the property market section of the Stantec report. The observation is made there (paragraph 5.46) that, “In our stakeholder workshop and one-to-one consultations, we asked property agents and developers how easy or difficult it was for occupiers to find the space they need. All our consultees felt that it was difficult, because currently there is very little property on the market, and any units that do become available let immediately. They reported that there was substantial unmet demand in the market, so companies who could find the space they need moved to other places, or perhaps stayed in premises that no longer met their needs, compromising growth or efficiency. These views are strongly confirmed by our analysis of market signals in the next section.” The market response is clearly one that points to requirements that have remained unfulfilled.

The Stantec report refers (paragraph 5.49) to there being just over four months’ available supply in the district. It observes (paragraph 5.50) that, “Despite new units coming onto the market in the last 12 months, market indicators point to an exceptionally tight floorspace market, where demand is much in excess of supply.” The vacancy rate in the district for the non-strategic sector has been on a steep downward trend since 2012 (paragraph 5.52), and floorspace is in extremely short supply (paragraph 5.56). The conclusion is reached (paragraph 5.62) that, “Non-strategic industrial space across North West Leicestershire is seriously undersupplied, as buoyant demand is frustrated by almost non-existent availability. This confirms the conclusion we reached in Chapter 3, based on different evidence, that there is demand for new floorspace in the district not only to cater for future growth, but also to fill the supply gap that already exists.”

In this context the Stantec report comments in its conclusions (paragraph 6.4) that its forecast should be treated as a minimum, “because historical evidence from the VOA suggests that the true demand could be much higher. Unfortunately we cannot estimate that higher number, because land supply has been constrained for so long that we do not have solid evidence of what happened in a relatively unconstrained market – except from the VOA experimental statistics, which may not be entirely reliable, at least for planning purposes.”

The evidence, then, points very clearly to suppressed or frustrated demand having existed for an extended period. It also points to a need to measure and account for the demand that has been constrained for a long time. This is acknowledged by Stantec, but they do not find a way to make it good; it is an important part of the general (and indeed strategic) requirement that is simply not accounted for. This is not something to have emerged overnight, but rather it has accumulated through time. There are real world consequences to this; potential investment is lost, and business and jobs go elsewhere. This issue of suppressed demand sits alongside the further methodological concerns with the approach

taken by Stantec summarised above. These points must be addressed if reliance is to be placed on the evidence base.

This issue is of course not unique to North West Leicestershire or the broader Leicestershire market. It was explored very recently in the January 2022 publication by the British Property Federation (BPF) of “Levelling Up – The Logic of Logistics”, a report considering the benefits of the industrial and logistics sector. The BPF Report comments on the modern-day growth drivers which are not properly taken into account in estimating future demand, and also the extent to which future requirements are underestimated because the sector has been supply constrained for the majority of the last decade.

To understand and address this imbalance Savills and St Modwen have developed a new methodology built upon the principle of “suppressed demand” that accounts for demand that has been lost due to supply shortages. In this way it addresses one of the key shortcomings in the Council’s evidence base. This is explained in headline terms in the BPF Report. The calculation of suppressed demand can then be added to projections to give a more accurate picture of likely demand into the future. Applied across England as a whole this methodology estimates future demand will be at least 29% higher than historic levels, equating to a minimum of 44 million sq ft per annum (net).

As discussed above, suppressed demand is not fully taken into account by the Stantec report in calculating the requirement for non-strategic employment land. The same point applies in terms of the separate assessment and requirement for strategic employment land (discussed below and elsewhere in these representations). It must be factored in to any analysis relied on to generate the figures for the Local Plan. Without it, and without addressing the further methodological issues with the Council’s evidence base, the expression of the employment land requirement to be met through the emerging plan cannot be relied upon. This is important and must be addressed.

In light of these concerns Savills were commissioned by St Modwen to prepare an alternative and more robust estimate of industrial and logistics demand within the District and the wider Functional Economic Market Area (“FEMA”, in this case the County as a whole). Their report, “Future Industrial and Logistics Demand: North West Leicestershire and Wider Sub-Region” is appended to and forms part of these representations (Appendix 2). It takes account of the Stantec report and also the further 2021 evidence base study assessing the strategic B8 requirement prepared by GL Hearn and MDS Transmodal, “Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change” (“the GLH Report”, also considered in more detail elsewhere in these representations). It applies the new methodology explained in the BPF Report.

The content of the Savills report should be read and understood as a whole as contributing to the position advanced by St Modwen. In summary, though:

- It explains the very significant contribution made by the industrial and logistics sector to the national economy, the quality and value (as well as range and quantity)

of jobs it generates, and the reasons why it represents critical national infrastructure.

- It identifies the extremely low vacancy rate within this sector of 3% across the FEMA and just 2% in the District, compared with the benchmark for a properly functioning market of 8%. This, and other dynamics such as rapid rental growth, point to under provision in this market.
- The methodological issues of the Stantec report and the GLH Report are identified, including those noted here and others, and observing that they result in a significant underestimate of the future industrial and logistics requirement. It is also noted that the approach taken is inconsistent between these two reports, and they do not correspond with each other.
- The Savills methodology is NPPG-compliant. It builds on past trends but with an adjustment for historic supply shortages and the subsequent loss in demand. This suppressed demand is added to the historic demand trend, and a further adjustment made for e-commerce growth.
- The calculation is first made at FEMA level. Savills estimate the total strategic industrial and logistics requirement for this area. The Council's evidence base (the GLH Report) only includes the strategic logistics element for this market. Savills extrapolate from their analysis to arrive at a comparable demand for strategic B8 across the FEMA totalling 1,783 ha for the plan period, which is nearly double the GLH estimate.
- The FEMA wide assessment is then apportioned by Savills to North West Leicestershire. That apportionment will ultimately be determined during the plan making process but using a range based on the District's current contribution to the FEMA's stock and the Council's approach set out in the Options document they arrive at a total industrial and logistics requirement for North West Leicestershire of between 587 ha and 1,207 ha. This is very substantially greater than the allowance made in the emerging plan. Savills advise that the amount to plan for should be within this range and depend on factors such as developable land capacity and cooperation discussions with other Leicestershire authorities.
- Looking at a combination of the Stantec and GLH work Savills calculate that the evidence base underestimates the employment land requirement in North West Leicestershire by at least 302 ha.

As such it is St Modwen's position that the Council's evidence base underestimates the future industrial and logistics demand for the FEMA and District to a significant degree. Setting aside the extent of that shortfall for a moment it is clear that suppressed demand is a key consideration in the market generally and North West Leicestershire specifically, but has not been accounted for in the evidence base. That must be remedied in the plan going

forward through an expression of the true requirement for industrial and logistics land, and allocations made to match this.

These qualitative and quantitative points have an important bearing on the type and amount of employment land required and must be resolved such that measures can properly be put in place to ensure continuity of supply. This notwithstanding, in principle and in general terms based on the alternatives presented by the Options document, a combination of Options 2 and 4 should be preferred for securing a continuity of employment land supply.

Option 2 – increasing the requirement figures by an additional factor – should provide certainty that the basic requirement is met whilst also offering the flexibility to meet a wider range of occupier demands in a manner responsive to the market (if it is assumed that the correct requirement, including an allowance for suppressed demand, is acknowledged). This is to be preferred to Option 1 – identifying reserve sites – which would create uncertainty, particularly in terms of the circumstances and timeframe within which they might be brought forward. It might also create, for example, a perverse situation whereby an occupier with a specific need well suited to a reserve site cannot be accommodated because unsuitable allocated land remains.

Option 3 – awaiting the next review of the local plan – should be avoided. It simply defers the problem to another day. A key issue with the adopted local plan was its failure to grapple properly with the requirement for employment land. It would also risk embedding the problem identified above in relation to suppressed demand for a further 5 years. It would of course be expected that the issue is reassessed at the time of the local plan review; that is entirely appropriate as new evidence comes to light and market circumstances change. However, that should be a process of recalibration from a robust starting point, and there should be no sense that the next review of the plan is in any way to be “awaited”. Investment decisions and the planning and development process for large scale employment schemes can easily take 5 or more years and so it is essential to have a robust, positive, and long-term strategy in place from the outset to provide the market certainty which is essential to securing continuity of supply.

Option 4 – relying on Policy Ec2(2) or its equivalent – should also be supported. Properly applied, Option 2 should minimise the requirement for any such policy, but it is essential that one is provided to allow for circumstances where allocated land cannot meet a requirement. Absent such provision an inevitable outcome would be potential jobs and investment being lost to the district.

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

Table 8 in the Development Strategy and Policy Options document reflects the distribution of employment land achieved through the adopted Local Plan in terms of development, allocations and permissions. Three observations can be made in this regard.

First, it is notable that the distribution of strategic B8 land to the Measham / Appleby Magna area has been relatively modest, and the distribution of smaller B8 and industry extremely low, in the context of the obvious advantages of this locality relative to the M42 / A42 and onward links to the M1 and M6. This suggests that this area should make a greater contribution to the balanced delivery of the district's employment land requirement at the non-strategic and strategic levels.

Second, the contribution of the Ashby area to employment land appears relatively high. Whilst it is not possible on the information provided to unpack Table 8 it is understood that this is largely due to the unimplemented allocation at Money Hill. For reasons expressed elsewhere in these representations there are questions in terms of whether this historic allocation can continue to be relied upon. Its non-implementation must not in any way act to impede the delivery of preferable employment sites elsewhere.

Third, the distribution of strategic B8 to the Castle Donington area is notable. This reflects the advantages of this locality for such activity and the enthusiasm for it in the market. It is a key strength for North West Leicestershire, and the Plan should continue to take advantage of it.

In this context, General Employment Land Strategy Option 2 is to be preferred. This would have the benefits of reinforcing the existing strengths of the district around Castle Donington, whilst also establishing a new or expanded employment location around Junction 11 of the M42, so capitalising on that infrastructure, and helping to serve less affluent parts of the district.

It is noted that the Options in this part of the Development Strategy and Policy Options document are expressed as "General Employment Land", and in a part of the document dealing with "Strategy options for general employment land". However, paragraph 6.19 refers to them as pertaining to the distribution of "future employment land", i.e. not specific to the general (local) requirement. To be clear, St Modwen's preference for the distribution of the requirement as a whole, i.e. general and strategic, is Option 2.

The Development Strategy and Policy Options suggest (paragraph 6.21) that a difficulty might arise due to strong competition from the strategic distribution sector at Junction 11. However, there is nothing to prevent policy being formulated to support the balanced development of employment space at this (or any other) location, so that a range of employment needs are met. St Modwen have promoted land at Junction 11 and also at Junction 1 of the A50 (Castle Donington) capable of meeting a wide range of employment needs and consistent with helping to deliver Option 2. Both sites should be allocated.

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

Elsewhere in these representations in relation to Question 10 and the general (non-strategic) employment land sector it was noted that before assessing the appropriate option to ensure continuity of supply it is important properly to establish the requirement. The same applies to policy options for the strategic sector. The comments made at Question 10, and the reliance placed on further evidence (provided here at Appendix 2) prepared by Savills around the true requirement for industrial and logistics land, also have direct relevance to this question on strategic warehousing, and should be read and understood accordingly.

As with the general sector, the strategic sector is not homogeneous. Classified in North West Leicestershire as all units of 9,000 sq m and above this covers large local requirements through sub-regional, regional and multi-regional or national scale provision. It is important that the right quantity but also the right type and location of land is allocated to meet the full and diverse range of strategic employment needs.

Again as noted elsewhere in relation to general employment land, it is essential for strategic land that the Plan is flexible and responsive enough to adapt to rapidly changing circumstances including the as yet uncertain implications of Brexit, and the recovery from the pandemic. The Development Strategy and Policy Options note (paragraph 6.24) that the level of provision in the District alone has exceeded that predicted for the County as a whole up to 2031 by the previous evidence base (the 2017 Strategic Distribution Study). This only serves to underline that a fixed and rigid approach now would be entirely inappropriate as the evidence rapidly evolves. The Plan must be able to respond nimbly to real-world change.

An updated evidence base for strategic B8 is provided by the 2021 report “Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change” prepared by GL Hearn and MDS Transmodal for Leicester and the Leicestershire authorities (“the GLH Report”).

In terms of the GLH Report, and its interpretation in the Development Strategy and Policy Options document in relation to non-strategic employment space, a number of observations should be made. Again, these should be read alongside the comments made in relation to Question 10.

First, the significant and pressing requirement for strategic employment space in Leicestershire, and North West Leicestershire in particular, measured in a number of ways, is evident throughout the GLH Report. For example, it estimates (Table 13) that the direct supply across the county amounts to less than a year, and just 8.5 months in North West Leicestershire. It should also be noted that this calculation of years of direct supply is based on average take-up from 2014 – 2019, i.e. constrained by availability and what the market and planning system could deliver. A calculation based on actual demand, i.e. what occupiers sought and would have taken without these constraints, would yield a lower

representation of years of direct supply. A similar point applies to the assessment of potential future supply (paragraph 6.5), where the estimated number of years' availability would be reduced if measured against unconstrained demand.

Second, it is noted the Development Strategy and Policy Options focuses on the strategic requirement in terms of floorspace, but also converts this to a land requirement using a ratio of 35% for non-rail served sites. In the GLH Report in some contexts a ratio of 40% is used. Figures of this order are only appropriate if intended to relate to net developable area. Caution must be applied if such ratios are to be used in calculating a land requirement. If used, then it must be made clear it yields a net land requirement, what that requirement represents (i.e. specifying what is excluded), and allocations made accordingly. This will require an assessment of the likely net developable area of allocations to ensure this net requirement can be met, or there will be a significant risk of insufficient provision being made.

Third, there are concerns in terms of some of the approaches taken in the GLH Report to estimating future strategic need. The uncertainty around the outcome from the pandemic is identified (paragraph 7.3) and is of course unavoidable, but does speak to the need to keep the evidence base under review and for the Plan to recognise that in due course newer analysis might well be preferable. Separate to this, though, is that the approaches used – econometric forecasts for labour demand, and past completion trends – are both informed by what has happened in the past. The rapid and fundamental changes in the logistics sector in recent years, and the planning and development constraints that have been in place, mean that past performance is not on its own a good guide to future requirements.

The econometric model is based on more than just an extrapolation of past trends (paragraph 7.4) but is still shaped in part by historical evidence (paragraph 7.5). The completions trend model refers to a period since 2012. The Report considers this (paragraph 7.31) a useful period as it is post-recession and aligns with growth in e-commerce, but it does not of course properly reflect the recent acceleration of that shift through the pandemic, and is balanced towards pre-Brexit years, so does not reflect recent growth drivers including (for example) re-shoring and stockpiling. The completions trend is also constrained by availability and what the planning system and market was able to deliver over the selected period, and does not reflect the actual requirement, which would be higher.

Other approaches in the GLH Report – notably the freight traffic growth model – do include an adjustment for e-commerce growth by way of a sensitivity test (paragraph 8.23). It is not clear, though, the extent to which this is also intended to account for other recent trends driving growth. These again include re-shoring and stockpiling but also (for example) changing consumer expectations around faster deliveries, and the shift towards co-location of different functions which may reduce the demand for traditional office space but place upward pressure on industrial and logistics space requirements.

Fourth, the only place where the GLH Report accounts in the methodology for the acknowledged tightness in the market is through the application of a margin of flexibility

equivalent to 5 years based on completions trends (paragraphs 10.11 and 10.12). This is intended to reflect the fact that markets function best when some vacancy allows for choice and churn, and vacancy has been very low in Leicestershire. However, it is also intended additionally to provide a margin for delays in delivery of schemes, and further still a buffer to account for uncertainties in forecasting.

The 5 years based on completions trends is presented as being in line with convention, but without any justification as to whether it is correct or reasonable. Five years of completions reflects what the market and planning system were able to deliver in that period, not what was required. No analysis is presented in terms of the extent to which this would “correct” the vacancy rate to a more efficient level, or make good any historic shortfall from extended periods of low availability, and then additionally still provide a margin to allow for the further considerations around delay and forecasting uncertainty.

Fifth, the approach taken to the apportionment of the requirement between rail and non-rail served sites is arbitrary. The starting position is that nationally and indeed across the County about 6% of stock is rail served (paragraph 9.2). Reference is made (paragraph 9.3) to assumptions that 26% of future new-build warehousing would be rail-served. A further leap is then made (paragraph 9.7) to say that units over 25,000 sq m will benefit from or be of a nature to be attracted to rail-served sites, so the regional representation of such units (56% of large scale stock, rounded up to 60%) is used as a proxy for demand for rail-served space. This of course assumes that all occupiers of new units over 25,000 sq m would need and wish to be rail linked. That cannot be true.

The GLH Report, then, looks at one ambitious assumption (26%) equivalent to more than four times the current rail-served representation, a second position (60%) equivalent to ten times the current representation, and then takes a mid-point between the two. This mid-point (43%) assumes that the proportion of new build strategic space over the Plan period will be seven or more times greater than the existing proportion across the region.

The technology, policy and other drivers encouraging increased rail-served development set out in the GLH Report are noted, and a shift towards such provision is to be expected. However, there is no evidence to suggest this will or can happen to the extent suggested by the GLH Report. It should be acknowledged that there is a very wide range of potential outcomes between something aligned to the current level of provision and something of a different order of magnitude. The GLH Report alights on a point mid-way between two very different alternatives, but that position has no inherent validity or justification, and is unrealistic. Given the very considerable uncertainty in this regard the Plan should, at most, provide some guidance as to the proportion sought of new provision that might be rail-served, and must not set out a strict division or policy split in this regard.

Sixth, the GLH Report includes only strategic B8 and not strategic B2. The latter is a much smaller element than the former, but it is still significant and of considerable importance to the economy. An allowance should be made for it.

Read as a whole, these observations point to the GLH Report having understated the requirement for strategic employment land across a range of scenarios, as well as suggesting a distribution between rail and non-rail served sites that cannot be justified. A seventh and final point, which again goes to the extent to which the GLH Report understates the requirement, is that no allowance is made for any pent up or “suppressed” demand that might have accrued over a more extended period. This point is also made elsewhere in these representations in relation to the general employment land requirement (Question 10), and the observations made there should be noted as also having direct relevance to the strategic sector.

As discussed above a margin of flexibility is applied to relax the market in the GLH Report, but also to allow a margin for delays in delivery, and further still a buffer to account for uncertainties in forecasting. There is no consideration of the adequacy with which it would achieve these multiple objectives, and no suggestion that it would additionally address suppressed demand. That does not appear to have been accounted for anywhere in the GLH Report. It must be factored in to any analysis relied on to generate the figures for the Local Plan.

Detailed comments are made in response to Question 10 about the alternative evidence prepared by Savills and appended here which seeks fully to quantify the requirement for employment land at County and District levels. Those comments are not repeated here, but should be referred to. They include that the estimate provided by Savills for the strategic B8 requirement across the County totals 1,783 ha for the plan period, which is nearly double the GLH estimate. The apportionment to North West Leicestershire of the overall industrial and logistics requirement is very significantly greater than that suggested by the Council’s evidence base.

In this context it is not possible to agree (or indeed disagree) with any initial policy option for strategic warehousing. If it assists with progressing the Plan making process an assumption that North West Leicestershire should accommodate 50% of the outstanding road-served requirement can of course be followed, but only as a place holder until a proper assessment of that requirement has been made which addresses the points made above and, in particular, incorporates an additional allowance for suppressed demand, and backs away from an artificial division between rail and non-rail served sites.

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

It is disappointing that six of the eight policy options in this regard are negatively framed and would seek to make the existing policy (Ec2(2)) for employment land proposals on unidentified sites more restrictive. The starting point should be to seek to allocate the right amount of land, of the right type, in the right location, such that development requirements are met. However, the Development Strategy and Policy Options rightly acknowledges (paragraphs 7.4 – 7.6) that the Plan must be flexible to reflect changing circumstances and accommodate needs not anticipated in its formulation. This is particularly pertinent in this

period of great flux and uncertainty, driven by Brexit, the recovery from the pandemic, and wider structural changes in the market.

There must be a positive approach to planning for this. There have been tensions in the application of adopted policy Ec2(2) in North West Leicestershire but those have arisen from the demand for employment land (and strategic employment land in particular) not being tackled by the adopted Local Plan. This has inevitably made proposals for development on unidentified sites and the application of this policy more prevalent than might otherwise have been expected. If this Plan takes a robust, comprehensive and positive approach to the planned delivery of employment land, having first properly quantified that requirement, then the need for a policy dealing with unidentified sites will be greatly reduced. It will not be eliminated, though, and the Plan should embrace that, not shy away from it.

Option 1 – deleting this policy – is unappealing because it would lead to uncertainty and a lack of clarity. Options 3 – 8 are negative, defensive and restrictive. It should be borne in mind that a policy of this form would only be engaged if a proposal cannot be met on an allocated site. If the allocations have been properly formulated but are then exhausted or found to be inadequate as circumstances change, the Plan should welcome further development subject to controls of the type embodied in policy Ec2(2). In this context, Option 2 (retaining the policy in its current form) should be supported.

The disadvantages of Option 2 suggested by the Development Strategy and Policy Options are unjustified. The existence of the policy does not encourage unwarranted applications. Rather, it enables the consideration of applications for development which the Plan has failed to allow for through allocations. It is not too permissive; it includes sensible controls, and the other development management policies of the Plan continue to apply. If to any degree it encourages schemes of a type not suited to high-value occupiers then it is not clear what the downside of this would be. The development industry will not deliver buildings for which there is no demand. Whilst in general terms the provision of space to attract high-value occupiers is to be encouraged that should not be to the exclusion of premises to meet the full spectrum of requirements. There is a place for lower value, unexciting, everyday buildings and some sectors of the economy rely on this. It should be provided for, not seen as a disadvantage.

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

As discussed elsewhere in these representations the Development Strategy and Policy Options suggest that the provision of space other than for high-value occupiers is a disadvantage. For the reasons set out, this is not considered appropriate – there should be a place for development to meet a full range of requirements. This is particularly pertinent if the requirement for start-up space is to be met.

In terms of the suggested options, it is considered that a version of Option 3 is likely to be most appropriate. A generic policy could be applied to all employment sites encouraging,

and requiring them to justify the approach taken to, the provision of start-up space. It would be difficult prescriptively to impose specific size thresholds and percentage requirements, and requiring a financial contribution is unlikely to be appropriate unless the Council sets itself up as a provider of such space. However, a policy could reasonably set a target for start-up workspace, require applicants properly to justify the extent to which they have considered it, and confirm that development which contributes to the target will be considered favourably.

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

If carefully applied, Option 2 (policy to require local employment initiatives in new, large-scale developments) should be preferred. This should be quite straightforward. It can be implemented through a pre-commencement condition requiring the submission, approval and implementation of an Employment Plan which includes measures to encourage local recruitment during construction, and a pre-occupation condition requiring the same for the operational phase. Much of the detail in this regard will be unknown at the planning application stage, so it should be sufficient for applicants just to commit to the principles and express in headline terms how they might be achieved. In practice this should amount simply to a commitment from the relevant parties to recruit locally where possible. Properly framed this need not be onerous, and would have benefits in terms of building relationships between development and the community, and reducing commuting.

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

As framed the policy largely replicates the requirements of other policies, and then requires a Health Impact Assessment (HIA). If an HIA is to be required by a further policy then it is not clear why a separate health and wellbeing policy is needed. The provisions of the draft health and wellbeing policy can instead be provided as policy justification for an HIA policy or (at most) combined into a single HIA policy.

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

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?

None of the suggested options is appropriate. Any HIA requirement should be specific and not include any additional screening assessment. Any policy should set out clearly the range of development types to be included, and just require a proportionate and relevant HIA to be carried out for them. If such a policy is to be effective it needs to be clear, simple and not unnecessarily burdensome.

It is not clear why the list of developments to require an HIA should include leisure facilities and non-residential institutions.

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

The draft policy is appropriate, but part 5) would benefit from some clarification. As written, it could be interpreted as requiring on-site energy generation from each of solar, wind and other technologies, when in fact the most appropriate approach should be determined on a case-by-case basis. It is suggested that this part of the policy is amended to read, "...electricity and heat production from renewable technologies so as to..."

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

St Modwen agree that the Plan should include a clear and comprehensive policy to address climate change. However, the draft policy as framed would benefit from some clarification. As written, it is unclear how the required reduction in regulated CO2 is to be applied, as it appears to relate to all new development yet be referable to the Dwelling Emission Rate. The approach to commercial and other non-residential development should be clarified.

APPENDIX 2 (Attached Below)

Future Industrial and Logistics Demand: North West Leicestershire and Wider Sub-Region (Savills, March 2022)

Future Industrial & Logistics Demand

North West Leicestershire and Wider Sub-Region

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Executive Summary

I&L Facilities are Critical National Infrastructure

The I&L sector is a **major contributor to the national economy**...



3.8 million jobs
in England

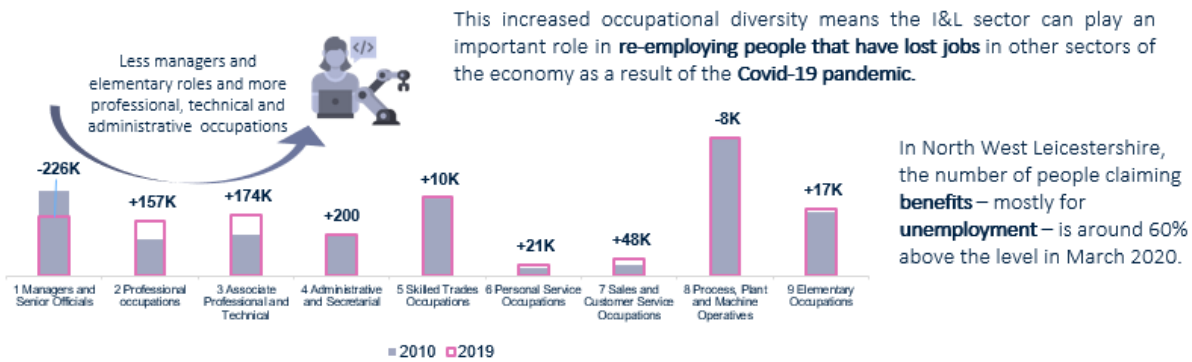


£232 billion of GVA p.a.



29% productivity increase
between 2025 and 2039

.....the **occupations it provides are becoming more diverse**...



.....and I&L jobs **pay more than the national average**



The I&L sector's growth is multi-faceted and likely to remain in place for the foreseeable future



North West Leicestershire’s I&L market at a glance

22.9 million sqft of I&L floorspace

Very low availability at 2%

High rental growth (2011-21) at 67%

Leasing demand (net absorption) at 921,000 sqft p.a. exceeds the amount of new floorspace delivered at 891,000 sqft p.a. This explains the low availability and high rental growth.



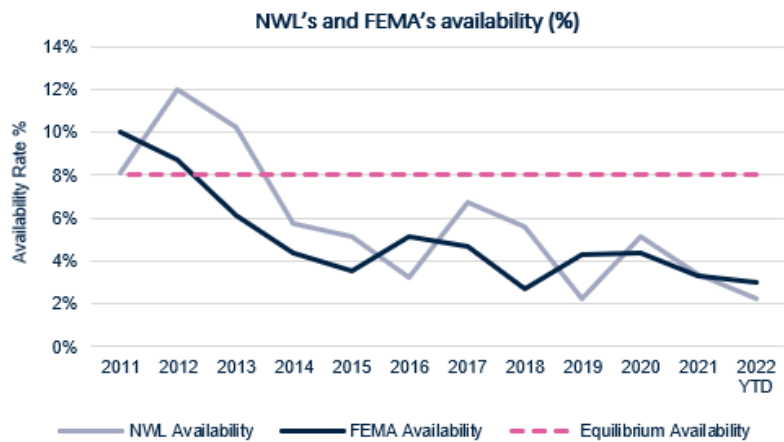
North West Leicestershire (NWL) falls within the Leicester and Leicestershire FEMA which also comprises Blaby, Charnwood, Harborough, Hinckley and Bosworth, Leicester City, Melton, and Oadby and Wigston.

The FEMA is located in the East Midlands, where take-up of I&L premises above 100,000 sqft in 2021 was 113% above the long-term average, the highest on record, accounting for 22.5% of national take-up.

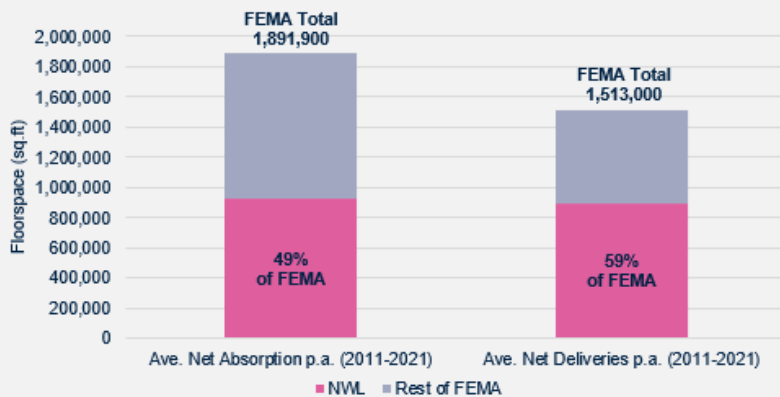
NWL accounts for nearly a quarter of the FEMA’s I&L stock and has the largest I&L stock in the FEMA at 22.9 million sqft (Leicester City has the second highest at 22.2 million sqft).

We consider a market to be **supply constrained** when floorspace availability is below 8%. The availability rate across the FEMA is extremely low at just 3%. It is even lower within NWL at only 2%.

The FEMA’s availability rate has been below the 8% benchmark since 2013, and NWL’s since 2014, indicating that the I&L market has been supply-constrained for most of the last decade.



I&L Demand vs. Supply



The lack of new floorspace (supply) has reduced availability and restricted demand (net absorption).

New I&L floorspace across the wider FEMA over the last decade (1.5 million sqft per annum) has lagged demand, as measured by net absorption (1.9 million sqft) between 2011 and 2021.

A similar situation is evident NWL.

Previous employment studies have significantly underestimated I&L demand for NWL and the FEMA

NWL’s Options Document (2022) relies on Stantec’s 2020 study covering NWL’s ‘non-strategic’ demand for I&L floorspace and GL Hearn’s 2021 study covering strategic B8 demand for the FEMA to inform its policy options for the new Local Plan.

Study	Geographic Scope	Uses Covered	Time Period	Demand Estimates
Stantec Study (2020)	NWL	Non-Strategic Industrial (B1c, B2 and B8 (<9,000 sqm))	2017-2039	71.6 ha (incl. losses and flexibility margin)
GL Hearn Study (2021)	Leicester and Leicestershire FEMA	Strategic B8 (9,000+ sqm)	2020-2041	861 ha (incl. 5-year flexibility margin)

These studies have a number of methodological issues, resulting in a significant underestimation of future I&L demand in NWL and the FEMA. Savills methodology seeks to address these shortcomings and provide a more accurate estimate of future demand.

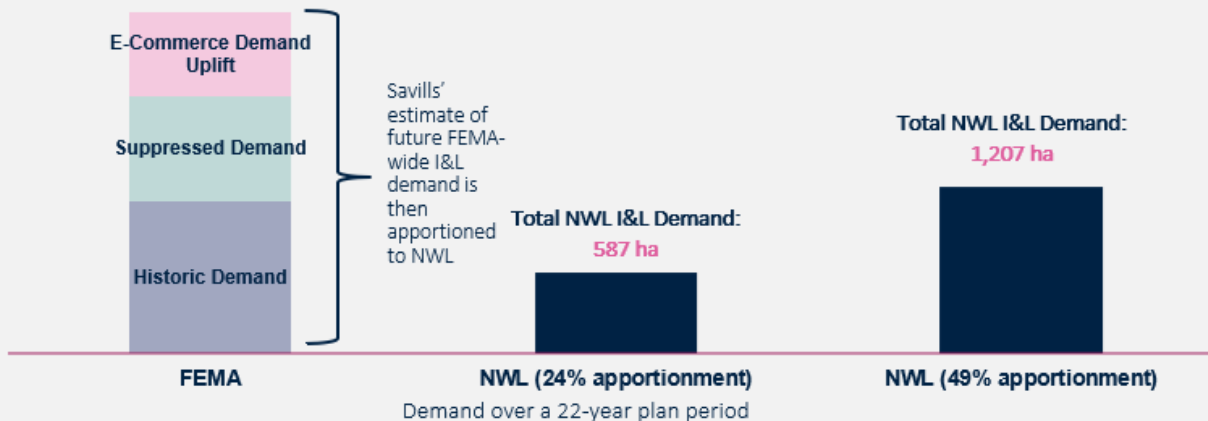
The Savills method first calculates demand at the FEMA-wide level, then apports it for NWL

Savills’ methodology is **NPPG-compliant** as it builds on **past trends**, adjusting for historic supply shortages and the subsequent loss in demand. We refer to this as ‘**suppressed demand**’ which is added to the historic demand trend as a top-up. We also factor in **future e-commerce growth**.

Several factors can be considered to apportion FEMA-wide demand to NWL including % of stock (NWL represents 24% of the FEMA’s total stock), net absorption (NWL represents 49% of the FEMA total) and net deliveries (NWL represents 59% of the FEMA total). We consider net absorption to be the most relevant given it is a key indicator of demand while the other two metrics are supply based. 49% also broadly aligns with NWL’s Options document’s commitment to meeting 50% of the FEMA’s road-served demand. However, we appreciate this generates a large number at 1,207ha vs 587ha based on NWL’s current proportion of the FEMA’s overall I&L stock. The final land amount that should be planned for within this range will depend on developable land capacity in NWL and ‘Duty to Cooperate’ discussions with the other local authorities in the FEMA.

Savills Total I&L Floorspace Demand: 93.4 million sqft

Savills Total I&L Land Demand: 2,479 ha (based on 35% plot ratio)



Comparing Savills demand estimate for Strategic B8 against GL Hearn estimate

Using Savills overall demand estimate for the FEMA, we have extrapolated demand for strategic B8 uses in order to compare it to the GL Hearn estimate (which only looks at strategic B8, and not strategic B2 needs).

We estimate demand for **strategic B8 across the FEMA to total 1,783 ha** which is **98% higher than the GL Hearn estimate** over a 22-year plan period.

Conclusion

The Stantec and GL Hearn studies do not take into account the FEMA’s and NWL’s supply-constrained I&L market and its impact on suppressing demand. Based on the Savills estimates, we believe the GL Hearn and Stantec studies combined have underestimated future I&L demand for NWL of between 302 to 696ha over the 22 year plan period depending on how much strategic B8 demand across the wider FEMA is apportioned to NWL.

1 Introduction

1.1 Purpose

- 1.1.1 Savills have been instructed by SEGRO and St Modwen to estimate future industrial and logistics (I&L) demand within North West Leicestershire (NWL) and its wider Functional Economic Market Area (FEMA). The FEMA consists of the following local authorities: Blaby, Charnwood, Harborough, Hinckley & Bosworth, Leicester City; Melton, North West Leicestershire and Oadby & Wigston.
- 1.1.2 We focus on market demand and supply factors as these are the key determinants of how much I&L floorspace and land is needed in the future. From our experience secondary factors such as labour supply, GVA outputs, development completions or similar methods routinely underestimate future demand, especially for strongly performing markets such as England's I&L sector.
- 1.1.3 North West Leicestershire District Council (NWLDC) is currently in the process of preparing a new Local Plan. The aim of Savills' report is to recommend overall I&L demand within the FEMA and then apportion this down to NWL specifically. As part of this process we make comparisons with the various local and regional employment studies which focus on different geographies (i.e. FEMA vs NWL) and different segments of the market (strategic vs non-strategic). This includes a review of the methodologies used to estimate future demand which we consider to have a number of methodological issues. As a result we consider them to have underestimated future I&L demand.
- 1.1.4 After building up a picture of current and historic market demand and supply, we detail Savills' methodology for estimating future I&L demand. Our approach is considered to address the methodological weaknesses of the employment evidence by quantifying the impact historic supply constraints have had on 'suppressing' demand. We also take account of current day growth drivers such as e-commerce.
- 1.1.5 The Savills approach is to consider overall I&L demand across the entire FEMA first and then apportion this down to individual local authorities via consideration of various demand and supply factors. As part of this we consider both industrial (inclusive of light industrial and manufacturing) and logistics (warehousing) uses together. This is because using a larger pool of data is generally considered more robust in modelling terms, and also because industrial and logistics occupiers desire similar locations and types of premises. Once overall I&L demand has been estimated, the contribution of different segments of the market, either by unit size, type of use or geography, can then be extrapolated.
- 1.1.6 Based on Savills demand methodology, over a 22 year plan period, we estimate FEMA wide I&L demand to be 2,479 ha of land. Depending on the level of apportionment we consider NWL should look to plan for between **587 ha to 1,240 ha** of I&L land over this period. We appreciate the upper band based on net absorption generates a large number at 1,207 ha. The final land amount NWL should plan for within this range will depend on developable land capacity in NWL and 'Duty to Cooperate' discussions with the other local authorities in the FEMA.
- 1.1.7 In terms of strategic B8 demand (i.e. excluding industrial) across the FEMA we estimate this to be 1,783 ha over the 22 year local plan period. This compares to 902 ha from GL Hearn's Warehousing and Logistics in Leicester and Leicestershire study (2021) once the 21 year period covered by its estimates is pro-rated to 22 years to be consistent with the NWL local plan period.
- 1.1.8 It is clear from these results that we consider the various employment evidence studies to have

underestimated future I&L demand to a significant degree. Therefore it is recommended that NWLDC seek to identify more quality sites for I&L uses. It is acknowledged that a new employment study is referenced in the Local Plan options document for publication in the Spring 2022. We hope this report is seen as constructive and acts as a platform for meaningful debate with the Council and its economic advisors.

1.2 Report Structure

1.2.1 The report is structured as follows:

- **Section 2** provides an overview of the I&L market nationally and in the East Midlands and Leicestershire;
- **Section 3** reviews previous employment land needs assessments commissioned for the FEMA and NWL;
- **Section 4** assesses I&L demand and supply factors in the Leicester and Leicestershire FEMA;
- **Section 5** provides Savills' estimate of future demand for I&L floorspace across the FEMA and in NWL;
- **Section 6** concludes and provides Savills' recommendations for future I&L floorspace need in NWL.

1.3 Reader Note

1.3.1 When we refer to the industrial and logistics (I&L) sector we mean Light Industrial (formerly B1c use class now part of Class E), General Industry (B2 use class) and Storage and Distribution (B8 use class). Effectively the primary use classes that require shed-type units (including ancillary offices) and associated yard spaces. These use classes typically cover the diverse range of industrial, manufacturing and logistics companies that operate within England.

2 I&L Facilities are Critical National Infrastructure

2.1 Introduction

- 2.1.1 In this section we discuss some of the key trends that have been driving growth in the I&L sector, drawing on Savills' recent publication for British Property Federation "*Levelling-up – The Logic of Logistics*"¹.
- 2.1.2 Not only has the sector been outperforming other commercial sectors in the UK for some time, but it is also critical national infrastructure that supports the functioning of our economy and the way we live our lives. The food we eat, the products and services we purchase, the materials used to build new homes and new infrastructure, even the vaccines that give us protection from Covid-19 are stored, manufactured and distributed from warehouses and factories to 'us' the end customer. Without these facilities and the increasingly efficient supply chains that link them with suppliers and end customers, the delivery of our purchases would be much slower, more expensive and we would have less choice.
- 2.1.3 For these reasons I&L premises should not be seen as separate from the infrastructure which enables goods to be moved around the UK, but should be considered critical national infrastructure itself.

2.2 National and regional context

- 2.2.1 Over the course of 2021, Savills Big Shed Briefing (which assesses I&L premises above 100,000 sqft) found that gross take-up had reached a new annual record of 5.12 million sq. m, **86% above the annual average**². The number of transactions nationally was 220, surpassing the previous record of 172 in 2020³.
- 2.2.2 Strong take-up has meant that the **supply of premises nationwide has fallen at its fastest pace ever recorded**. There is a particularly severe shortage of supply of the best quality Grade A space, which has fallen to 0.66 million sq. m, down from 1.83 million sq. m. prior to the onset of the Covid-19 pandemic in Q1 2020⁴. This is reflected in a national vacancy rate estimated to be 2.91%, the lowest level ever recorded and significantly below the level necessary for market equilibrium (commonly held to be around 8%)⁵.
- 2.2.3 Similarly to the national picture, take-up in the East Midlands was **113% above the long term average** in 2021 (1.15 million sqm); the highest on record⁶. Take-up in the East Midlands in 2021 accounted for around 22.5% of national take-up, highlighting the strategic importance of the region in the I&L market. Again the supply of premises is at an historically low level as evidenced by a regional **vacancy rate which stands at just 1.69%**⁷ - the lowest of any region nationally. Manufacturing occupiers in the East Midlands have accounted for c. 6% of take up of larger units over the last five years (2017-2021 inclusive) with the remaining 94% being occupiers within the logistics sector⁸.

¹ Savills and BPF (2022), *Levelling-up – The Logic of Logistics*

² Savills Research (2022) Big Shed Briefing (January 2022) Available at: https://www.savills.co.uk/research_articles/229130/323880-0

³ Ibid

⁴ Ibid

⁵ Ibid

⁶ Savills Research (2022) Big Shed Briefing – The Logistics Market in the East Midlands. Available at: https://www.savills.co.uk/research_articles/229130/323892-0

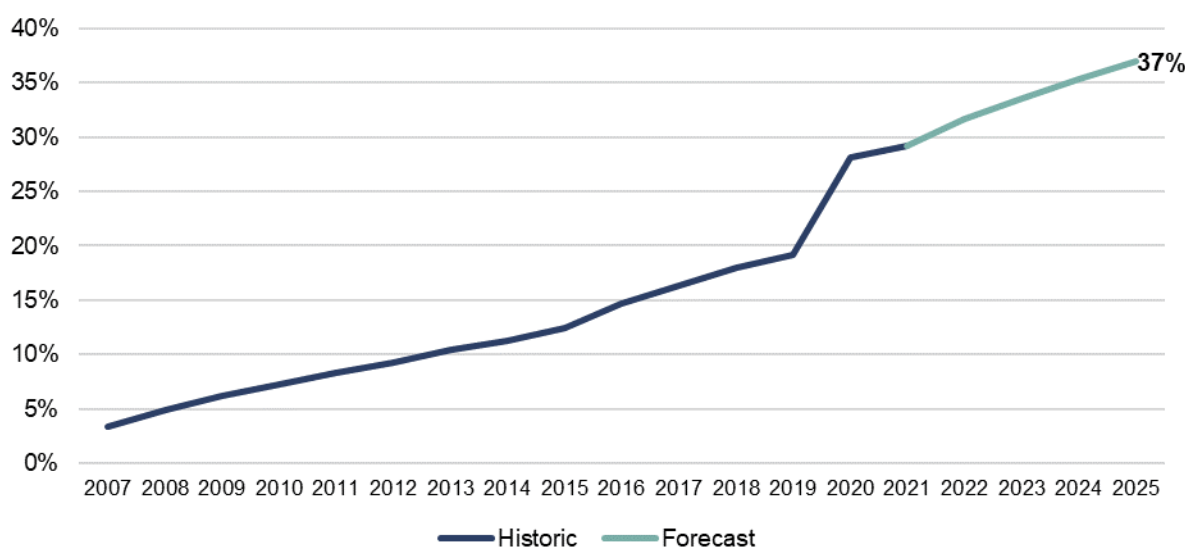
⁷ Ibid

⁸ Ibid

2.3 Current I&L Growth Drivers

- 2.3.1 The I&L sector is facing an era of unprecedented change. The past decade has seen the sector undergo a remarkable transformation, reshaping operating models and occupier requirements in ways that are only starting to become recognisable as an industry-wide phenomenon. Logistics uses in particular have shown strong performance for a number of years, but the Covid-19 pandemic has exacerbated existing trends. This has driven demand up even further for logistics floorspace while adversely impacting other commercial sectors such as retail and offices.
- 2.3.2 The shift in habits we have been witnessing – first of all the extraordinary growth in **online retailing** – is structural rather than temporary, meaning that as the country’s population continues to grow, so will I&L floorspace needs to support household consumption and other sectors of the economy. Statistics collected by the ONS from November 2006 show that the share of internet sales has consistently increased over time and it was at 19% before the onset of the Covid-19 pandemic. During the pandemic, due to lockdowns and restrictions this figure considerably increased and is around 27% as of January 2022⁹. The growth in online shopping has significant implications on future I&L demand given that e-commerce requires around 3 times the logistics space of traditional bricks-and-mortar retailers¹⁰.
- 2.3.3 While the proportion of online retailing may soften slightly as the UK economy opens up, most commentators agree that online retailing will continue to grow from a higher base than before the pandemic due to behavioural changes such as increased home working and continued demand for rapid parcel deliveries. Forrester Research, a respected source of future online retail projections, estimate that online retail will continue to grow but from a higher base reaching 37% by 2025 (**Figure 2.1**).

Figure 2.1 Internet Sales as a % of Retail Sales, 2006-2025



Source: ONS, Retail Sales Index Time Series, Forrester Research, Savills 2021

- 2.3.4 Freight flows are another key driver of I&L floorspace demand. Significant growth is forecast across all **freight** modes (**Figure 2.2**). Freight arriving and leaving the UK needs to be sorted, packaged and

⁹ ONS (2021), Internet sales as a percentage of total retail sales (ratio) (%)

¹⁰ Prologis (2016), Global E-Commerce Impact on Logistics Real Estate. Online Article: <https://www.prologis.com/about/logistics-industry-research/global-e-commerce-impact-logistics-real-estate>. Internet shopping relies on increased choice for the consumer and also increased delivery speeds to a location of people’s choosing. This means that more inventory is required to be located nearer to the general population. This in turn has meant that more and more warehouse space is required.

distributed via a network of freight handling infrastructure (i.e. ports, airports, rail freight interchanges and motorways) and conveniently located I&L premises in order to reach end customers.

Figure 2.2 Projected growth in freight by Mode



Source: DfT, MDS Transmodal, Boeing, Savills

2.3.5 Brexit and Covid-19 have highlighted the level of interconnectedness of international supply chains and their fragility when one or more links break. Companies have started building up greater resilience in their operating models by moving operations either back to the UK (**re-shoring**) or closer by (**near-shoring**) as a means to minimise future supply-chain-induced disruptions. According to a survey carried out in July 2020 by the Institute for Supply Management, 20% of firms are planning to or have already started to near-shore or re-shore. These findings are corroborated by a survey carried out by Savills¹¹ whereby over 80% of respondents expected the Covid pandemic to either ‘greatly increase’ or ‘somewhat increase’ on-shoring. This is likely to lead to higher domestic inventory requirements, further increasing demand for I&L space.

Near-shoring definition	Re-shoring definition
Transferring a business operation to a nearby country as opposed to a more distant one (i.e. off-shoring)	Moving a business that had gone overseas back to the country from which it had originally relocated

2.3.6 Increases in demand and occupancy could also arise due to higher levels of **stockpiling**. For example, businesses may find it too risky to have a single warehouse serving their customer base compared to a multiple stocking solution. Therefore, instead of concentrating in one location, some firms might seek to spread their inventory over different regions, but in smaller spaces.

2.3.7 The Government’s Freeport programme aims to play a role in the UK’s post-Covid economic recovery and contribute to realising the levelling up agenda. At a Freeport, imports can enter with simplified customs documentation and without paying tariffs¹². Businesses operating inside designated areas in and around the port can manufacture goods using the imports and add value before exporting again without ever facing the full tariffs or procedures¹³. Freeports are similar to enterprise zones, but are designed to specifically encourage businesses that import, process and then re-export goods¹⁴. Therefore, the programme could lead to increased trade through designated Freeport areas, such as the East Midlands Freeport (EMF), which is the UK’s only inland Freeport¹⁵.

2.3.8 EMF aims to drive economic regeneration across the East Midlands by playing to the region’s strengths in the advanced manufacturing, automotive and logistics sectors, proximity to East Midlands Airport and

¹¹ Savills (2020) The impact of Covid-19 on Real Estate. Online Article: <https://www.savills.com/impacts/market-trends/the-impact-of-covid-19-on-real-estate.html>

¹² <https://www.emfreeport.com/what-are-freeports>

¹³ <https://www.emfreeport.com/what-are-freeports>

¹⁴ Ibid

¹⁵ <https://www.emfreeport.com/#vision>

other multimodal transport connections¹⁶.

2.3.9 The image below, provides a visual representation of some of the major trends driving growth in the I&L sector. While e-commerce grabs most of the headlines for driving growth in the sector, there are several growth drivers at play leading to unprecedented levels of demand.

Figure 2.3 I&L Growth Drivers



Source: Savills

2.4 The I&L sector is a major contributor to the national economy

2.4.1 The I&L sector is a significant employer of at least 3.8 million people in England and produces £232 billion of GVA annually¹⁷. Over the last 10 years the logistics component of the I&L sector has grown by 26% compared to only 14% across the economy as a whole (**Figure 2.4**).

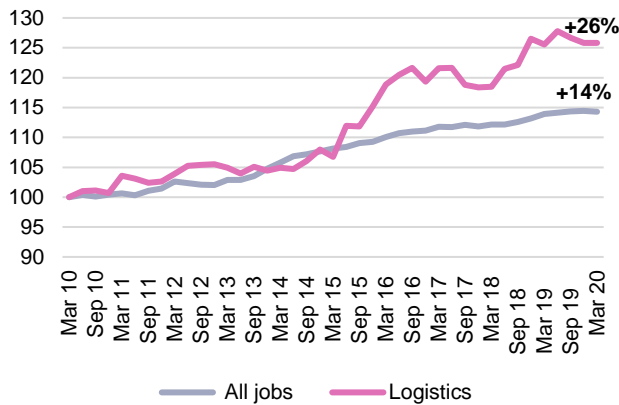
2.4.2 Notwithstanding its importance in terms of employment and GVA contribution, the sector is subject to a number of misconceptions about average pay levels, skills required and types of spaces provided.

2.4.3 Average pay is higher than the UK average. Data from the Office for National Statistics (ONS) show wages above average at +£4,600 for Manufacturing and +£4,900 for Logistics. Again, the logistics component of the sector is performing above average, with wages between 2019 and 2020 having increased more than in other sectors (+6% growth in logistics vs +4%).

¹⁶ Ibid

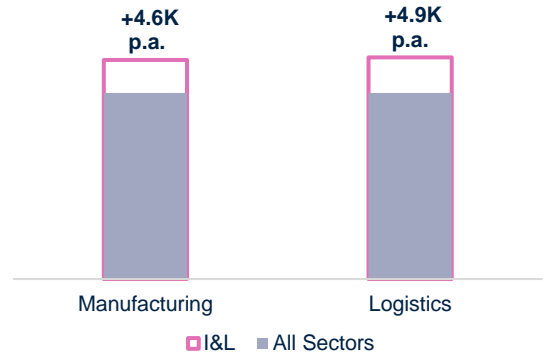
¹⁷ ONS (2021), Workforce Jobs by Region and Industry - Jobs in Manufacturing, Transportation and Storage for March 2020; ONS (2021) – England, Regional Gross Value Added (Balanced) by Industry – GVA for Manufacturing, Transportation and Storage in 2019 – England

Figure 2.4 Jobs Growth in England (2010-20)



Source: ONS, Workforce Jobs by Industry and Region

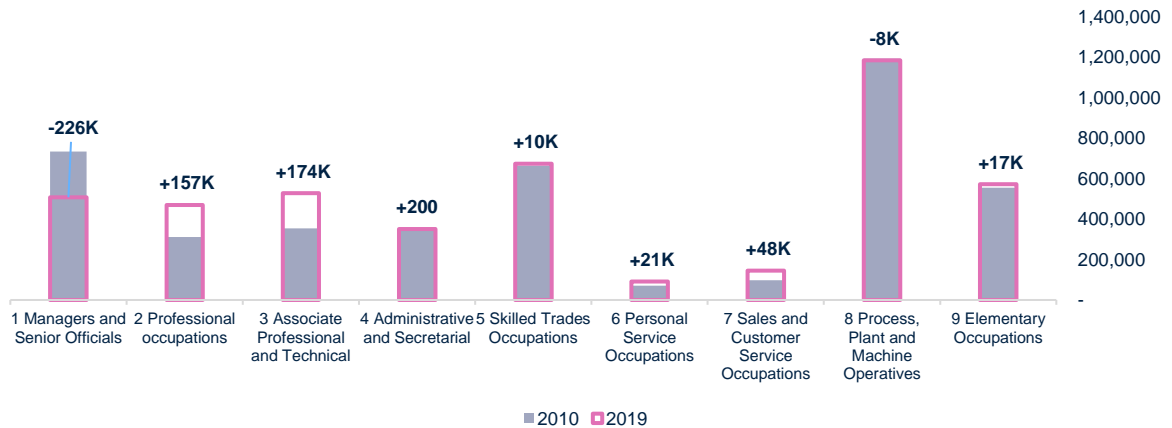
Figure 2.5 I&L jobs pay more (2020)



Source: ONS ASHE

2.4.4 I&L jobs have also become increasingly diverse over the last decade. **Figure 2.6** shows the change in the share of occupations in I&L in 2010 and 2019. While at the beginning of the decade we see a more polarised distribution, with a higher share of managers at one end of the spectrum and more routine occupations at the other end, today we see a higher share of Professional and Associate Professional and Technical roles. These roles are typically associated with higher-skilled engineering and technological professions in response to increased automation and robotics in the sector and more advanced supply chain processes. These office-based roles are increasingly co-locating alongside production and logistics uses as it is convenient for these people to be closer to the operations they control and analyse.

Figure 2.6 Occupational Distribution in Manufacturing, Transport & Storage



Source: ONS APS, Savills 2020

2.4.5 This increased occupational diversity means the I&L sector can play an important role in re-employing people that have lost jobs in other sectors of the economy as a result of the Covid-19 pandemic.

2.4.6 The Government’s Coronavirus Job Retention Scheme (CJRS) has helped cushion the impact of economic contraction on the job market, with the latest statistics released in December 2021¹⁸ reporting

¹⁸ Coronavirus Job Retention Scheme (CJRS) Statistics: 16 December 2021, Table 12

20,500 jobs furloughed across Leicester and Leicestershire¹⁹. However, in spite of this effort, data on the Claimant Count for the area remains high. The Claimant Count measures the number of people claiming benefit principally for the reason of being unemployed. While in the second half of 2021, the number of claimants started to decrease, as of January 2022 the Count still totalled 24,450 claimants in Leicester and Leicestershire and 1,640 in NWL, which is around 60% higher than the Count as of March 2020 (+9,300 claimants and +600 claimants respectively). The growing I&L sector can help to re-employ these local people.

2.5 Conclusions

- 2.5.1 I&L premises facilitate modern lives and therefore should be considered as 'Critical National Infrastructure,' similar to how major roads, ports, airports and rail freight interchanges are. The sector makes a significant contribution to the national economy and supports a diverse range of well paid jobs.
- 2.5.2 Current demand within the sector is at unprecedented levels being supported by a number of key growth drivers. There is a strong need to support and foster economic growth in order to support the post-COVID recovery. It is vital to support those sectors which are proving to be resilient (including logistics and manufacturing) and are therefore well-placed to provide new employment opportunities to mitigate job losses in other sectors and underpin the economic recovery locally and within the wider sub-region.

¹⁹ Leicester City and Leicestershire County

3 Review of Employment Evidence

3.1 Introduction

3.1.1 Several employment need reports have been commissioned within the last 5 years with the aim of understanding future I&L demand and available supply across the Leicester and Leicestershire FEMA (comprising Blaby, Charnwood, Harborough, Hinckley and Bosworth, Leicester, Melton, NWL, and Oadby and Wigston). However these reports, neither as a set or individually give a complete picture of demand and supply across the FEMA as a whole nor NWL specifically.

3.1.2 **Table 3.1** below summarises the different report scopes, the different estimation methods used, their future I&L demand recommendations and Savills view of each reports methodological weaknesses.

Table 3.1 Local and Sub-Regional Employment Studies

Study	Scope	Recommendations	Methodological Issues (Savills View)
Housing & Economic Development Needs Assessment prepared by GL Hearn (HEDNA 2017)	<ul style="list-style-type: none"> Geographic scope: Leicester City and Leicestershire Region Uses: B1, B2, small B8 (<9,000 sqm); Strategic B8 (9,000+ sqm) Time period: 2011-2031 and 2011-2036 	<ul style="list-style-type: none"> B1c/B2 NWL: 3.3 ha (2011-31); 4.1 ha (2011-36); FEMA: 131.7 ha (2011-31); 164.5 ha (2011-36); Small B8 (<9,000 sqm) NWL: 16.8 ha (2011-31); 21 ha (2011-36); FEMA: 93 ha (2011-31); 117 ha (2011-36); Strategic B8 (9,000+ sqm) (FEMA wide): 361 ha (2011-31); 472 ha (2011-36) 	<ul style="list-style-type: none"> Preferred employment needs methodology for B1a/b/c/B2/small B8 is based on past completions Completions is a supply measure not a demand measure mainly dependent on land being allocated in Local Plans. This is not an accurate measure of 'true' market demand Calculations for B1c/B2/small B8 land do not take into account expected losses of land, completions, or commitments The Reg 18 Local Plan notes that supply of sites for industrial and smaller warehousing premises in NWL has surpassed the estimated requirements of the HEDNA, clearly demonstrating its need methodology is not reflective of true demand Does not address strategic needs for B2 floorspace
North West Leicestershire The Need for Employment Land prepared by Stantec (Stantec Study 2020)	<ul style="list-style-type: none"> Geographic scope: North West Leicestershire Uses: Non-Strategic Industrial (B1c, B2 and B8 (<9,000 sqm)) Time period: 2017-2039 	<ul style="list-style-type: none"> Non-strategic industrial (<9,000 sqm): 47 ha 	<ul style="list-style-type: none"> Preferred demand estimation method based on GVA outputs does not take account of historic supply constraints which the study itself notes as a limitation Preferred demand estimation method is completely different to the methods used by GL Hearn Study, resulting in lack of consistency between local and regional demand forecasts Different time period used to GL Hearn (2021), again highlighting inconsistencies between local and regional demand forecasts
Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change (2021)	<ul style="list-style-type: none"> Geographic scope: Leicester City and Leicestershire Region Uses: Strategic B8 (9,000+ sqm) Time period: 2020-2041 	<ul style="list-style-type: none"> Strategic B8 (FEMA-wide): 861 ha (including 5 year safety margin) 	<ul style="list-style-type: none"> Preferred employment needs methodology results in less demand than historic trend in direct contrast with the strength of the I&L market Demand estimates per annum are lower than HEDNA's estimates for strategic B8 made in 2017, even with a 5 year safety

<p>prepared by GL Hearn, MDS Transmodal and Icen (GL Hearn Study 2021)</p>			<p>margin. Again in direct contrast with the strength of the I&L market</p> <ul style="list-style-type: none"> • Does not address strategic needs for B2 floorspace which is also not addressed in the Stantec Study 2020 • Unrealistic apportionment of demand to rail served sites vs road based sites • Does not recommend how the regional need / demand is apportioned amongst local authorities in the region. The Study has limited mention in the NWL Reg 18 Options document.
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Source: Savills (2022)

- 3.1.3 The above summary clearly demonstrates the various reports ‘do not talk to one another’ which is a by-product of them using different demand estimation methods, covering different time periods and focusing on different segments of the market (i.e. large warehouse units above 9,000 sqm versus smaller warehouse and industrial units). While the various reports note demand has outpaced supply historically, none have addressed the impact low availability has on ‘suppressing’ demand as tenants can’t find the space they want.
- 3.1.4 In terms of the estimation methods the various reports use a combination of labour demand forecasts, GVA outputs, past completions or freight flows to estimate future I&L demand. None of these methods have proved accurate in estimating future demand. If they did, availability wouldn’t have trended downwards across the FEMA and NWL for most of the last decade as a result of demand outpacing supply. As a result we have seen above inflation rental growth as occupiers vie for limited available stock.
- 3.1.5 As we discuss further in **Section 4** and **Section 5**, availability has been below the level we consider to represent a balance between supply and demand for most of the last decade. This equilibrium rate is around 8% nationally, a level the FEMA and NWL have been below since 2013 and 2014 respectively. As a result, the FEMA has experienced I&L rental growth of 67%, more than twice the rate of inflation (25%) over the last decade²⁰.
- 3.1.6 Below we review in detail the two most recent studies being the Stantec Study (2020), focused on demand for industrial/small warehousing at the NWL level and the GL Hearn Study (2021) focused on the demand for large warehousing at the FEMA level.
- 3.1.7 As we discuss in detail both studies have a number of methodological flaws. The Stantec Study uses GVA Outputs to estimate future demand which the study itself notes as flawed because it does not address historic supply constraints. The GL Hearn Study uses a completely different set of demand estimation methods; its preferred method based on replacement floorspace and road and rail freight flows. While this is an interesting approach, its final recommendations are not sensible given its future floorspace demand estimates are below historic completions. This is completely contrary to market realities whereby demand is currently 86% above long terms trends and vacancy is at the lowest levels since reliable records began (as discussed in **Section 2**).

3.2 The Stantec Study (2020) North West Leicestershire - The Need for Employment Land

²⁰ According to the Bank of England inflation calculator between 2011 and 2021 (<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>)

- 3.2.1 The Stantec Study was commissioned by NWLDC to assess the district's need for employment land in the period to 2039. Even though the Local Plan had been recently adopted at the time, the Council felt it had not identified enough employment land to meet its needs – as measured by the previous employment need assessment, the 2017 HEDNA. For example, the HEDNA expected office development to take up twice as much land as industrial but in practice more land had been developed for industry, suggesting that the HEDNA had misread the market.
- 3.2.2 With regard to industrial land, the Stantec study covers **non-strategic industrial space**, namely:
- **Core industrial space:** factories and workshops
 - **Non-strategic warehousing space:** small and mid-sized distribution / logistics units up to 9,000 sqm
- 3.2.3 It **excludes strategic warehousing**, a category comprising B8 units over 9,000 sqm which are instead covered by the GL Hearn study (2021) discussed further below.
- 3.2.4 The study starts off by exploring two types of forecasts for estimating future industrial floorspace needs: one based on jobs and one based on output (GVA per sqm).
- 3.2.5 The **output forecasts** are then taken forward given growth in industrial output in NWL has historically more closely mirrored growth in floorspace than using growth in jobs. Experian (July 2020) and Oxford Economics (August 2020) forecasts are used as part of this analysis.
- 3.2.6 The GVA output forecasts are translated into employment floorspace using densities based on “*economic data and the Valuation Office Agency (VOA) floorspace statistics for 2017*”²¹ in terms of £ million of GVA per sqm. This results in an estimated 26,126 sqm per annum (p.a.) from Experian and 27,566 sqm p.a. from Oxford Economics. Using this density effectively assumes that industrial activities on strategic and non-strategic sites contribute in equal measure to GVA on a £ per sqm basis. This assumption seems unlikely to hold true in reality and does not appear to be validated in the study, which we consider a major flaw that can easily lead to over-estimation or under-estimation.
- 3.2.7 In order to isolate future demand for non-strategic land, the Study considers historical evidence on the mix of industrial development in NWL based on annual monitoring data and VOA. Over the short-term, the share of non-strategic demand averages 5.5% over the last 10 years – leading to the ‘low scenario’, increasing to an average of 21.6% if a longer 19 year period is used – leading to the ‘main scenario’.
- 3.2.8 A **vacancy rate of 7.5% is applied** to both scenarios, to allow for units that are empty between tenancies and generally for choice and competition. This broadly corresponds with Savills’ 8% equilibrium availability rate (ie: when supply and demand are in balance). This is discussed in more detail in **Section 3.3** below and in **Section 5**.
- 3.2.9 Finally, floorspace estimates are translated into **land requirements applying a 40% plot ratio**. This yields an estimate of 0.9 ha p.a. under the low scenario, and between 2 to 2.1 ha p.a. under the main scenario.
- 3.2.10 The Study considers the low scenario as not suitable due to historic supply constraints impacting the non-strategic land segment of the market. Therefore the main scenario is taken forward, estimating

²¹ Para 3.12 p.16

demand for circa 187,000 sqm of net additional floorspace, or circa **47 ha of land** over the **22-years plan period**.

- 3.2.11 While Savills considered the use of GVA outputs better than jobs, it is still a flawed metric for estimating future floorspace, and by extension, land demand. The I&L sector, like all property markets, is driven by the relationship between the supply of floorspace / land and how much demand there is for this supply. When demand exceeds supply, availability reduces and rents typically rise as occupiers vie for limited available stock. The strong demand and rising rents make building new floorspace attractive for investors. However the delivery of new floorspace primarily relies upon new sites coming forward via the planning process (notwithstanding some net uplift in floorspace can be achieved via the intensification of existing sites).
- 3.2.12 In England, market demand and supply data is readily available via industrial agents, planning application information, Authority Monitoring Reports and commercial databases such as CoStar and EGi which record transactional information (demand), properties available to the market (availability) as well as data on rents, yields and tenant sectors. Given the wealth of market information available it is unclear as to why the Stantec Study has relied primarily on third party statistical models to try and understand future market demand rather than market data itself.
- 3.2.13 The Stantec study does appear to recognise its own limitations: *“The industrial forecast should be treated as a minimum, because historical evidence from the VOA suggests that the true demand could be much higher. **Unfortunately we cannot estimate that higher number, because land supply has been constrained for so long that we do not have solid evidence of what happened in a relatively unconstrained market**” [emphasis added].²²*
- 3.2.14 The Savills demand estimation method, discussed in **Section 5**, addresses the major flaw of the Stantec Study by being able to estimate demand that has been lost due to historic supply shortages. We refer to this as ‘suppressed demand’.
- 3.2.15 The recommendations from the Stantec Study have been taken forward in the NWL Reg 18 Options document. The overall demand for industrial/small warehousing is estimated at **71.57 ha**²³. This includes the Stantec requirement of 47 ha, an allowance for losses of 18.2 ha and a flexibility margin of 6.37 ha equivalent to 5 years annual average completions. This breakdown is set out in **Table 3.2** below.

Table 3.2 Total Demand in the NWL Reg 18 Options document

	Sqm	Ha
Stantec Requirement (2017 – 39)	187,000	47
Losses allowance (2023 – 39)	72,800	18.2
Flexibility Margin	25,484	6.37
Total Requirement	285,284	71.57

Source: North West Leicestershire Development Strategy Options and Policy Options (Regulation 18) Consultation (2022)

- 3.2.16 It is noted that overall estimates of need will be updated ‘in due course’ as NWL will need to account for additional large warehousing demand. This will draw on a new study due to be completed in Spring

²² Para 6.4., p.64

²³ Discussed in Section 6, p. 37-38 of the Options document

2022, which breaks down for each local authority area the large warehouse need identified in the GL Hearn study at FEMA level.

3.3 The GL Hearn Study (2021), Warehousing and Logistics in Leicester and Leicestershire

3.3.1 The study was prepared by GL Hearn with MDS Transmodal for a consortium comprising Blaby, Charnwood, Harborough, Hinckley & Bosworth, Melton, North West Leicestershire, Leicester City, Leicestershire County Council, Oadby & Wigston and the Leicester and Leicestershire Local Enterprise Partnership.

3.3.2 The study focuses on large scale logistics warehouse facilities (B8) greater than 9,000 sqm²⁴, and estimates demand across the FEMA over a 21-year period to 2041. **The need for large B2 units of 9,000 sq. m plus across the FEMA is not covered by the study** despite this representing a small but significant component of occupier demand, as we discuss below.

3.3.3 The GL Hearn study uses a completely different set of estimation methods compared to the Stantec Study, undermining any synergy between both. The estimation methods it explores include:

- Labour demand: based on Oxford Economics jobs forecasts which are then translated into floorspace using employment densities and then into a land requirement using a 40% plot ratio;
- Historic trends: based on historic completions data; and
- Replacement + Traffic Growth: based on the need to replace obsolete stock and need to handle freight traffic growth. Traffic growth is translated into floorspace demand, which is then split between road-based and rail-based. Floorspace estimates are translated into a land requirements using a 35% plot ratio for road-based and 25% plot ratio for rail-based.

3.3.4 A summary of the floorspace demand estimates from these methods is tabulated below in **Table 3.3**. The estimates cover the period between 2020 and 2041.

Table 3.3 GL Hearn Estimated Need by Model Type (2020 to 2041)

Type	Model Name	Description	2041 Needs ('000 sqm)
Labour Demand	Labour demand	Assumes the baseline model for all sectors	-50
	Labour demand sensitivity	Assumes baseline model for warehouse and related sectors for growth-only districts	161
Historic Trends	Completions trend	Reflects large warehouse floorspace delivery over the 2012-19 period, projected forwards	2,702
	VOA trend	Models growth-only districts 2011-18 projected forwards, all warehouse and industrial stock including losses	1,941
Replacement + Traffic Growth	High replacement, central traffic growth	30 year stock longevity and baseline traffic growth	2,466

	Low replacement, central traffic growth	40 year stock longevity and baseline traffic growth	2,061
	High replacement, sensitivity test traffic growth	30 year stock longevity and higher traffic growth from heightened e-commerce trading as a result of Covid-19	2,571
	Low replacement, sensitivity test traffic growth	40 year stock longevity and higher traffic growth from heightened e-commerce trading as a result of Covid-19	2,166

Source: GL Hearn, Savills

3.3.5 The preferred model is the “**High replacement, sensitivity test traffic growth**” which estimates 2,571,000 sqm of floorspace demand by 2041. This model relies on two factors driving future demand:

- **Replacement Build:** requiring new large-scale warehousing to replace existing obsolete buildings.
 1. This assumes the life of a modern warehouse building is 30 years.
 2. Over a 21-year period this corresponds to 70% of existing stock (21 years / 30 years = 70%).
 3. This leads to an estimated demand of **1,620,000 sqm** by 2041.
- **Growth Build:** future demand driven by the need to handle growth in volume of consumer goods handled.
 1. This is derived from growth in annual freight volumes delivered directly to large scale distribution centres.
 2. The chosen model variant assumes higher growth in traffic induced by heightened e-commerce trading occurring since the onset of the Covid-19 pandemic.
 3. The traffic forecasts are then converted into floorspace need “using generally accepted 'conversion factors' which relate annual tonnage throughput and floor space at large scale 'high bay' type warehouses”²⁵.
 4. This leads to an estimated demand of **308,000 sqm** by 2041.

3.3.6 The **Replacement Build and Growth Build** components are then combined as follows:

1. Floorspace demand from the two components leads to a combined demand of **1,928,000 sqm**.
2. A 5 year margin for flexibility is then applied, leading to an overall requirement of **2,571,000 sqm**.

3.3.7 Floorspace demand from the above step is apportioned to rail-served and road-served sites at a 43% and 57% share respectively. Floorspace is then converted to land requirements assuming a 35% plot ratio for road-based and 25% plot ratio for rail-based sites. This equates to demand for **861 ha**.

²⁵ Para 8.25, p.109

3.3.8 Below we summarise our views on the methodology adopted in this study.

The preferred model underestimates true demand

3.3.9 A major concern with the preferred model is that its total demand estimate of **2,571,000 sqm** is lower than the historic trend model based on completions at **2,702,000 sqm**. This does not reflect reality given I&L demand for large units, as we discussed in **Section 2**, is the strongest its even been, both nationally and across the region. As a result available stock is nearly completely exhausted with vacancy at just 2.91% nationally and 1.69% in the East Midlands, the lowest levels ever on record.

3.3.10 The lack of available supply within the I&L sector is not a recent occurrence but is historic. When supply, as signalled by floorspace availability, is low, demand is 'suppressed' as prospective tenants can't find space in a market. 8% availability is typically referred to as the equilibrium level at a national level when supply and demand are broadly in balance (as sourced in publications such as the GLA's Land for Industry and Transport SPG 2012). **We discuss this further in Section 5.**

3.3.11 Below this level, available supply becomes tight and rents increase as occupiers compete for limited available stock. NWL's I&L market has been below the 8% benchmark since 2013, so nearly a decade. The GL Hearn Study notes the lack of supply in several instances (i.e. Sections 3 and 6), however instead of trying to address this issue, and its impact on demand, it appears to further accentuate the issue by recommending less demand than the historic 'supply constrained' (i.e. completions) trend.

3.3.12 Not only are historic trends not reflective of the current and future strength of demand in the sector, the Study's use of completions as a demand measure is fundamentally flawed. Development completions is a supply measure, not a demand measure. While new floorspace can be delivered on existing sites through redevelopment and intensification, it mainly depends on new employment sites being made available (allocated) for development via the planning system. The length of time and complexities involved in delivering sites, particularly those of a strategic scale, is why supply measures (completions) typically lag actual demand (net absorption). Therefore the use of a lagging supply measure, and the projection of this forward into the future, results in an underestimate of 'true' market demand.

3.3.13 The failing of past completions methods is evident in the NWL's Reg 18 Options Document which states at para 6.4 that there *"has been considerable market demand for industrial and smaller warehousing premises in NWL over recent years and the supply of sites for these uses has been quite strong, already surpassing the estimated requirements in the Housing and Economic Development Needs Assessment 2017 (HEDNA)"*. Effectively GL Hearn's previous HEDNA Study, based on past completions, has been proven to underestimate market demand. **Their response, within this more recent study, appears to be to select an alternative method (replacement plus traffic growth) that estimates even less future floorspace demand than the failed past completions method.**

3.3.14 We address these issues as part of the Savills estimation method in **Section 5.**

The Study uses different plot ratios

3.3.15 Plot ratios are used to convert floorspace demand to land requirements. The GL Hearn study applies different plot ratios across the different demand models. Such inconsistency is not considered justified. For instance the historic trend model uses a plot ratio of 40% based on historic evidence but the preferred Replacement + Traffic Growth model uses 35% for road and 25% for rail sites.

3.3.16 While we agree these lower plot ratios are more representative of larger unit development, the primary

output of each model is their future floorspace demand estimations not plot ratios. By using different plot ratios to translate floorspace to land, the study has removed the ability to compare results from the different models on a 'like for like' basis. For instance the past completions method (including a 5-year margin)²⁶ has a much higher future floorspace demand requirement but only a slightly higher land requirement (3.3 million sqm gives 869 ha) compared to the preferred method (2.6 million sqm gives 861 ha). This is due to the past completions trend being based on a more land efficient plot ratio of circa 40% (which, it should be noted, is too high and does not reflect market realities for many large unit schemes).

- 3.3.17 If the same road and rail plot ratios were also used for the past completions method (including a 5-year margin)²⁷, its land requirement would increase to 1,120 ha (made up of 575 ha (road) and 545 ha (rail)). This is **259 ha higher** than the preferred method (861 ha).

Demand for B2 strategic floorspace is not taken into account

- 3.3.18 In line with national trends, and as a result of the region's location and accessibility, the vast majority of take-up of larger units is by companies within the logistics sector. However, the East Midlands also continues to account for a significant and above average proportion of UK manufacturing output. Manufacturing accounts for 16% of economic output in the region and 11.1% of jobs, compared to the national average of 10% and 7.4% respectively²⁸.

- 3.3.19 Leasing activity for strategic I&L floorspace (above 9,000 sqm) between 2012 and 2021 for the East Midlands, shows that B2 floorspace accounted for 21.5% of all deals (or 8% by floorspace)²⁹.

- 3.3.20 Examples of large scale manufacturing investment in Leicestershire include:

- Countryside Properties took a 359,305 sq. ft build to suit unit at Mountpark, Bardon in March 2020 for the manufacture of its advanced modular panel system that will deliver around 3,250 new homes a year for the company's three Midlands regions when the factory is fully operational. The facility created over 100 jobs, including apprenticeships for the local area.
- Power Towers took a speculative unit of 100,000 sq. ft at Leicester Distribution Park in December 2019. Power Towers are a UK manufacturer founded in 2007.
- Mattel Toys took a new speculative unit of 205,760 sq. ft at Optimus Point, Leicestershire in December 2017.

- 3.3.21 Given the important role that the manufacturing sector plays in the East Midlands, and that B2 uses occupy similar types of units to B8, their needs should be considered.

Several key assumptions are not substantiated

- 3.3.22 Based on an assessment of trends within the I&L sector, the study separately quantifies the need for rail-served and non-rail (road-based) floorspace and land.

- 3.3.23 The Study notes that new warehouses are constructed partly to accommodate growing traffic volumes over the long term – this forms the 'growth build' element of the Study's preferred demand forecasts.

²⁶ A five year margin of flexibility of 643,000 sqm is added to the past completions estimation of 2.7 million in order to compare the preferred method on a like for like basis

²⁷ Ibid

²⁸ Future of the East Midlands Economy, 3rd September 2021 (House of Commons Library CDP-2021-2033)

²⁹ CoStar (2022)

The focus is commodities which pass through large scale distribution centres (excluding bulk and semi-bulk cargoes such as aggregates and forest products) – in 2019 and forecast to 2041. These specific commodities are not identified in the Study, but are set out in the Leicester and Leicestershire Strategic Distribution Sector (SDS) Study Part A Interim Report, published in 2014. They include Beverages, Food (fresh, perishable and non-perishable), Furniture, Clothing, Manufactured Articles, Paper and Card (including packaging), Parcels and Wood/Cork Manufactures³⁰.

- 3.3.24 The current and forecast freight volumes are produced using the MDS Transmodal GB Freight Model. For those commodities which pass through large scale distribution centres, it estimates the total volume of cargo currently destined for Leicestershire, and the proportion estimated to be delivered directly to large scale distribution centres.
- 3.3.25 As discussed in **Section 2**, significant growth is forecast across all freight modes, with LGV traffic estimated to grow between +25% and +108% by 2050 and rail traffic by +74% by 2043/44. However, in spite of this strong forecast growth, the preferred model, based on freight traffic forecasts, predicts future floorspace demand below past completions. If freight is forecast to grow, and we know freight growth is linked to demand for I&L floorspace, it is therefore not reasonable to expect lower demand for I&L floorspace than past completions – as the preferred model suggests.
- 3.3.26 The Study estimates that 45% of road freight traffic destined for the East Midlands will be delivered to a distribution centre (assumed to be a unit of 9,000 sq. m plus). This is based upon research undertaken as part of the East Midlands Strategic Distribution Study prepared by Savills and MDS Transmodal which was published in 2006. As noted at **Section 2**, there have been significant changes in the sector since this time including the significant growth of e-commerce. The accuracy of this figure now (and even more so in 2041) is therefore questionable.
- 3.3.27 The main issue is likely to be around the assumption for converting freight traffic to floorspace. This key assumption is not explained in the document, its only reference at paragraph 8.25 is to say “*generally accepted conversion factors.*” This is a fundamental assumption in the model and should have been presented with more transparency. In contrast, more detail was provided for the alternative methods not taken forward in the Study. For instance, for the labour demand method, the conversion factor when relating labour demand (jobs) to floorspace was clearly stated as based on densities from the HCA’s 2015 guide, which we recognise as industry standard.

The targets for rail served sites appear unrealistic

- 3.3.28 The Study considers three scenarios in relation to the proportion of new build warehousing required at rail-served sites (i.e. 26%, 43% and 60% rail). 26% is already an ambitious figure while 60% is not justified as being realistic, neither is the 43% mid-point.
- 3.3.29 The lower scenario (26%) is based on forecasts by Network Rail undertaken in 2018³¹ and the highest scenario is on the assumption that all demand for units of 25,000 sq. m is met at rail served sites,³² with the final scenario of 43% representing a middle ground. The Study asserts that the proportion of new floorspace to be rail-served should be in excess of the Network Rail forecasts as a result of changes in national planning policy, high growth rates in intermodal rail freight, the cost competitiveness of rail

³⁰ MDS Transmodal & Savills (2014) Leicester and Leicestershire Strategic Distribution Sector Study: Part A Interim Report, para 3.2, footnote 6

³¹ National Rail Freight Demand Forecasts

³² Ibid, paragraph 9.8

freight services over road, and the decarbonisation agenda.

- 3.3.30 It is clearly unrealistic to assume that all units in excess of 25,000 sq. m will be located at a rail-served site. The number of SRFI within the FEMA are limited. While new ones are planned they can take a considerable amount of time to come forward. Furthermore, many occupiers don't need to be located on a SRFI given their supplies don't come in via a port or they need more regular supplies or lower volumes that rail freight routes typically support. Whilst the rail agenda is important and should be fully supported due to the wide ranging benefits it can bring, there is a danger of downplaying the continuing and necessary reliance on road freight for the majority of distributors.
- 3.3.31 According to Savills' analysis, between 2015 and 2021, delivery of SRFI floorspace (at Prologis RFI DIRFT and East Midlands Gateway) made up only 14% of total new floorspace delivered over 9,000 sqm in the East Midlands region. This rises to 20% between 2015 and 2023 (accounting for current and future deliveries at EMG, DIRFT and Northampton Gateway). This is well below the mid-point of 43%, assumed by the Study.
- 3.3.32 Furthermore, future supply of rail-served sites is unlikely to increase the proportion to these high levels either. Hinckley NRFI is expected to receive DCO consent by 2023, with a build out period of 10 years meaning its delivery is some way off. East Midlands Intermodal Park (EMIP) is still in its pre-planning stage. It aims to engage on its initial masterplan in Spring 2023 and to progress its DCO in 2023³³. Rail Central Northampton's DCO application was withdrawn in 2019, and the project is currently on hold³⁴.

Air freight and LGV freight flows appear to be ignored

- 3.3.33 The growth build element of the preferred model does not appear to take into account the role of air freight and associated I&L demand. This is despite East Midlands Airport (EMA) handling the second-highest volume of air freight in the UK³⁵, after Heathrow, and being the UK's largest dedicated air cargo operation, making it the country's most important airport for express freight³⁶. EMA was one of the top 10 airports in Europe by air traffic movements during the middle of the Covid-19 pandemic³⁷. The Study also fails to account for the Airport's ambition to treble its cargo activity to 1 million tonnes a year over the next 20 years³⁸, which will likely lead to increased demand for I&L premises located near the airport.
- 3.3.34 Similarly freight moved by LGV appears to have been ignored with only HGV movements considered. Paragraph 8.21 in the Study notes the road freight data is derived from the Department for Transport's Continuing Survey of Road Goods Transport (CSRGT) which obtains details of domestic activity of GB-registered HGVs³⁹. Therefore LGV traffic, which is estimated to grow between +25% and +108% by 2050, as discussed in **Section 3**, is not taken into account. While we appreciate that HGV movements are more linked to larger sheds, to infer LGV traffic has zero relationship is not correct. This omission has likely led to underestimates in future floorspace demand.

Supply Review

- 3.3.35 As at April 2020, the study found that there was 338,000 sq. m of consented rail-served floorspace,

³³ <https://uk.goodman.com/east-midlands-intermodal-park/>

³⁴ <https://railcentral.com/news/ashfield-land-and-glp-pause-rail-central/>

³⁵ Civil Aviation Authority (2021) UK Airport Data; Table 14 International and Domestic Freight

³⁶ <https://www.eastmidlandsairport.com/about-us/cargo/>

³⁷ Manchester Airports Holdings Limited Unaudited Interim Report and Condensed Consolidated Financial Statements for the Six Months Ended 30 September 2020

³⁸ https://www.magproperty.co.uk/app/uploads/2018/10/EMA_2018_Brochure_FinalProof2.pdf

³⁹ <https://www.gov.uk/government/statistics/continuing-survey-of-road-goods-transport-gb-respondents-section>

together with 1,073,000 sq. m of consented road-based floorspace⁴⁰.

3.3.36 The supply of land across both categories has fallen significantly since the publication of the Study, as illustrated by **Table 3.4** below. Supply of rail-served floorspace has fallen to 96,000 sq. m. This includes one plot at East Midlands Gateway and one plot at East Midlands Distribution Centre (please note that whilst this is included as rail-served to allow comparison with the Study’s conclusions, the only unit which is rail-served at EMDC is Marks & Spencer, so the remaining supply should technically be included within the road-based figures). The supply at road-based sites has fallen to 676,000 sq. m. **In total, supply has fallen from 1,411,000 sq. m to 772,000 sq. m (a 45% reduction) in less than two years.**⁴¹

Table 3.4 Supply Update

Scheme	Study Supply (Vacant units & Consented Plots)	Update Supply Position (000's sq. m)	Difference	Comment
EMDC (Rail)	102	32	-70	EMDC 525 let to Buy it Direct
EMG (Rail)	236	64	-172	Plot 5 remaining for strategic B8
Hinckley & Bosworth				
Unit 1 Mountpark Phase II	62	0	-62	Let to VF Corporation
Bardon, Hinckley & Bosworth	0	89	89	Consent on Appeal
Blaby				
Land West of St Johns, Enderby	99	107	8	Application awaiting determination
Charnwood				
Rothley Lodge, Loughborough Rd	11	11	0	Cross Link 646
Former Artform International premises, Loughborough	14	0	-14	U/O
Harborough				
Tornado 186, Magna Park	16	0	-16	Let to Bleckmann
Magna Park South	279	110	-169	MPS5 and MPS7
Magna Park North	320	244	-76	MPN2 (spec), MPN 5, 6 & 7
M1 Access, Lutterworth	11	11	0	Available - 129,012 sq. ft spec
X Dock 377, Magna Park	35	0	-35	Let to Armstrong Logistics
Quantum, Magna Park	38	0	-38	Let to Amazon
Hurricane Warehouse (4400), Magna Park	24	0	-24	Let to Clipper
Leicester				
Leicester Distribution Park	9	14	5	Unit 2 - 150,000 sq. ft spec
North West Leicestershire				
225 @ Interlink, Bardon	21	0	-21	Let to Oakland
Zorro, Ashby-De-La-Zouch	22	0	-22	Let to EV Cargo
Former Coal Lounge	62	70	8	G Park, Ashby - planning 2021
Unit 2 Mountpark Phase II	50	0	-50	Countryside Pre-let
Bardon Hill, Coalville	0	20	20	Under construction
Non-Rail Total	1073	676	-397	
Rail Total	338	96	-242	
Total Supply	1411	772	-639	

Source: Savills

3.3.37 It is clear that the rate of take-up experienced over the course of 2020 and 2021 has far exceeded the historic trend and consequently, supply has been eroded at a much faster rate than anticipated by the

⁴⁰ Ibid, Tables 41 and 43, pages 121 and 124

⁴¹ Based on study supply date of April 2020

GL Hearn Study. As we evidence in **Section 4** below, both the wider FEMA and NWL are supply constrained and have been for most of the last decade. This lack of available supply has resulted in high levels of pent up demand, which coupled with current day growth drivers means available space in prime locations has been taken up quickly.

3.3.38 The speed at which strategic sites are being taken up is further illustrated by a review of take-up at key schemes within the FEMA:

- **East Midlands Gateway**

A timeline of 10 years was originally envisaged for completion of the scheme but after 4 years there is now only one plot remaining which is capable of accommodating a unit in excess of 9,000 sq. m. Plot 5 can accommodate a unit of 64,000 sq. m. Take up at the scheme has been far quicker than envisaged and has averaged **113,746 sq. m per annum** since serviced plots became available.

- **Magna Park**

Take up across Magna Park North and South has averaged 115,467 sq. m per annum since 2018, increasing to **244,993 sq. m per annum** on average over 2020 and 2021. If this rate of take up continues then the remaining capacity of c. 354,000 sq. m could be exhausted in less than 18 months, considerably less time than envisaged when the planning permission was granted for these schemes.

3.4 Conclusions

3.4.1 This chapter has reviewed the three employment reports commissioned within the last 5 years which address supply and demand issues within the wider FEMA and NWL.

3.4.2 The HEDNA, prepared by GL Hearn in 2017 for the FEMA, uses past completions as its preferred employment needs methodology for I&L premises below 9,000 sqm. Past completions is a supply measure, rather than a demand measure, and is thus not an accurate measure of 'true' market demand. This is illustrated by NWL's Reg 18 Options document noting that the supply of sites for industrial and smaller warehousing premises has surpassed the estimated requirements in the HEDNA.

3.4.3 The Stantec study (2020), prepared for NWL in 2020, looks only at non-strategic industrial floorspace (B1c, B2 and B8 space below 9,000 sqm). The preferred demand estimation method based on GVA outputs does not take account of historic supply constraints. The Study itself notes this as a limitation, and states that its estimates should be treated as a minimum as future demand has likely been underestimated.

3.4.4 The GL Hearn and MDS Study, prepared for the FEMA in 2021, assesses demand for strategic B8 floorspace (above 9,000 sqm). We consider the Study to present a number of methodological issues, the most concerning of which is that its preferred demand estimation is lower than the past completions trends. Other issues include:

- the use of different plot ratios for different demand models;
- no consideration of strategic B2 floorspace;
- the proportion of rail-served demand is too aspirational and unrealistic, while demand for road-served sites is underestimated; and

- air freight and LGV traffic are not taken into account.

- 3.4.5 As a result of the continued strength of the I&L market, supply continues to be depleted at a much faster rate than anticipated (for example, around 45% less floorspace is now available in comparison to GL Hearn's figures). This has a direct implications for the amount of land which is necessary to meet identified needs over the plan period.
- 3.4.6 Savills addresses these methodological shortcomings and seeks to provide a more accurate estimate of I&L demand for NWL in **Section 5**.

4 I&L Market Assessment

4.1 Introduction

- 4.1.1 This section compares NWL's I&L market and that of the wider Functional Economic Market Area (FEMA), across a number of supply and demand indicators.
- 4.1.2 The sub-regional (or FEMA-wide) context is important given that future I&L investors and occupiers will consider the attractiveness of locations within NWL against other competing locations within the wider FEMA. New I&L investment and occupier demand will naturally flow to the strongest locations in terms of road, rail and airport freight connectivity and access to population centres. Furthermore, I&L companies typically have supply chains that span 1 to 4 hours travel time, sometimes longer, connecting themselves with their suppliers and end use customers. This again indicates that a sub-regional approach, beyond the individual local authority level, is appropriate for understanding market supply and demand dynamics.
- 4.1.3 NWL is part of a wider FEMA that includes neighbouring local authorities. FEMAs are essentially a group of local authorities that share similar characteristics in terms of key economic drivers, housing markets and workforce and consumer flows. The FEMA was defined in the HEDNA 2017⁴² and It covers the seven local authorities of Leicestershire plus Leicester City District, as shown in **Figure 4.1**.

⁴² GL Hearn (2017), Housing and Economic Development Needs Assessment - Leicester and Leicestershire Authorities and the Leicester and Leicestershire Enterprise Partnership

Figure 4.1 Functional Economic Market Area



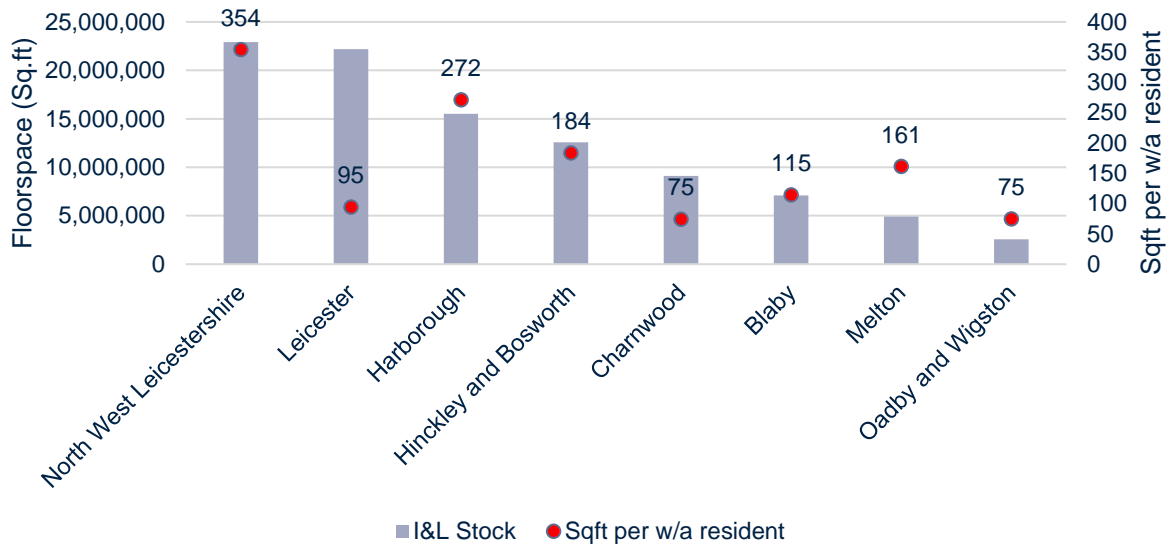
Source: Savills

4.2 Market Supply & Demand Factors

Existing Stock

- 4.2.1 There are 96.9 million sqft of I&L floorspace across the FEMA – nearly a quarter of which (24%, 22.9 million sqft) is located within NWL.
- 4.2.2 **Figure 4.2** shows how much I&L floorspace each local authority in the FEMA has per working age (w/a) resident. In effect it shows how large, and by extension, how important the I&L sector is relative to the size of the local working age population.
- 4.2.3 NWL has 354 sqft of I&L floorspace per working aged resident, which is the highest ratio across the FEMA. This demonstrates that NWL is the main I&L employment location in the sub-region. It also indicates how critical the sector is to its local economy and jobs market.

Figure 4.2 I&L sqft per working age residents – FEMA local authorities

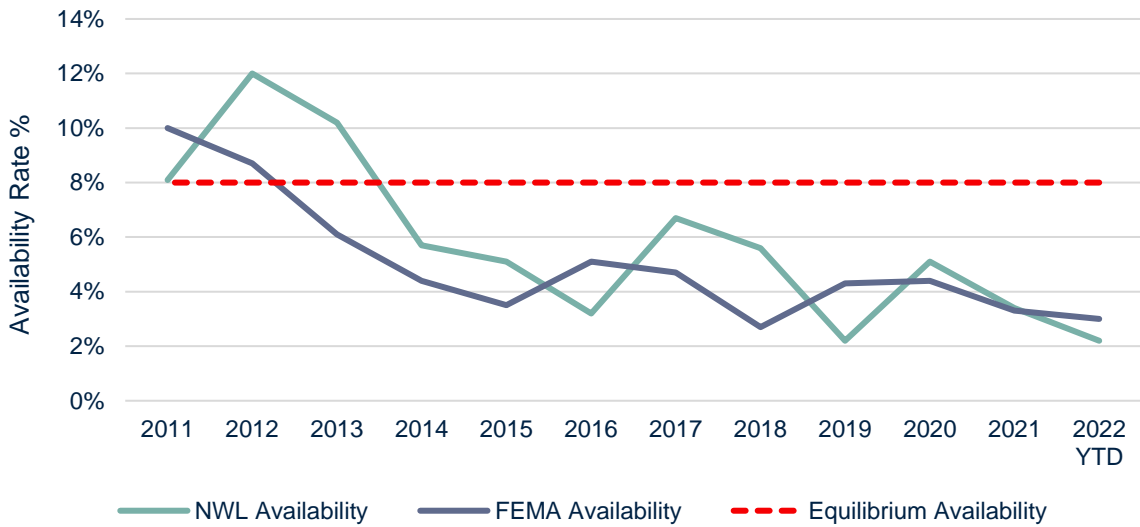


Source: Costar, Savills

Availability

- 4.2.4 The availability rate across the FEMA is extremely low at just 3%. It is even lower within NWL at only 2%. At the national level, 8% availability is commonly referred to as the level where a market is broadly in balance (i.e. frictional capacity) in terms of supply and demand (as sourced in publications such as the GLA’s Land for Industry and Transport SPG, 2012). Below this level available supply becomes tight and rents increase as strong occupier demand compete for limited available stock.
- 4.2.5 As shown in **Figure 4.3**, availability across the FEMA has been below the 8% equilibrium level since 2013, for over 9 years. This means that the FEMA’s I&L market has been supply constrained for a considerable period of time which in turn suppresses demand as not all occupiers can find space to meet their needs. As a result they are either forced to remain in their existing premises, even if not ideal for their operational requirements, or alternatively have to leave the FEMA to find suitable premises elsewhere, taking the jobs and investment they generate with them. A similar pattern of tight and falling availability has occurred also within NWL. Savills can provide a long list of unmet enquiries as evidence of this supply-constrained market, if the Council requires.
- 4.2.6 The Stantec report, as discussed in **Section 3**, recognises that a major flaw of its findings is the inability to estimate the impact historic supply constraints has had on demand and how to address this as part of its future demand estimates. The Savills methodology explained in **Section 5** is able to address this issue by accounting for ‘suppressed demand’ i.e. demand lost historically due to the lack of available supply.

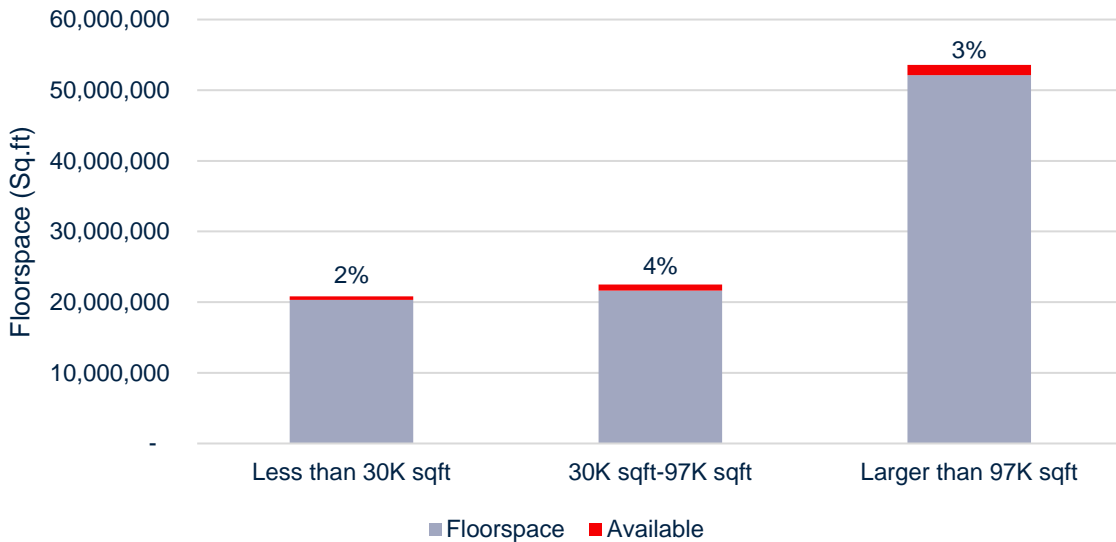
Figure 4.3 FEMA Availability Rate since 2011



Source: Costar, Savills

4.2.7 Given the low availability rates discussed above it is not surprising all segments of the I&L market are supply constrained. With reference to **Figure 4.4**, it can be seen smaller units of up to 30,000 sqft, medium sized of 30,000 to 97,000 sqft⁴³ all suffer from very low levels of availability, well below the 8% equilibrium benchmark. The 3% availability for larger units over 97,000 sqft is particularly stark given this size band accounts for over half (55%) of total I&L stock across the FEMA.

Figure 4.4 FEMA Availability by Size Band



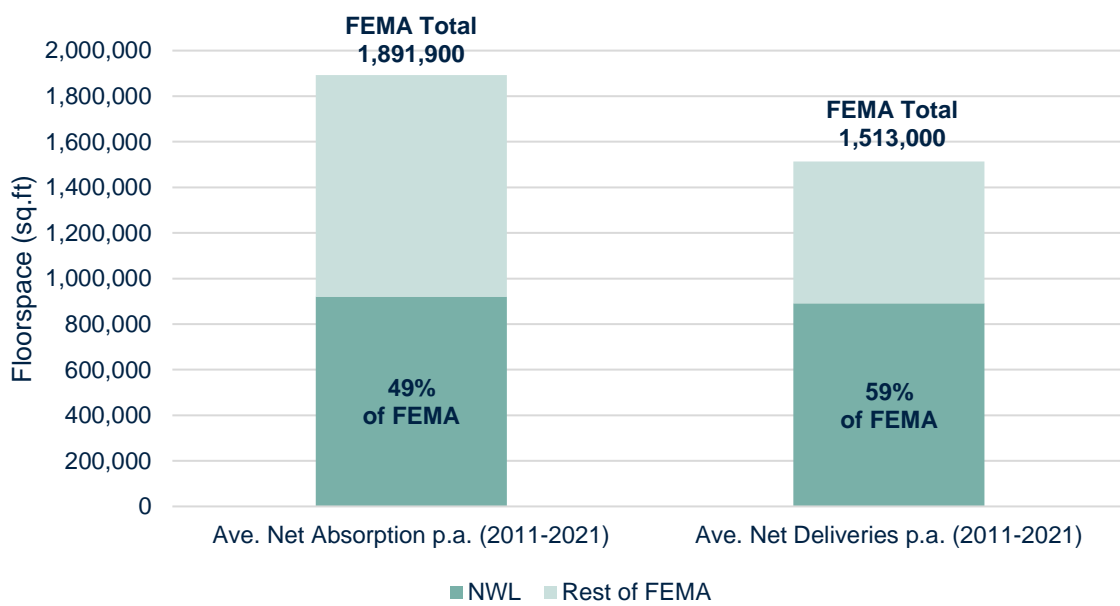
Source: Costar, Savills

⁴³ We have used the 97,000 sqft threshold rather than a more intuitive 100,000 sqft, as the former is equivalent to circa 9,000 sqm, which is the size threshold used in the GL Hearn study for large strategic warehouses which we reviewed in **Section 3**.

Demand vs Supply

4.2.8 Over the last decade net absorption has averaged 1.9 million sq. ft p.a. while net deliveries of stock have averaged 1.5 million sq. ft p.a. since 2011 across the FEMA. Net absorption is a leading measure of demand, comparing occupied space (move-ins) versus vacated space (move-outs). On the other hand net deliveries is a measure of supply and registers the change in inventory. Net deliveries being lower than net absorption within the FEMA indicates that supply has not kept pace with demand over the last decade. The chart in **Figure 4.5** shows that over the last decade NWL has been playing a critical role in the FEMA’s I&L market, accounting for 49% of the FEMA’s average net absorption and 59% of the FEMA’s average net deliveries.

Figure 4.5 FEMA Average Net Absorption and Net Deliveries p.a. (2011 to 2021)



Source: Costar, Savills

4.2.9 In **Figure 4.6** we assessed the share of average net absorption accounted for by each size band. It shows that the largest size band is driving demand for floorspace across the FEMA – accounting for 76% of average net absorption over the last decade. Given that properties in this size band account for 55% of total stock, a demand level at 76% indicates that demand for large properties is growing above historic levels across the FEMA.

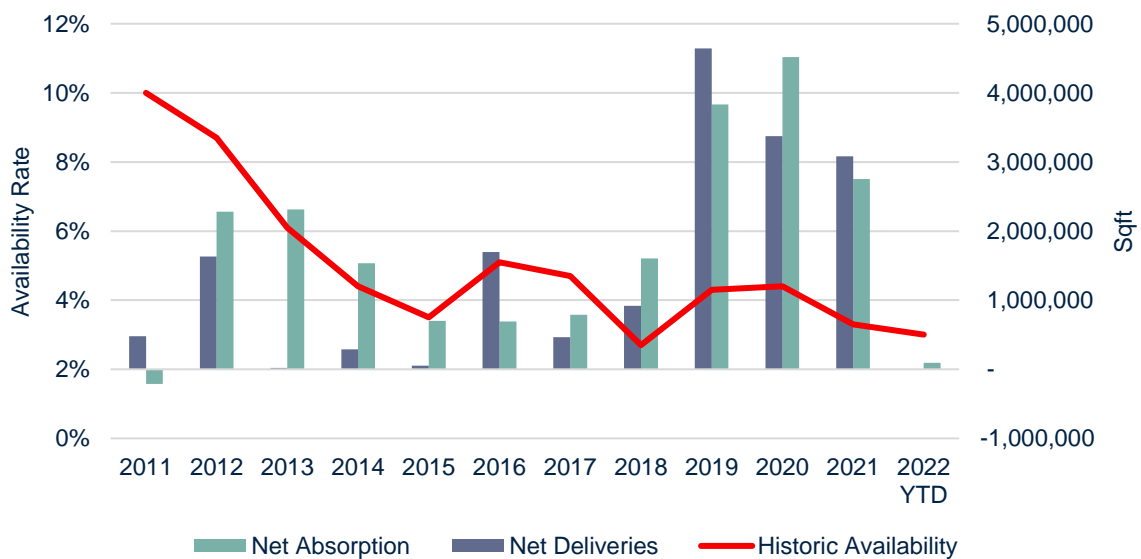
Figure 4.6 FEMA Average Net Absorption by Size Band (2011-2021)



Source: CoStar, Savills

4.2.10 **Figure 4.7** shows net absorption and net deliveries on an annual basis since 2011 across the FEMA. It clearly shows that the lack of new floorspace has progressively reduced the availability rate. Over the last three years net deliveries increased but the new floorspace has been quickly absorbed by the market, as shown by the availability remaining well below the 8% equilibrium level. As outlined in **Section 2**, the I&L sector is the strongest commercial sector in the UK and has been for some time. It generates a diverse range of well-paid occupations and given its continued growth profile, and the troubles being faced by the office and retail sectors, it is likely to drive future jobs growth within the FEMA. However for this job growth to happen, demand within the sector will need to be accommodated via new land being allocated as part of the Local Plan process.

Figure 4.7 FEMA Net Absorption and Net Deliveries p.a. vs Availability Rate since 2011



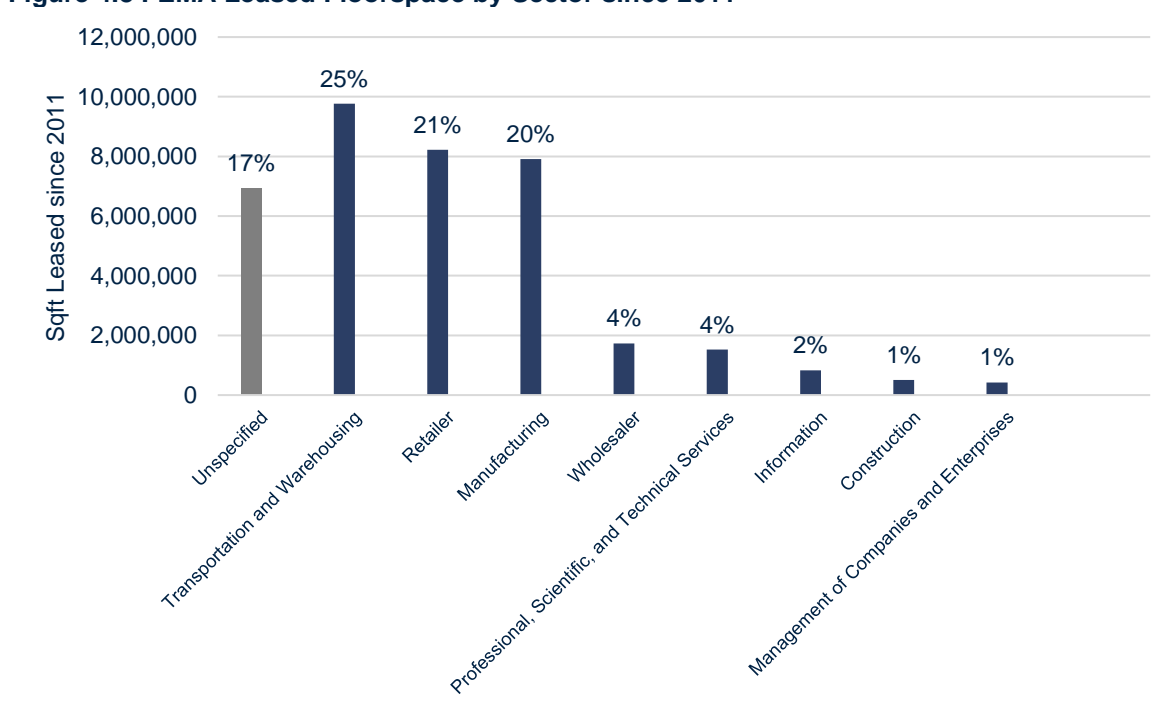
Source: Costar, Savills

Demand by Sector

4.2.11 To better understand the nature of demand across the FEMA over the last decade, we look at lease transactions by sector since 2011 – illustrated in **Figure 4.8**. The chart shows that the Transport & Warehousing sector contributed at least a quarter of floorspace leased (25%), followed by Retail (21%) and Manufacturing (20%).

4.2.12 The sectors which are typically linked to e-commerce are Retail, Transport and Warehousing and Wholesale. In markets that have managed to take advantage of the increase in e-commerce related activities, the combined take-up of these sector tends to be in the region of at least 40%-50%. Across the FEMA these sectors account for 49% of leasing demand, suggesting that e-commerce is a strong driving force for demand across the FEMA.

Figure 4.8 FEMA Leased Floorspace by Sector since 2011



Source: Costar, Savills

Rental Growth

4.2.13 Finally, another key market indicator for understanding the relationship between supply and demand is rental growth. When demand outstrips supply, rental growth is typically higher as occupiers compete for limited available stock. This in turn drives up rents. Conversely, when there is sufficient supply to accommodate demand rental growth is lower, typically tracking inflation more closely.

4.2.14 Rents across the FEMA have grown by 67% between 2011 and 2021, more than twice the rate of inflation over the same period at 25%⁴⁴, and higher than the national rate of 61%. As seen in **Table 4.1** rental growth has been much stronger post 2014, with an average year-on-year (YoY) rate of 6.2% vs only 1.5% between 2011 and 2021 (nationally, average YoY rental growth was 5.8% post 2014). This broadly corresponds to when I&L availability across the FEMA dropped below the 8% equilibrium rate

⁴⁴ According to the Bank of England inflation calculator between 2011 and 2021 (<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>)

indicating a supply constrained market (see **Figure 4.3** above). This further evidences that the FEMA's I&L market has become increasingly supply constrained in recent times, a situation that will only worsen further given the strength of the sector.

Table 4.1 Annual Rental Growth – FEMA

Period	Market Rent	Year-on-Year Growth	Average YoY
2021	£6.76	8%	2014 to 2021 = 6.2%
2020	£6.25	4%	
2019	£6.01	6%	
2018	£5.66	8%	
2017	£5.25	7%	
2016	£4.92	7%	
2015	£4.61	6%	
2014	£4.33	4%	2011 to 2013 = 1.5%
2013	£4.17	2%	
2012	£4.08	1%	
2011	£4.04	1%	

Source: Costar, Savills

5 Savills Future Demand Estimates

5.1 Introduction

- 5.1.1 The purpose of this chapter is to estimate I&L land demand across the FEMA. This is then compared against the estimated demand from the local (Stantec Study) and regional (GL Hearn Study) employment evidence.
- 5.1.2 Based on Savills demand methodology, over a 22 year plan period, we estimate FEMA wide I&L demand to be 2,479 ha of land. Depending on the level of apportionment we consider NWL should look to plan for between **587 ha to 1,240 ha** of I&L land over this period. We appreciate the upper band based on net absorption generates a large number at 1,207 ha. The final land amount NWL should plan for within this range will depend on developable land capacity in NWL and 'Duty to Cooperate' discussions with the other local authorities in the FEMA.
- 5.1.3 Based on the Savills estimates, we believe the GL Hearn and Stantec studies combined have underestimated future I&L demand for NWL of between 302 to 696ha over the 22 year plan period depending on how much strategic B8 demand across the wider FEMA is apportioned to NWL.

5.2 Savills Estimate of Future I&L Demand

- 5.2.1 We present below Savills full methodology for estimating future I&L demand. Our methodology is considered to address the issues we raised against the Stantec and GL Hearn studies in **Section 3**. Our methodology is NPPG-compliant as it builds upon historic take-up (demand), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up. We also factor in future e-commerce growth which is a key growth driver for the sector.
- 5.2.2 Our overarching approach to demand estimation considers the full market for I&L units, estimating demand for all unit sizes and relevant planning uses classes. This is considered a more robust approach as it relies on a larger pool of data and based on the fact that industrial and logistics occupiers desire similar types of premises in terms of location and design. After running our model for the full I&L market, it is then possible to segment that demand for different size categories or for industrial versus logistics uses, based on the analysis of market data such as leasing activity.
- 5.2.3 We also take a sub-regional approach to estimating future I&L demand. NWL like all local areas is part of a wider sub-regional market, or FEMA, and therefore is subject to supply and demand forces which need to be assessed beyond its local authority boundaries. This is true for many commercial sectors, but it is particularly important for I&L occupiers which typically have distribution networks linking their customers and suppliers of between 1 to 4 hours travel time, sometimes longer, depending on their size i.e. up to 4 hours plus is more typical of very large companies with a national reach, while 1 hour drive time is ideal for the majority of companies.

Step 1: Estimating demand over the Local Plan period

- 5.2.4 We assume a 22-year plan period which is consistent with the NWL Reg 18 Options document.

Step 2: Estimation of historic demand

- 5.2.5 This is based on the average annualised net absorption for the FEMA (from **Section 4**) at 1.9 million sqft per annum between 2011 and 2021. Savills considers net-absorption to be the leading measure of

demand for floorspace as it indicates the quantum of net floorspace occupied over a period of time (i.e. move-ins minus move-outs) based on leasing deals.

- 5.2.6 As discussed in **Section 3**, we do not consider take-up / completions (considered in the GL Hearn study, albeit eventually disregarded) as an accurate measure of demand. Completions is a supply measure which primarily depends on new land being allocated as part of the Local Plan process followed by the grant of planning permission before new development is constructed. This is a lengthy process which explains why completions (new supply) typically lags demand (net absorption) as it has been the case in NWL and the wider FEMA. Using net absorption rather than completions results in a higher historic demand profile. For example, as we discussed in **Section 4**, completions in the wider FEMA averaged 1.5 million sq. ft per annum since 2011, which is lower than average net absorption over the same period at 1.9 million sq. ft per annum.

Step 3: Estimation of suppressed demand

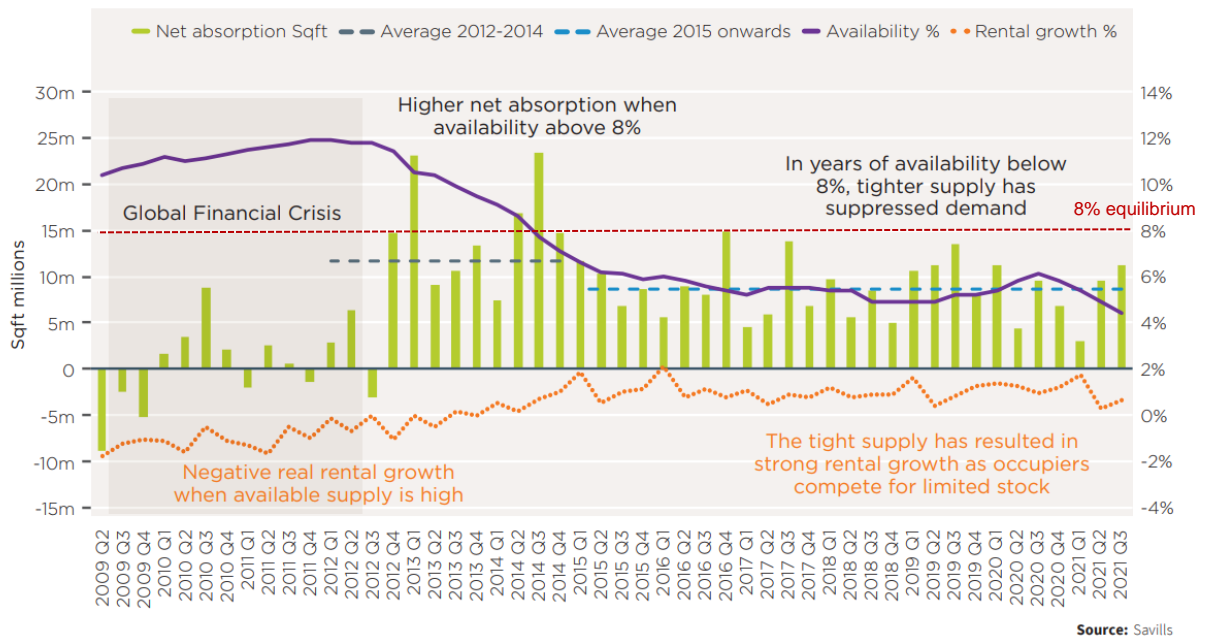
- 5.2.7 The rationale for accounting for suppressed demand is that when sufficient supply isn't available, demand cannot be accommodated. This is the top-up figure to be added to the historic demand trend to account for years when the market was supply constrained.
- 5.2.8 Supply and demand are inextricably linked across all commercial property sectors. Put simply if demand exceeds supply rents typically rise more quickly as occupiers vie for limited available stock. This can have a number of wider implications. For example, new companies aren't able to move into a market area, nor are existing companies able to find new space if their floorspace needs change, for instance due to expansion. It may also happen that some existing local companies get priced out of the market as they can't afford the increasing rents. As a result, companies have to locate to areas that are not ideal in terms of serving their customer base, thereby increasing travel times and the costs of doing business, not to mention environmental impacts. The lack of supply may also mean companies are forced to occupy space that is not entirely suitable for their operational needs impacting productivity.
- 5.2.9 We describe a market where supply doesn't keep up with demand as being 'supply-constrained'. Limited supply in a strongly performing market, such as NWL and the wider-FEMA's I&L sector, means that demand cannot be fully satisfied, typically resulting in strong rental growth. As demonstrated in **Section 4**, the wider FEMA's I&L rents have increased by 67% since 2011, indicating new supply has struggled historically to keep pace with the strong demand. This is more than double the rate of inflation over the same period⁴⁵.
- 5.2.10 At the national level the market equilibrium level, where supply and demand are broadly in balance and rents are more stable, is around 8% availability. This benchmark rate is found in a number of prominent publications such as the GLA's Land for Industry and Transport Supplementary Planning Guidance (SPG).
- 5.2.11 If one studies real rental growth (i.e. rental growth adjusted for inflation) over the past decade at the national level and observes its relationship to availability, it becomes clear that I&L rents begin to grow strongly when availability is below 8%. This relationship is clearly illustrated in **Figure 5.1** below. When availability was above 8% between 2009 and 2014 real rental growth (net of inflation) was either negative or only slightly positive. This enabled demand to be accommodated as sufficient supply was

⁴⁵ According to the Bank of England inflation calculator between 2011 and 2021 (<https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>)

available.

5.2.12 However since 2014, as availability dipped below 8% and has stayed below this level ever since at the national level, real rents have grown strongly year-on-year. During this period net absorption has been lower than the 2009-2014 period despite the I&L sector going from strength to strength. This clearly shows the suppressing nature tight availability (below 8%) has had on I&L demand nationally.

Figure 5.1 Historic Net Absorption (Sq.ft.), Availability (%) and Real Rental Growth (%) in England



Source: CoStar, OBR, Savills

5.2.13 The 8% benchmark is also applicable to NWL’s wider FEMA, which is established by looking at real rental changes at regional level. In **Appendix A** we report the quarterly rental change for the East Midlands and the availability rate in each quarter over the last decade. The data presented shows that the transition between negative rental growth and sustained positive rental growth is around 8% availability. When above and below the 8% level rents growth is typically either strongly negative or positive.

5.2.14 The individual steps for calculating the FEMA’s suppressed demand are as follows:

- **Step 3a:** For years where availability has been below the 8% equilibrium threshold, we calculate the quantum of floorspace necessary to achieve 8% availability (Column “Av. To EQ (sqft)” in **Table 5.1**, calculation F);
- **Step 3b:** We then take the average of the ratio between net absorption and available floorspace for every year over the past decade (Calculation E averages 49% based on Column “Net Absorption / Availability”);
- **Step 3c:** We apply this average to the estimated floorspace required to reach 8% availability in each year where the market is below the 8% availability threshold to estimate each period’s suppressed demand (Calculation F*E in Column “Suppressed Net Absorption (sqft)”);

- **Step 3d:** We calculate average suppressed net absorption over the past decade. This give the annualised suppressed demand figure to be used as a top-up to the historic trend. The estimated average suppressed demand figure for the FEMA is 1.3 million sqft per annum since 2011.

Table 5.1 shows the relevant calculations.

Table 5.1 Suppressed Demand Calculations within the FEMA

	A	B	C=(A*B)	D	D/C	F=(8%-B)*A	F*E
Years	Inventory (sqft)	Availability (%)	Availability (sqft)	Net Absorption (sqft)	Net Absorption / Availability	Av. To EQ (sqft)	Suppressed Net Absorption (sqft)
2021	96,881,425	3.3%	3,197,087	2,751,447	86.1%	4,553,427	2,239,737
2020	93,797,587	4.4%	4,127,094	4,519,058	109.5%	3,376,713	1,660,935
2019	90,423,901	4.3%	3,888,228	3,833,563	98.6%	3,345,684	1,645,673
2018	85,782,604	2.7%	2,316,130	1,605,057	69.3%	4,546,478	2,236,319
2017	84,864,640	4.7%	3,988,638	788,696	19.8%	2,800,533	1,377,524
2016	84,400,990	5.1%	4,304,450	691,654	16.1%	2,447,629	1,203,938
2015	82,706,378	3.5%	2,894,723	701,944	24.2%	3,721,787	1,830,670
2014	82,654,564	4.4%	3,636,801	1,536,863	42.3%	2,975,564	1,463,619
2013	82,368,129	6.1%	5,024,456	2,313,631	46.0%	1,564,994	769,788
2012	82,348,268	8.7%	7,164,299	2,281,447	31.8%	- 576,438	-
2011	80,716,564	10.0%	8,071,656	-211,964	-2.6%	- 1,614,331	-

E=Average

Suppressed Demand=Average

Source: Savills, CoStar

- **Step 3e:** The final step requires adding the combined annualised historic (1.9 million sqft per annum) and suppressed demand (1.3 million sqft per annum) figures totalling 3.2 million sqft per annum, and multiplying this by the number of years in the plan period (3.2 million sqft x 22 years). This gives a total floorspace demand of **70.5 million sqft** over a 22-year period.

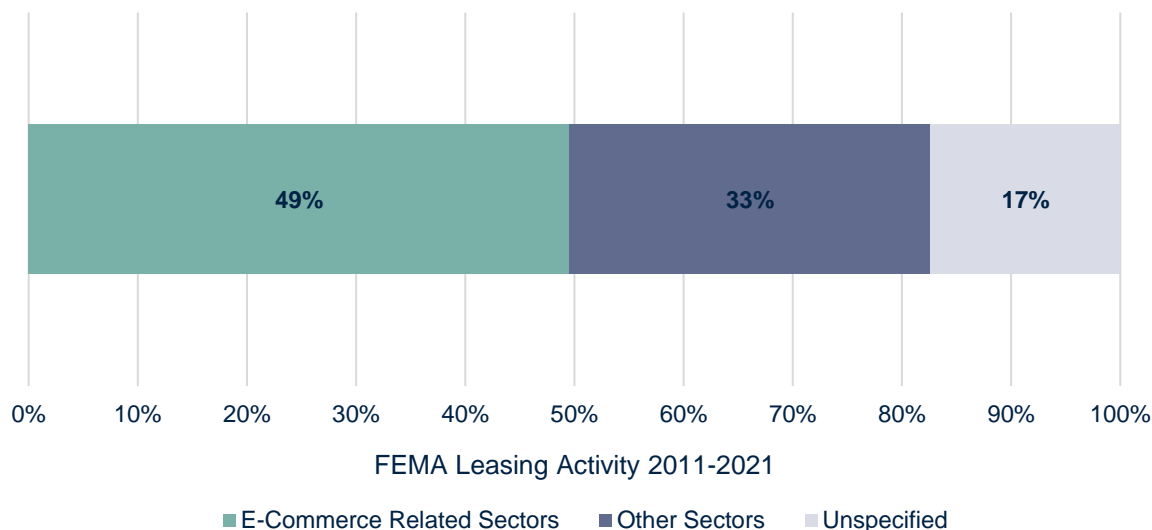
Step 4: Adjusting for increases in online retail

5.2.15 As discussed in **Section 2**, there are a number of factors driving future growth in demand for I&L uses which are not captured by historic trend based projections. Attempting to factor them all in is a challenging exercise prone to errors and overestimation due to the uncertainty around major events such as Brexit and the risk of double counting the impacts of different growth factors. The strongest growth drivers are population growth and the move to online shopping, which the Covid-19 pandemic has accelerated. We consider demand arising from population growth to be largely captured by increases in online sales which are a function of household spending and household growth. For this reason, in our work we focus on the move to online shopping.

5.2.16 In order to estimate future increases in I&L demand linked to e-commerce growth, we first need to establish the share of demand that has historically been linked to e-commerce and then determine how much higher this is likely going to be in the future. As discussed in **Section 4** above, the sectors which are typically linked to e-commerce are Retail, Transport and Warehousing and Wholesale. In markets that have managed to take advantage of the increase in e-commerce related activities, the combined take-up of these sector tends to be in the region of at least 40%-50%. Across the FEMA these sectors account for 49% of leasing demand, as shown in **Figure 5.2**. If we assume that this share remains the

same to the end of the plan period, 49% of projected future demand corresponds to 34.9 million sqft (49% * 70.5 million sqft) over the plan period.

Figure 5.2 FEMA Leasing Activity by Sector, 2011-2021



Source: Savills (2022); CoStar (2022)

5.2.17 We have considered Forrester’s⁴⁶ online retail forecasts for the UK to 2025 and compared the annual increase in online spending over this period to that seen over the last 10 years. As shown in **Table 5.2**, between 2011 and 2019 online retail sales increased at an average rate of £5.95 billion per annum. 2020 marked a departure from the historic trend, bringing total online sales above £100 billion, up from £79 billion in 2019 (a £26 billion annual increase). If we accept that 2020 and 2021 were exceptional years due to the Covid-19 pandemic and exclude them from our calculations, and focus on the period between 2022 and 2025, online sales growth is predicted to average £9.86 billion per annum. This suggests a 66% uplift from the 2011-2019 trend.

Table 5.2 UK Online Sales Forecasts (£ million)

Year	Online Sales (£m)	Annual Increase (£m)	
2011	£29,946	+£4,337	2011-2019 Average Annual Increase +£5,950 million
2012	£34,417	+£4,471	
2013	£38,908	+£4,491	
2014	£43,905	+£4,997	
2015	£49,212	+£5,307	
2016	£56,549	+£7,338	
2017	£64,505	+£7,955	
2018	£72,014	+£7,509	
2019	£79,157	+£7,143	
2020	£104,827	+£25,670	Excluded from calculations as these were atypical years due to the Covid-19 pandemic
2021	£122,831	+£18,003	
2022	£134,005	+£11,174	2022-2025 Average Annual Increase +£9,860 million
2023	£143,267	+£9,262	

⁴⁶ A prominent retail forecasting house

2024	£152,722	+£9,455	<i>(+66% uplifted compared to 2011-2019)</i>
2025	£162,271	+£9,549	

Source: Forrester, Savills

- 5.2.18 Applying this 66% uplift to the historic and suppressed demand from e-commerce sectors yields a future demand of 57.8 million sqft over the plan period. This equates to an uplift of 22.9 million sqft (**Table 5.3**).

Table 5.3 Adjusting for Current and Future Increases in Online Retail within the FEMA

Demand	Annual (sq. ft)	Over Plan Period (sq. ft)
E-commerce related (49% of historic + suppressed)	1,585,700	34,885,650
E-commerce related after 66% uplift	2,627,900	57,812,900
E-commerce demand uplift	+ 1,042,100	+ 22,927,200

Source: Savills

Step 5: Savills Estimate of Future I&L Demand across the FEMA

- 5.2.19 Adding the e-commerce uplift to the combined historic and suppressed demand estimates yields a total demand of **93.4 million sqft** over the plan period, as summarised in **Table 5.4** .

Table 5.4 Summary of Future Demand (over Plan Period) within the FEMA

Adjustment Type	Adjustment (sqft) (over plan period)	Total (over plan period)
Historic Demand (Net Absorption) Over 22 years		41,622,800
Suppressed Demand Over 22 years	+ 28,856,400	70,479,200
Ecommerce Uplift	+ 22,927,200	93,406,400

Source: CoStar, Savills

- 5.2.20 The above floorspace figures are translated into land requirements using a plot ratio of 35%. The Stantec study used a 40% plot ratio while the GL Hearn study adopted a 35% for road-based sites and a 25% ratio for rail-based sites. Based on our professional experience and examples of recent developments from across the country, we consider a 40% plot ratio to be too high and not reflective of modern I&L occupier requirements which typically command a ratio in the region of 30-40%. Therefore we consider a 35% ratio as appropriate. Savills can provide evidence of lower plot ratios for recent developments across the country if the Council requires.

- 5.2.21 Applying a 35% plot ratio to the estimated floorspace demand of 93.4 million sqft translates into a future land requirement of **2,479 ha across the FEMA**.

5.3 Comparing Savills Future Demand Estimate with the GL Hearn & Stantec Studies

Future strategic B8 demand

- 5.3.1 We first compare our demand estimate to the GL Hearn study, which we consider to have a number of methodological issues as discussed in **Section 3**.
- 5.3.2 The GL Hearn study covers the market for large warehousing (9,000 sqm and above). It excludes B2 uses above 9,000 sqm and smaller I&L premises (which are covered in the Stantec study). We consider

the exclusion of larger B2 premises to be a significant omission given that, based on Savills analysis, they still represent circa 5% take-up for large sites over the last five years across the FEMA.

5.3.3 As discussed at the beginning of this chapter, our approach is to consider overall I&L demand across all segments of the market. This is because using a larger pool of data allows for a more accurate assessment of market trends, plus industrial and logistics occupiers, while having very different operations, have similar preferences in terms of location and the sorts of premises they desire. For these reasons, investigating overall market demand in the first instance and then interrogating the results by market segment or unit size is considered a preferable approach.

5.3.4 In order to compare ‘like for like’ with the GL Hearn study we need to determine what proportion of our overall demand figure relates to large B8 premises over 9,000 sqm. We follow three steps to do this –

- **Step 1, determine proportion of overall FEMA demand to large units over 9,000 sqm:** Over the last decade 1.4 million sqft per annum, or 76% (1.4m sqft / 1.9m sqft * 100)⁴⁷ of historic demand (net absorption) in the wider FEMA was for units above 9,000 sqm. This equates to **70.7 million sqft** or **1,877 ha of land for the 9,000 sqm plus category**.
- **Step 2, remove demand from B2 occupiers from Step 1 result:** According to Savills take up data, B2 occupiers have leased circa 5% of large unit space over 9,000 sqm across the FEMA since 2017. Removing this demand from the Step 1 result equates to **1,783 ha**.
- **Step 3, match the future time periods:** The GL Hearn study provides future demand estimates for a 21-year period while the NWL Reg 18 Options document covers a 22-year plan period. To ensure consistency we have annualised the GL Hearn estimates and then multiplied by 22 years to marry up with the Options document. From our review of the GL Hearn study in **Section 3**, we reported that their estimated demand from their preferred model amounted to 2,571,000 sqm or 861 ha over a 21-year period. These figures correspond respectively to 122,429 sqm p.a. (1.3 million sqft p.a.) and 41 ha p.a. Multiplied over a 22-year period these equate to **2.7 million sqm (29 million sqft) and 902 ha of land** at a plot ratio of 25% for rail-based demand and 35% for road-based. **Table 5.5** shows how this compares to the Savills estimate from **Step 2**.

Table 5.5 Comparing Demand Estimates over 22-year plan period

	Sqft	Ha
Savills (B8 9k sqm+)	67,161,100	1,783
GL Hearn (B8 9k sqm+)	28,992,100	902

Source: CoStar, GL Hearn, Savills

5.3.5 In summary, a direct comparison using the Savills methodology results in future demand estimates for strategic B8 land across the FEMA being almost double that estimated by GL Hearn.

Future I&L demand within NWL

5.3.6 As we discussed in **Section 3**, the numerous regional and local employment studies do not operate as a consolidated set and therefore it is difficult to understand what is being recommended for each local authority in the FEMA including NWL.

5.3.7 Within this section we seek to apportion the Savills FEMA wide demand estimate to NWL. This can be

⁴⁷ Differences due to rounding

done in a number of different ways as follows:

- Based on NWL’s current proportion of I&L inventory across the FEMA;
- Based on NWL’s historic proportion of average demand (net absorption) between 2011 and 2021; or
- Based on NWL’s historic proportion of average net deliveries of new I&L floorspace between 2011 and 2021.

5.3.8 The results of this comparison are detailed in **Table 5.6** below. Inventory gives the lowest metric at a 24% share while demand (net absorption) and new supply (net deliveries) are higher at 49% and 59% respectively. Net absorption is considered the most representative of current day trends around NWL being a core I&L market. This metric also broadly aligns with NWL Reg 18 Options document to take 50% of the FEMA’s road-served demand over the plan period (Para 6.31, p.44).

Table 5.6 NWL I&L market share of FEMA

	NWL % of FEMA	NWL Floorspace Demand (sqft)	NWL Land Requirements
Inventory (2022)	24%	22,100,600	587
Avg. Net Absorption (2011-2021)	49%	45,459,300	1,207
Avg. Net Deliveries (2011-2021)	59%	55,028,400	1,461

Source: CoStar, Savills

5.3.9 Based on the above it is useful to consider a range between 24% based on inventory and 49% based on net absorption. This translates to a floorspace requirement for NWL of between 22.1 million sqft (1 million sqft p.a.) and 45.5 million sqft (2.1 million sqft p.a.) and a land requirement of between 587 ha and 1,207 ha over a 22-year plan period as summarised below.

5.3.10 However, we appreciate the upper band based on net absorption generates a large number at 1,207 ha. The final land amount NWL should plan for within this range will depend on developable land capacity in NWL and ‘Duty to Cooperate’ discussions with the other local authorities in the FEMA.

Table 5.7 Apportioning Savills Demand to NWL over 22-year plan period

	NWL %	Sqft	HA
Lower Bound	24%	22,100,600	587
Upper Bound	49%	45,459,300	1,207

Source: CoStar, Savills

Savills Estimate vs Stantec & GL Hearn Combined

5.3.11 Finally we consider it useful to compare the Savills estimate for NWL to what the Stantec and GL Hearn studies combined could potentially estimate for NWL under the same apportionment assumptions we have used above (ie 24% and 49% share for NWL).

5.3.12 As discussed in **Section 3**, a major failing of the various employment evidence studies is that they use different timeframes, different estimation methodologies, focus on different segments of the market and ultimately don’t provide a future demand estimate for the FEMA’s I&L market overall or for each respective local authority. We also note yet another study for the FEMA is due to be published in the Spring which many address some of these issues. We hope this report can inform this study and aid meaningful discussions with the Council and their economic advisor.

5.3.13 **Table 5.8** below compares Savills I&L demand estimate with the Stantec (taken forward in the Options document) and GL Hearn studies combined. The Options document, which covered non-strategic land, estimated a total land demand of 71.6 ha over the plan period. We know that the GL Hearn study, which covered strategic B8, only provides a FEMA wide estimate not specific to individual local authorities. To address this we apply the 24% and 49% apportionment assumption we used for the Savills estimates above. The results of this comparison indicate NWL's current evidence base underestimates demand by between 302 to 696ha over the 22 year plan period depending on how much strategic B8 demand across the wider FEMA is apportioned to NWL. Obviously the final strategic B8 apportionment to NWL will be the result of 'Duty to Cooperate' discussions between the FEMA authorities.

Table 5.8 Evidence Base Difference from Savills Estimates (ha)

Assumed NWL %	Strategic B8 (GL Hearn)	Non-strategic (Options)	Total Evidence Base	Savills Estimate	Difference from Savills
24%	213	71.6	285	587	- 302
49%	439	71.6	511	1,207	- 696

Source: CoStar, GL Hearn, Savills

6 Summary & Recommendations

- 6.1.1 The I&L sector is booming nationally. Even before the pandemic the I&L market had been growing strongly with demand outstripping supply. The Covid Pandemic has merely accelerated a number of growth drivers that were already in place such as online shopping and the desire for quick deliveries. Brexit too is increasing I&L demand as companies consider bringing part of their operations back to the UK to guard against future supply chain shocks, as well as increasing their inventory levels. Significant growth is also forecast across all freight modes (which could be increased further by the Government's Freeport programme, which includes East Midlands Freeport).
- 6.1.2 The latest figures from Savills Big Shed Briefing indicate demand (gross) is currently **86% above the long term average**⁴⁸, while vacancy is the lowest on record at only 2.91%. Similar to the national picture, demand in East Midlands was **113% above the long term average** in 2021, the highest on record⁴⁹, with vacancy at an historical low of 1.69% (the lowest rate nationally). Take-up in the East Midlands is driven by NWL and its wider FEMA clearly cementing it as one the most important I&L markets in the country.
- 6.1.3 Despite this strength of demand, the local and regional employment studies that inform the NWL emerging local plan have underestimated future floorspace and land needs. While these studies acknowledge demand has been outstripping supply, their future estimation methods fail to take into account demand that has been lost due to the lack of available supply. The GL Hearn study applies an interesting methodology looking at freight flows, however this approach estimates a lower future floorspace need than historic completion trends. This appears completely at odds with the above market realities of the highest demand on record.
- 6.1.4 Given the struggles being faced by the office and retail sectors, I&L is likely to be the major generator of jobs for many local economies. As we have evidenced average pay levels within the sector are nearly £5k per annum higher than the UK average. The diversity of occupations has also been increasing which will enable the sector to play a key role in re-employing people that have lost jobs in other sectors as a result of the Covid pandemic. This is highly relevant for NWL and its wider FEMA where the claimant count⁵⁰ is around 60% higher than the level recorded before the pandemic as of January 2022. Should not enough I&L land be allocated into the future, and subsequently the historic supply constraints continue, I&L demand will remain 'suppressed' as will the jobs and wider economic contribution the sector can make to local and regional economies.
- 6.1.5 As a collective, the current local and regional evidence base studies that support the emerging local plan are disjointed in that they use different estimation methodologies, cover different segments of the market and fail to recommend future I&L demand at the local authority level across both strategic and non-strategic-scale units. In addition the various studies present a number of methodological issues, which in our view, has led them to underestimate future I&L demand. For instance:
- The HEDNA prepared by GL Hearn in 2017 for the FEMA uses past completions as its preferred employment needs methodology for I&L premises below 9,000 sqm. Completions are a supply measure, not a demand measure, dependent on local plans to allocate new land for I&L

⁴⁸ Savills Research (2022) Big Shed Briefing (January 2022) Available at: https://www.savills.co.uk/research_articles/229130/323880-0

⁴⁹ Savills Research (2022) Big Shed Briefing – The Logistics Market in the East Midlands. Available at: https://www.savills.co.uk/research_articles/229130/323892-0

⁵⁰ The number of people claiming benefit principally for the reason of being unemployed

development. As we have evidenced supply (net deliveries) has lagged demand (net absorption) by a considerable margin throughout the FEMA indicating this methodology as flawed.

- The Stantec study for non-strategic industrial land within NWL uses GVA outputs to estimate future demand. However the study notes the limitation of this approach given that it does not take account of historic supply constraints. As we have evidenced, the wider FEMA and NWL especially, have been supply constrained since 2013 and 2014 respectively.
- The GL Hearn study focuses on larger scale B8 demand at the FEMA level and in doing so, doesn't account for strategic B2 demand. While B8 occupiers are undoubtedly driving demand for larger sheds, B2 occupiers still represent around 5% based on take-up⁵¹. Given they desire the same sorts of locations and shed specifications as logistics occupiers, to ignore their future needs is a key omission. Another methodological issue is the estimates for rail-served demand are considered too aspirational and unrealistic, while demand for road-served sites is underestimated and air freight and LGV traffic appear to be ignored. Combined, these methodological issues have led to the Study's preferred estimation method showing less floorspace demand compared to the past completions trends. As we have discussed, the past completions trends is not a true measure of demand given this a supply measure and supply has lagged demand historically.

6.1.6 The Savills approach to estimate future demand is aimed at addressing the above methodological issues by focusing directly on market trends rather than secondary factors. Our methodology is NPPG-compliant as it builds upon historic demand (net absorption), adjusting past trends for historic supply shortages and the subsequent loss in demand. We refer to this as 'suppressed demand' which is added to the historic demand trend as a top-up. We also factor in future e-commerce growth which is a key growth driver for the sector.

6.1.7 Based on Savills demand methodology, over a 22 year plan period, we estimate FEMA wide I&L demand to be 2,479 ha of land. Savills' FEMA-wide demand estimate can be apportioned to NWL in a number of different ways:

- Based on NWL's current proportion of I&L inventory across the FEMA;
- Based on NWL's historic proportion of average demand (net absorption) between 2011 and 2021; or
- Based on NWL's historic proportion of average net deliveries of new I&L floorspace between 2011 and 2021

6.1.8 Inventory gives the lowest metric at a 24% share while demand (net absorption) and new supply (net deliveries) are higher at 49% and 59% respectively. Net absorption is considered the most representative of current day trends around NWL being a core I&L market. This metric also broadly aligns with NWL's Options document to take 50% of the FEMA's road-served demand over the plan period (Para 6.31, p.44).

6.1.9 It is useful to consider a range between 24% based on inventory and 49% based on net absorption. Therefore, NWL should look to plan for between **587 ha to 1,207 ha** of I&L land over this period. We appreciate the upper band based net absorption generates a large number at 1,207 ha. The final land amount NWL should plan for within this range will depend on developable land capacity in NWL and

⁵¹ 2017-2021

'Duty to Cooperate' discussions with the other local authorities in the FEMA.

6.1.10 Based on the Savills estimates, we believe the GL Hearn and Stantec studies combined have underestimated future I&L demand for NWL of between 302 to 696ha over the 22 year plan period depending on how much strategic B8 demand across the wider FEMA is apportioned to NWL.

Appendix A – East Midlands Market Equilibrium

Year & Quarter	Real Rent £/sq.ft	Rental Growth Q-o-Q	Availability Rate
2021 Q4	£6.47	0.9%	3.1%
2021 Q3	£6.41	0.8%	3.4%
2021 Q2	£6.36	0.5%	4.2%
2021 Q1	£6.33	1.8%	4.7%
2020 Q4	£6.22	1.3%	5.2%
2020 Q3	£6.14	0.8%	5.4%
2020 Q2	£6.09	1.2%	5.4%
2020 Q1	£6.02	1.3%	4.9%
2019 Q4	£5.94	1.4%	4.3%
2019 Q3	£5.86	1.0%	3.7%
2019 Q2	£5.80	0.5%	3.5%
2019 Q1	£5.77	1.8%	3.8%
2018 Q4	£5.67	0.9%	3.8%
2018 Q3	£5.62	0.5%	3.8%
2018 Q2	£5.59	1.1%	4.3%
2018 Q1	£5.53	1.5%	4.4%
2017 Q4	£5.45	1.1%	4.7%
2017 Q3	£5.39	0.7%	4.4%
2017 Q2	£5.35	0.4%	4.5%
2017 Q1	£5.33	1.1%	3.9%
2016 Q4	£5.27	0.6%	4.2%
2016 Q3	£5.24	0.6%	5.0%
2016 Q2	£5.21	0.8%	4.9%
2016 Q1	£5.17	1.6%	4.4%
2015 Q4	£5.09	1.2%	4.3%
2015 Q3	£5.03	0.8%	4.4%
2015 Q2	£4.99	0.2%	4.4%
2015 Q1	£4.98	2.0%	4.9%
2014 Q4	£4.88	0.6%	5.0%
2014 Q3	£4.85	0.4%	5.7%
2014 Q2	£4.83	0.2%	7.1%
2014 Q1	£4.82	0.6%	7.8%
2013 Q4	£4.79	0.0%	8.0%
2013 Q3	£4.79	0.4%	8.5%
2013 Q2	£4.77	-1.0%	9.0%
2013 Q1	£4.82	0.2%	9.3%
2012 Q4	£4.81	-1.2%	9.9%
2012 Q3	£4.87	-0.2%	10.4%
2012 Q2	£4.88	-0.6%	10.8%
2012 Q1	£4.91	-0.2%	10.9%
2011 Q4	£4.92	-1.4%	10.6%
2011 Q3	£4.99	-0.6%	10.1%
2011 Q2	£5.02	-1.4%	9.9%
2011 Q1	£5.09	-1.4%	9.9%

Source: Costar, Savills



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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Ben
Last Name		Williams
[Job Title]		Senior Planner
[Organisation]	GLP (formerly Gazeley UK Ltd)	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 GLP (formerly 'Gazeley UK Ltd') 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').

GLP

GLP was formed in 1987. It is a leading developer, investor, owner and manager of prime logistics real estate. The business has capabilities from investment to development, asset management and leasing. The Company owns high quality employment sites across Western Europe and internationally. Its portfolio is characterised by high specification 'big box' logistics buildings with a diverse customer base.

GLP has a proven track record of delivering large scale employment sites. In the UK alone, the company has delivered circa 2 million sqm of logistics floorspace and is currently embarking on the delivery of G-Park Ashby which will involve the redevelopment of a significant brownfield site to the east of Ashby-de-la-Zouch.

G-Park Ashby | Background and Latest Planning Permission

In July 2012, full planning permission was granted for the erection of a distribution building at G Park Ashby (ref. 07/01372/FUL). The building had a gross floorspace of 78,740 sqm. This permission has been lawfully implemented and has been identified as a B8 planning permission in the adopted Local Plan 2011-2031 (November 2017) under Policy Ec1.

In 2017, c.10ha of land to the west was safeguarded for Phase 2b of HS2. GLP therefore decided to progress plans for a revised, HS2-compliant Class B8 scheme which incorporated additional land to the east (c.5ha), extending up to Corkscrew Lane, to allow the building(s) of up to c.70,000sqm to be developed (comparable to the scheme permitted in 2012).

Planning permission for the revised scheme was granted in January 2021 (LPA ref. 19/00652/FULM). GLP is currently discharging the relevant pre-commencement conditions and is expecting to start construction on site imminently.

G-Park Allocated for Employment Development

The Regulation 18 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. 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.

We request that G-Park Ashby should be allocated (or committed) for employment development within the Substantive Review of the Local Plan. The site benefits from hybrid planning permission and should therefore be formally identified in the Local Plan Review as an allocation (or commitment).

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 '**EMP48 – Former UK Coal Lounge Disposal Point**'.

It is noted that the boundaries reflect the 2021 planning permission (ref. 19/00652/FULM). The SHELAA assesses the site positively in terms of its suitability, availability and achievability.

The site is assessed as "developable" rather than "deliverable", with an assumed timeframe of 6-10 years. It appears that it has not been considered "deliverable" (within 5 years) because reserved matters applications have yet to be brought forward, although the council acknowledge that development could come forward sooner.

We highlight that hybrid planning permission has been secured which means the site-wide infrastructure works can, and will, commence imminently to pave the way for the servicing of the development plots; GLP is set to begin construction on the full elements of its 2021 hybrid permission imminently. Applications for the approval of reserved matters will then be able to progress concurrently with the site-wide infrastructure works. Given the strong demand for strategic logistics land in this location, there is a good prospect that occupiers will be identified swiftly as the development plots become visible and reserved matters approval could be secured in either 2022/23 or 2023/24 with the whole of the development likely to have been completed within 5 years. Accordingly, this site should be classed as "deliverable".

Summary

GLP's 'G-Park Ashby' site is suitable, available, and achievable, it will be delivered within 5 years, and it should be included within the Substantive Review of the Local Plan as either an allocated site for employment or a commitment.

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?

GLP's 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 means of dealing with uncertainties around need requirements over 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 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 tests in national planning policy or guidance (unlike housing) to trigger the release of additional 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 the time it arises (which may be very different in 10 years' time). Again, the council acknowledge this 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 sufficient 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.

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, particularly where employment needs are "larger than local" and cover sub-regional, regional, or even national, markets.

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. Indeed, it has been specifically highlighted as an example of best practice in local plan making in the BPF's "Employment Land Manifesto" (July 2021) and in Turley's "Playing to our Industrial Strengths" Report (page 25, May 2021).

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...

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?

GLP's 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. Indeed, it has been specifically highlighted as an example of best practice in local plan making in the BPF's "Employment Land Manifesto" (July 2021) and in Turley's "Playing to our Industrial Strengths" Report (page 25, May 2021).

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

14 March 2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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.

Local Plan Review. Consultation Response

Name Emma Hender.....

Address [REDACTED].....

Dear Sirs,

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

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

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

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

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

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

year, the DHL freight complex [and then extension] a couple of years ago, and MOTO before that - what comes next?

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

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

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

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

local distinctiveness, identity, character, natural and rural heritage. In the case of EMP90, construction would be a monstrous and negligent breach of this objective.

9. 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 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. 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

Emma Hender



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Last Name	Thorley	Evans
[Job Title]	Land and Planning Manager	Director (Planning)
[Organisation]	Jelson Limited	Avison Young
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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...

Q2

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

Q2. Do you agree with the proposed settlement hierarchy?

The Authority's proposed settlement hierarchy is presented in the table on page 11 of the consultation document. It is virtually identical to that in the adopted Local Plan. Jelson broadly supports the principle of the settlement hierarchy and in particular that the Principal Towns, including Coalville and Whitwick will be the preferred locations for growth. Jelson does, however, have significant concerns about the proposed status of Ashby-de-la-Zouch within the hierarchy but these concerns are discussed in the separate representations prepared on behalf of Jelson by Pegasus Planning in relation to its site at A42/ Packington Nook, in Ashby (A18).

Jelson welcomes the approach that the Council has taken to assessing the sustainability of some of the lower order settlements and in particular that the assessment focusses not only on the range of services, facilities and employment opportunities within each settlement but that it also recognises that whilst certain settlements have a fairly limited range of services and facilities themselves, they are nevertheless inherently sustainable because they are extremely well related geographically to the higher order settlements and they are therefore able to benefit from the wider range of services, facilities and employment opportunities available within them. Moreover, Jelson is pleased that the Council has taken account of the fact that local residents are in the vast majority of instances able to use public transport to make these journeys where necessary.

Notwithstanding the above, Jelson does have some concerns about the way in which the sustainability of the settlements identified as Local Service Centres (i.e. Ibstock, Kegworth and Measham), have been assessed in the Settlement Study. For example, it is evident from the Council's Settlement Hierarchy Review that Ibstock performs / scores better than the other Local Service Centre (LSC) settlements and its arguably on a par with Castle Donington (it is only scored worse because of its convenience store provision), which is proposed to be designated as a Key Service Centre (KSC). Moreover, of the three LSCs Ibstock has, by some margin, the best relationship to the Coalville Urban Area and is served by a frequent bus service that offers a direct route to the centre of Coalville in less than 20 minutes. It is also the only LSC that includes a Secondary School and extensive sports centre (Ibstock Leisure Complex). This clearly sets Ibstock apart from the other LSCs of Kegworth and Measham, both of which are served by smaller-scale amenities and facilities and are less well connected to Coalville Urban area and the KSCs of Ashby and Castle Donington. This being the case, Jelson is of the view that the Council should amend the settlement hierarchy to reflect this. In other words, Ibstock should be promoted to a Key Service Centre, alongside Castle Donington and the amount of growth to be allocated to the settlement should be increased accordingly.

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

T Evans

Date

10/03/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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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...

Q4

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

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

The consultation document identifies four housing growth scenarios. These are shown in Table 1 below together with a brief summary of how they each have been identified:

Table 1: Housing Growth Scenarios

Scenario	Dwellings per annum (dpa)	Summary
Low Scenario	368	Minimum local housing need, calculated using the standard method.
Medium Scenario	448	Taken from the Housing and Economic Development Needs Assessment 2017 (HEDNA)
High 1 Scenario	512	Taken from the Leicester and Leicestershire Strategic Growth Plan (2018)
High 2 Scenario	730	Based on the 2018 household projections

It concludes that the Low Scenario and Medium Scenario, would not be appropriate on the basis that neither option provides (i) sufficient flexibility to account for under-delivery; or, (ii) sufficient flexibility to appropriately accommodate unmet need from Leicester City, some of which is likely to be redirected to North West Leicestershire. Jelson agrees that neither of these options should be pursued.

The consultation document indicates that overall, the Council has concluded at this time that, the amount of growth to be accounted for is either:

- **High Scenario 1** – 512 dwellings per annum (a residual requirement of 1,000 dwellings); or,
- **High Scenario 2** – 730 dwellings per annum (a residual requirement of around 5,100 dwellings).

We note that the Consultation Document suggests that High Scenario 1 is a potentially suitable option because it is consistent with the Strategic Growth Plan and might be capable of meeting some of

Leicester's unmet housing needs. However, it goes on to note that this level of growth would be well below both demographic trends and build rates.

Insofar as High Scenario 2 is concerned, the Consultation Paper highlights that this is potentially the best option in that it provides a degree of flexibility to help the District meet the issues surrounding Leicester's unmet needs, whilst also taking into account other market signals.

The Government has introduced the Standard Methodology for calculating local housing need. The National Planning Policy Framework (NPPF) provides that in order to determine the minimum number of homes needed, strategic policies should be informed by a local needs housing assessment, conducted using the standard method referred to in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, it clearly states ***“that any needs that cannot be met within neighbouring areas should be taken into account in establishing the amount of housing to be planned for.”***

In the light of the above, the preferred growth strategy presented in the Consultation Document should be the Authority's assessment of its objectively assessed need. In other words, its local assessed need (calculated using the Standard Methodology), plus any exceptional adjustments (i.e. economic growth) plus an adjustment for resilience and any unmet need from adjacent authorities. Although Jelson welcomes the Council's approach of pursuing options that would see it deliver significantly more housing than its locally assessed need, it is nevertheless concerned that neither growth option is underpinned by a proper and robust assessment of the District's actual housing need. They are simply options that the Council thinks might contain sufficient flexibility to meet the District's housing needs over the plan period, but on the other hand they might not. For example, it is clear from the Consultation Paper that the Authority's preferred development strategy does not confirm what Leicester's unmet need is (other than it might be around 18,000 houses), what proportion of it the Council expects to take and what agreements are in place with other Leicestershire LAs in terms of the proportion of unmet need they are prepared / able to accommodate. In our Client's view, it is inappropriate for the Council to proceed with a preferred growth strategy in advance of this matter being addressed and for the evidence underpinning any 'agreed statement' between the Leicestershire authorities to be published and consulted on. In Jelson's view it is also inappropriate for this matter to be left to be dealt with through the Leicester and Leicestershire Strategic Growth Plan which is a non-statutory planning document.

Moreover, the 'adjustments' that the Council seeks to make to its housing requirement to take account of economic growth and other market trends are not based on up to date, robust evidence. For example, the Council makes an upward adjustment to its High Scenario 2 Growth Strategy because the Leicester and Leicestershire Housing and Economic Needs Assessment (HEDNA) which was published in 2017 and informed the current adopted Local Plan housing requirement included a similar upward adjustment for economic need. This part of the evidence base is now significantly out of date and therefore, the Council needs to commission a fresh, up to date assessment of its housing and economic needs, to inform its future growth strategy.

On the face of it, all of above suggests that the most appropriate growth option would be the High 2 Scenario given it would provide ample flexibility to (i) ensure a continuous five-year supply of land for housing, (ii) accommodate unmet need from the wider Housing Market Area (Leicester's unmet need);

and, (iii) potentially address economic and other market factors. However, this needs to be properly evidenced.

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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Signed Date

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PART B – Your Representation

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Please state which consultation question your response relates...

Q5

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

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

The Council's preferred growth options - High 1 (530 dwellings per annum (dpa)) and High 2 (730 dpa) mean that the Council would need to identify sufficient land to accommodate either 1,000 dwellings or 5,100 dwellings over the plan period. With this in mind, the Council has identified 9 spatial options for how growth may be distributed across the District. When combined with the two potential growth scenarios identified in Section 4 of the Consultation Document, this has resulted in 16 detailed distribution options which describe, theoretically, how growth may be assigned to different settlement categories. These detailed options range from primarily directing growth to the Principal Town and Key Service Centres, to focussing development on lower order settlements within the Settlement Hierarchy. There is also an option which proposes to provide the entirety of the District's housing need for the Plan period in a new settlement, close to East Midlands Airport.

The Council's assessment of the various options has led to it concluding that it is currently minded to take forward Option 3a (which would see 500 dwellings delivered in the Principal Town, 300 dwellings in the Key Service Centres; and, 200 dwellings in the Local Service Centres) to satisfy its High 1 growth scenario; and, Option 7b (which would require 1,785 dwellings to be delivered in the PTs; 1,785 dwellings in a new settlement; 765 dwellings in the KSCs; , 510 dwellings in the LCSs; and 255 dwellings in the Sustainable Villages). Jelson broadly agrees in principle with the distribution of housing proposed under each option given each would ensure that development would be distributed throughout the settlement hierarchy; would allow the majority of housing growth to be directed to the most sustainable and accessible settlements in the District; will support the vitality and viability of services in the lower order settlements; and, allow for a good mix of sites in a variety of locations which will help deliver the wide choice of housing demanded by the NPPF.

Insofar as the High 2 Option is concerned, Jelson note that this, save for the allocation of a new settlement, mirrors the existing Spatial Strategy expressed in the adopted Core Strategy. Jelson would again support

this approach given it has led to the Council being able to demonstrate a strong track record of housing delivery. That said, as highlighted in our response to Question 2 and in the representations of Pegasus in respect of Jelson site on the A42, in Ashby, it is considered that the role of Ashby and Ibstock within the hierarchy needs to be reviewed. This is to ensure that the relative sustainability of settlements across and within each tier of the hierarchy is properly reflected in the proportions of growth allocated to each. Ashby is more sustainable than Castle Donnington and Ibstock is more sustainable than Kegworth and Measham. Growth allocations must therefore reflect this.

Jelson also has concerns about the Council's reliance upon a new settlement to deliver a significant proportion of its housing requirement. As the Consultation Document highlights, Nathaniel Lichfield and Partners (Lichfields) published its findings on how quickly large-scale housing sites deliver in 2020 but, in addition, there are a number of other studies that have been produced which assess the delivery of large-scale housing sites such as new settlements, sustainable urban extensions and sustainable development areas.

For example, Savills published a report assessing the delivery rates of urban extensions in October 2014. The report consider how long it takes for a sustainable urban extension (SUE) to progress through the planning system and rates of delivery once construction has begun. It concludes that, on average, an SUE starts construction on the first phase of housing more than four years after the submission of an outline application. In terms of delivery rates, Savills' analysis suggests that sites are anticipated to deliver 60 units in the first year, 100 units per annum in the second year and then at a consistent level of around 120 units thereafter. The build out rate of each site will of course depend on local circumstances. For instance, there are examples in the south of England where delivery rates have exceeded 120 dwelling per annum.

The original (2016) Lichfields report on large site housing delivery, concluded that the average time it takes for large sites (over 2,000 dwellings) with outline planning permission to deliver housing is between 5 and 8.4 years. The current Lichfields Report does not provide data on the average lead in times for large sites (i.e. from first contemplation, to a local planning allocation, through to submission of a planning application) but the 2016 version of the report suggested that this was on average 3.9 years. This being the case, it could potentially take a new settlement in the District between **8.9 years and 12.3 years** to deliver any housing. In regard to sites of 2,000 plus dwellings (arguably the new settlement will fall into this category), the report concluded that average delivery rates barely exceed 160 dpa. Moreover, and more importantly, the Lichfield study identified that the lead-in time (planning delivery periods) for large sites jumped post-recession. It also acknowledges that the market area, number of outlets and tenure all impact significantly on delivery rates.

The Government produced an independent review of build out rates in June 2018. This was prepared by Sir Oliver Letwin MP. He found that the median build out time period for large sites was 15 years, with a median of 6.5% of the site built out each year.

All of the above studies are noteworthy. However, they are not without their shortcomings. Principally, the averages are taken from sites around the country where different economic circumstances can influence results. For instance, SUEs in the south east of England are more likely to have higher build out rates due to the local housing market than a site in the north-east for example.

With the above in mind, Jelson has commissioned Avison Young to undertake an assessment of the lead in times on major development sites. This study has focussed on large sites within Leicestershire. We have recently completed our analysis of all major housing developments, promoted through the local plan process in Leicestershire since the mid-1990's (that is all 500+ unit schemes). The results of this study are perhaps more pertinent to the proposed new settlement in North West Leicestershire District, than the study that the local authority refers to in the consultation document given it looks solely at the delivery of large sites in Leicestershire (the local housing market).

The Avison Young study examined a total of 19 developments. The data indicates that it takes on average:

- 71 months to get from first contemplation to the submission of an application for planning permission;
- 21 months, from validation of an application for planning permission to secure a resolution to grant planning permission;
- 19 months to negotiate and complete a Section 106 agreement;
- 31 months to get from the submission of the first reserved matters to or from the submission of the first application to discharge conditions to having in place all the planning approvals the developer needs to make a start on site (this does not include 'technical approvals' required from say the highways and drainage authorities); and,
- 22 months to get from making a start on site to the first completion (based on actual 'opening up' data or predications given by housebuilders).

The Avison Young study concludes that on average it takes large sites in Leicestershire on average **13.6 years** to start delivering housing.

On this basis it is unrealistic for the Authority to pursue a housing delivery strategy that relies on a large proportion of its housing to come from a single large site. Instead, the strategy should, in Jelson's view, focus on a greater proportion of the residual housing requirement being distributed to the Principal Town, Key Service Centres and Local Service Centres. The housing distribution strategy that the Council chooses

to take forward should also ensure that it has a sufficient supply of deliverable and developable sites to enable it to achieve the High Growth (option 2) scenario.

In this regard, Jelson has a number of sites within the Principal Town and a Local Service Centre that it believes are capable of being allocated in the emerging plan. The Authority will be aware of its site at Whitwick has previously been put forward for consideration in the Council's SHLAA and has also been the subject of a planning application. However, Jelson has only very recently acquired the sites at Kirton Road in Coalville and land south of Water Meadow Way in Ibstock and are not aware that they have previously been put forward for consideration through the SHLAA process.

Land off Torrington Avenue, Whitwick

Jelson is promoting approximately 5.5 ha of agricultural pasture land, which is located to the west of Torrington Avenue in Whitwick. It is bound to the north and west by existing agricultural fields, to the south by Coalville Rugby Football Club (although this is screened from the site due to the area of woodland belt planted along the site's southern boundary) and to the east by existing residential properties along Tiverton Avenue and Stainsdale Green.

The site is in a sustainable location immediately adjacent to the built up area of one of the District's main towns. It is well located and within walking distance of a number of local services and amenities. The centres of Whitwick and Coalville are located approximately 0.8 miles (1.2 km) and 1.2 miles to the north and south-west of the site respectively. Both centres include a good range of local facilities and services including food stores, a pharmacy, Post Office, places of worship and recreational spaces such as parks and playing fields. Warren Hill County Primary School and King Edward VII Science and Sports College are both located 0.9 miles (1.4 km) to the east of the site.

Torrington Avenue connects to Hall Lane, north-east of the site, which provides a direct vehicular route to the centre of Whitwick to the north. Junction 22 of the M1 is located 5 miles (8km) to the south east of the site, via the A511. The nearest bus stops are located less than 200m north east of the site, and are served by routes no.29 and no.29A, which provide frequent services to Whitwick, Coalville and Leicester City Centre.

The site is currently shown to have an Area of Separation (AoS) designation in the adopted Core Strategy. The purpose of the corresponding policy En5 is to prevent the coalescence of Whitwick and Coalville. Importantly, it does not impose a complete ban on development within the AoS. The AoS is within the defined limits to development for Coalville, is not designated as Countryside and is not therefore subject to the provisions of Policy S3 of the Core Strategy (i.e. development is precluded in this location). The

boundaries of the Coalville / Whitwick AoS were assessed in detail in a Settlement Fringe Analysis (SFA) commissioned by the Council in 2010. The SFA gave consideration to the landscape and visual value of the areas comprising the AoS and the potential for any development impacts upon them to be mitigated. In regard to the Coalville / Whitwick AoS, the SFA recommended the retention of woodland and the enhancement of gateway rural views between Whitwick and Coalville. At the same time, **the SFA did not rule out some level of development, with potential for mitigation.** Although the previous Local Plan Inspector ultimately concluded that there was overriding merit in the judgement of the Council that the AoSs were justified for the life of the Plan, he went on to say that *“importantly though, on the evidence provided to this Examination, there is scope for reconsideration of the detailed boundaries and land uses for the AoSs, in the event that it becomes necessary, at any time in the future, for the Plan to be reviewed in the light of increased development needs.”* In Jelson’s view, we are at that stage now and it is necessary therefore that the Council undertakes a detailed review of the AoSs and in particular the Coalville / Whitwick AoS, in the light of the Council now having to grapple with its increased development needs.

It is important to note that at present the relationship between the built form and the Area of Separation is extremely poor in this area. Existing properties in Tiverton Avenue and Stainsdale Green back onto the AoS. This prevents any public view of, or access to, the AoS in this location very significantly diminishing its local value and undermining its role and function in planning terms. As can be seen on the illustrative masterplan attached, limited development on the edge of the AoS would actually allow a new urban edge to be created that would provide a visual and functional relationship between the urban area and the AoS. Views would be opened up and public access provided along the full boundary to the site actually allowing the community to appreciate the role and function of the AoS and the gap between Coalville and Whitwick.

To support promotion of the site, Jelson has commissioned a team of technical consultants and a masterplanner to carry out various surveys and investigations and has used these comments to inform the development potential of the site. The findings have been published in a Vision Document, appended to these representations at **Appendix 1**. The Illustrative Masterplan prepared as part of this Vision Document demonstrates that the site is capable accommodating approximately 100 dwellings. This is attached at **Appendix 2**.

Jelson of course already benefits from an in-depth knowledge of the site and its surroundings and it has taken on board the concerns raised previously about the development of this land (including from the appeal Inspector), and in particular its impact on the Green Wedge and the harm that this would bring to the separate identities of Coalville and Whitwick. It is therefore confident that there are no significant or irresolvable physical constraints to the development of the land. Those constraints that do exist could easily

be mitigated through standard mitigation measures such as sustainable drainage, landscaping and public open space, woodland planting etc.

Taking the above into account, the site at Torrington Avenue is in a sustainable location. It is available now and residential development would be suitable and achievable. Moreover, it could be developed without impacting on separation and harming the character and identities of Coalville and Whitwick – it would actually substantially improve the relationship between the urban edge and the AoS. In addition, planned properly, it can accommodate development that will maintain an appropriate degree of separation whilst delivering significant benefits to local people including, but not limited to, (i) much needed new housing; (ii) enhancements in terms of landscape and biodiversity through structural planting and habitat creation; and, (iii) enhancements to public access by improving pedestrian links to the AoS and creating extensive areas for recreational use.

Land South of Kirton Road, Coalville

The site extends to 11.5 ha and is located towards the south-eastern edge of the Coalville Urban Area. It comprises several agricultural pasture fields. There are groups of mature trees and hedges along its boundaries and within the site itself. We understand that none of the trees within the site or along its boundaries are subject of a Tree Preservation Order. A Public Right of Way cuts through the centre of the site from north to south and provides pedestrian connections to Brandon Hill.

It is bound by existing residential properties along Kenmore Crescent to the north, an allotment to the west, Bardon Hill wood to the south, and further agricultural fields to the east. Bardon Hill Quarry Site of Special Scientific Interest (SSSI) and Bardon Hill SSSI are located approximately 600m to the south.

There are a number of local services located along Greenhill Road to the north of the site, including a foodstore, community centre, a dentist and a play area. The main centre of Coalville, which contains a wider range of amenities, is located 2.1 miles (3.4 km) to the west. The nearest primary school (Warren Hills County Primary School) is located 0.4 miles (0.7 km) to the north. Bus Stops located along Greenhill Road to the north are served by route no.11 which provides frequent services to Coalville.

Jelson has commissioned RGP to provide an indicative Site Layout Plan, which is attached to these representations at **Appendix 3**. It indicates that the site is capable of accommodating 175 dwellings. This is subject to further technical investigation.

The Plan also shows that site access can be provided via an extension of Kirton Road and can be delivered solely within the site and on land controlled by the local highway authority. In other words, there is no reliance on third party land to achieve a suitable means of access.

As part of any development, Jelson would expect a scheme to propose landscaping that would respect significant and mature trees within, and along the boundaries of, the site. Where possible, a development proposal would make provision for areas of replacement planting to mitigate the loss of any trees associated with development on the site.

Land South of Water Meadow Way Ibstock

Jelson is promoting approximately 7.5ha of land to the south of Water Meadow Way in Ibstock. Site location plans are appended at **Appendix 4 and Appendix 4A**. The site is situated towards the south-eastern edge of Ibstock and comprises two pasture fields and one arable field. It is bound to the north by a row of mature trees, beyond which lie existing residential properties on Water Meadow Way and Douglas Drive. There are also rows of trees within the site which separate the various individual fields. To the west, the site is bound by existing agricultural uses, and to the east by a mixture of agricultural land and woodland (Grange Wood). A single-track road bounds the site to the south. There are two Public Right of Way that cross the site which provide connections to the residential properties to the north and Grange Wood to the south.

The site is in a sustainable location on the south eastern edge of the settlement, adjacent to existing built development. It is within walking distance of a range of services and facilities. The centre of Ibstock is located around 0.3 miles (0.5 km) to the north west. Ibstock contains a number of key services and amenities including a chemist, a Post Office, various restaurants and takeaways, a foodstore and a range of recreational facilities including playing fields and Ibstock Leisure Complex. St Denys CE Infant School and Ibstock Junior School are situated approximately 0.4 miles (0.7km) north of the site. Bus stops along High Street, around 400m north of the site, are served by route no.15 which provides frequent services to Coalville and Ravenstone. There are employment opportunities within Ibstock and there is good bus access to larger opportunities in nearby Coalville.

The site has not been put forward for development previously as Jelson has only recently acquired it. The site is therefore newly available. Jelson owns the entire site, including land needed for access. There are no agricultural tenancies or other ownership restrictions. The site is therefore available for development now.

Jelson is in the process of appointing a team of technical consultants and masterplanners to carry out various surveys and investigations to determine the site's constraints and opportunities and the extent of development that could be accommodated on the site. It will present its findings to the Council in due course.

However, on the face of it, there doesn't appear to be any reason why this site shouldn't be suitable for allocation in the emerging Plan.

In regard to achievability and delivery, as you know Jelson has a longstanding reputation as one of the Region's leading housebuilders. Its work in the past has included numerous projects within the District. Jelson knows the housing market in North West Leicestershire and it is therefore confident that there is demand in Coalville and Ibstock for the types of homes they build.

All of the developments described above would be self-financing and would not require public subsidy. Jelson is confident that the development of each site would be viable and that a policy compliant level of affordable homes could be provided on each one. The development of these sites would place no unusual pressures on public services that could not be dealt with through contributions in a legal agreement, in the usual way.

Taking all of the above into account we conclude that development of these sites is achievable with a realistic prospect that housing could be delivered on each site within 5 years, thereby fulfilling the NPPF deliverability test.

In Jelson's view the development of these sites would represent logical and compact extensions to each settlement without giving rise to any significant environmental or visual harm. These sites could help meet the housing need of the District through high quality, sustainable developments that are deliverable in accordance with the tests set out in the NPPF. Development of these sites would also contribute to the supply of market and affordable homes in the District, consistent with the proposed settlement hierarchy and the Council's high growth development strategy and would help it to deliver its housing requirement arising from the Standard Method, together with the necessary uplifts to take account of Leicester's unmet need and other economic adjustments.

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

T Evans

Date

10/03/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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.

Land off Torrington Avenue, Whitwick

VISION DOCUMENT

September 2021



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VISION

“*The Land at Torrington Avenue Whitwick will provide a high quality, sustainable location for people to live and enjoy their spare time together. Located on the edge of the Green Wedge between Whitwick and Coalville, the scheme will maintain separation between the settlements, provide an attractive new settlement edge to Whitwick and create additional new pedestrian access to green space within the Wedge. The development will be a distinctive community which is designed to respect its context and draw upon the best aspects of the character of the nearby settlement of Whitwick. It will create an attractive transition between the built up settlement edge and the Green Wedge to the west. The community will be connected by a network of attractive Green Infrastructure.***”**





Visualisation looking east from southern residential parcel

CHAPTER 1

INTRODUCTION

The land off Torrington Avenue lies on the western edge of the settlement of Whitwick. This document has been prepared on behalf of Jelson who control the land off Hall Lane. The document outlines the guiding principles for a high-quality development that could accommodate up to 100 new homes.

Our Background and The Vision Document

Jelson is a Leicester based house builder that has been delivering homes in the local area and the wider East Midlands for over 130 years. They have developed a reputation for delivering high quality, traditional family homes on consistently popular development sites.

The company works across the East Midlands on schemes of varying scale and complexity, with integrated planning teams promoting high quality residential schemes through the planning process.

The land has previously been subject to planning applications as part of a much larger proposal. The vision explored in this document is for a much smaller proposal. Assisting the aims of the green wedge in which the site is located.

This Vision Document has been prepared in this context and sets out

Jelson's vision for a distinctive, high quality development on the land and is intended to form the basis of discussions which will hopefully enable the proposals to be refined and supported through the review of the Local Plan.

The purpose of this vision document is to:

- Describe the results of the technical analysis which has been undertaken;
- Demonstrate that the site is a sustainable and suitable location for the delivery of new housing;
- Explain how the site could be developed;
- Identify the various social, economic and environmental benefits that development of the land could deliver.



Image showing the location of the site and surrounding landscape



Aerial Photograph showing the location and wider context

CHAPTER 2

THE SITE & CONTEXT

Location and Context

The site is situated off Torrington Avenue, southwest of the settlement of Whitwick, Leicestershire. The town of Coalville is located approximately 800m to the west. The site covers approximately 5.5ha. The site extends westward from the settlement edge of Whitwick into two irregular shaped parcels of arable land.

Landscape features within the site are limited due to the existing agricultural nature of the site. Features are limited to the peripheries with field boundary hedgerows, hedgerow trees and a woodland belt enclosing the site from the south. The hedgerows have relatively few hedgerow trees and there are some gaps in the hedges.

Properties off Tiverton Avenue and Stainsdale Green adjoin the site from the east. The Coalville Rugby Club located to the south of the site has restricted visual connection to the site due to the woodland belt along the southern boundary.

The wider context of the site includes the open land between Hall Lane and the A 511 Stephenson Way, with Hermitage Road to the north and Broom Leys Road to the south. This broader area includes arable farmland, horse grazing pasture and sports fields. Green Lane is a small road that extends south from Hermitage Road, and becomes a dead end, although the lane itself continues as a private road and public footpath. Views are possible from this route across the site to the existing residential edge of Whitwick.

Two recently planted woodlands are located to the north of this area and have been named Harold Smalley Wood (to the west of Green Lane) and Thomas Ashford Wood (to the east of Green Lane). These woodlands include some permissive paths. When fully established they will form significant landscape features to the north of the area.



1) View of the site from the southern parcel looking north.



2) View from Torrington Avenue showing proposed access area

CHAPTER 2

THE SITE & CONTEXT

Connectivity to Local Services

The centre's of Whitwick and Coalville are located approximately 1.2km to the north east and south west of the development site, and includes a good range of local facilities and services including:

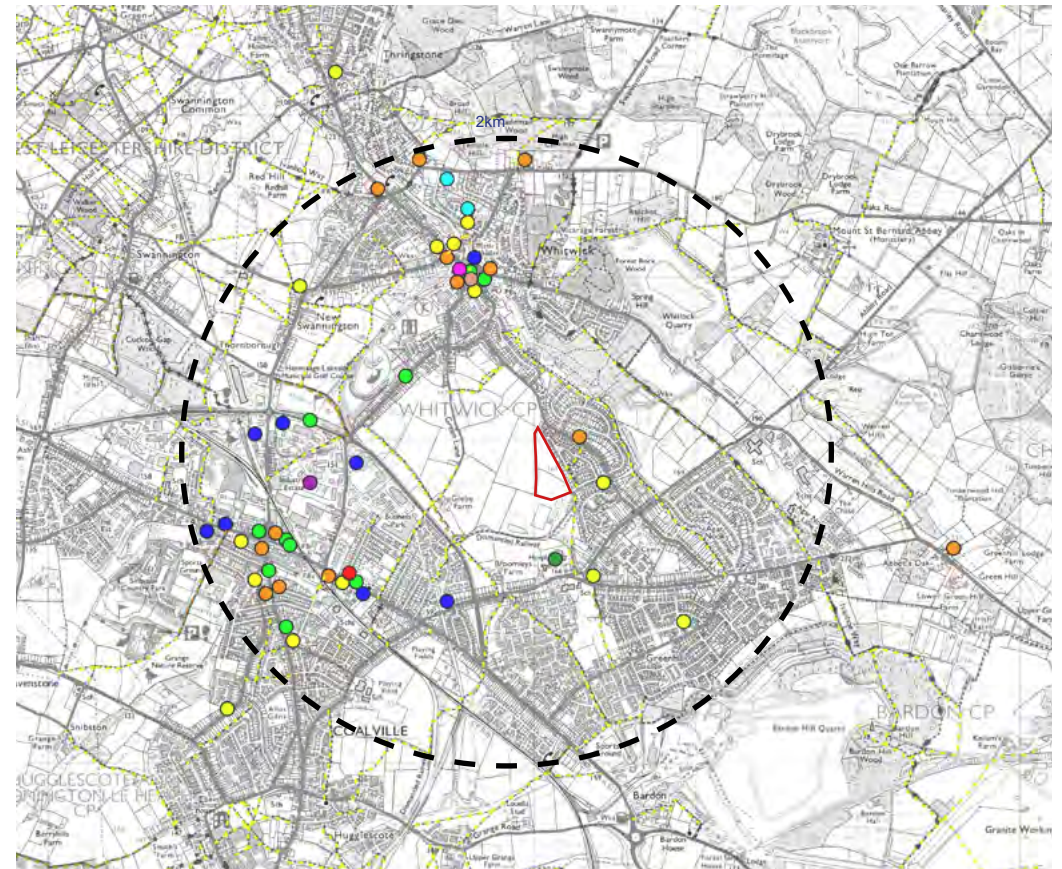
- Four Co-operative food stores;
- Two Spar food stores;
- Iceland food store,
- Butchers
- Pharmacy;
- Post Office and newsagents;
- Church and other places of worship;
- Public House;
- Community Library;
- Café, restaurants and a takeaway;
- Parks, playing fields and other recreational spaces.

Holy Cross and St John The Baptist CE Primary School are located approximately 1.7km from the site via Hall Lane. The nearest secondary schools are the Castle Rock and King Edward VII Science and Sport College, which are both approximately 1.2km from the site and are accessible from the site via public transport.

There are a range of small employment opportunities at businesses within the Whitwick, as well as further opportunities within the employment area and industrial estate on the edge of Coalville, which provides a greater number of larger businesses. This area is located within walking distance of the site (approx. 1.2 km) and is accessible via public transport.

The settlement is served by regular Arriva bus services (Route No. 27,16 and 11) which provide connections to Leicester, Ratby, Coalville, Agar Nook and Loughborough. The nearest bus stop to the site is on Hall Lane, less than 250m from the site's eastern boundary.

A development proposed in this area could help to protect and increase the viability of both existing and new services and facilities within the settlement, as well as offer opportunities for enhancement.



Plan showing the site and location of local services

CHAPTER 3

PLANNING POLICY CONTEXT

The site is being promoted for development in the context of the recently revised national planning policy and guidance and a local policy framework which is evolving.

National Planning Policy Framework (NPPF)

The NPPF sets out the Government's economic, environmental and social planning policy and in combination these policies give the Government's vision of sustainable development.

Paragraph 174 states at part a) that planning policies and decisions should protect and enhance valued landscapes. Part b) states that planning policies and decisions should recognise "the intrinsic character and beauty of the countryside".

The site is within an area not designated for its landscape character or value

The Adopted Development Plan

The Development Plan for Northwest Leicestershire District Council currently comprises:

- *Northwest Leicestershire Local Plan Adopted (November 2017);*
- *Mineral and Waste Safeguarding North West Leicestershire District Document S6/2015*

The Local Plan sets out the vision, objectives, strategy and core policies for the spatial planning of the District.

The Local Plan contains policy S1 'Future housing and economic development needs'. Which seeks to ensure that provision will be made for the development of dwellings to meet the objectives;

Policy S2 – 'Settlement Hierarchy' will be used when assessing the suitability of a settlement for new development, with the general principle being that those settlements higher up the hierarchy will take more growth than those lower down. Within this document, Whitwick falls under Coalville which is a Principal Town. Development within this settlement should be able

to able to manage higher levels of growth.

Policy S3 – 'Countryside' Land outside the Limits to Development is identified as countryside.

Key landscape policy

The site lies within an area covered by policy Policy En5; The aims of this policy in this area are to maintain the physical separation between Whitwick and Colaville the supporting text to the policy suggests that *"Development in this area, if permitted, would result in the physical coalescence of Coalville and Whitwick and the loss of the separate identity of the two settlements."*

CHAPTER 4

ENVIRONMENTAL CONSIDERATIONS

The environmental and technical capacity of the site has been investigated, through both site assessment and desk study.

Landscape Character

The site at Whitwick is located within the Natural England's National Character Area (NCA) 73 'Charnwood'.

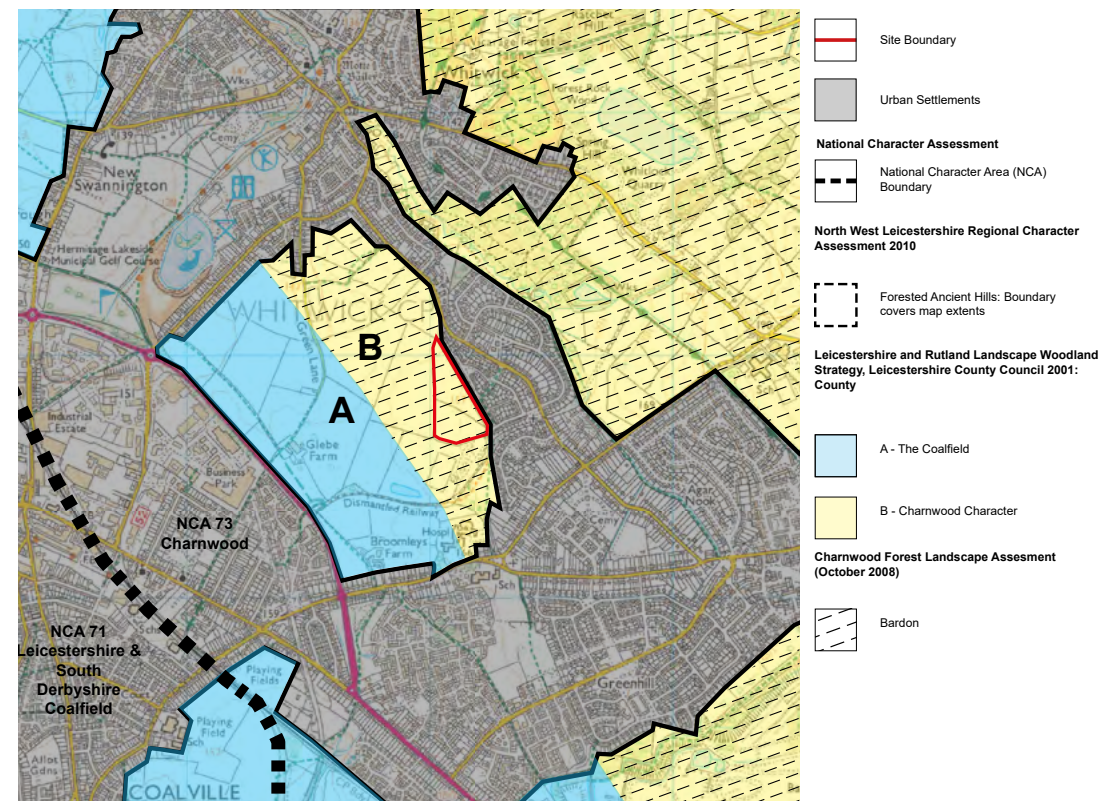
At a local scale, the Leicester, Leicestershire and Rutland Landscape and Woodland Strategy (2001) provides more detailed information. The site falls into LCA 'Charnwood Forest' and LCT: 'Bardon'. The document includes amongst others the following recommendations:

- *Conserve the existing woodland resource;*
- *Increase woodland cover and provide links between ancient semi-natural woodlands;*
- *Conserve and enhance the hedgerow network;*
- *Create new woodland along roadsides and industry fringes to reduce their visual prominence within the landscape;*

- *Restore hedgerows where they have become fragmented.*

Within the North West Leicestershire Settlement Fringe Assessment (2010), the site forms part of area 3 Coalville, which covers the land between Hermitage Road, Hall Lane and Stephenson Way. The study notes that the landscape is;

- *The land is typical of land on the urban fringes with areas of farmland left unmanaged with maturing hedgerows, pockets of arable and pasture, horse paddocks as well as recreational uses. The flat landform and relatively few landscape features and presence of built form combines to create a uniform and in places bland character.*



Plan illustrating the site's landscape character

ENVIRONMENTAL CONSIDERATIONS

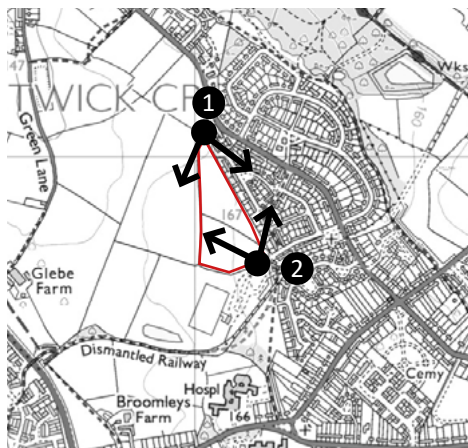


Photo Viewpoint Location Plan



Photo Viewpoint 1: View from Public Footpath facing west off Tiverton Avenue.



Photo Viewpoint 2: View north from south-eastern corner within the site.

CHAPTER 5

OPPORTUNITIES & CONSTRAINTS

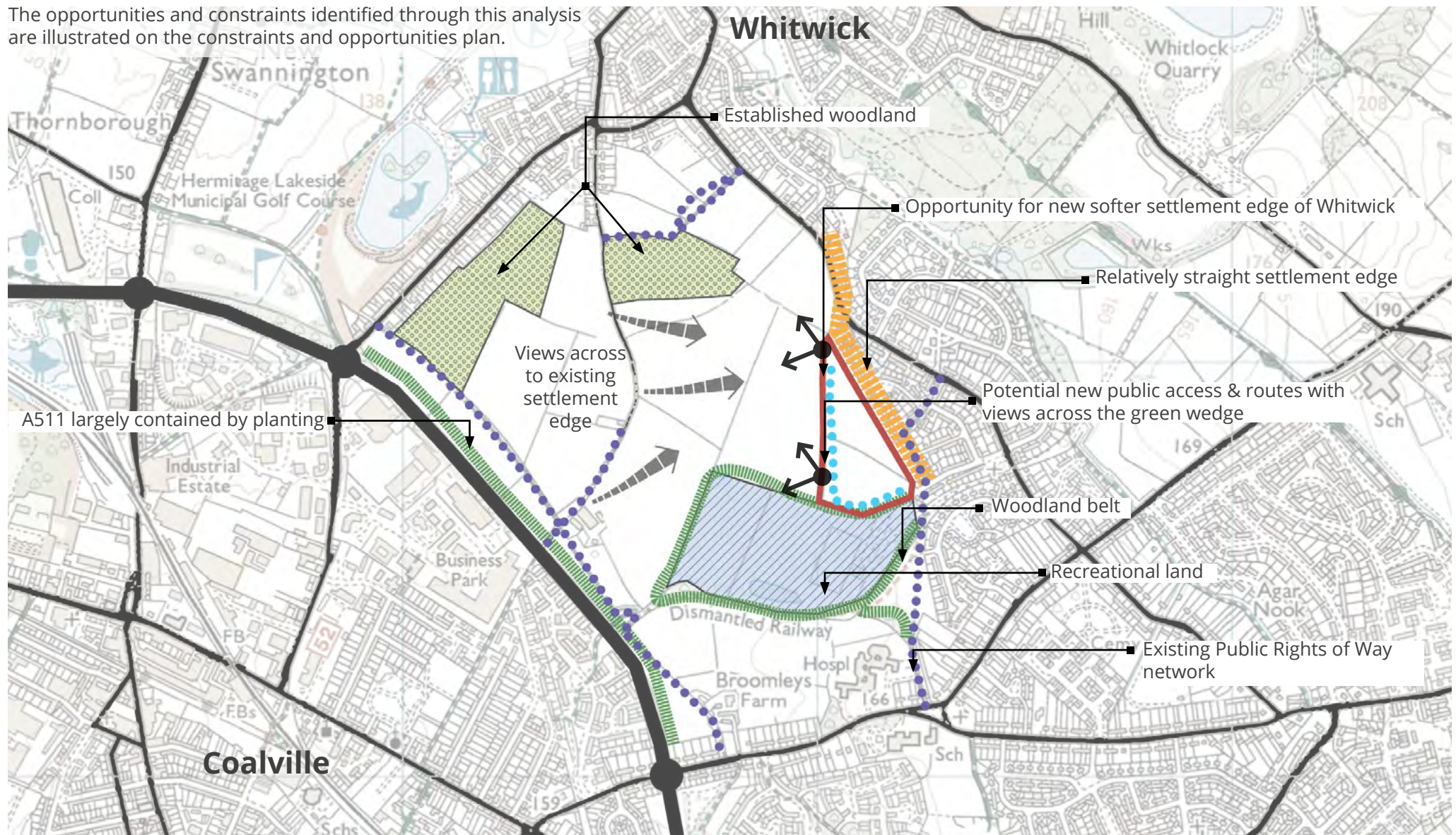
An analysis of the site and its context has been undertaken and this has influenced and helped to shape the development proposals for the site.

Constraints & Opportunities

- The site has potential to yield a high quality sustainable housing development accommodating up to 100 new homes with associated infrastructure and green space.
- The site's eastern boundary is not defined by vegetation at present and existing properties along the settlement edge appear exposed. Additionally the sites western boundary consists of a narrow hedgerow. These boundaries could feature new hedgerows and tree planting to provide a softer, greener edge to the settlement.
- The tree belt to the south of the site will be retained, reinforced and utilised to create a firm southern edge to development. Hedgerow gapping up and reinforcement will help to deliver a bio-diversity net gain.
- Development can allow for greater pedestrian permeability, allowing the eastern edge of the green wedge to be opened up to public access via the perimeter paths.
- The main access to site can be safely taken from Torrington Avenue on the eastern edge of the site.
- There is the opportunity for pedestrian, cycle and emergency access into the site from two additional locations on the eastern boundary of the site.
- The site topography is flat which reduces the need for extensive earthworks to facilitate the construction of new homes.
- There are existing bungalows which back on to the eastern boundary of the site. There is the opportunity to mitigate views from these existing properties by providing a row of new bungalows / low-rise housing within the site parallel to these existing dwellings.
- There are properties adjacent to the north-east corner of the site which front on to the site. Views from these properties could be enhanced by providing an area of attractive public open space for these residents to look on to.
- The vegetation within the site is limited and has much potential for enhancement.
- No public rights of way cross the site, but new public access could be provided.

OPPORTUNITIES & CONSTRAINTS

The opportunities and constraints identified through this analysis are illustrated on the constraints and opportunities plan.



Plan illustrating key opportunities and constraints

CHAPTER 6

ILLUSTRATIVE MASTERPLAN

The following key design principles and parameters which have shaped the masterplan for the site and have been informed by the analysis.

Green Infrastructure

The masterplanning process has considered the inherent characteristics of the site and wider area. The existing characteristics of the site have informed the shape and structure of the proposals, including the location and extent of development blocks and green infrastructure. Vehicular access into the site is proposed off of Torrington Avenue. There are further pedestrian, cycle and emergency access points into the site on the eastern boundary of the site. A network of main streets and secondary streets have been set out to provide easy legible access. The proposals incorporate a broad green buffer on the western edge of the development to assist with the integration of development with the wider Green Wedge., This would

provide a long term green edge and in time would assist in visual separation between Whitwick and Coalville. An area of public open space featuring pedestrian routes is proposed within the central area of the site, with an additional area of public open space in the northern section of the site, and a linear green space along the site's western and southern edges.

The illustrative masterplan shows bungalows proposed along the eastern development edge, to respect the existing bungalows along Tiverton Avenue. Where the existing houses front onto the site, an area of green space has been proposed, to retain the open aspect. Within a development a simple street layout is proposed, with outward facing development blocks

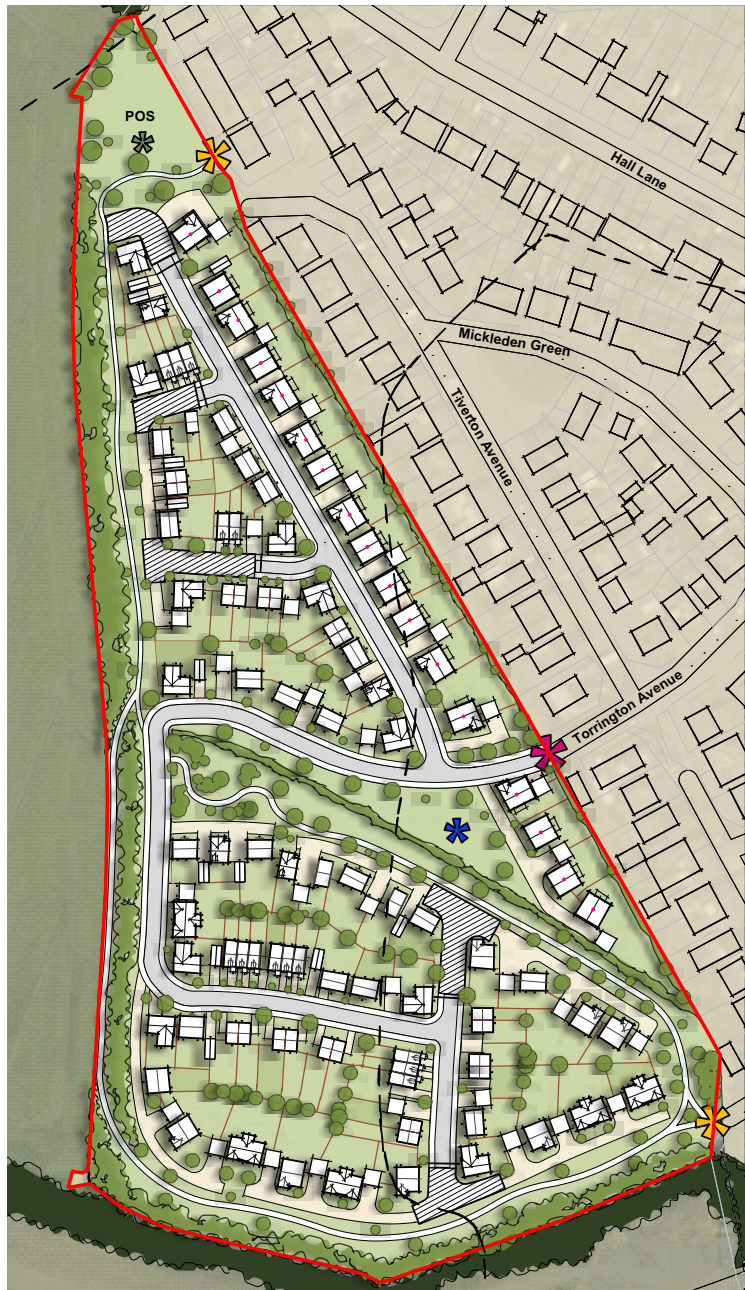
providing an attractive streetscape and overlooking the proposed green spaces.

Overall the 5.5ha site could deliver;
100 new homes on a net development area of 3.3ha

The provision of 2.2ha of land dedicated to Green Infrastructure, this includes features such as Public Open Space, play and habitat related proposals.



CHAPTER 6 MASTERPLAN VISION



-  Site Boundary 5.5ha
-  Residential Development (100 Dwellings at 30 dph) 3.3ha
-  Green Infrastructure (Accessible green space, planting and habitat creation) 2.2ha
-  Existing Vegetation
-  Existing Urban Area
-  Existing Contours
-  Proposed Bungalow
-  Proposed Road Network
-  Proposed Shared Surface
-  Proposed Private Drive
-  Proposed Footpath
-  Proposed Rear Garden Boundaries
-  Proposed Vegetation
-  Proposed Vehicular Access
-  Proposed Pedestrian Access
-  Proposed Play Area

Illustrative masterplan



Public open space



Main street



Green edge



CHAPTER 6

MASTERPLAN VISION

Access and Movement

The site's location allows convenient pedestrian and cycle access with existing schools, the town centre and other facilities and amenities.

Public transport will be readily available to all. Existing bus stops are located off Hall Lane.

Vehicular access will be facilitated via Torrington Avenue and a descending hierarchy of streets and footways, associated with the street network. Within the development a clear and legible hierarchy of routes would be provided, to allow easy access. The point of access would be linked indirectly by a primary street which would also connect development parcels via a series of secondary and tertiary streets.

The Illustrative Masterplan shows a network of pedestrian routes through a connected pattern of

streets, footpaths and open spaces. New footpaths through the proposed green infrastructure network would provide linkages to the existing Public Rights of Way into the settlement and provide new opportunities to experience the green wedge.

This overall strategy will encourage the community to walk and will promote healthy active living. The proposed routes will serve all significant desire lines within the site and offer safe and secure routes towards connections into the town centre and out into the wider landscape.

The street design will also include footways which prioritise the safe and easy movement of pedestrians and cyclists through the development.



New linkages to the existing Public Rights of Way and through the development will encourage walking and will promote healthy active living

CHAPTER 6 MASTERPLAN VISION

Land Use and Development

The site boundary extends over 5.5ha. The masterplan shows parcels covering approximately 3.3 ha of the site. The design provides approximately 2.2 ha of open space, including space for recreational use, play provision and habitat creation. It is envisaged that residential areas will have a density of 30 units per hectare. The site could, therefore, accommodate between up to 100 dwellings.

The majority of dwellings that adjoin the site from the east are bungalows and as such, the development along this edge will seek to reflect this in its scale. Buildings located within the center and to the west will typically be 2 storeys in height.

Buildings will be designed to have a variation in their height from ground level to ridge or eaves level. The arrangement of buildings within a plot should seek to ensure subtle changes in height to create a varied roof line across the development.



CHAPTER 7

CONCLUSIONS

Whitwick is a sustainable settlement that has good connections to nearby settlements and Leicester. It is, therefore, a suitable sustainable location for development in the Borough.

The Site will deliver a High Quality Development

Land off Torrington Avenue, Whitwick provides a sustainable location for new homes, with residents able to use and support local facilities and services. The site is located on the edge of the Green Wedge between Whitwick and Coalville, and development of the site provides the opportunity for increased access to the area, and new landscape areas and planting that over time could increase the visual separation between the settlements.

A softer and more attractive settlement edge could be established increasing the long term value of the landscape between Whitwick and Coalville.

The site could deliver up to 100 new homes and 2.2ha of new Green Infrastructure. The new housing would be sensitive to the adjacent existing settlement edge, with bungalows proposed along the edge

next to the existing bungalows on Tiverton Avenue and Stainsdale Green.

Overall a distinctive new neighbourhood could be established, providing valuable new homes and Green space accessible to the local population and with long term landscape enhancements to the Green Wedge between Whitwick and Coalville.



Visualisation looking along pedestrian walkway along the site perimeter

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Rev	Issue Status	Prepared / Date	Approved / Date
-	Draft	TW / 31 August 2021	MGH / 31 August 2021

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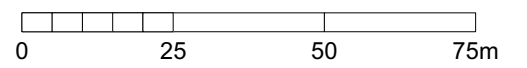
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Land off Torrington Avenue, Whitwick
VISION DOCUMENT

NOTES

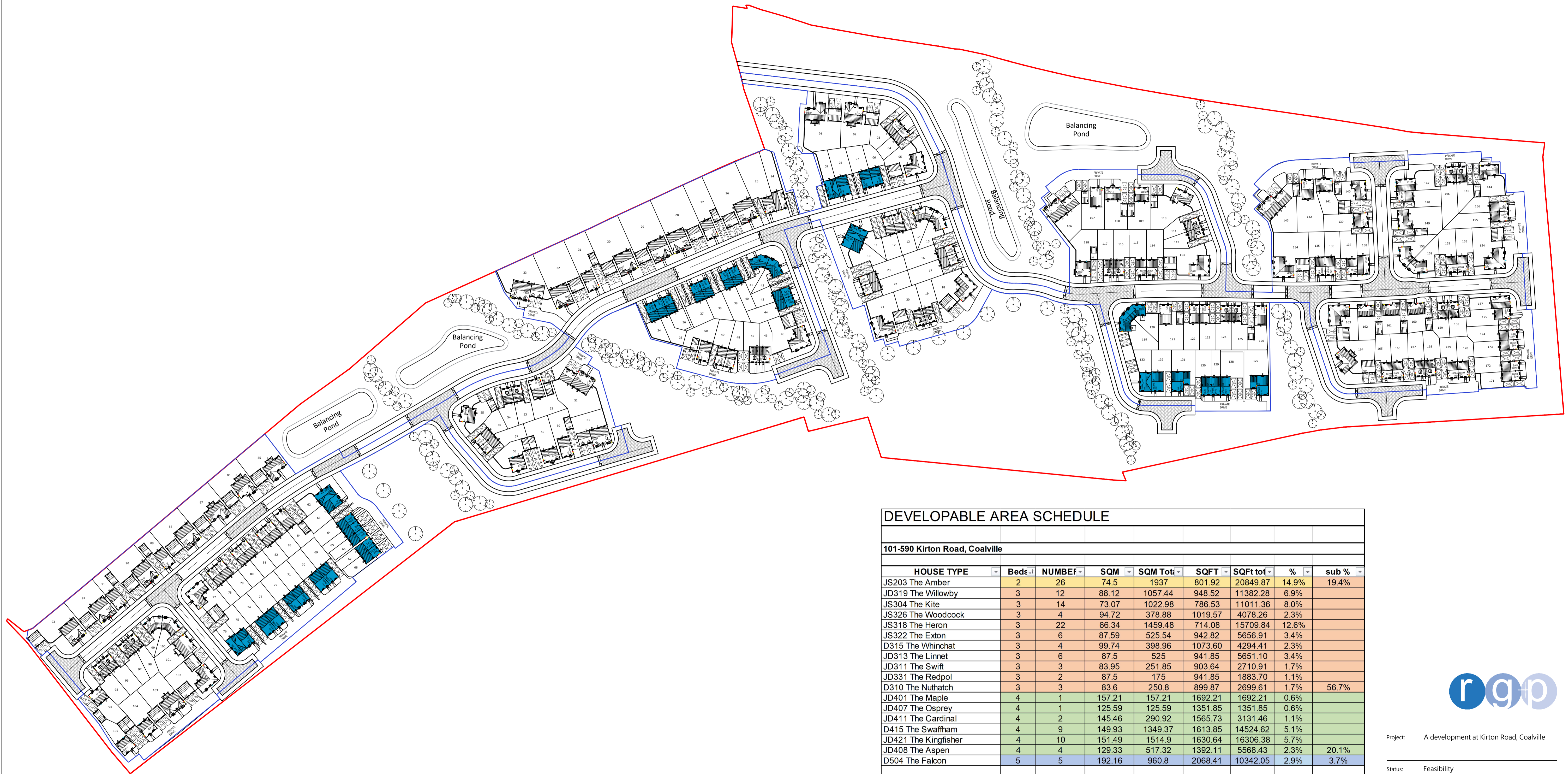
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-  Proposed Rear Garden Boundaries
-  Proposed Vegetation
-  Proposed Vehicular Access
-  Proposed Pedestrian Access
-  Proposed Play Area



File: J:\7500\7532\LANDSIPlans\7532-L-P04 Illustrative Masterplan.vwx



DEVELOPABLE AREA SCHEDULE								
101-590 Kirton Road, Coalville								
HOUSE TYPE	Bed ^s	NUMBE ^r	SQM	SQM Tot ^a	SOFT	SQFT tot ^a	%	sub %
JS203 The Amber	2	26	74.5	1937	801.92	20849.87	14.9%	19.4%
JD319 The Willowby	3	12	88.12	1057.44	948.52	11382.28	6.9%	
JS304 The Kite	3	14	73.07	1022.98	786.53	11011.36	8.0%	
JS326 The Woodcock	3	4	94.72	378.88	1019.57	4078.26	2.3%	
JS318 The Heron	3	22	66.34	1459.48	714.08	15709.84	12.6%	
JS322 The Exton	3	6	87.59	525.54	942.82	5656.91	3.4%	
D315 The Whinchat	3	4	99.74	398.96	1073.60	4294.41	2.3%	
JD313 The Linnet	3	6	87.5	525	941.85	5651.10	3.4%	
JD311 The Swift	3	3	83.95	251.85	903.64	2710.91	1.7%	
JD331 The Redpol	3	2	87.5	175	941.85	1883.70	1.1%	
D310 The Nuthatch	3	3	83.6	250.8	899.87	2699.61	1.7%	56.7%
JD401 The Maple	4	1	157.21	157.21	1692.21	1692.21	0.6%	
JD407 The Osprey	4	1	125.59	125.59	1351.85	1351.85	0.6%	
JD411 The Cardinal	4	2	145.46	290.92	1565.73	3131.46	1.1%	
D415 The Swaffham	4	9	149.93	1349.37	1613.85	14524.62	5.1%	
JD421 The Kingfisher	4	10	151.49	1514.9	1630.64	16306.38	5.7%	
JD408 The Aspen	4	4	129.33	517.32	1392.11	5568.43	2.3%	20.1%
D504 The Falcon	5	5	192.16	960.8	2068.41	10342.05	2.9%	3.7%
Private Sub total		134		12899.04		138845.27	76.57%	
JS203	2	17	74.55	1267.35	802.46	13641.76	9.7%	41.5%
JS322	3	4	87.59	350.36	942.82	3771.28	2.3%	
JS394	3	5	94.72	473.6	1019.57	5097.83	2.9%	
JS396	3	7	100.22	701.54	1078.77	7551.38	4.0%	
JS397	3	6		0	0.00	0.00	3.4%	14.6%
JD422	4	2	120	240	1291.68	2583.36	1.1%	4.9%
Affordable Sub total		41		3032.85		32645.60	23.4%	
TOTALS:		175		15931.89		171490.86	100.0%	
Total Site Area:		11.614			Hectares			
Total Site Area:		28.698			Acres			
Site Density:		15.07			DPH			
Developable Site Area:		6.314			Hectares			
Developable Site Area:		15.602			Acres			
Developable Density:		11.22			Units / Acre			
Developable Density:		27.72			Units / Hectare			
Sq. Feet/Acre Coverage		10991.82			Sq. Feet/Acre			



Project: A development at Kirton Road, Coalville

Status: Feasibility

Client: Jelson

Sheet title: Site Layout

Scale: 1:1000@A1

Date: 02/09/2021

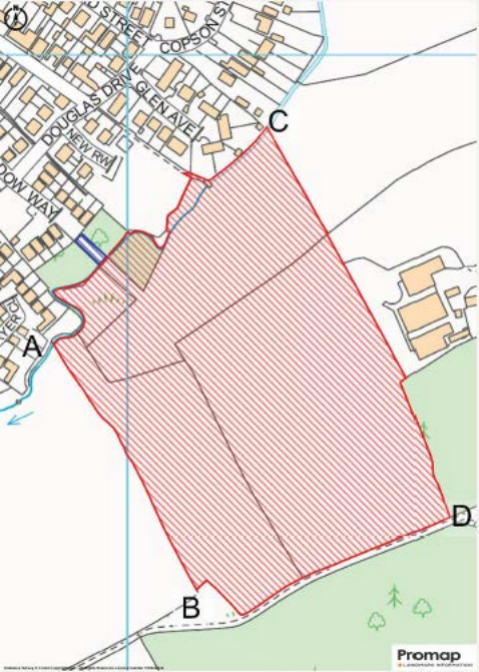
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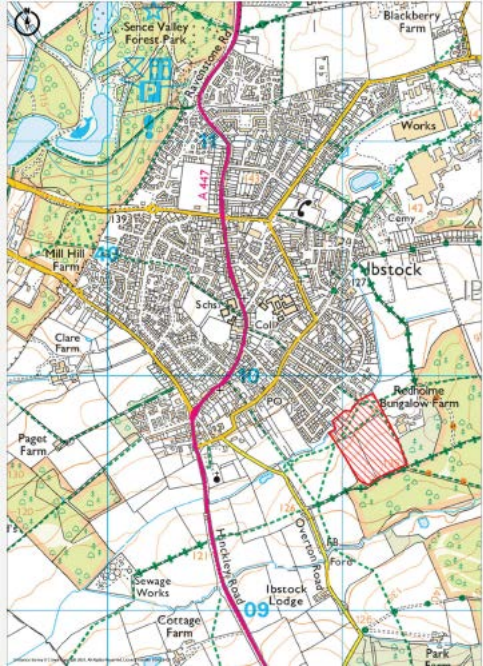
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Ref: 101-590AR/001

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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

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	Personal Details	Agent's Details (if applicable)
Title	Mr	Mr
First Name	Robert	Tim
Last Name	Thorley	Evans
[Job Title]	Land and Planning Manager	Director (Planning)
[Organisation]	Jelson Limited	Avison Young
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...

Q6

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

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

The proposed policy seeks to encourage the provision of serviced plots for self-build and custom housebuilding where there is clear evidence of local demand . It also provides that the Council will seek the provision of serviced plots on all housing sites over 50 dwellings.

Jelson does not support this policy. There is no legislative requirement and nor does national planning policy stipulate that housebuilders must provide / give over plots for custom housebuilding. Indeed, legislation and policy states that it is incumbent on local authorities, rather than housebuilders, to ensure that it grants sufficient planning permissions to meet the identified demand for this type of housing. The NPPG encourages rather than requires Council's to engage with developers about the contribution their schemes might be able to make towards the supply of self and custom build plots and makes clear that this is only where housebuilders have expressed an interest in giving over land in this way.

The introductory text to this policy confirms that the Council maintains a register of those who are interested in building their own homes within the District. It states that as of 30 October 2021 there are 72 individuals on the list (and as at January 2022 the Council had received a further 6 inquires), taking the total to 78. The Council claims that this demand equates to the need to deliver 72 self / custom build plots by October 2024. However, Jelson is concerned that this may significantly over-estimate the actual level of demand. For example, it isn't possible to determine whether those people / organisations registered on it are registered within one or more local authority and if there is therefore, an element of double counting occurring. It is also unclear how often the register is updated and if those who are on it are regularly approached to determine whether their interest or locational preference remains. It is also unclear what evidence needs to be provided by an individual in order to be entered on to the list. This cannot be just and expression of interest, it needs to be a firm commitment, including that an interested party has the financial means to proceed.

Whilst the Council's Register might indicate an interest on the part of those who have an interest in this type of housing Jelson is not convinced that this data can be reliably translated into any sort of actual demand.

Insofar as the provision of serviced plots on large sites (50+ dwellings) is concerned, these types of sites, do not in Jelson's view, lend themselves to the provision of self or custom build properties due to practical site management and health & safety issues. It is therefore difficult to see how the allocation of plots on larger sites would be coordinated with the development of the wider site. For example, larger housing sites are often developed in phases with groups of houses being built at the same time along with the delivery of the infrastructure needed to serve it (access roads, sewers etc.) As a consequence, there are often multiple contractors on site at any one time. Along with machinery and vehicles. The housebuilding industry is heavily regulated in terms of health & safety and takes these responsibilities extremely seriously. It is hard to see how this can be reconciled with allowing amateur builders to operate within this framework.

Moreover, it is not clear from the Council's self / custom build register whether those individuals who have expressed an interest in acquiring a self-build plot would wish to do so on a large housing site. In Jelson's experience the demand for land to build this type of home is on small sites in the countryside or on smaller scale housing developments (10-25 dwellings). One of the main drivers for people choosing to go down the self-build route is so that they can build a unique property in a unique environment – not as part of a large housing estate.

We note also that the policy text suggests that when demand for plots is not realised after 12 months they can be used to deliver market housing. However, this in itself, presents problems for housebuilders like Jelson. For example, the plots could lie vacant for up to 12 months whilst new houses are constructed around them, the plots would then need to be either built out by the housebuilder or sold on and developed at a later stage (meaning that they would sit vacant for even longer). All told, this is likely to result in a consequential delay in development on those lots coming forward and may present practical difficulties in terms of co-ordinating their development with construction activity on the wider site.

In the light of the above Jelson is of the view that this policy should relate to individual plots or smaller scale housing schemes only potentially utilising some form of exceptions policy for high quality self-build projects in appropriate locations.

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.

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

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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**DEVELOPMENT STRATEGY
OPTIONS & POLICY OPTIONS**
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PART B – Your Representation

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Please state which consultation question your response relates...

Q7

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

Q7. Do you agree with the proposed policy on space standards? If not, why not?

The draft Space Standards Policy requires all new residential development to meet the minimum Nationally Described Space Standards (NDSS). However, criteria (f) of paragraph 130 the NPPF and the corresponding footnote (49) make clear that “...Policies may also make use of the nationally described space standard, ***where the need for an internal space standard can be justified.***” If the Council intends to pursue such a policy then it needs to commission the necessary evidence to support its approach. As things stand it hasn’t done this.

The NPPG makes clear that “*where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies.*” The NPPG also makes clear that in doing so, local authorities should take into account matters such as “*need, viability and timing*”.

It is clear that far more work needs to be done by the Council to justify its approach on NDSS.

Even if the need for such a policy can be evidenced Jelson remains concerned about the proposal to introduce NDSS as a blanket requirement. Housing size is a key determinant of cost and affordability, and it is not necessarily the case that simply because a house is bigger it will better meet the needs of every consumer. Keeping prices low will remain a priority for many purchasers rather than imposing arbitrary space requirements. Jelson would therefore encourage any **evidence based** policy to seek a proportion of homes to be NDSS compliant rather than every home so that consumers can continue to prioritise what is important to them when making house purchasing decisions.

Transitional arrangements will also be important. Whilst the industry (including Jelson) is constantly reviewing house specifications, adapting the range to suit the policies of individual planning authorities can take time and certainly does not happen overnight. It will be important therefore that if evidence-based policies can be justified then there is a period of time between formal adoption of a policy and its implementation.

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

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Signed

T Evans

Date

10/03/2022

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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...

Qs 19-25

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

Q19 – Q25. Do you agree with the proposed renewable energy policy? If not, why not?

Jelson does not agree with the Council's proposed policies related to climate change and energy / water efficiency set out in questions 19 to 25.

The housebuilding industry, together with the Government fully recognises the need to address climate change and this is being addressed on a co-ordinated and industry wide basis through Building Regulations changes, agreed targets and joint multi-agency working relationships. This is in recognition that the solution to the problem lies in the industry wide development and trialling of new technology and approaches benefitting from a collective sharing of research and knowledge and economies of scale. The current and proposed changes to building regulations take account of this and set extremely challenging but deliverable targets for the development industry. Jelson, along with the rest of the industry is fully committed to this and is already in the process of trialling and evaluating options.

Individual Local Planning Authorities seeking to impose standards and targets that go beyond these nationally recognised objective threatens simply to undermine these collective efforts and result in attentions being targeted to finding ad-hoc temporary and ineffective solutions to meet the requirements of individual Local Authorities on a site-by-site basis. This can only be counter-productive.

This is why the NPPG stresses that Local Planning Authorities should only seek to go beyond nationally agreed objectives where there is clear and specific local evidence of a need to do so. No such evidence of a compelling local need in NW Leicestershire exists.

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

Yes

No

Declaration

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Signed

T Evans

Date

10/3/2022

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From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response
Date: 14 March 2022 13:20:40

Name Christopher Fearn

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,

Christopher Fearn

Sent from my iPhone

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Diseworth Local Plan Review. Consultation Response
Date: 14 March 2022 13:33:55

Local Plan Review. Consultation Response

Name: Mr Simon Arnold

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 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 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 pantechicons 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. 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.

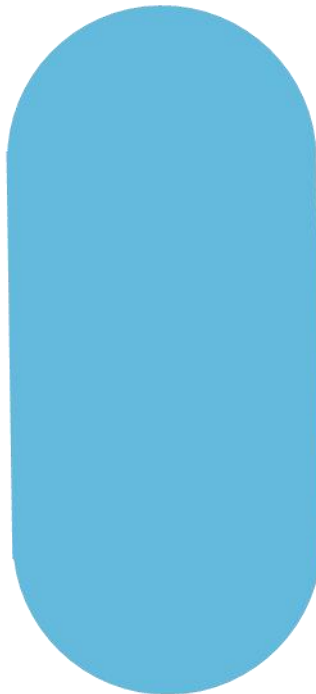
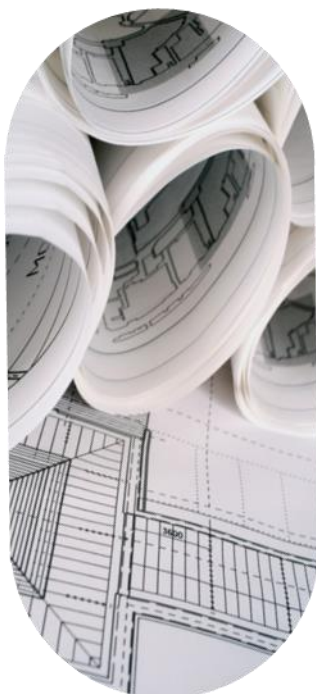
Yours Faithfully

Simon Arnold

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

LAND OFF RUSHEY CLOSE, ASHBY DE LA ZOUCH

On Behalf of Richborough Estates



1. INTRODUCTION

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

2. BACKGROUND AND CONTEXT

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

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

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

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

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

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

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

2.9 Paragraph 60 of the NPPF says that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.

2.10 Paragraph 61 of the NPPF says that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach and paragraph 62 confirms that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

2.11 Paragraph 66 of the NPPF says that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set

out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

2.12 Paragraph 68 of the NPPF says that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.

2.13 Paragraph 69 of the NPPF recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Paragraph 72 of the NPPF goes on to say that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.

2.14 Paragraph 74 says that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies.

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

2.16 Paragraph 79 of the NPPF says that to promote sustainable development

in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

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

1. the plan must set out an overall strategy for the pattern of development that makes sufficient provision for housing to meet the needs of North West Leicester as well as any needs that cannot be met within neighbouring areas;
2. Sufficient sites to deliver the strategic priorities of the area must be planned for and allocated;
3. a sufficient amount and variety of land can come forward where it is needed;
4. the plan should be positive, aspirational and be responsive to changes in local circumstances;
5. strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations;
6. In rural areas housing developments that enhances or maintains the vitality of rural communities should be supported; and
7. suitable locations for villages to grow and thrive should be identified, especially where this will support local services, including extensions to villages where this can help to meet identified needs in a sustainable way.

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

3.1 The Local Plan Review notes the Leicester and Leicestershire Strategic Growth Plan includes an agreed vision and a strategy for the city and county up to 2050 to be delivered through individual authorities' local plans. The SGP is particularly relevant given Leicester City's unmet need and the implications for Local Plans currently being prepared in the county. We understand the local authorities are actively seeking to resolve housing distribution to manage unmet need.

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

2 – Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type.

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

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

3.3 The Local Plan Review proposes a Settlement Classification (paragraph 3.11) based upon the findings of the North West Leicestershire District Council Settlement Study 2021. The methodology includes an assessment of services and facilities available within a settlement, but also considered accessibility to services and facilities elsewhere by public transport as such provision can contribute towards the sustainability of a settlement. This is considered a sensible approach in the context of the urban form within North West Leicestershire.

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- 3.4 The Settlement Classification identifies the Principle Town as the Coalville Urban Area which comprises of Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone and Whitwick as well as the Bardon employment area
- 3.5 Ashby de la Zouch is identified as a Key Service Centre, the 2nd tier within the hierarchy, and is identified in the Settlement Study 2021 as being the second most suitable settlement after the Coalville Urban Area. We agree with the approach taken to arrive at the settlement hierarchy.
- 3.6 Four options for the annualised housing requirement are identified in relation to the development strategy:
- 368 dwellings (this is the result from the standard method) – referred to as Low scenario
 - 448 dwellings (this is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA)) – referred to as Medium scenario
 - 512 dwellings (this is the figure from the Leicester and Leicestershire Strategic Growth Plan) – referred to as High 1 scenario
 - 730 dwellings (this is based on the 2018 household projections with an allowance for vacancy rates in dwellings) – referred to as High 2 scenario
- 3.7 These options have been assessed against demographic trends, build rates (market signals), unmet need and deliverable growth strategies in relation to the preferred option within the Local Plan Review. The Council accept at 4.14 of the draft local plan, and the evidence clearly agrees, that any housing requirement included as part of the Local Plan will have to be higher than the standard method.
- 3.8 Scenarios High 1 and High 2 are concluded to represent potentially
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suitable options until such time as the issue of the redistribution of unmet housing need from Leicester City has been agreed. The bullet points within paragraph 4.19 of the draft local plan identify that the High 2 scenario “performs the best” and provides a very significant degree of flexibility to help address issues of unmet need.

- 3.9 The latest Authority Monitoring Report (December 2021) sets out housing completions since 2011 with the most recent 5 years (2016-21) averaging 770 dwellings per year and peaking in 2017/18 at 978 dwellings. This evidence points to a higher housing requirement than any of the options identified.
- 3.10 Several Council’s in Leicester and Leicestershire, including North West Leicestershire, have accepted there is an unmet need from Leicester City of approximately 18,000 dwellings (2020-36). The Framework is clear in its expectation that these homes should be accommodated somewhere in Leicestershire.
- 3.11 The Leicester and Leicestershire authorities continue to work together to agree how this will be distributed. At the time of writing the most up to date framework for strategic planning in the housing market area is set out in the Strategic Growth Plan (SGP) for Leicester and Leicestershire. The SGP appears to have been based on unmet need from Leicester City for somewhere between 6,000 and 8,000 homes to 2036 and arrived at a housing requirement for North West Leicestershire for 512 dwellings each year between 2031-50. Clearly the unmet need is now known to be significantly higher.
- 3.12 The context for housing requirements in North West Leicestershire point to the Low scenario not being a sensible approach. Limiting delivery would conflict with the SGP and will not allow for any flexibility in meeting unmet housing need from Leicester. Such an approach, directly conflicting with the recent joint work across Leicestershire, would result in a plan which has not been positively prepared and would almost certainly lead to challenges in respect of accommodating unmet need. Such an approach would also restrict future growth within the District, effectively

acting as a moratorium.

- 3.13 The Medium scenario at 448 dwellings per annum is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA). This study was published 5 years ago and has its foundations under the pre-standard method approach utilising aged demographic data. The SGP was informed by the 2017 HEDNA and arrived at a higher figure for North West Leicestershire. Adopting a lower figure than the SGP would conflict with the HMA agreement, a backwards step and inappropriate in the context of increased unmet need.
- 3.14 High 1 scenario aligns with the Leicester and Leicestershire SGP to 2039, albeit the SGP envisaged growth across the longer period to 2050. As set out in respect of the Medium scenario, the Leicester City unmet need is now identified to be circa 18,000 homes rather than the 8,000 homes that underpinned the SGP. Pursuing High 1 would provide no relief to the additional 10,000 homes that now need to be found.
- 3.15 As set out in paragraph 4.19 of the draft local plan, High 1 is considered to *“provide a good buffer for accommodating unmet need from Leicester City, although it is not clear at this time whether it would be sufficient and so it would still represent a risk.”* Further, it is acknowledged that 512 dwellings per annum is below demographic trends and build rates for the District.
- 3.16 The Council’s own evidence points to consistently high delivery of homes and there is a danger that the standard method seriously underplays the demand for homes and the role the District plays in the housing market area. There are clear arguments to support a housing target higher even than the High 2 category which is below recent delivery.
- 3.17 On this basis, the High 2 scenario is considered to *perform the best* and provide a very significant degree of flexibility to address unmet need. There are clearly arguments to support a higher growth scenario in the District. However, the preference for the High 2 scenario is considered

appropriate given the scenario's considered.

3.18 The draft local plan sets out 9 options for the spatial distribution of development:

- Option 1: As per adopted Local Plan
- Option 2: Principal Town and Key Service Centres
- Option 3: Principal Town and Key Service Centres and Local Service Centres
- Option 4: Principal Town and New settlement
- Option 5: Principal Town, New settlement and Key Service Centres
- Option 6: Principal Town, New settlement and Key Service Centres and Local Service Centres
- Option 7: Principal Town, New settlement and Key Service Centres and Local Service Centres and Sustainable Villages
- Option 8: New settlement
- Option 9: Principal Town, New settlement and Key Service Centres and Local Service Centres, Sustainable Villages and Small Villages

3.19 The Council have identified a clear preference for the High 2 growth scenario and on the basis that only options 2b, 3b, 4b, 5b, 6b, 7b, 8 and 9b are capable of accommodating that level of growth we only comment on these options.

High 2 scenario (residual requirement = 5,100 dwellings)	
Option 2b	Principal Town (3,060 dwellings) and Key Service Centres

	(2,040 dwellings))
Option 3b	Principal Town (2,550 dwellings), Key Service Centres (1,530 dwellings) and LSC (1,020 dwellings)
Option 4b	Principal Town (2,040 dwellings) and New Settlement (3,060 dwellings)
Option 5b	Principal Town (2,295 dwellings), New Settlement (2,295 dwellings) and KSC (510 dwellings)
Option 6b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (1,020 dwellings) and LSC (510 dwellings)
Option 7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)
Option 9b	Principal Town (1,020 dwellings), New Settlement (1,785 dwellings), KSC (459 dwellings), LSC (255 dwellings), Sustainable Villages (1,377 dwellings) and Small Villages (204 dwellings)
New Settlement (residual requirement = 5,100 dwellings)	
Option 8	New Settlement

3.20 We appreciate that the Plan identifies Options 3a and 7b as the preferred options, with 3a relating to the High 1 scenario and 7b the High 2 scenario. As acknowledged within the Plan, and set out in paragraph 3.21, the High 2 scenario performs best and therefore Option 3a is not considered suitable.

3.21 Option 7b represents a continuation of the strategy in the adopted Local Plan which has a demonstrable strong delivery record albeit that the option includes a new settlement and the existing strategy does not. The

SA identifies potential significant positive effects (SA4 - good quality homes to meet local needs and SA6 - enhance the vitality and viability of existing town and village centres). However, The SA also makes clear that the inclusion of a New Settlement causes potential significant negative effects for SA13 (conserve and enhance the quality of the District's landscape and townscape character) and SA14 (ensure land is used efficiently and effectively).

3.22 The Council will be aware of the guidance at paragraph 69 of the Framework which recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Such sites are often found at villages in the sustainable settlement tier and restricting such development through the inclusion of a new settlement is directly opposed to that approach. In our view, an option which distributes through the hierarchy, to sustainable settlements, without a new settlement should be considered and assessed.

3.23 A new settlement may provide a sensible solution for growth within Leicestershire in the future. However, it is not likely to deliver substantial numbers within a plan period to 2039. The Framework recognises this position and says that new settlements require a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery. We agree with this and in our view a new settlement could be considered against a longer timeframe such as 2050 set out in the SGP or for the next Local Plan.

3.24 Only options 7b and 9b distribute growth to Sustainable Villages. However, both options include a New Settlement at 1,785 homes. By contrast options 2b and 3b do not include a new settlement and distribute only to the principal town and key service centres (2b) and principal town, key service centre and local service centres (3b). In this respect, 2b and 3b provide for much greater growth in the higher order settlements. The inclusion of a new settlement in both options which distribute to sustainable settlements results in less opportunity for growth in those

villages.

- 3.25 In our view, a hybrid strategy is required for the reasons sets out above and should be tested through SA. A distribution under such a hybrid option could be:

Principal Town (1,785 dwellings), Key Service Centres (1,330 dwellings), Local Service Centres (1,020 dwellings) and Sustainable Villages (965 dwellings)

4. REPRESENTATIONS IN RESPECT OF LAND AT RUSHEY CLOSE, ASHBY DE LA ZOUCH

- 4.1 Ashby de la Zouch is the second most sustainable settlement in North West Leicestershire and is well placed to be considered as a location for growth. Ashby has a strong market and distributing housing to the town, particularly a smaller site for 50 homes, provides for excellent delivery prospects.
- 4.2 The land at Rushey Close, Ashby De La Zouch extends to approximately 3.19 hectares and is immediately adjacent to the existing built form. The site is currently maintained as agricultural land with the south-eastern boundary abutting the recently constructed Bellway Homes development on the western edge of Ashby. The site is of a size which will have excellent marketability for the smaller, regional developers but also working for the national developers.
- 4.3 The site benefits from access through the Bellway development and the continuation of Rushey Close which connects to Bishop Hall Road and subsequently Burton Road.
- 4.4 The site is in a suitable location for accessing a significant range of local facilities on foot, including a convenience store within 650m and a medical practice and pharmacy within 550m. The nearest primary school is circa 1,000m from the site and therefore accords with the IHT guidance

regarding an acceptable walking distance of 1,000m to the nearest primary school, while an additional primary school is under construction approximately 750m from the site. Ashby Town Centre is located circa 1.75km from the site, providing further access to all required amenities. This is still within the 2km walking distance referred to in the MfS guidance.

- 4.5 Bus stops are located on Burton Road and Moira Road, providing access to the no. 9 and no. 29 services. These stops are 550m and 700m respectively from the centre of the site and provide a regular service to Burton, Swadlincote, Coalville, Bardon Hill, Markfield and Leicester. A further bus stop on Bishop Hall Road approximately 300m from the site has recently been delivered as part of the consented development.
- 4.6 Traffic associated with the development proposal will not have a material impact on the local highway network given the small number of trips generated.
- 4.7 The site has a strong relationship with the built-up edge of Ashby due to being formed of sloping ground overlooking the settlement edge. Whilst the site itself is undeveloped, the character of the site is inevitably influenced by the proximity of the residential development immediately adjacent to the east. This restricts any sense of a rural or open countryside character being evident. Residential development at the site would represent a small-scale extension to the existing settlement edge.
- 4.8 The site presents an opportunity to utilise the physical and functional separation provided by the National Forest woodland plantation and solar farm to the west to provide a residential development which does not compromise the established separating function of these features and without adversely affecting the visual amenity of users of the locality.
- 4.9 The hedgerows on site can be enhanced through suitable planting. The wider biodiversity is limited by the sites arable status which creates a low biodiversity value which can be enhanced through the creation of wet and dry areas such as drainage ponds and species rich planting. In addition,

bat and bird boxes can be included to support these species and deliver a net gain in biodiversity within the scheme.

- 4.10 The Council will be aware that the site was formerly part of an area reserved for National Forest tree planting as part of the outline permission for the development of 275 dwellings (14/00578/OUTM). However, an off-site contribution to National Forest tree planting has been delivered by the development as was agreed during the course of the reserved matters permission (15/01191/REM). Consequently, the site was not required for National Forest Planting and is able to come forward for development.
- 4.11 Richborough Estates are committed to meeting the National Forest Planting guidelines. Early discussions have taken place with the National Forest Company and there are a number of options for planting on the site or for off-site planting through contributions, possibly on land within the same ownership. Richborough Estates would welcome further discussions to explore this with the Council and the National Forest Company.
- 4.12 The land available has been assessed as suitable, available and achievable for development within a 5 year period. The total land available is suitable to deliver approximately 50 dwellings.
- 4.13 Richborough Estates has prepared an indicative masterplan to respond to the constraints and opportunities (Appendix A). Nevertheless, they are willing and able to take a flexible approach to the development and would welcome dialogue with the Council. To that end, the masterplan should not be taken as the final product but rather than a stage in an iterative process.
- 4.14 Given that there are no physical or technical constraints which would prevent development from taking place and the sustainable and logical location the site should be selected as a site allocation in Local Plan Review.

5. CONCLUSION

- 5.1 We agree with the settlement hierarchy in principle and the identification of Ashby de la Zouch as a Key Service Centre.
- 5.2 We agree that the housing requirements proposed in the Low and Medium scenarios are not appropriate. The Council's own evidence shows that the High 1 scenario is below demographic trends and recent build rates for the District. There is clear evidence to support a growth scenario above the Standard Method and, taking into account the circumstances including increasing unmet need from Leicester City, the evidence suggests that High 2 is the most appropriate option. We endorse that finding.
- 5.3 We do not consider the Council's preferred option should be based upon the delivery of a new settlement, which is unlikely to deliver sufficient growth within the plan period. With the best two performing options including a new settlement we consider it necessary to test a hybrid which distributes the 1,785 new settlement homes to other tiers in the hierarchy including sustainable settlements to allow for a greater focus on delivery from small and medium sites in accordance with paragraph 69 of the Framework. Including homes at Ashby under such a hybrid is imperative due to its strong market and safe delivery prospects.
- 5.4 Our proposed hybrid development strategy aligns with the benefits of option 7b whilst removing the negative impacts from the new settlement and suggests the following distribution:
- Principal Town (1,785 dwellings), Key Service Centres (1,330 dwellings), Local Service Centres (1,020 dwellings) and Sustainable Villages (965 dwellings).
- 5.5 The Land off Rushey Close is suitable, available and achievable and Richborough Estates are committed to its promotion and willing to deliver homes in the short term.

-
- 5.6 Richborough Estates are willing to explore how the Land off Rushey Close can support infrastructure delivery, including National Forest Planting, and to take a flexible approach to the number of homes required to provide a sensible and meaningful contribution to the eventual housing requirement.
- 5.7 The site can positively contribute towards a five year supply and as a result we respectfully request that Land off Rushey Close is identified as a housing allocation in the Local Plan Review.

Appendix A – Indicative Layout for Land off Rushey Close, Ashby de la Zouch

The contractor is responsible to ensure that no products are to be utilised that do not comply with relevant British and/or European Standards and/or Codes of Practice, COSHH Regulations, Construction Regulations, or which are known or suspected at the time of product selection and/or construction to be deleterious to health and safety or to the durability of the work or not in accordance with good building practices. The contractor is responsible for checking dimensions, tolerances, levels and references. This drawing is to be read in conjunction with all relevant consultants or specialists drawings. Any discrepancy to be notified to Baily Garner LLP and rectified before proceeding with the works on site or shop drawings. Where an item is covered by drawings to different scales, the larger scale drawing is to be worked to. Do not scale drawings. Figured dimensions to be worked to in all cases. This drawing and the copyrights and patents therein are the property of Baily Garner LLP and may not be used or reproduced without consent or attribution. Baily Garner LLP, 55 Charlotte Street, Birmingham, B3 1PX. 0121 236 2236. birmingham@bailygarner.co.uk



This drawing is for indicative purposes only and subject to detailed design and survey.

KEY

	POTENTIAL PHASE 2 DEVELOPMENT CIRCA 7.9 ACRES/ 3.19 HA
	NET DEVELOPABLE AREA CIRCA 3.59 ACRES/ 1.45 HA <small>Proposed quantum: 35 net dph, Circa 51 dwellings 38 net dph, Circa 4 dwellings</small>
	POS CIRCA 4.24 ACRES/1.71 HA

B: Annotation amends to JB email comments	cjl	cjl	230717
A: Red line boundary added to viewport	cjl	cjl	230717
REVISION:	D:	C:	DATE:

0A2

CLIENT:
RICHBOROUGH ESTATES LTD

PROJECT:
**LAND OFF BURTON ROAD,
ASHBY-DE-LA-ZOUCH**

PURPOSE OF
ISSUE:
PRELIMINARY

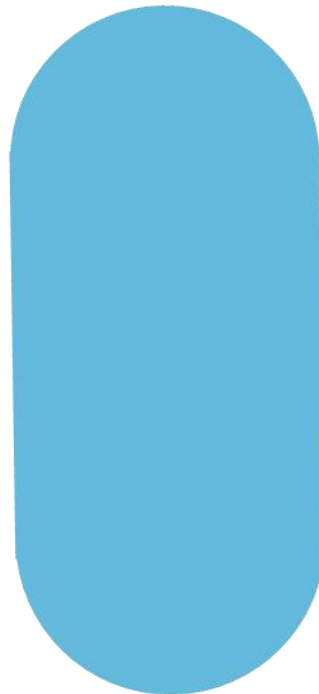
DRAWING TITLE:	D	C	DATE:
PROPOSED DEVELOPMENT	CJL	CJL	21.07.2017
CONCEPT PLAN			
JOB NUMBER:	DRAWING NUMBER:	REVISION:	SCALE:
30041	1	B	1:2000BA2



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

LAND WEST OF WASH WAY/A447, RAVENSTONE, COALVILLE

On Behalf of Avant Homes



1. INTRODUCTION

1.1 This representation is made on behalf of our client, Avant Homes Midlands in respect of their interests at land west of Wash Way/A447, Ravenstone, Coalville. It responds specifically to the North West Leicestershire Local Plan 2020-2039 (Consultation Draft Plan).

1.2 The Consultation Draft Plan is currently the subject of consultation and representations are invited until the 14 March 2022.

1.3 This representation provides our views on the:

- Duty to Cooperate and distribution of development across the HMA (Leicester and Leicestershire Statement of Common Ground),
- settlement hierarchy
- amount of housing development
- Interim Sustainability Appraisal Report of the Spatial Options
- Specific comments regarding self and custom build housing; space standards; accessible and adaptable housing and energy efficiency
- The case for the Ravenstone site

2. BACKGROUND AND CONTEXT

2.1 The National Planning Policy Framework (NPPF) confirms at paragraph 15 that the planning system should be genuinely plan-led. The presumption in favour of sustainable development applies to plan making and says that plans should positively seek opportunities to meet the development needs of their area, and that strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas (paragraph 11).

2.2 Plans should be prepared positively, in a way that is aspirational but

deliverable and be shaped by early, proportionate and effective engagement between plan-makers and, inter alia, local businesses. They should also contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals (paragraph 16).

- 2.3 Paragraph 20 says that strategic policies should set out an overall strategy for the pattern, scale and quality of development, and make sufficient provision for housing (including affordable housing), and community facilities (including education). Paragraph 22 goes into say that strategic policies should look ahead over a minimum 15 year period from adoption and larger scale developments form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery
- 2.4 Paragraph 23 of the NPPF says that strategic policies should provide a clear strategy for bringing sufficient land forward, and at a sufficient rate, to address objectively assessed needs over the plan period, in line with the presumption in favour of sustainable development. This should include planning for and allocating sufficient sites to deliver the strategic priorities of the area.
- 2.5 Paragraph 31 says that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.
- 2.6 Paragraph 32 recognises the legal requirement for local plans to be informed throughout their preparation by a sustainability appraisal demonstrating how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). It highlights that significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.
- 2.7 Plans should set out the contributions expected from development,

including the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for health). This should not undermine the deliverability of the plan (paragraph 34).

2.8 For a plan to be adopted it must pass an examination and be found to be 'sound'. Paragraph 35 identifies that plans are 'sound' if they are:

a) **Positively prepared** – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

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

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

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

2.9 Paragraph 60 of the NPPF says that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.

2.10 Paragraph 61 of the NPPF says that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach and paragraph 62 confirms that within this context,

the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

- 2.11 Paragraph 66 of the NPPF says that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.
- 2.12 Paragraph 68 of the NPPF says that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 2.13 Paragraph 69 of the NPPF recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Paragraph 72 of the NPPF goes on to say that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.
- 2.14 Paragraph 74 says that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five

years' worth of housing against their housing requirement set out in adopted strategic policies.

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

2.16 Paragraph 79 of the NPPF says that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services.

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

1. the plan must set out an overall strategy for the pattern of development that makes sufficient provision for housing to meet the needs of North West Leicester as well as any needs that cannot be met within neighbouring areas;
2. sufficient sites to deliver the strategic priorities of the area must be planned for and allocated;
3. a sufficient amount and variety of land can come forward where it is needed;
4. the plan should be positive, aspirational and be responsive to changes in local circumstances;
5. strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations;
6. in rural areas housing developments that enhances or maintains the vitality of rural communities should be supported; and
7. suitable locations for villages to grow and thrive should be identified, especially where this will support local services, including extensions

to villages where this can help to meet identified needs in a sustainable way.

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

3.1 The Local Plan Review document deals specifically with Development Strategy and Policy Options. A further two Regulation 18 Consultations are programmed for 2022 to outline potential site allocations (expected April/May 2022) and to set out the scope and detail of plan policies (expected October and November 2022).

3.2 The current consultation acknowledges the need for the District to work constructively with other Authorities and partners organisations on strategic matters that have cross boundary implications. In particular, the Council acknowledges the Leicester and Leicestershire Strategic Growth Plan (SGP), which sets out an agreed vision and a strategy for the city and county up to 2050 to be delivered through individual authorities' local plans. The SGP is particularly relevant given Leicester City's unmet need and the implications for Local Plans currently being prepared in the county. We understand the local authorities are actively seeking to resolve housing distribution to manage unmet need.

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

2 – Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type.

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

4 - Reduce the need to travel and increase opportunities for cycling,

walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure.

- 3.4 The Local Plan Review proposes a Settlement Classification (paragraph 3.11) based upon the findings of the North West Leicestershire District Council Settlement Study dated 2021. The methodology includes an assessment of services and facilities available within each settlement, but also considers the accessibility to services and facilities elsewhere by public transport as such provision can contribute towards the sustainability of a settlement.
- 3.5 The Settlement Classification has Coalville Urban Area comprising of Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone and Whitwick as well as the Bardon employment area as the districts 'Principal Town'. Castle Donington and Ashby de la Zouch are identified as Key Service Centres and are identified as second tier settlements, whilst Measham, Ibstock and Kegworth are identified Local Service Centres forming a third tier of settlements.
- 3.6 Ravenstone is identified as a Sustainable Village, the fourth tier within the hierarchy. There are 18 settlements identified by the Council as falling in this tier of the settlement hierarchy.
- 3.7 We agree with the general approach taken to arrive at the settlement hierarchy but have some concerns about the detailed methodology used to appraise the settlements. For example Ravenstone benefits from a close relationship with the Principal Town of Coalville being less than 500m from the Snibston area of the Town. This allows the village to benefit from many of the services and facilities that the town offers and yet, in our view, the methodology fails to properly take account of the close functional relationship that must exist.
- 3.8 For example the current edge of Ravenstone is located around 1.2km from Stephenson Industrial Estate and around 1km from Oaks and Ravenstone Road Industrial Estates. There are metalled and lit paths

between the edge of the settlement and these sites and they are in easy walking distance, but the score that can be assigned to the village in respect of the employment criteria is constrained by the fact that these commercial sites are in the settlement boundary of the Principal Town rather than the settlement boundary of Ravenstone. Clearly this is an irrelevance and what matters is the accessibility to the facility itself.

3.9 Similarly Ravenstone benefits from the secondary and post-secondary education provision available in Coalville. It is likely that development in Ravenstone could be better related to the towns education offer than some parts of the Principal Town, for example Thringstone or Whitwick, but again, this is not reflected adequately in the Council's Settlement Hierarchy evidence.

3.10 There is, in our view, a strong argument for including Ravenstone within Tier 1 of the settlement hierarchy. Its proximity and functional relationship to the Coalville Urban Area are obvious and whilst there would be a need to protect the distinct character of Ravenstone, this can be secured through careful planning. Indeed, the Council has successfully protected the distinct characters of Whitwick Thringstone and other areas of the district that comprise the Principal Town of Coalville through successive plans.

3.11 However, even if Ravenstone remains to be considered as a sustainable Village the guidance at paragraph 79 of the Framework states that planning policies should identify opportunities for villages to grow and thrive and that development in one village may support services in a village nearby. These circumstances are suggestive of a role for growth at Ravenstone, which fit well with the local plan vision and objective 4 and other sustainable settlements cannot match. We believe these more nuanced matters should be borne in mind when it comes to selecting site allocations with the benefits of development at Ravenstone weighted accordingly.

3.12 The consultation document goes on to identify four options for the housing requirement:

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- 368 dwellings (this is the result from the standard method) – referred to as Low scenario;
 - 448 dwellings (this is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA)) – referred to as Medium scenario;
 - 512 dwellings (this is the figure from the Leicester and Leicestershire Strategic Growth Plan) – referred to as High 1 scenario; and
 - 730 dwellings (this is based on the 2018 household projections with an allowance for vacancy rates in dwellings) – referred to as High 2 scenario.
- 3.13 These options have been assessed against demographic trends, build rates (market signals), unmet need and deliverability. The Council accept at paragraph 4.14 of the draft local plan that on the basis of the evidence it has reviewed *“that any housing requirement included as part of the Local Plan will have to be higher than the standard method”*.
- 3.14 Scenarios High 1 and High 2 are concluded to represent potentially suitable options until such time as the issue of the redistribution of unmet housing need from Leicester City has been agreed. The bullet points within paragraph 4.19 of the draft local plan recognise that the High 2 scenario “performs the best” and provides a very significant degree of flexibility to help address issues of unmet need.
- 3.15 The latest Authority Monitoring Report (December 2021) sets out housing completions since 2011 with the most recent 5 years (2016-21) averaging 770 dwellings per year and peaking in 2017/18 at 978 dwellings. This evidence points to a higher housing requirement than any of the options identified.
- 3.16 Several Council’s in Leicester and Leicestershire, including North West
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Leicestershire, have accepted there is an unmet need from Leicester City of approximately 18,000 dwellings (2020-36). The Framework is clear in its expectation that these homes should be accommodated somewhere in Leicestershire.

- 3.17 The Leicester and Leicestershire authorities continue to work together to agree how this will be distributed. At the time of writing the most up to date framework for strategic planning in the housing market area is set out in the Strategic Growth Plan (SGP) for Leicester and Leicestershire. The SGP appears to have been based on unmet need from Leicester City for somewhere between 6,000 and 8,000 homes to 2036 and arrived at a housing requirement for North West Leicestershire for 512 dwellings each year between 2031-50. Clearly the unmet need is now known to be significantly higher.
- 3.18 The context for housing requirements in North West Leicestershire point to the Low scenario not being a sensible approach. As the Council note in Table 3 of the Draft Consultation Report, this scenario would conflict with national policy and would raise significant issues for the Local Plan in respect of the Duty to Cooperate. This is because limiting delivery would conflict with the SGP and will not allow for any flexibility in meeting unmet housing need from Leicester. Such an approach, directly conflicting with the recent joint work across Leicestershire, would result in a plan which has not been positively prepared and would almost certainly lead to challenges in respect of accommodating unmet need.
- 3.19 The Medium scenario for 448 dwellings per annum is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA). This study was published 5 years ago and has its foundations under the pre-standard method approach utilising aged demographic data. The SGP was informed by the 2017 HEDNA and arrived at a higher figure for North West Leicestershire. Adopting a lower figure than the SGP would conflict with the HMA agreement, a backwards step and inappropriate in the context of increased unmet need.

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- 3.20 High 1 scenario aligns with the Leicester and Leicestershire SGP to 2039, albeit the SGP envisaged growth across the longer period to 2050. As set out in respect of the Medium scenario, the Leicester City unmet need is now identified to be circa 18,000 homes rather than the 8,000 homes that underpinned the SGP. Pursuing High 1 would provide no relief to the additional 10,000 homes that now need to be found.
- 3.21 As set out in paragraph 4.19 of the draft local plan, High 1 is considered to *“provide a good buffer for accommodating unmet need from Leicester City, although it is not clear at this time whether it would be sufficient and so it would still represent a risk.”* Further, it is acknowledged that 512 dwellings per annum is below demographic trends and build rates for the District.
- 3.22 The Council’s own evidence points to consistently high delivery of homes and there is a danger that the standard method seriously underplays the demand for homes and the role the District plays in the housing market area. There are clear arguments to support a housing target higher even than the High 2 category which is below recent delivery.
- 3.23 Still, the High 2 scenario is considered to *perform the best* and provide a significant degree of flexibility to address unmet need. There are clearly arguments to support a higher growth scenario in the District. However, the preference for the High 2 scenario is considered the most appropriate given the scenarios considered.
- 3.24 The draft local plan sets out 9 options for the spatial distribution of development:
- Option 1: As per adopted Local Plan
 - Option 2: Principal Town and Key Service Centres
 - Option 3: Principal Town and Key Service Centres and Local Service Centres
 - Option 4: Principal Town and New settlement
-

- Option 5: Principal Town, New settlement and Key Service Centres
- Option 6: Principal Town, New settlement and Key Service Centres and Local Service Centres
- Option 7: Principal Town, New settlement and Key Service Centres and Local Service Centres and Sustainable Villages
- Option 8: New settlement
- Option 9: Principal Town, New settlement and Key Service Centres and Local Service Centres, Sustainable Villages and Small Villages

3.25

The Council have identified a clear preference for the High 2 growth scenario and on the basis that only options 2b, 3b, 4b, 5b, 6b, 7b, 8 and 9b are capable of accommodating that level of growth we only comment on these options.

High 2 scenario (residual requirement = 5,100 dwellings)	
Option 2b	Principal Town (3,060 dwellings) and Key Service Centres (2,040 dwellings)
Option 3b	Principal Town (2,550 dwellings), Key Service Centres (1,530 dwellings) and LSC (1,020 dwellings)
Option 4b	Principal Town (2,040 dwellings) and New Settlement (3,060 dwellings)
Option 5b	Principal Town (2,295 dwellings), New Settlement (2,295 dwellings) and KSC (510 dwellings)
Option 6b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (1,020 dwellings) and LSC (510 dwellings)
Option 7b	Principal Town (1,785 dwellings), New Settlement (1,785

	dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)
Option 8	New Settlement (5,100 dwellings)
Option 9b	Principal Town (1,020 dwellings), New Settlement (1,785 dwellings), KSC (459 dwellings), LSC (255 dwellings), Sustainable Villages (1,377 dwellings) and Small Villages (204 dwellings)

3.26 We appreciate that the Plan identifies Options 3a and 7b as the preferred options, with 3a relating to the High 1 scenario and 7b the High 2 scenario. As acknowledged within the Plan, and set out in paragraph 3.21, the High 2 scenario performs best and therefore Option 3a is not considered suitable.

3.27 Option 7b represent a continuation of the strategy in the adopted Local Plan which has a demonstrable strong delivery record albeit that the option includes a new settlement and the existing strategy does not. The SA identifies potential significant positive effects (SA4 - good quality homes to meet local needs and SA6 - enhance the vitality and viability of existing town and village centres). However, the SA also makes clear that the inclusion of a new settlement causes potential significant negative effects for SA13 (conserve and enhance the quality of the District's landscape and townscape character) and SA14 (ensure land is used efficiently and effectively).

3.28 The Council will be aware of the guidance at paragraph 69 of the Framework which recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Such sites are often found at villages in the sustainable settlement tier and restricting such development through the inclusion of a new settlement is directly opposed to that approach. In our view, an option which distributes

through the hierarchy, to sustainable settlements, without a new settlement should be considered and assessed.

3.29 A new settlement may provide a sensible solution for growth within Leicestershire in the future. However, it is not likely to deliver substantial numbers within a plan period to 2039. Not least because new settlements usually require significant cooperation between multiple developers and other stakeholders and government agencies and often present significant infrastructure funding and delivery challenges which can often delay site delivery. The NPPF recognises this position and says that new settlements require a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery. We agree with this and in our view a new settlement could be considered against a longer timeframe such as 2050 set out in the SGP or for the next Local Plan.

3.30 Only options 7b and 9b distribute growth to Sustainable Villages. However, both options include a new settlement and allow for the delivery of 1,785 homes within that settlement by 2039. By contrast options 2b and 3b do not include a new settlement and distribute housing only to the Principal Town and Key Service Centres (2b) and Principal Town, Key Service Centre and Local Service Centres (3b). In this respect, 2b and 3b provide for much greater growth in the higher order settlements. The inclusion of a new settlement in both options which distribute to sustainable settlements results in less opportunity for growth in those villages.

3.31 In our view, a hybrid strategy is required for the reasons sets out above and should be tested through Sustainability Appraisal. A distribution under such a hybrid option could be:

Principal Town (1,785 dwellings), Key Service Centres (1,330 dwellings), Local Service Centres (1,020 dwellings) and Sustainable Villages (965 dwellings)

3.32 Such an option would allow for the Council to continue concentrating

most growth in Coalville, with further notable growth for Castle Donington and Ashby de la Zouch and further proportionate growth in third and fourth tier settlements. In our view this would represent a continuation of the Council's current growth strategy and so represent a Business as Usual (BAU) scenario in respect of the apportionment of housing growth.

- 3.33 This is because Sustainable Villages and smaller settlements have accounted for the delivery of 950 dwellings between 2011-21, equivalent to 15.3% of the District's housing supply over that past ten years. In this context we would highlight that the delivery of just 255 dwellings in fourth tier settlements as proposed in Option 7b (equating to just 5% of the District's housing requirement under the High 2 Growth Scenario) would appear very low and is likely to be significantly suppress the delivery of both market and affordable housing in otherwise sustainable settlements.
- 3.34 Turning to Housing issues outlined in Section 5 of the North West Leicestershire Local Plan Review please also note the specific responses in respect of self and custom build housing; space standards; accessible and adaptable housing and energy efficiency:
- 3.35 Question 6: Avant disagree with the Council's proposed policy relating to self-build and custom housebuilding. There is no national policy basis for imposing an obligation on landowners/developers of sites to set aside plots for self/custom housing on sites comprising more than 50 dwellings. Under the Self Build & Custom Housebuilding Act 2015 and NPPF (2021, para 62) it is the responsibility of the Council, not developers, to ensure that sufficient permissions are given to meet demand. The Council have no authority to restrict the use of land to deliver self/custom build. The NPPG sets out ways in which the Council should consider supporting self/custom build by 'engaging' with developers and 'encouraging' them to consider self/custom build 'where they are interested'.
- 3.36 In addition, the provision of self/custom plots adds extra complexities and health and safety issues in the development of the wider site. Any differential between lead-in times and build out timescales may lead to construction work outside of designated formal compounds and
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unfinished plots next to completed and occupied plots, which not only results in consumer dissatisfaction, but could potentially cause safety issues with families living immediately adjacent to unmanaged 'small' building sites. It is important that unsold plots are not left empty and/or half completed as this would be detrimental to the attractiveness of the wider site and potentially adversely affect sales rates. Therefore, the timescale for reversion of these plots to the original housebuilder should be as short as possible, and the proposed marketing of plots should be reduced to 12 weeks maximum.

- 3.37 Question 7: Avant disagree with the Council's proposed Space Standard Policy. If the Council wishes to apply the optional Nationally Described Space Standard (NDSS) to all dwellings, then this should only be done in accordance with the 2021 NPPF. The Council therefore need to provide a local assessment evidencing their case/justification for requiring internal space policies. In addition, there is a direct relationship between unit size, £sqm and affordability. The Council's policy approach does not recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Smaller dwellings play a valuable role in meeting specific needs in both market and affordable housing.
- 3.38 Question 8: Avant disagree with the Council's proposed Accessible and Adaptable Housing Policy. The Council's proposed policy approach will be unnecessary if National Policy is amended via proposed changes to Part M of the Building Regulations. As set out in the 2021 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate and proportionate. The evidence provided by the Council does not justify the proposed policy requirement. No local circumstances are identified which demonstrates that the needs of North West Leicestershire differ substantially to those across Leicestershire or East Midlands. Furthermore, additional costs associated with M4(2) and M4(3) compliant dwellings should be included in the Council's updated Viability Assessment.

3.39 Question 9: The M4(3)(a) requirement should not apply to market housing – it should only be required for dwellings over which the Council have housing nomination rights as set out in the NPPG.

3.40 Question 20: Avant disagree with the Council's proposed policy approach for energy efficiency. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes, set out in the 2021 Part L Interim Uplift proposals for the 2025 Future Homes Standard.

4. REPRESENTATIONS IN RESPECT OF LAND TO THE WEST OF WASH WAY/A447, RAVENSTONE, COALVILLE

4.1 Ravenstone is classed as a 'Sustainable Village' within the North West Leicestershire Local Plan and is well served in terms of facilities as highlighted by the Council's Settlement Study. The village benefits from a post office and local shop within 400m of the southern edge of the Wash Way site), primary school (700m), playschool (100m), village hall (200m), sports pitches and playgrounds and parks (50m). There are bus stops located on the A447, 50m to the south of the site and immediately adjoining the site on Church Lane. This is served by the Arriva 15 service and provides an hourly service between Coalville and Ibstock. Further bus stops are located within 400m of the site on Swannington Road served by the Arriva Midlands 29 service also serving Coalville and Ibstock as well as the no. 15 service. Together these services provide an half hourly service to Coalville)

4.2 Avant Homes Midlands are promoting a 12 hectare parcel of land comprised of two agricultural fields to the north of Ravenstone for residential development. The site immediately adjoins the northern edge of the village and wraps around the existing sports field and is located between Church Lane and the A447.

4.3 The site is largely unconstrained and is relatively flat, falling slightly from

north to south. The two fields are bound by established hedgerows, including roadside hedges that feature several mature hedgerow trees. A Public Right of Way crosses the site between the two fields, providing a pedestrian connection from Wash Lane to the recreation ground and Church Lane (via Piper Lane). Electricity pylons and overhead power lines cross the northern field. A high pressure gas main crosses the site from north-west to south-east where it then runs south along Wash Lane

- 4.4 The site is entirely within Flood Zone 1, land at the lowest risk of fluvial flooding, and is not at risk from canals, reservoirs or large waterbodies. There are no heritage assets within, or adjoining the site, and is located outside of any local landscape designations. Given the current land use the site is unlikely to present any notable ecological impacts and a significant buffer proposed between land for development and the existing edge of Coalville will provide opportunity for significant National Forest tree planting and biodiversity enhancements in line with emerging biodiversity net gain requirements.
- 4.5 As noted elsewhere in this report the immediate context is provided by the urban influence of the Coalville Urban Area and urbanising features such as energy transmission infrastructure.
- 4.6 There are no clear views of the site from the older part of Ravenstone – and its Conservation Area - on account of the screening created by the intervening and more modern built-up area located between the site and the historic core of the village.
- 4.7 The proposed landscape approach has been informed by a Preliminary Review of Landscape Character and Visual Amenity' prepared by FPCR Environment and Design Ltd in support of development of the site. This concludes that although it has some value like all landscapes, the site and the surrounding landscape is not designated for any landscape quality at a national or local level and that whilst having rural characteristics in terms of farmland, there are urbanising influences on the site primarily from the electricity pylons and overhead power lines, which are a prominent detracting feature within the site and the local

landscape. Overall, it is considered that the Site is rather unremarkable farmland being bound and contained by buildings, hedgerows, and the main transport route of the A447. It has no pronounced sense of scenic quality, tranquillity, wildness and distinctiveness such that it sets it apart from the wider landscape. Furthermore, it has no significant natural features, and is not covered by any ecological or cultural heritage designations.

- 4.8 This assessment is consistent with the Council's own evidence, prepared by Gillespies that concludes the overall landscape sensitivity for the site for housing development is medium and that landscape is less susceptible to harm owing to the presence of large scale energy infrastructure. In respect of visual sensitivity the site is similarly considered to fall in an area where residential development would have a medium impact.
- 4.9 Nonetheless, our client is proposing sensitively address this site reflecting its location between Ravenstone and the Coalville urban area.
- 4.10 The proposed approach to managing landscape and visual impacts is to leave the northern part of the site free of built development. This will facilitate the strong integration of the urban edge and will ensure appropriate separation of the two settlements. Moreover this part of the site would be available to accommodate Nation Forest tree planting and other habitat creation reflecting the desirability to create a strong landscape buffer between the two settlements.
- 4.11 ADC Infrastructure Ltd have reviewed highways issues relating to the site and prepared an access strategy. On the assumption that the speed limit on Wash Lane would remain as 40mph, a new access should be separated from existing accesses on the opposite side of the road by 50m. 2.4m x 120m visibility splays would be required from any access and which can be achieved along Wash Lane. Given this road is a Classified A road with a 40mph speed limit with relatively high traffic volumes, an appropriate form of access would be a ghost island T-junction. That is, a T-junction with an added right turn lane. Refuges

placed within the hatching would help constrain speeds and be seen as a benefit. They would also allow pedestrians to cross Wash Lane, to reach the footway and bus stops along the eastern side of Wash Lane. This would require some widening of Wash Lane to around 9m at the access point. A footway would be required along the frontage on the site side of the road.

- 4.12 The site also adjoins Church Lane. This is a C class road with a carriageway about 6.4m wide, and a 30mph speed limit. The site is at the same level as Church Lane. There is terraced housing with no off-street parking, which means there are parts only wide enough for one-way passage. Church Lane is therefore not suitable as a primary access into the site, but could be used as a secondary access. As a secondary access on to a 30mph road with relatively low traffic volumes, a simple T-junction would be adequate. Church Lane has a slight crest. Therefore, an access point would need to be on that crest, or sufficiently far from it to ensure forward visibility is not obscured
- 4.13 The land available has been assessed as suitable, available and achievable for development within a 5 year period.
- 4.14 Avant Homes Midlands has prepared a vision document and indicative masterplan to respond to the constraints and opportunities (Appendix A). The masterplan shows how the site could be developed for around 200 dwellings, significant open space and green infrastructure including green buffer between Ravenstone and the Coalville Urban Area.
- 4.15 Avant homes are willing and able to take a flexible approach to the development and would welcome dialogue with the District Council. To that end, the masterplan should not be taken as the final product but rather than a stage in an iterative process. Related to the above, the site is located between the Coalville Urban Area and Ravenstone and is contiguous to both settlements, i.e. The Principal Town of Coalville and Ravenstone which is a fourth tier settlement being classed as a sustainable village. Clearly the masterplan shows the development as rounding off the northern edge of Ravenstone and providing a strong

boundary and area of separation between the two settlements. However the close relationship of the site to both Coalville and Ravenstone does allow the site to benefit from substantially better access to local services and facilities than many comparable fourth order settlements.

- 4.16 We believe sites of this nature and scale would contribute to delivery of the housing trajectory and would provide for the strong delivery of sites, especially early in the plan period as strategic sites are bought forward. We also consider Ravenstone to be well placed to receive growth in recognition of its sustainable nature and close relationship with Coalville. There are no physical or technical constraints which would prevent development from taking place on the site and we respectfully request that the site be selected as a housing allocation in the Council's forthcoming Local Plan Review.

5. CONCLUSION

- 5.1 We agree with the settlement hierarchy in principle although the high levels of services and facilities accessible to residents in Ravenstone and its physical and functional relationship with the Coalville Urban Area should be taken into account when considering where growth should be directed.
- 5.2 We agree that the housing requirements proposed in the Low and Medium scenarios are not appropriate. The Council's own evidence shows that the High 1 scenario is below demographic trends and recent build rates for the District. There is clear evidence to support a growth scenario above the Standard Method and, taking into account the circumstances including increasing unmet need from Leicester City, the evidence suggests that High 2 is the most appropriate option. We endorse that finding, although reserve the right to comment further once the further information relating to the quantum and apportionment of unmet need in the Leicestershire Housing Market Area is published.
- 5.3 We do not consider the Council's preferred option should be based upon

the delivery of a new settlement, which is unlikely to deliver sufficient growth within the plan period. With the best two performing options including a new settlement we consider it necessary to test a hybrid which distributes the 1,785 new settlement homes to other tiers in the hierarchy including sustainable settlements to allow for a greater focus on delivery from small and medium sites in accordance with paragraph 69 of the Framework. Any allocation of a new settlement in this Plan period, should simply be to facilitate its delivery in the next Plan given the high level of uncertainty surrounding housing delivery on such sites.

- 5.4 Our proposed hybrid development strategy aligns with the benefits of option 7b whilst removing the negative impacts from the new settlement and suggests the following distribution:

Principal Town (1,785 dwellings), Key Service Centres (1,330 dwellings), Local Service Centres (1,020 dwellings) and Sustainable Villages (965 dwellings).

- 5.5 The settlement hierarchy within the Local Plan Review identified Ravenstone as a Sustainable Village and it is well served by existing facilities and services. Importantly, the village is well related to the centre of Coalville and is in fact closer to many of the Towns facilities than Thringstone and parts of Whitwick which are identified within the Coalville Urban Area.

- 5.6 Our Client's site is relatively unconstrained. Available transport and landscape information indicates that there are no notable constraints that could frustrate early delivery and the site is available and achievable.

- 5.7 The site can positively contribute towards a five year supply and as a result we respectfully request that Land west of Wash Way/A447, Ravenstone, Coalville is identified as a housing allocation in the Local Plan Review.

**Appendix A – Promotion Document: Land west of Wash Way/A447, Ravenstone,
Coalville**

PROPOSED RESIDENTIAL DEVELOPMENT ON

LAND EAST OF

WASH LANE

RAVENSTONE

PROMOTION DOCUMENT

PREPARED BY MARRONS PLANNING
ON BEHALF OF AVANT HOMES

MARCH 2022

Prepared by



on behalf of



March 2022

Document Title: Promotion Document

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2 PLANNING MATTERS

3 THE PLACE

4 OPPORTUNITIES & CONSIDERATIONS

5 THE DEVELOPMENT VISION

6 CONCLUSIONS

INTRODUCTION

EXECUTIVE SUMMARY

Marrons Planning have been instructed by Avant Homes to prepare this Promotion Document to demonstrate the deliverability of land to the north of Ravenstone for residential development. The document is in response to the ongoing Call for Sites exercise currently being conducted by North West Leicestershire District Council (NWLDC).

The site is a logical and deliverable extension to Ravenstone, a settlement which is well-placed geographically to provide new homes for the district.

The site comprises two agricultural fields adjoining existing residential development to the south. Development of the site would represent a natural and logical extension to Ravenstone.

The site is largely unconstrained, benefiting from direct access to the public highway, permanent and defensible boundaries as well as accessibility to public transport and employment opportunities. The site can be accessed directly from the A447 (Wash Lane) to the east, and from Church Lane to the north-west.

This document demonstrates how the site, having taken account of all known opportunities and considerations, is deliverable and viable.

More specifically, analysis of the site's attributes and local context have informed the preparation of an illustrative masterplan included within this document. This in turn demonstrates the ability of the site to deliver approximately 200 new homes.

It is shown within this document that the site is deliverable with the potential to supply much-needed new housing. The site is available now, offers a suitable location for development, is achievable with the potential for development to commence on site within 5 years, and is viable. Accordingly, the site should be allocated in the new NWLDC Local Plan.





COALVILLE

RAVENSTONE

THE LOCATION

Ravenstone is a village located between Coalville and Ashby-de-la-Zouch, in North West Leicestershire and within the National Forest.

Ravenstone is an accessible village with services and amenities that support sustainable development, including:

- St Michael & All Angels Church
- Ravenstone Recreation Park and sports pitches
- Post Office & local shop
- Woodstone Community Primary School
- Play school
- Playgrounds and parks
- Village hall

There are no listed buildings on or near the site that development would impact upon. A handful of Listed Buildings are located in the western part of Ravenstone, within and around the Ravenstone Conservation Area. It is considered that the site is suitably separated from these heritage assets by existing topography and intervening landscaping.

Ravenstone is strategically located, being around 2km west of Coalville which offers an array of facilities and amenities including shops, schools, healthcare services, pubs, a library and supermarkets.

Ravenstone is connected to larger towns and cities by bus and road links. There are bus stops within walking distance of the site and the settlement is located close to the A42 and M1 motorway. As such, Ravenstone is well connected and proposals for the site would constitute sustainable development.

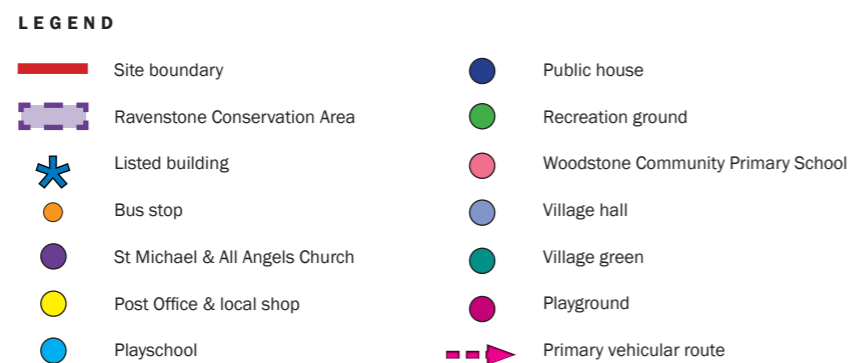


FIG. 1 AMENITIES & MOVEMENT PLAN | not to scale





VIEWS AROUND RAVENSTONE | St Michael & All Angels Church | Ravenstone Village Green | Playground | Village hall

PLANNING MATTERS

OVERVIEW OF PLANNING MATTERS

North West Leicestershire District Council’s Local Plan 2011-2031 was adopted in November 2017 and subjected to Partial Review in 2020. The purpose of the review was to extend the life of Policy S1 of the of the 2017 Local Plan.

Policy S1, as it appeared in the 2017 Local Plan, required the Council to commence a review of the 2017 Local Plan by the end of January 2018 or within 3 months of the adoption of the Local Plan. The Policy also required submission of the Local Plan review within two years from the commencement of that review, otherwise, as the Policy stated, the Plan would be deemed to be out of date. This was to address the Inspector’s concern about whether the Council should accommodate any unmet needs of Leicester.

The Review process did not include any review of the need for development in the District or the allocation of land to meet housing needs.

Within the Adopted Local Plan, Ravenstone is identified as a ‘Sustainable Village’. This is in effect a fourth tier settlement behind Coalville (Principle Town), Ashby-de-la-Zouch and Castle Donnington (Key Service Centres) and Ibstock, Kegworth and Measham (Local Service Centres). The Adopted Local Plan notes that within sustainable villages such as Ravenstone, which have some services and facilities but on a lesser scale, some development would be appropriate.

EMERGING PLAN POSITION

NWLDC has commenced a Substantive Review of its Local Plan. Its preparation timetable is set out in the Council’s Local Development Scheme (LDS), published in January 2022:

TIMETABLE	
Stage	Dates
Consult on Development strategy and other matters	January/February 2022
Consult on potential site allocations	Spring 2022
Consult on draft policies	Autumn 2022
Agree publication version (Regulation 19)	June 2023
Consult on Publication Local Plan (Regulation 19)	June/July 2023
Submission	October 2023
Examination	January 2024
Adoption	mid 2024

TABLE 1 **SUBSTANTIVE REVIEW TIMETABLE**
 excerpt from NWLDC’s local development scheme (january 2022)

The Substantive Review will take account of the requirements arising from the standard method. It will also take account of any, as yet unknown, unmet housing and employment need arising from elsewhere in the Housing Market Area (HMA) or Functional Economic Market Area (FEMA), particularly Leicester City, which the Council is required to accommodate as a result of working with other HMA/FEMA authorities to agree how and where the unmet need will be accommodated.

LANDSCAPE POLICY

There is no specific landscape character policy within the Adopted Local Plan (2017) or the Adopted Local Plan as amended Partial Review (2021). In the latter document, policies that are relevant from a landscape perspective comprise Policy S3 Countryside, D1 Design of New Development, If1 Development and Infrastructure, En1 Nature Conservation, and En3 The National Forest.

NORTH WEST LEICESTERSHIRE, SETTLEMENT FRINGE ASSESSMENT (2010)

This report forms part of the evidence base of the Adopted Local Plan.

The report notes that it has “assessed the landscape value of land around settlement fringes of Ashby de la Zouch, Castle Donnington, Coalville, Ibstock, Kegworth and Measham”. The second part of the report is “a more detailed landscape assessment of the possible future development sites around the settlements identified in the Core Strategy consultation”.

The report identifies diagrammatic land around each settlement as “settlement fringe” areas. The land around Coalville - which includes Ravenstone - is subdivided into areas, with the site lying within part of Area 8 and within the smaller component of C9.

The site (i.e. C9) is identified by the report as being of “Low-potential for mitigation”. Judgments on mitigation are made upon built development extending across the entirety of each site, which may not be the case, and are reached without the benefit of a masterplan, which would include design and landscape mitigation measures to integrate development into the landscape.

It considered that limited weight should be given to the findings of the Settlement Fringe Assessment, as there are issues with its methodology, the lack of transparency in terms of judgment, and the use of an outdated formulaic scoring approach to sensitivity and capacity. A more recent study, completed in 2019, and prepared in line with current professional guidance has been completed in the form of the NWL Sensitivity Study as part of the Local Plan Review. This is considered to have greater weight in terms of sensitivity and ability for sites to accommodate change.





VIEW WITHIN THE SITE | northern field



VIEW WITHIN THE SITE | southern field

NORTH WEST LEICESTERSHIRE LANDSCAPE SENSITIVITY STUDY (2019)

This report forms part of the evidence base of the Adopted Local Plan, Partial Review (2021).

Five large areas of land are identified around the edges of Coalville. Whilst the site lies within Ravenstone it is shown within part of Coalville Urban Parcel E (O1COA-E).

When assessing “Overall Landscape Sensitivity” and using a five-point criteria of “high, high-medium, medium, medium-low, and low”. The report concludes that Urban Parcel E - within which the site is located - is of “medium landscape sensitivity” and “medium visual sensitivity” to accommodating housing development. The report concludes the following:

“OVERALL LANDSCAPE SENSITIVITY

This is a rural landscape comprising pastoral fields, woodland areas and small scale streams / rivers. Natural features are regularly occurring through the parcel however the presence of a pylon line through much of the parcel influences landscape sensitivity. The overall landscape sensitivity is considered to be medium to change arising from new housing development and medium-high to change arising from new employment development”

OVERALL VISUAL SENSITIVITY

The typically flat nature of this rural landscape allows for long distance views to the wider landscape and adjoining settlements. This in balance with the presence of a pylon line across much of the parcel, and the presence of higher susceptibility recreational receptors, means that overall visual sensitivity is considered to be medium to change arising from new housing development and medium-high to change arising from new employment development”

WHY THE SITE IS IDEAL FOR HOUSING

- It is in a sustainable location close to local amenities, accessible by bus and for pedestrians and cyclists;
- It is well connected and related to existing development;
- It will provide a strong, defensible settlement boundary and green 'buffer' along the settlement's northern edge;
- It is suitable, available and deliverable for development and Avant Homes have a good track record in delivering high quality development;
- It is of a size, form and topography which is suitable and deliverable without the need for significant new infrastructure, other than normal provisions for access, drainage and utilities; and
- Its existing mature hedgerows and trees provide an attractive, semi-rural setting for development which can be further enhanced with the provision of green infrastructure and public open space.



THE PLACE

THE SITE

The site comprises two adjoining fields located on the northern edge of Ravenstone. Together, the fields amount to approximately 12 hectares of arable land within the context of the village. The site is bound and contained by the A447 (Wash Lane) to the east, and by Church Lane to the north and west.

The southern field lies alongside Ravenstone Recreation Park and is adjacent to existing residential development. The northern field lies alongside Piper Lane (public footpath) to the west and is bordered by housing at Beadmans Corner to the north-east.

The site is relatively flat in character, the northern field falling gently from north to south.

The site contains no significant landscape features. The two fields are bound by established hedgerows, including roadside hedges that feature several mature hedgerow trees. There is a belt of mature trees along Piper Lane, on the opposite side of the lane to the site.

A Public footpath crosses the site between the two fields, providing a pedestrian connection from Wash Lane to the recreation ground and Church Lane (via Piper Lane).

Electricity pylons and overhead power lines cross the northern field and are a prominent infrastructure feature in this landscape and a detracting visual element

A high pressure gas main crosses the site from north-west to south-east where it then runs south along Wash Lane.

The features, opportunities and considerations of the site are considered fully later in this document.

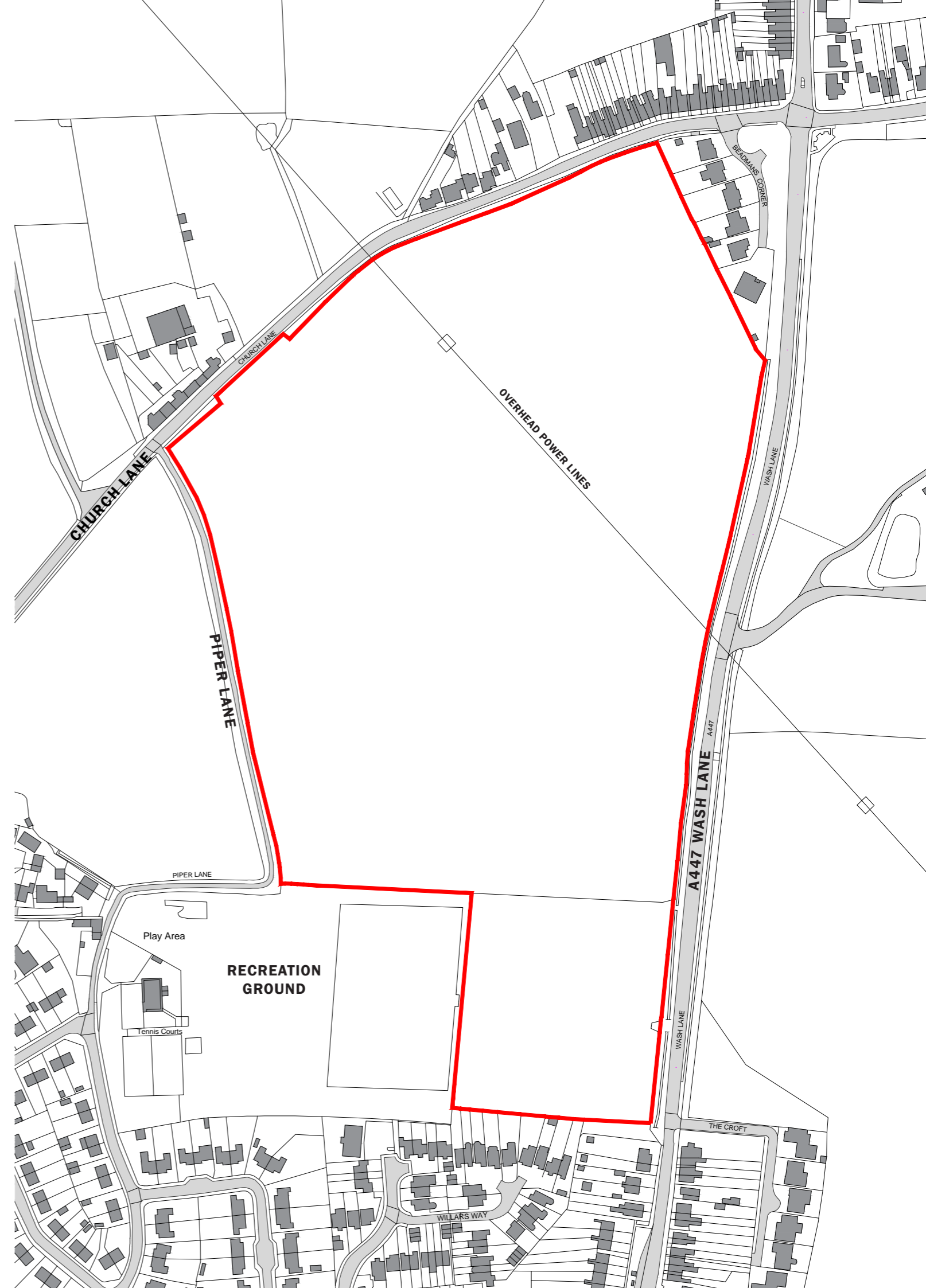


FIG. 2 THE SITE | not to scale





VIEWS OF THE SITE



VIEW WITHIN THE SITE

LANDSCAPE

A 'Preliminary Review of Landscape Character and Visual Amenity' has been prepared by FPCR Environment and Design Ltd in support of development of the site. The purpose of the review is to explore landscape character and visual amenity and to consider the ability for the site and its context to absorb change in the form of new housing development.

Baseline studies have determined the current condition of those aspects of the environment that are likely to be affected by any development and are summarised here.

LANDSCAPE VALUE

Although it has some value like all landscapes, the site and the surrounding landscape is not designated for any landscape quality at a national or local level. Although landscape designations are not an exclusive indicator of quality, designated landscapes are commonly acknowledged as being of particular importance and sensitivity.

Whilst having rural characteristics in terms of farmland, there are urbanising influences on the site primarily from the electricity pylons and overhead power lines, which are a prominent detracting feature within the site and the local landscape.

The adjacent A447 and the built form of Ravenstone to the north on Church Lane, Beadmans Corner and to the south at Ravenslea and Willars Way have an urbanising influence on this landscape.

Overall, it is considered that the Site is rather unremarkable farmland being bound and contained by buildings, hedgerows, and the main transport route of the A447. It has no pronounced sense of scenic quality, tranquillity, wildness and distinctiveness such that it sets it apart. Furthermore, it has no significant natural features, and is not covered by any ecological or cultural heritage designations.

VISUAL AMENITY

The baseline visual study includes an understanding of the area in which proposed development may be visible, the groups of people who may experience views and the nature of these views.

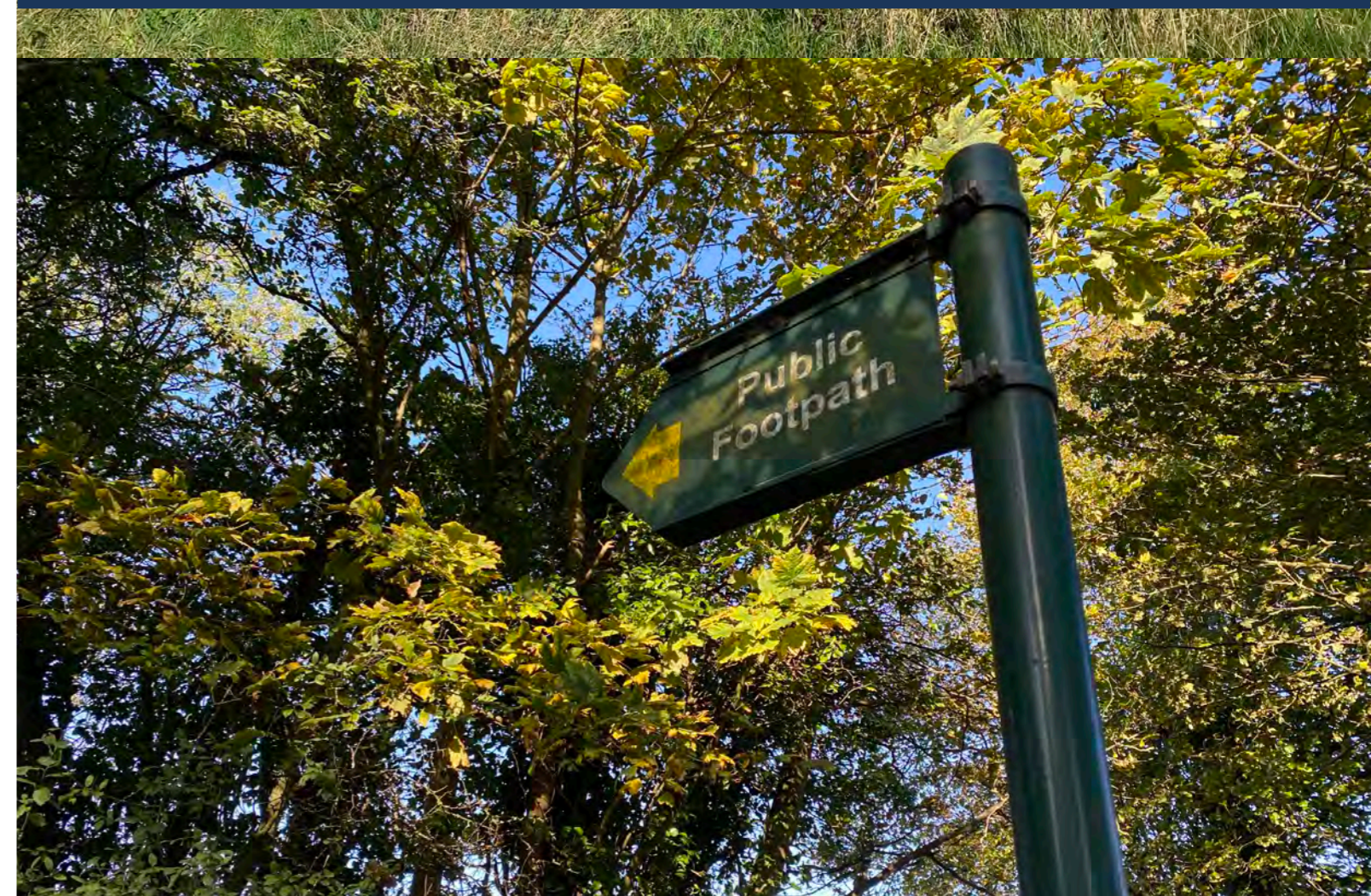
Visual receptors include residents; users of public rights of way, open spaces, and recreational facilities; and highways users. In general, the first two categories (residents and rights of way users) are normally of higher susceptibility to change, although the surrounding context can, in some cases, have a bearing on susceptibility.

The availability of views of the site for visual receptors has been undertaken in parallel with the baseline landscape study. This has determined those visual receptors within the landscape that have views of the site, considering factors such as landform, vegetation and buildings that determine the extent of actual visibility across the landscape.

Further field work would be undertaken as part of any planning application in the form of a Landscape & Visual Appraisal.



VIEW WITHIN THE SITE | view of the northern field from the southern field



PUBLIC FOOTWAY THROUGH THE SITE



VIEW TOWARDS THE SITE FROM BEADSMANS CORNER | site behind



VIEW ALONG PIPER LANE PUBLIC FOOTPATH | site on the left

Residents

There are no clear views of the site from the older part of Ravenstone – and its Conservation Area - on account of the screening created by the intervening and more modern built-up area located between the site and the heritage asset.

From Coalville Lane to the north east of the site, views of the site are effectively prevented and restricted by intervening houses at Beadmans Corner and by mature roadside tree cover along the A447.

Residents that border the site to the south on Ravenslea, Willars Way and those along Church Lane and Beadmans Corner have, to varying degrees, views of the site. There is intervisibility between these parts of Ravenstone such that residents at Church Lane for example experience views across the site towards housing at Willars Way and Wash Lane. Similarly, residents at Willars Way, for example, have views across the site to housing at Church Lane and Beadmans Corner. Consequently, any new housing development on the site would not be an uncharacteristic feature within this landscape context as residential receptors would observe new development within the setting and backdrop of existing buildings.

Design and mitigation measures in the form of ‘off-sets’ between new and existing properties, and the use new planting and green space to filter and ‘soften’ views would provide an appropriate design approach to minimise the level of impacts.

Public Footpaths

There are close range views of the site from the Public Footpath that crosses the site. There are open views of the southernmost field in addition to residential properties at Willars Way, passing traffic on the A447 and the adjacent Recreation Ground. Looking northward there are also views of the northern field with properties visible on Church Lane and Beadmans Corner.

Along Piper Lane, which borders the Site there are views across the northern field. The mature tree belt restricts views into the adjacent arable field to the southwest. The experience for footpath users is of moving through farmland on the settlement edge.

The Footpath can be sensitively integrated into the development. Design measures, such as new green corridors and planting along the route can be created to deliver a pleasant route around and through the development.

Highway Users

Highway Users are judged to be of medium-low sensitivity.

There are intermittent and transient views of the southern parts of site for highway users passing by on the A447. Along the northern stretch of the A447 where it meets the junction of Coalville Lane and Church Lane views of the site are restricted by the gentle rise in landform and by roadside tree cover.

There are glimpsed transient views of the site for highway users on Church Lane where there are some occasional breaks in the perimeter hedgerow.

The current experience within the vicinity of Ravenstone is trees, hedgerows, farmland, and residential properties, such that views of new development would be seen within that context. New planting can be provided around the Site to filter views.

Summary

The Site has a comparatively restricted visual envelope on account of the containment and screening effects created by buildings, landform and vegetation. This comprises the built form of Ravenstone to the north and south which prevent clear views into the site from the wider area.

Similarly, the gentle rise in the land to the north at Beadmans Corner and the A447-Coalville Lane-Church Lane junction restricts views from the north and north-west.

Mature trees and established hedgerows within this landscape, which includes planting along the A447, Piper Lane and Church Lane provides further levels of containment.

As a result, views of the site (and any development upon it) are limited to localised views within its immediate vicinity. Through a well-designed masterplanning approach in terms of layout and planting, built development can be appropriated integrated into the site and this landscape without resulting in unacceptable harm on visual amenity.



VIEW ALONG WASH LANE | site on the right



VIEW ALONG CHURCH LANE | site on the right



EXISTING FIELD ACCESS ONTO CHURCH LANE



EXISTING FIELD ACCESS ONTO WASH LANE

TRANSPORT & HIGHWAYS

ADC Infrastructure Ltd have reviewed highways issues relating to the site and prepared an access strategy to support development of the site.

When reviewing acceptable carriageway widths for new developments, The Leicestershire Highway Design Guide (HDG) states:

- An access road with a 5.5m wide carriageway can serve up to 400 dwellings, although normally no more than 150 from a single point of access.
- An access road with a 6.76m wide carriageway can serve up to 400 dwellings, although normally no more than 400 from a single point of access.
- Developments in excess of these limits will be considered on a site by site basis.

The site has a frontage to the public highway on both the A447 Wash Lane and Church Lane. The northern field has an existing field access off Church Lane while the southern field has access off Wash Lane.

ADC reviewed the potential for access and likely carriageway widths off both roads, the findings of which are summarised in this document.

WASH LANE

The A447 (Wash Lane) is an A class road with a 40mph speed limit, which remains at 40mph through the village. Wash Lane ranges in width, being a minimum of 7m wide.

There is a slight downhill slope on Wash Lane, travelling north to south, but few undulations, so forward visibility is unobstructed. The site is at the same level as Wash Lane.

On the assumption that the speed limit on Wash Lane would remain as 40mph, a new access should be separated from existing accesses on the opposite side of the road by 50m. In this case, therefore, no access within 50m of the centreline of The Croft, or the industrial access, on the eastern side of Wash Lane.

2.4m x 120m visibility splays would be required from any access and which can be achieved along Wash Lane.

Given the type of road – A class, 40mph speed limit, high traffic volumes – an appropriate form of access would be a ghost island T-junction. That is, a T-junction with an added right turn lane. Refuges placed within the hatching would help constrain speeds and be seen as a benefit. They would also allow pedestrians to cross Wash Lane, to reach the footway and bus stops along the eastern side of Wash Lane. This would require some widening of Wash Lane to around 9m at the access point. A footway would be required along the frontage on the site side of the road. As there is a ditch along the site frontage, it would need to be culverted which is deemed to be achievable.



VIEW ALONG WASH LANE | site on the right



VIEW ALONG WASH LANE | site on the right



VIEW ALONG CHURCH LANE | site on the left



VIEW ALONG CHURCH LANE | site on the right

CHURCH LANE

Church Lane is a C class road with a carriageway about 6.4m wide, and a 30mph speed limit. The site is at the same level as Church Lane. There is terraced housing with no off-street parking, which means there are parts only wide enough for one-way passage. Church Lane is therefore not suitable as a primary access into the site, but could be used as a secondary access. As a secondary access on to a 30mph road with relatively low traffic volumes, a simple T-junction would be adequate.

Church Lane has a slight crest. Therefore, an access point would need to be on that crest, or sufficiently far from it to ensure forward visibility is not obscured.

Any access point would need to avoid being located opposite houses fronting Church Lane to avoid headlights from vehicles exiting an access shining in to front rooms.

SUMMARY

Following the analysis of the highway issues connected with the site, it is deemed appropriate for the size of development to propose a single access point off Wash Lane to service development. This would be in the form of a ghost island T-junction providing direct access to the northern field parcel.

It is not deemed that a secondary access is required off Church Lane.

Further field work would be undertaken as part of any planning application in the form of a Transport Assessment.

OPPORTUNITIES & CONSIDERATIONS

- Existing access points on Wash Lane and Church Lane;
- Potential pedestrian access off Church Lane and Wash Lane;
- Existing network of public footpaths through and around the site;
- Existing electricity pylons and overhead power lines crossing the site;
- An identified area within the north of the site required to form part of the 'Coalville settlement fringe', whereby no built development would be proposed in this area;
- Ravenstone Conservation Area located to the south-west, separated from the site by intervening landscaping and proposed residential development;
- The field parcel to the west of the site proposed for residential development by Redrow Homes;
- Natural breaks in existing boundary hedgerows providing opportunity for access and routes with minimal impact on hedgerows;
- Identified boundary hedgerows and mature tree planting to site frontages;
- Existing high pressure gas main crossing the site; and
- Proximity to local amenities including a local shop, public house, a recreation ground and areas for play.



FIG. 3 OPPORTUNITIES AND CONSIDERATIONS PLAN | not to scale



THE DEVELOPMENT VISION

SITE PARAMETERS

- Site area: 29.8 acres / 12 ha;
- Gross developable area: 17.8 acres / 7.2 ha (60% of the total site)
- Proposed new vehicular access off Church Lane;
- Proposed new pedestrian access off Church Lane, Wash Lane and via the recreation ground;
- Retained public footpath route through the site;
- Land within the north of the site to form part of the 'Coalville settlement fringe', with no built development proposed within this area, which totals 1/3rd of the total site area;
- Rural 'green edge' to the northern edge of development parcels;
- Existing electricity pylons and overhead power lines retained, proposed development to be set a suitable distance from the power lines;
- Existing gas main retained. Proposed built development to be kept clear of the easement;
- Land within the gas main easement to be used for a landscaped green corridor and access road;
- Proposed sustainable drainage system and attenuation basin;
- High quality existing trees and hedgerows retained and reinforced with new native species planting;
- High quality landscaping, green infrastructure and public open space.

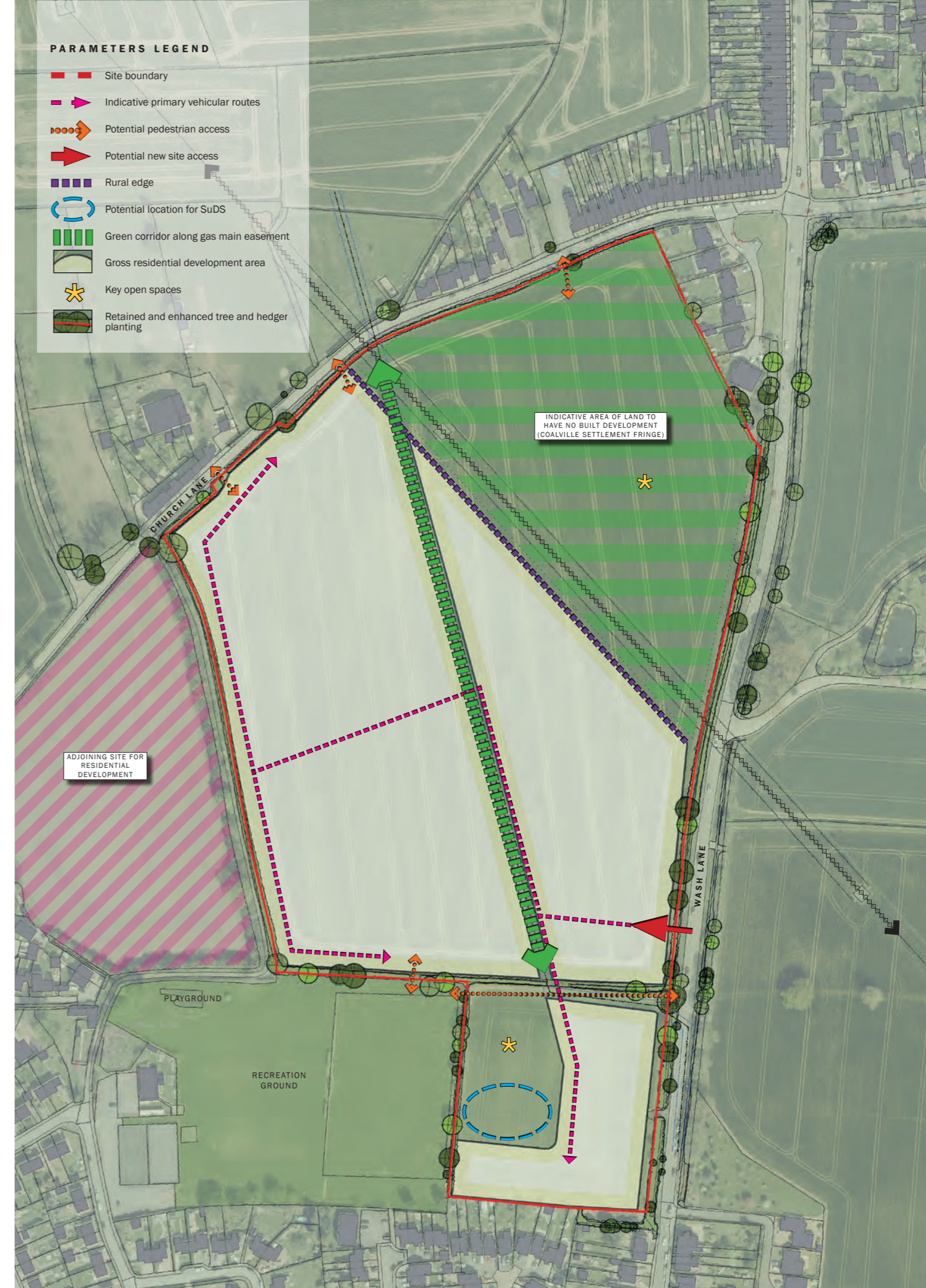


FIG. 4 PARAMETERS PLAN | not to scale



ILLUSTRATIVE MASTERPLAN

- Provision for residential developable area within a new and enhanced landscaped setting;
- Dedicated vehicular access proposed off Wash Lane with new tree-lined avenues through the development;
- Provision for dedicated routes through the development for pedestrians and cyclists;
- Outward-facing development parcels ensuring visual interest and high levels of natural surveillance of the public realm;
- Provision for high quality landscaped public open space;
- New and enhanced landscape planting and open space along the northern site boundary as part of the 'Coalville settlement fringe', providing a green edge to the development;
- Retention of the landscape character of Piper Lane with retained and reinforced landscape planting;
- Retention of existing landscape boundaries to Wash Lane, Church Lane and the recreation ground;
- Proposed development set back from the boundary to the recreation ground, partly to provide a suitable location and setting for the sustainable drainage design but also to provide additional green space neighbouring the adjoining sports pitches.



FIG. 5 ILLUSTRATIVE MASTERPLAN | not to scale





THE FUTURE CONTEXT

The site, if allocated for residential development, would represent a logical and sustainable extension to the northern edge of Ravenstone.

Fig 6 demonstrates how development of the site would exist in its context as part of Ravenstone, whilst maintaining the village's separation from Coalville.

The developed site, together with proposed residential development on the adjoining land to the west, would 'wrap around' the village's recreation ground, helping to articulate and define this key open space.

The northern area of the site would remain free of built development, forming part of the 'Coalville Settlement Fringe'. This would ensure that green landscape separation is maintained between the settlements of Coalville and Ravenstone.



FIG. 6 AERIAL IMAGE ILLUSTRATING HOW THE DEVELOPED SITE MAY LOOK WITHIN THE VILLAGE IF ALLOCATED BY THE LOCAL AUTHORITY

CONCLUSIONS

This Promotion Document has demonstrated that the site is unconstrained, available and deliverable for residential development.

In doing so, it will make a valuable contribution to the District's housing land supply and deliver much needed market and affordable housing in Ravenstone.

The site is available now, offers a suitable location for development, is achievable with the potential for housing to be delivered on the site within five years, and is viable.

Accordingly, for the reasons set out within this document, it is requested that the site be allocated as a residential land site in the Local Plan Review.



www.marrons-planning.co.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. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	Mr
First Name	Andrew	Nigel
Last Name	Noton	Harris
[Job Title]		Director
[Organisation]	Redrow Homes Limited	WSP
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

Please see attached Representations and Plan.

(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

Nigel Harris

Date

14/03/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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.



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

14 March 2022

Dear Sir/Madam,

**North West Leicestershire Local Plan 2039 (Regulation 18): Consultation on draft policies
Land off Meadow Lane, Coalville**

We write on behalf of our client, Redrow Homes Limited ('Redrow'), to submit a representation in response to the North West Leicestershire ('the Council') Local Plan Review Development Strategy and Policy Options ("the draft plan"), consultation from 17 January until 28 February 2022.

Redrow have submitted a site (at 'Land off Meadow Lane, Coalville') for a residential allocation as part of the 'call for sites' process for the draft plan. The red line boundary of this site can be seen from the plan accompanying these representations (ref: W16_126).

Redrow is one of Britain's leading, premium housebuilders, with a network of 14 operational divisions across the UK, employing 2,300 people. For nearly 50 years, Redrow has been creating high quality homes and communities for their customers, building over 100,000 homes across the country. Redrow's award-winning Heritage Collection fuses modern, open plan living with the traditional exterior features of the Arts and Crafts movement, creating the perfect home-life balance for customer. From garden villages to urban luxury apartments, Redrow provide a range of homes.

Redrow have eight placemaking principles that define how sustainable development is achieved on their sites to create a better way to live. These principles put people at the heart of their planning, building, sales and aftercare process, allowing communities to thrive. Redrow's approach involves helping people to connect to one another in the community, creating wildlife habitats, promoting health and wellbeing and honouring the local area in the design of their developments.

BACKGROUND

The site (submitted in the call for sites process) is a large greenfield site, adjacent to Whitwick, that comprises of 23ha of land. It has been given the site reference C76 'Land at Meadow Lane, Coalville' in the Strategic Housing and Economic Land Availability Assessment 2021 (SHELAA). The site is ideally suited for residential development, as recognised in the SHELAA assessment which positively explains that the site is 'potentially suitable', 'available' and 'potentially achievable' for the development of up to 431 homes in a 6–10-year timeframe. For these reasons the site should be allocated for housing in the emerging local plan.

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wsp.com



Scope of Representations

Redrow supports the general principle of the draft plan and the direction of growth but have some comments which are provided in this letter.

This response primarily focuses on the draft plan's position regarding housing provision. Feedback is also provided on the guiding development policies, as far as they are relevant to the 'Land off Meadow Lane, Coalville' site and Redrow's proposals. We have structured our response according to the questions posed on the draft plan document.

Subject to the amendments proposed, much of the plan is supported in principle, including the direction of growth and development.

In preparing our response, we have been mindful of the test for soundness set out in Paragraphs 35 and 36 of the National Planning Policy Framework 2021 (NPPF); namely we have sought to comment whether the plan is:

- Positively prepared;
- Justified;
- Effective; and / or
- Consistent with national planning policy.

RESPONSE TO REGULATION 18 CONSULTATION

We respond to the following draft policies in our representations:

- Local Plan Review Objectives [Question 1];

Housing:

- Proposed Settlement Hierarchy [Question 2];
- Approach to housing growth [Question 4];
- Approach to the distribution of housing growth [Question 5];
- Self-build and custom housebuilding [Question 6];
- Space Standards [Question 7];
- Accessible and adaptable housing [Question 8];
- Wheelchair adaptable dwellings [Question 9];

Health and wellbeing:

- Health and wellbeing [Question 16];
- Health Impact Assessment [Question 17];
- Health Impact Screening Statement [Question 18];

Energy efficiency:

- Energy efficiency [Question 20];
- Lifecycle Carbon Assessment [Question 21];
- Overheating [Question 22];
- Climate change [Question 23];
- Reducing carbon emissions [Question 24];

Water efficiency:

- Water efficiency [Question 25].



Question 1: Local Plan review objectives

DO YOU AGREE WITH THESE LOCAL PLAN REVIEW OBJECTIVES? IF NOT, WHY NOT?

Yes, Redrow supports the Local Plan Review Objectives.

Question 2: Proposed Settlement Hierarchy

DO YOU AGREE WITH THE PROPOSED SETTLEMENT HIERARCHY? IF NOT, WHY NOT?

Yes, Redrow agrees with the proposed settlement hierarchy.

Whitwick is included within the Principal Town classification, which Redrow supports. As recognised by this Principal Town classification, Whitwick should be considered a primary settlement in the district as it provides an extensive range of services and facilities including employment, leisure and shopping. It is also accessible by sustainable transport from surrounding areas and to other large settlements outside the district.

Castle Donington is included within the Key Service Centres classification, which Redrow also supports. As outlined in the Settlement Study 2021 and by the Key Service Centre classification, Castle Donington is a main settlement within the area as it provides a range of services and facilities, whilst playing an important role for the surrounding area. Key Service Centres are smaller than the Principal Town in terms of population and the range of services and facilities provided.

Ravenstone is included within the Sustainable Village classification, which Redrow supports. As outlined in the Settlement Study 2021 and by the Sustainable Village classification, Ravenstone has a limited range of services and facilities which will allow for a limited amount of growth.

Owing to this, the largest proportion of new development should be directed to Whitwick to support the regeneration and growth of Coalville, with a significant amount of development directed to Castle Donington and some growth to Ravenstone.

Question 4: Approach to housing growth

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, the latest demographic trends for housing need in the council (provided by the 2018-based Office for National Statistics) predicts that up to 14,296 new homes will need to be provided by 2039, this is a requirement for 752 homes to be provided per annum over the plan period. The housing need, as set out in the emerging plan, should be amended to reflect these requirements as an absolute minimum.

Leicester City Council's unmet housing need:

North West Leicestershire District Council (NWLDC) confirmed in a Joint Position Statement (JPS), along with seven other Leicestershire Local Planning Authorities, that there is a greater unmet housing need for Leicester City Council (LCC) than previously reported, owing to the most recent

Government Standard Methodology figures. This equates to a further 9,712 homes to Leicestershire's housing need between 2020 and 2036. Due to this, there is a need for each Local Authority to redistribute Leicester's unmet need between the districts and NWLDC agreed to deliver 359 extra houses per annum between 2020 and 2036 to help meet Leicester's unmet need.

However, LCC's emerging Local Plan over-relies on the delivery of new homes on previously developed urban land, whilst also failing to provide sufficient evidence to justify LCC's requirement for 4,905 homes to be provided in urban areas. There is a lack of flexibility with LCC's strategy to prioritise brownfield land, which is contrary to the requirements of Paragraph 35 of the NPPF, which requires sufficient flexibility to changing circumstances. There needs to be sufficient evidence provided to ensure that the level of urban development can be achieved and that housing needs can be met by 2036.

LCC's housing delivery rates have been historically slow, as demonstrated in the Strategic Housing and Economic Land Availability Assessment 2017, which demonstrates that the net housing completions since the start of the plan period in 2011 totals 5,955 dwellings, equating to 990 dwellings per annum and resulting in an annual shortfall of around 700 dwellings. Therefore, it is unlikely that the levels of housing set out in the LCC's draft Local Plan will be achieved and it over-relies on the contribution from allocated housing sites being delivered at a faster rate than can reasonably be expected.

This supports the requirement that the provision of 752 homes per annum over the plan period must be an absolute minimum to ensure that the district can support the shortfall of housing from Leicester City.

East Midlands Freeport:

There is the potential East Midlands Freeport allocation within the District, which will drive significant new job growth in the region. This will mean that there will be a higher demand for housing within the area so that workers have easy access to the new employment opportunities. This reinforces the need to ensure that the requirement for provision of 752 homes per annum over the plan period must be an absolute minimum to ensure that there is sufficient housing development to support the economic growth of the district.

NWLC's proposed housing:

The emerging plan also explains that, taking account of the 2020 housing trajectory, 8,748 homes are already planned to be built by 2039. These 8,748 proposed homes have then been taken off the total housing provision figure. We have reviewed the deliverability of these 8,748 homes in the housing trajectory and have found that the following should be discounted.

117 London Road, Coalville

This site achieved prior approval consent for the change of use of offices to 15 self-contained apartments, on 23 October 2018 (LPA Ref: 18/01631/PDNOTR). Since gaining approval, the consent has not been implemented and has expired. The expiration of this permission means these 15 dwellings should be discounted.

Summary:

The proposed approach to housing growth should be amended so that a minimum of 14,296 new homes are to be provided by 2039, a requirement of 752 homes per annum. 15 homes that are



projected as deliverable by 2039, from 117 London Road, should be discounted and therefore the current projected provision should be reduced from 8,748 to 8,733.

Owing to this, the housing requirements should be amended to reflect what is set out in Table 1 below.

Table 1: Housing requirements

Annual Amount	Total Requirement 2020-39	Total projected provision	Over provision/shortfall
752	14,296	8,733	5,563

The emerging policy should therefore be amended to support the provision of 752 dwellings per year as an absolute minimum, for which there is a residual requirement of 5,563 homes.

Question 5: Approach to the distribution of housing growth

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.

Redrow does not agree that Option 3a or 7b are the most sustainable approaches to the distribution of housing growth. Option 3a should be discounted because it does not provide for the residual requirement of 5,563 homes that we have outlined should be the housing growth requirement.

Redrow instead supports Option 2b for High 2 scenario as the preferred option. Option 2b is supported because it provides the highest number of dwellings throughout the plan period for Principal Towns, such as Whitwick. The provision of dwellings should be focused within Principal Towns because they are the most sustainable and accessible locations, with a range of services available to local people. Development in Principal Towns would be in accordance with Paragraph 8 of the NPPF which sets out the social objective of achieving sustainable development, outlining that a sufficient number and range of homes with accessible services needs to be provided to meet the needs of present and future generations.

Option 2b has the least number of negative effects of all the High 2 Scenario options. The main reason Option 2b is not considered as the recommended approach is because it would require large-scale sites to come forward to achieve the scale of growth required. However, Paragraph 73 of the NPPF outlines that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as significant extensions to existing villages and towns. This supports Option 2b as large-scale development can be achieved through extending the Coalville Urban Area, which includes several towns and villages such as Coalville and Whitwick.

The Sustainability Appraisal of the Spatial Options Report forms part of the evidence base of the draft plan and includes the individual performance for each Spatial Option. Option 2b has one perceived significant negative effect, which is in regard to SA2 (reduced inequalities and ensure fair and equal access and opportunity for all residents) because it may put greater pressure on existing facilities, such as schools and employment zones.

However, the preferred Option 7b for High 2 Scenario also is highlighted to have a significant negative effect on SA2. Option 7b also has four other significant negative effects, including SA11 (climate change), SA12 (protecting and enhancing biodiversity), SA13 (conserve and enhance the quality of the District's landscape and townscape character) and SA14 (ensure land is used efficiently and effectively). Option 7b also spreads the delivery of new dwellings across different settlement classifications but there is no justification explaining why the specific numbers have been designated for each settlement. The proposed spread of dwellings across the District is used as justification for this option having a significant positive effect for SA4 (good quality homes to meet local needs), however this spread of dwellings could have significant negative effects as there may not be sufficient and sustainable access within smaller settlements to facilitate this scale of development.

Sustainable Villages should be included within Option 2b alongside the Principal Town and the Key Service Centres. This would have the potential to provide a significant number of smaller sites and would also represent less of a risk in terms of deliverability due to having a greater number of sites in a greater number of locations, whilst not having significant negative effects as the majority of development would still be focused within the Principal Town and Key Service Centres. Option 2b is not considered as the recommended approach because it would require large-scale sites to come forward to achieve the scale of growth required but including Sustainable Villages with Option 2b would help to mitigate this issue.

Owing to this, Option 3a and 7b are not justified to be considered sound in accordance with paragraphs 35 and 36 of the NPPF. Instead, Option 2b should be brought forward as the preferred option, however it should include Sustainable Villages too and 5,563 homes should be provided for and therefore this option should be amended so that 3,523 homes are provided for in the Principal Town (including Whitwick) and 2,040 dwelling are provided for in Key Service Centres. This will ensure that the required number of homes is distributed in the most sustainable and accessible locations.

Question 6: Self-build and custom housebuilding

DO YOU AGREE WITH THE PROPOSED SELF-BUILD AND CUSTOM HOUSEBUILDING POLICY? IF NOT, WHY NOT?

No, Redrow does not support the proposed self-build and custom housebuilding policy. Self-build and custom housebuilding development should be provided on specific or smaller sites. The draft plan states that the North West Leicestershire register for demand has 78 individuals on the list and demonstrates demand for self-build and custom housebuilding plots in the district.

A meeting of the Local Plan Committee on 26 June 2019 agreed not to require the provision of self-build and custom housebuilding plots as part of general market developments due to the practical issues with the application of such an approach and due to the lack of consistent support from Inspectors at examinations of Local Plans. This shows that there can be issues with the inclusion of self-build and custom housebuilding plots within larger developments and reinforces that these plots should be included within specific or smaller sites to avoid practical issues.



Question 7: Space Standards

DO YOU AGREE WITH THE PROPOSED POLICY ON SPACE STANDARDS? IF NOT, WHY NOT?

Yes, Redrow agree with the proposed policy on Space Standards, as the required standards equate to the Nationally Described Space Standards as set out in the Technical Housing Standards Nationally Described Space Standard.

Question 8: Accessible and adaptable housing

DO YOU AGREE WITH THE PROPOSED POLICY ON ACCESSIBLE AND ADAPATABLE HOUSING? IF NOT, WHY NOT?

Yes, Redrow agree with the proposed policy on accessible and adaptable housing.

Question 9: Accessible and adaptable housing

SHOULD PART M4(3)(A) WHEELCHAIR ADAPTABLE DWELLINGS ALSO APPLY TO MARKET HOUSING? IF NOT, WHY NOT?

Redrow complies with and supports as a minimum the standards set out in the approved National Policy and the Building Regulations. As this is an optional requirement within the Building Regulations, this means that applying part4(3)(A) wheelchair adaptable dwellings to market housing could cause viability issues that are not assessed for within the draft Plan.

Question 16: Health and wellbeing

DO YOU AGREE WITH THE PROPOSED HEALTH AND WELLBEING POLICY? IF NOT, WHY NOT?

Yes, Redrow is supportive of the proposed health and wellbeing policy.

Question 17: Health Impact Assessment

DO YOU AGREE WITH THE PROPOSED HEALTH IMPACT ASSESSMENT POLICY? IF NOT, WHY NOT?

Yes, Redrow supports the proposed Health Impact Assessment policy.

Question 18: Health Impact Screening Statement

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, Redrow agrees with this.

Question 20: Energy efficiency

DO YOU AGREE WITH THE PREFERRED APPROACH FOR ENERGY EFFICIENCY? IF NOT, WHY NOT?

No, Redrow does not support the preferred approach for energy efficiency as it is higher than national requirements. For new buildings, there is precedent to set a 19-20% CO2 reduction against Building Regulations Part L 2013; this target has been proven to be effective and viable on a national scale as part of the Government's Future Homes Standard Consultation.

No evidence to support the energy efficiency rates above this level rates, or evidence that it has been viability tested, has been provided. It is unclear how the energy efficiency rates has been assessed for viability purposes and, therefore, whether it is deliverable. Paragraph 154 of the NPPF outlines that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Question 21: Lifecycle Carbon Assessment

DO YOU AGREE WITH THE PREFERRED POLICY APPROACH FOR LIFECYCLE CARBON ASSESSMENT? IF NOT, WHY NOT?

Redrow does not support the inclusion of the Lifecycle Carbon Assessment within policy. As recognised in the supporting evidence base (Renewable and Low Carbon Energy AECOM Study), such an assessment would incur significant design team costs. No evidence has been provided to suggest this has been viability tested and therefore it is unclear whether it is deliverable.

A Lifecycle Carbon Assessment is not part of national policy, with paragraph 154 of the NPPF stating that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards.

Redrow complies with and supports as a minimum the standards set out in the approved National Policy and the Building Regulations.

Question 22: Overheating

DO YOU AGREE WITH THE PREFERRED POLICY APPROACH FOR OVERHEATING? IF NOT, WHY NOT?

No Redrow does not support the preferred approach for overheating as the assessment is not nationally required, with paragraph 154 of the NPPF outlining that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Redrow complies with and supports as a minimum the standards set out in the approved National Policy and the Building Regulations.

There is no evidence included to support Option 3 being the preferred choice, or any evidence that it has been viability tested. Therefore, it is unclear whether this option would be deliverable.

Question 23: Climate change

DO YOU AGREE WITH THE PREFERRED POLICY APPROACH FOR THE CLIMATE CHANGE ASSESSMENT OF DEVELOPMENT? IF NOT, WHY NOT?

No, Redrow does not support the preferred policy approach for the climate change assessment of development. This is because the standards are not nationally required and are not found within the current Building Regulations. Paragraph 154 of the NPPF outlines that any local requirements for the sustainability of buildings should reflect the Government's policy for national technical standards. Redrow complies with and supports as a minimum the standards set out in the approved National Policy and the Building Regulations.

Further to this, no viability evidence has been provided as to the inclusion of a policy that requires applicants to undertake a recognised industry assessment (Home Quality Mark for residential developments). Therefore, it is unclear how this has been assessed for viability purposes and whether it is deliverable.

Question 24: Reducing carbon emissions

DO YOU AGREE WITH THE PROPOSED POLICY FOR REDUCING CARBON EMISSIONS? IF NOT, WHY NOT?

Redrow does not agree with the proposed policy for reducing carbon emissions as several of the targets are above the national requirements as mentioned in the previous questions, such as the target to achieve a 31% reduction in regulated CO₂ emissions. Redrow complies with and supports as a minimum the standards set out in the approved National Policy and the Building Regulations.

The Building Regulations (Part L) state that the Dwelling CO₂ Emission Rate and the Dwelling Fabric Energy Efficiency rate must be no worse than the Target Emission Rate and Target Fabric Energy Efficiency rate calculated using methodology approved by the Secretary of State.

The proposed policy should include a Carbon Offsetting Fund as developments may not be able to deliver the required level of CO₂ emissions reduction onsite. This fund should be tested to ensure the viability the set rates will have on developers and these assessments should be made clear to prove that it is deliverable.

Question 25: Water efficiency

DO YOU AGREE WITH THE PROPOSED POLICY FOR WATER EFFICIENCY STANDARDS? IF NOT, WHY NOT?

No, Redrow does not agree with the proposed policy for water efficiency standards. This is because the standards are 110 litres per person per day, which is more than the nationally required standards, which are 125 litres per person per day. Redrow complies with and supports as a minimum the standards set out in the approved National Policy and the Building Regulations.

National Planning Policy Guidance states that local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres per person per day if a clear need can be established based on existing sources of evidence, consultations with local water and sewerage companies, the Environment Agency and

catchment partners and the consideration of the impact on viability and housing supply of such a requirement.

Despite using evidence from key stakeholders, the draft plan does not undertake consultations with the stakeholders stated within National Planning Policy Guidance in Paragraph 015. This means that some details may have been missed, such as specific areas may be more suitable for development than others based on the water demands. Also, there is no consideration of the impact on viability and housing supply, which is also one of the requirements needed to establish a clear need within Paragraph 015 of the National Planning Policy Guidance.

Redrow supports the dismissal of the consideration of an option of requiring a more ambitious standard of no more than 105 litres of water per person per day.

It is recommended that Option 1 is taken forward and water efficiency standards are kept at the national requirement of 125 litres per person per day as the requirements to establish a clear need have not all been undertaken currently.

Question 26: Additional comments

WHAT ADDITIONAL COMMENTS DO YOU HAVE ABOUT THE LOCAL PLAN REVIEW NOT COVERED BY THE PRECEDING QUESTIONS?

No additional comments.

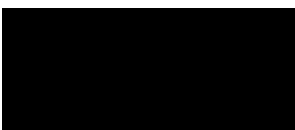
SUMMARY

Redrow welcomes the opportunity to respond to the Regulation 18 consultation for the council's draft plan. Redrow supports the draft plan objectives.

As set out within this representation, in order for the draft plan to be found sound at Examination, the following changes should be made:

- The housing requirement set out within the draft Plan needs amending to 752 houses per annum to meet the identified based on the latest demographic trends for housing need in the council (provided by the 2018-based Office for National Statistics) and to help meet LCC's unmet housing need and mitigate the demand for housing from the potential Freeport allocation;
- The preferred approach to the distribution of housing growth should be Option 2b, with the addition of Sustainable Villages; and
- All policies should only require the minimum standards set out by National Policy and the Building Regulations.

Yours faithfully



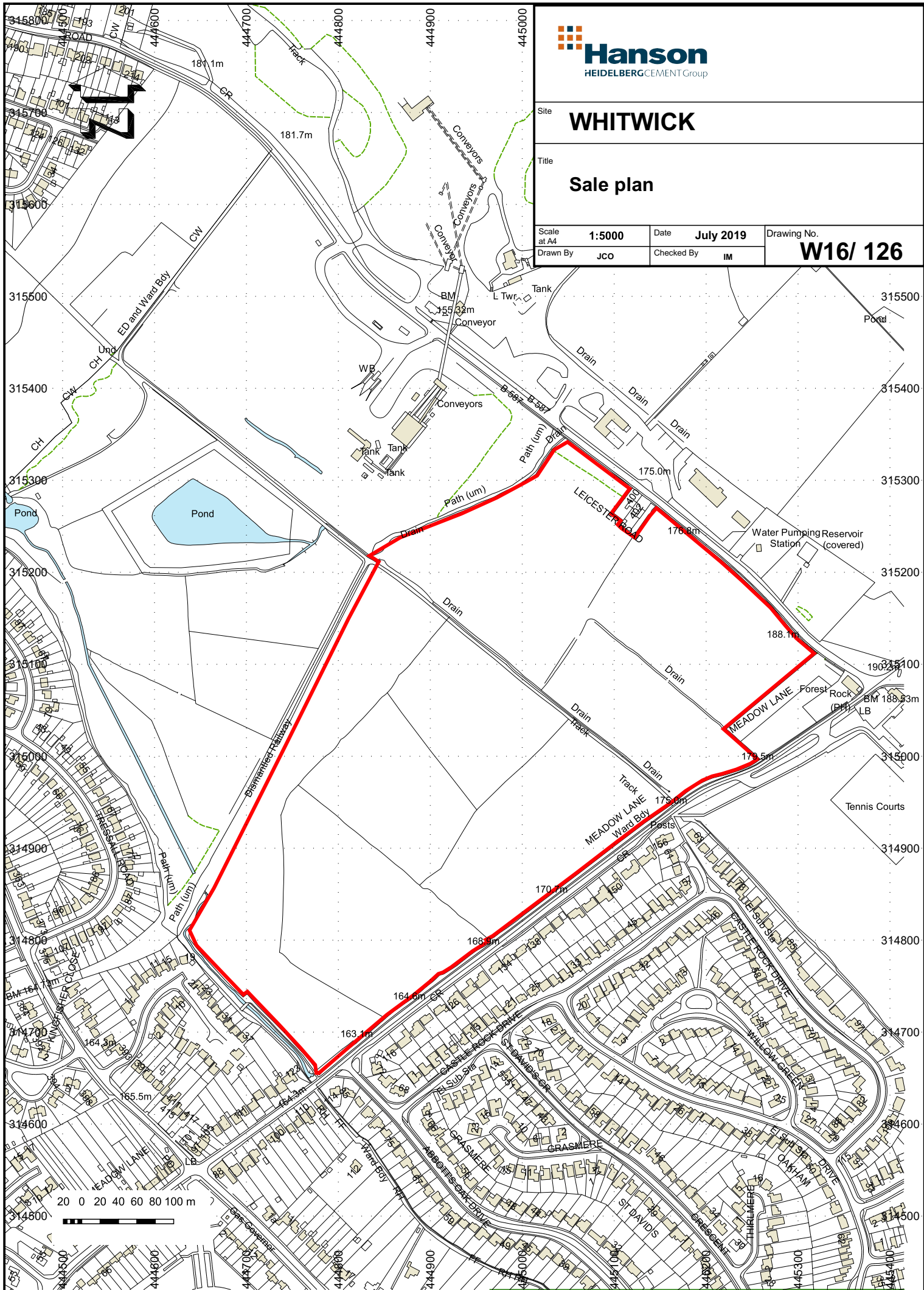
George Ducker
Planner



Site **WHITWICK**

Title **Sale plan**

Scale at A4	1:5000	Date	July 2019	Drawing No. W16/ 126
Drawn By	JCO	Checked By	IM	





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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		MS
First Name		SUE
Last Name		GREEN
[Job Title]		PLANNING MANAGER
[Organisation]		HOME BUILDERS FEDERATION (HBF)
Address Line 1		[REDACTED]
Address Line 2		[REDACTED]
Address Line 3		[REDACTED]
Address Line 4		
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... to:

**4, 5, 6,
7, 8, 9,
20 & 25**

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 HBF agree that the Low and Medium Housing Growth Scenarios of 6,103 dwellings (368 dwellings per annum) and 8,512 dwellings (448 dwellings per annum) between 2020 – 2038 should not be pursued as both scenarios are below the currently adopted housing requirement of 481 dwellings per annum and past average housing delivery rates of 619 dwellings per annum (2011 – 2021). Furthermore, the adopted non-statutory Leicester & Leicestershire Strategic Growth Plan (SGP) envisages more growth in North West Leicestershire and neither scenario accommodates unmet housing needs from Leicester City, which will raise significant issues under the Duty to Co-operate.

The two higher Housing Growth Scenarios of 9,728 (512 dwellings per annum) based on the SGP and 13,870 dwellings (730 dwellings per annum) represent more appropriate approaches to proposed amounts of housing growth subject to agreement on the redistribution of circa 18,000 dwellings of unmet housing need from Leicester City across neighbouring Leicestershire authorities including North West Leicestershire District Council.

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

Under the High 1 (530 dwellings per annum) and High 2 (730 dwellings per annum) Housing Growth Scenarios, there are respective shortfalls of circa 1,000 and 5,100 dwellings against a projected housing land supply of 8,784 dwellings. Both High Housing Growth Scenarios were assessed against seven Options for the distribution of housing growth :-

- Option 2 - Principal Town & Key Service Centres (KSC) ;
- Option 3 - Principal Town, KSC & Local Service Centres (LSC) ;
- Option 4 - Principal Town & New Settlement ;
- Option 5 - Principal Town, New Settlement & KSC ;
- Option 6 - Principal Town, New Settlement, KSC & LSC ;
- Option 7 - Principal Town, New Settlement, KSC, LSC & Sustainable Villages ; and
- Option 9 - Principal Town, New Settlement, KSC, LSC, Sustainable Villages & Small Villages.

The High 2 Housing Growth Scenario was also assessed against Option 8 – New Settlement.

For High 1 Housing Growth Scenario, the Council proposes to take forward only Option 3a :-

- Principal Town (Coalville Urban Area comprising of Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone & Whitwick) - 500 dwellings ;
- KSC (Ashby de la Zouch & Castle Donington) - 300 dwellings ; and
- LSC (Ibstock, Kegworth & Measham) -200 dwellings.

This Option affords the greatest opportunity for growth in villages.

For High 2 Housing Growth Scenario, the Council's preference is Option 7b :-

- Principal Town - 1,785 dwellings ;
- New Settlement - 1,785 dwellings ;
- KSC - 765 dwellings ;
- LSC - 510 dwellings ; and
- Sustainable Villages (Albert Village, Appleby Magna, Belton, Blackfordby, Breedon on the Hill, Coleorton (the Lower Moor Road area only), Diseworth, Donisthorpe, Ellistown, Heather, Long Whatton, Moira (including Norris Hill), Oakthorpe, Packington, Ravenstone, Swannington, Woodville (part), Worthington) - 255 dwellings.

This Option, with the exception of a new settlement, represents a continuation of the spatial strategy in the adopted Local Plan, which has a demonstrably strong delivery record. The number of sites and locations will optimise deliverability.

The Council's proposed approach to the distribution of housing should ensure the availability of a sufficient supply of deliverable and developable land to deliver either the High 1 or 2 Housing Growth Scenarios. The Council's housing land supply (HLS) should meet the housing requirement, ensure the maintenance of 5 Years Housing Land Supply (5 YHLS) and achieve Housing Delivery Test (HDT) performance measurements. The HBF agree that to optimise housing delivery, the widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. The Council's overall HLS should include a short and long-term supply of sites by the identification of both strategic and non-strategic allocations for residential development. A diversified portfolio of housing sites offers the widest possible range of products to households to access different types of dwellings to meet their housing needs. Housing delivery is maximised where a wide mix of sites provides choice for consumers, allows places to grow in sustainable ways, creates opportunities to diversify the construction sector, responds to changing circumstances, treats the housing requirement as a minimum rather than a maximum and provides choice / competition in the land market.

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

The proposed Self-build & Custom Housebuilding Policy supports self-build & custom housing in suitable locations. Where there is clear evidence of demand and servicing / site arrangements can be made suitable for such homes, the Council will also seek the provision of land for self-build & custom housebuilding plots on housing sites of 50 or more dwellings. Where such self-build & custom housebuilding plots have been made available and marketed appropriately for a period of at least 12 months but have not been sold, then the plots may either remain available for purchase on the open market or be built out by the developer for sale on the open market.

The HBF disagree with the Council's proposed Self-build & Custom Housebuilding Policy. There is no legislative or national policy basis for imposing an obligation on landowners or developers of sites of more than 50 dwellings to set aside plots for self & custom build housing. Under the Self Build & Custom Housebuilding Act 2015 and 2021 NPPF (para 62), it is the responsibility of the Council, not landowners or developers, to ensure that sufficient permissions are given to meet demand. The Council are not empowered to restrict the use of land to deliver self & custom build housing. The NPPG sets out ways in which the Council should consider supporting self & custom build by "*engaging*" with developers and landowners and "*encouraging*" them to consider self & custom build "*where they are interested*" (ID 57-025-201760728).

As set out in the NPPG, the Council should use their Self Build Register and additional data from secondary sources to understand and consider future need for this type of housing (ID 57-011-20210208). In North West Leicestershire, there is a minimal demand for self & custom build housing. As of January 2022, the Council had only 78 entries on its Register. Furthermore, a simple reference to the headline number of entries on the Council's Register may over-estimate actual demand. The Register may indicate a level of expression of interest in self & custom build but cannot be reliably translated into actual demand should plots be made available because entries may have insufficient financial resources to undertake a project, be registered in more than one Local Planning Authority area and have specific preferences.

The provision of self & custom build plots on sites of more than 50 dwellings adds to the complexity and logistics of development. It is difficult to co-ordinate the provision of self & custom build plots with the development of the wider site. Often there are multiple contractors and large machinery operating on-site, the development of single plots by individuals operating alongside this construction activity raises both practical and health & safety concerns. Any differential between the lead-in times / build out rates of self & custom build plots and the wider site may lead to construction work outside of specified working hours, building materials stored

outside of designated compound areas and unfinished plots next to completed / occupied dwellings, which results in consumer dissatisfaction.

It is very important that unsold plots are not left empty to the detriment of neighbouring dwellings or the whole development. The timescale for reversion of these plots to the original housebuilder should be as short as possible because the consequential delay in developing unsold plots presents further practical difficulties in terms of co-ordinating their development with construction activity on the wider site. The proposed availability and marketing of plots for a period of at least 12 months is too long.

As well as on-site impracticalities, impacts on viability should be tested. The Council's updated Viability Assessment should consider the financial impacts of the proposed policy approach.

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

The proposed Space Standards Policy requires all new residential developments to meet the minimum Nationally Described Space Standards (NDSS).

The HBF disagree with the Council's proposed Space Standard Policy. If the Council wishes to apply the optional NDSS to all dwellings, then this should only be done in accordance with the 2021 NPPF (para 130f & Footnote 49). Footnote 49 states that "*policies may also make use of the NDSS where the need for an internal space standard can be justified*". As set out in the 2021 NPPF, all policies should be underpinned by relevant and up to date evidence, which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). The NPPG sets out that "*where a need for internal space standards is identified, the authority should provide justification for requiring internal space policies. Authorities should take account of the following areas need, viability and timing*" (ID: 56-020-20150327). The Council should provide a local assessment evidencing their case. The Council's initial assessment of Gross Internal Area (GIA) derived from floorplans and information submitted as part of planning applications since 2015 shows the majority of developments exceed the NDSS. From the Council's own evidence, the HBF conclude that there is no systemic problem to resolve.

There is a direct relationship between unit size, cost per square metre (sqm), selling price per sqm and affordability. The Council's policy approach should recognise that customers have different budgets and aspirations. An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. An inflexible policy approach imposing NDSS on all housing removes the most affordable homes and denies lower income households from being able to afford homeownership. The introduction of the NDSS for all dwellings may mean customers purchasing larger homes in floorspace but with bedrooms less suited to their housing needs with the unintended consequences of potentially increasing overcrowding and reducing the quality of their living environment. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS. The impact of introducing a policy requirement for NDSS should also be fully accounted for in the Council's updated Viability Assessment.

If the proposed requirement for NDSS is carried forward, the Council should put forward proposals for transitional arrangements. The land deals underpinning strategic and non-strategic sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. Prior to a

specified date, the NDSS should not be applied to any reserved matters applications or any outline or detailed approval.

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

The proposed Accessible & Adaptable Housing Policy requires all new build residential developments to meet at least M4(2) (accessible and adaptable) standards of the Building Regulations (or subsequent update).

The HBF disagree with the Council's proposed Accessible & Adaptable Housing Policy. The 2021 NPPF confirms that Local Plans should avoid unnecessary duplication (para 16f). The Council's proposed policy approach will be unnecessary if the Government implements proposed changes to Part M of the Building Regulations as set out in the "Raising Accessibility Standards for New Homes" consultation, which closed on 1 December 2020. In the meantime, if the Council wishes to adopt the optional standards for accessible & adaptable dwellings, then this should only be done in accordance with the 2021 NPPF (para 130f & Footnote 49) and the latest NPPG. Footnote 49 states *"that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing where this would address an identified need for such properties"*. As set out in the 2021 NPPF, all policies should be underpinned by relevant and up to date evidence which should be adequate, proportionate and focussed tightly on supporting and justifying the policies concerned (para 31). A policy requirement for M4(2) & M4(3) dwellings must be justified by credible and robust evidence. The NPPG sets out the evidence necessary to justify a policy requirement for optional standards. The Council should apply the criteria set out in the NPPG (ID 56-005-20150327 to 56-011-20150327).

The Council's evidence is set out in the HENA June 2020 by JG Consulting. This evidence does not justify the Council's proposed policy requirements. No local circumstances are identified, which demonstrate that the needs of North West Leicestershire differ substantially to those across Leicestershire, East Midlands or England. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards, then such standards would have been incorporated as mandatory in the Building Regulations, which is not currently the case.

As the Council is aware not all health issues affect housing needs. All new homes are built to M4(1) "visitable dwelling" standards. These standards include level approach routes, accessible front door thresholds, wider internal doorway and corridor widths, switches and sockets at accessible heights and downstairs toilet facilities usable by wheelchair users. M4(1) standards are not usually available in the older existing housing stock. These standards benefit less able-bodied occupants and are likely to be suitable for most residents. Many older people already live in the District and are unlikely to move home. No evidence is presented to suggest that households already housed would be prepared to leave their existing homes to move into new dwellings constructed to M4(2) standards. Those who do move may not

choose to live in a new dwelling. Recent research by Savills “Delivering New Homes Resiliently” published in October 2020 shows that over 60’s households “*are less inclined to buy a new home than a second-hand one, with only 7% doing so*”. The District’s existing housing stock is significantly larger than its new build component, therefore adaption of existing stock will form an important part of the solution.

The Council’s proposed policy approach should not compromise the viability of development. Therefore, additional costs associated with M4(2) and M4(3) compliant dwellings should be included in the Council’s updated Viability Assessment. The Government’s consultation “Raising Accessibility Standards for New Homes” estimates the additional cost per new dwelling is approximately £1,400 for dwellings, which would not already meet M4(2). The extra costs for M4(3) are much higher. In September 2014 during the Government’s Housing Standards Review, EC Harris estimated the cost impact of M4(3) per dwelling as £15,691 for apartments and £26,816 for houses. These costs should be applied plus inflationary cost increases since 2014. M4(2) and M4(3) compliant dwellings are also larger than NDSS (see DCLG Housing Standards Review Illustrative Technical Standards Developed by the Working Groups August 2013), therefore larger sizes should be used when calculating additional build costs for M4(2) and M4(3) and any other input based on square meterage except for sales values as enlarged sizes are unlikely to generate additional value. If the requirements for M4(2) & M4(3) are carried forward, the NPPG specifics that “*Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied*” (ID 56-008-20160519).

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

The proposed Accessible & Adaptable Housing Policy also requires 5% of all affordable housing to meet Part M4(3)(a) (wheelchair user dwellings) standard and a 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.

The M4(3)(a) requirement should not apply to market housing. The Council is reminded that the requirement for M4(3) should only be required for dwellings over which the Council have housing nomination rights as set out in the NPPG (ID 56-008-20150327).

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

The proposed Reducing Carbon Emissions Policy (Bullet Point 1) requires all new development to reduce carbon dioxide emissions by following a sequential energy hierarchy prioritising fabric first and to achieve a 31% reduction in regulated CO2 emissions against the 2013 Edition of the 2010 Building Regulations (Part L) (Bullet Point 2).

The HBF disagree with the Council's proposed policy approach for energy efficiency. The Council's proposed policy approach is unnecessary and repetitious of 2021 Part L Interim Uplift. It is the Government's intention to set standards for energy efficiency through the Building Regulations. The key to success is standardisation and avoidance of individual Council's specifying their own policy approach to energy efficiency, which undermines economies of scale for product manufacturers, suppliers and developers. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal because of the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.

Under the proposed Reducing Carbon Emissions Policy, major residential proposals will also be required to use the Homes Quality Mark. This requirement is inappropriate. The Home Quality Mark has no status other than as an example of a best practice guide. The HBF is supportive of the use of best practice guidance however, the use of such guidance should remain voluntary rather than becoming a mandatory policy requirement, which would oblige developers to use this tool as a pre-condition for support from the Council. It is unreasonable and unjustified for major residential proposals to be required to use the Homes Quality Mark.

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

The proposed Water Efficiency Standards Policy requires all new residential development to achieve the optional water efficiency standard of 110 litres of water per person per day.

The HBF disagree with the Council's proposed Water Efficiency Standards Policy. Under Building Regulations, all new dwellings must achieve a mandatory level of water efficiency of 125 litres per day per person, which is a higher standard than that achieved by much of the existing housing stock. This mandatory standard represents an effective demand management measure. If the Council wishes to adopt the optional standard for water efficiency of 110 litres per person per day then the Council should justify doing so by applying the criteria set out in the NPPG. The NPPG states that where there is a "*clear local need, LPA can set out Local Plan Policies requiring new dwellings to meet tighter Building Regulations optional requirement of 110 litres per person per day*" (ID : 56-014-20150327). The NPPG also states the "*it will be for a LPA to establish a clear need based on existing sources of evidence, consultations with the local water and sewerage company, the Environment Agency and catchment partnerships and consideration of the impact on viability and housing supply of such a requirement*" (ID : 56-015-20150327). Although, North West Leicestershire is located within an area covered by Severn Trent, which has been classed as seriously water stressed, the Council's evidence does not demonstrate a clear local need.

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

14/3/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Objections to proposal of land around Isley Walton
Date: 14 March 2022 14:17:02

Local Plan Review. Consultation Response

Name- Marie Slevin

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 [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 and destroy the wellbeing of current residents by removing the local green space and local walking areas.
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,
Marie Slevin



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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	Mr
First Name	Chris	Jon
Last Name	Warren	Kirby
[Job Title]		Senior Director
[Organisation]	St Philips	Lichfields
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...

Q2, Q4 and Q5

Please refer to representations prepared by Lichfields on behalf of St Philips Land in respect of Questions Q2, Q4 and Q5.

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

14-03-2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

Date: 8 March 2022

Our ref: 64756/01/JK/HPL/20811642v1

Your ref:

Dear Sir/Madam

Representations to Development Strategy Options and Policy Options (Regulation 18) Consultation

These representations have been prepared by Lichfields on behalf of St Philips Land Ltd ('St Philips') in response to the North West Leicestershire Local Plan Review ('LPR') Development Strategy Options and Policy Options Consultation.

These representations focus on the elements of the LPR relating to housing and residential site allocations and are written in the context of St Philips' development interests at land at Worthington Lane, Breedon on the Hill ('the site'). The site is being actively promoted for residential development and St Philips is therefore seeking its allocation for residential development through the LPR.

The location of the site is shown at **Annex 1** and further background on the site is provided below as this provides important context to our representations on the LPR.

Land at Worthington Lane, Breedon on the Hill

The site extends to approximately 1.24 ha (gross) and comprises agricultural land bordered by existing residential development to its northern periphery characterised by a gently sloping topography with predominantly hedgerow boundaries. The nearest bus stop is 255 metres north of the site, and there is an hourly bus service between Coalville and Castle Donington.

The site has been assessed through the latest Strategic Housing and Employment Land Availability Assessment ('SHELAA') (2021) under Site BR7, and an extract of the SHELAA location plan is enclosed at **Annex 2**. The SHELAA commentary considers Site BR7 "*potentially suitable in the longer term*", "*potentially available*" and "*potentially achievable*".

The commentary also highlights refused application 16/00360/OUTM, and subsequent dismissed appeal, seeking outline permission for up to 27 dwellings. In this regard, St Philips is undertaking technical assessment and analysis of the site to address the identified constraints and demonstrate residential development at the site is deliverable, suitable and achievable.

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

St Philips agrees with the proposed settlement hierarchy and supports the classification of Breedon on the Hill as a Sustainable Village.

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

Table 2 of the DSOPO, which sets out the proposed housing requirement by various housing growth scenario, is replicated below.

Scenario	Annual amount	Total requirement 2020-2039	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

Low and Medium Housing Growth Scenario

St Philips agrees that the Low and Medium Housing Growth Scenarios of 368 dpa¹ and 448 dpa respectively should **not** be pursued, as suggested by the Council at DSOPO paragraph 4.19.

Both scenarios are below the currently adopted housing requirement of 481 dpa and past average housing delivery rates of 619 dwellings per annum (2011–2021). In this regard, the Planning Practice Guidance² ('PPG') advises that it "*might be appropriate to plan for a higher housing need figure than the standard method indicates... where previous levels of housing delivery in an area... are significantly greater than the outcome from the standard method*".

High Housing Growth Scenario

St Philips supports the Council's recognition that in respect of the unmet need arising from Leicester City, "*whilst there is not an agreement at this time, it is reasonable to assume that some of this is likely to be redirected towards North West Leicestershire*" (DSOPO paragraph 4.12).

The Council is therefore reasonable to conclude that "*at this time the High 1 and High 2 scenarios appear to cover the most likely future requirement until such time as the issue of the redistribution of unmet housing need from Leicester City has been agreed*" (DSOPO paragraph 4.20).

However, St Philips recommends that the Council avoids a binary approach whereby one growth scenario is progressed over the other. Ultimately, St Philips advocates the progression of a growth option that falls within or above the two scenarios, as the housing requirement will also need to be informed by other policy

¹ In the interests of clarity, it should be noted that the standard method figure calculated by the Council is 368 dpa (paragraph 4.15), though Table 2 erroneously references this as 359 dpa.

² PPG ID: 2a-010-20201216

considerations, as advised by the PPG, such as strategic infrastructure improvements³ and affordable housing⁴.

In respect of the LPR’s contribution towards the Leicester and Leicestershire Housing Market Area (“the HMA”) unmet need, however, it is acknowledged that the scale of contribution will largely be informed by two considerations: firstly, the precise extent of shortfall quantified by Leicester City Council, and secondly the methodology of apportionment agreed by the HMA constituent authorities.

Regarding the extent of unmet need, it is deduced that the latest estimate is in the region of approximately 18,000 dwellings when comparing Leicester City’s local housing need with its identified supply, and this figure aligns with NWL’s estimate at DSOPO paragraph 4.11.

Component	Dwellings (Total)	Dwellings (Annual)	Source
Local housing need 2019-36	39,321	2,313	Standard method 2022
Total identified housing supply (commitments, windfall, draft allocations etc.)	21,362	1,257	Leicester Draft Plan (March 2020)
Total housing shortfall to be exported to HMA	17,979	1,056	Difference of housing need and supply

Regarding the methodology of apportionment, St Philips maintains that the Council’s method for determining the level of its contribution towards the shortfall needs to be robust and underpinned by evidence.

St Philips accepts there is no single, definitive, approach in determining the proportion of unmet needs that an authority should seek to accommodate. However, it is disappointing that the Council and its counterpart authorities are no further forward in agreeing such an approach since publication of the *Joint Position Statement relating to Leicester’s Housing and Employment Land Needs* (September 2020) and subsequently the *Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs* (March 2021) (‘the SoCG’).

In particular, the SoCG confirmed the HMA authorities’ intention that, prior to the Government’s changes to the standard method in December 2020:

“The authorities have been engaged in a process of testing reasonable alternative options for meeting Leicester’s unmet need through a Sustainability Appraisal process with a view to agreeing an apportionment of the unmet need ahead of the submission of the Charnwood Local Plan...” (paragraph 3.19)

Whilst the subsequent changes to the standard method resulted in the Charnwood Local Plan being submitted ahead of the apportionment being agreed (paragraph 3.20), it is imperative that the HMA authorities establish an agreed methodology sooner rather than later. This is to avoid the potential but increasingly likely scenario where emerging HMA Local Plans do not plan for a reasonable contribution, if any at all, consequently compounding the scale of shortfall to be addressed by the remaining authorities yet to progress their respective Local Plan Review.

At the time of writing, the Hinckley and Bosworth Draft Local Plan Regulation 19 consultation (March 2022) does not propose any contribution towards the HMA unmet need, after the Council reneged on a proposed

³ *Ibid*

⁴ PPG ID: 2a-024-20190220

contribution of around 850 dwellings, or 10% of its local housing need, in the Regulation 18 consultation (June 2021).

Consequently, given that there are only eight authorities within the HMA, two of which – LCC and Oadby and Wigston – are unable to address these needs, assuming an even split would leave the remaining five authorities to address around 3,500 dwellings each within their respective Local Plan Reviews.

If, for example, NWL was to progress a housing requirement under the High 1 Growth Scenario at 9,728 dwellings (512 dpa) over the plan period, this would seek to deliver only 2,736 dwellings (144 dpa) more than required from the standard method at 6,992 dwellings (368 dpa), representing a 39% buffer. Whilst this may on the face of it appear sufficient, any buffer would have to address all the considerations highlighted in the DSOPO at paragraphs 4.7 to 4.13, before the contribution towards the HMA shortfall is even considered:

- Demographic trends;
- Build rates (market signals);
- Growth strategies;
- Economic need (HEDNA).

Furthermore, St Philips recommends that the Council explicitly demarcates each component of the buffer with the above considerations that it seeks to address, in order to avoid a scenario similar to Hinckley and Bosworth's Draft Local Plan which appears to regard the 'headroom' in its supply as also serving as the authority's contribution to the HMA shortfall. Such an approach is fundamentally unsound as identified by the Inspector in its *Report on the Examination of the Harborough Local Plan*:

"Nor is it appropriate to regard the headroom – the difference between the housing requirement of 11,140 homes and the total plan provision of 12,800 homes – as Harborough District's contribution towards meeting Leicester's unmet need. This headroom is required to ensure the resilience of the Plan." (paragraph 35)

Such potential pitfalls only serve to highlight the necessary and urgent need for the Council and its counterpart authorities to establish an agreed methodology in apportioning the unmet need, as established in the 2021 SoCG. This is critical to ensure soundness of the Plan and that the Council's method for determining the level of its contribution towards the LCC unmet housing needs is robust and evidence based.

Indeed, the Council will need to avoid the same issue faced by North Warwickshire, who utilised a 10% figure for their contribution towards Birmingham City Council's unmet need. In the Inspector's Preliminary Note (Ref: INSP1), the Inspector stated that:

"28. Although establishing housing needs is not an exact science, LP paragraph 7.39 explains that NWBC has tested delivering 10% of that residual (3,970 homes), which is referred to in the LP as an 'aspiration'. Whilst that aspiration is significant in pro-rata terms given the number of authorities within the Greater Birmingham Housing Market Area ("GBHMA"), the justification for a figure of 10% is not readily apparent." [Emphasis added]

St Philips considers that the Council should undertake analysis that considers the functional housing market relationship between the various local authority areas. This should take account of the degree of migration and commuting linkages within the HMA, consider opportunities to capitalise on sustainable transport links and improve affordability, and the degree of environmental and physical constraints which might impede on an authority's ability to accommodate unmet housing needs. This analysis would, ultimately, illustrate the functional linkages between the authorities within the HMA, and the origins of the unmet housing need, and shows how the LCC's unmet housing needs could be sustainably distributed.

Until such time as the apportionment methodology is agreed, St Philips considers that progressing the LPR with either the High 1 or High 2 growth scenario carries significant risk as the contribution towards the HMA shortfall will only be predicated upon mere assumptions rather than evidence. Given that NPPF paragraph 35(c) establishes that “plans are ‘sound’ if they are... based on proportionate evidence”, such an approach will likely render the Plan unsound.

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.

Table 5 of the DSOPO, which sets out the detailed distribution options by the various housing growth options, is replicated below. The Council sets out its preferred options to be taken forward – Option 3a and Option 7b – at Table 6, however for ease of reference, the options supported by St Philips is set out below alongside the Council’s preferred options.

Option	Description	Preferred Option	
		NWL	St Philips
Low and Medium scenario (368-448 dwellings/annum)			
Option 1	Baseline Option (Continuation of adopted Local Plan)	No	No
High 1 scenario (residual requirement = 1,000 dwellings)			
Option 2a	Principal Town (Coalville – 600 dwellings) and Key Service Centres (KSC) (Castle Donington and Ashby de la Zouch – 400 dwellings)	No	No
Option 3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)	Yes	No
Option 4a	Principal Town (400 dwellings) and New Settlement (600 dwellings)	No	No
Option 5a	Principal Town (450 dwellings), New Settlement (450 dwellings) and KSC (100 dwellings)	No	No
Option 6a	Principal Town (350 dwellings), New Settlement (350 dwellings), KSC (200 dwellings) and LSC (100 dwellings)	No	No
Option 7a	Principal Town (350 dwellings), New Settlement (350 dwellings), KSC (150 dwellings), LSC (100 dwellings) and Sustainable Villages (50 dwellings)	No	Potential
Option 9a	Principal Town (200 dwellings), New Settlement (350 dwellings), KSC 90 dwellings), LSC (50 dwellings), Sustainable Villages (270 dwellings) and Small Villages (40 dwellings)	No	Yes
New Settlement (residual requirement = 5,100 dwellings)			
Option 8	New Settlement	No	No
High 2 scenario (residual requirement = 5,100 dwellings)			
Option 2b	Principal Town (3,060 dwellings) and Key Service Centres (2,040 dwellings)	No	No
Option 3b	Principal Town (2,550 dwellings), Key Service Centres (1,530 dwellings) and LSC (1,020 dwellings)	No	No
Option 4b	Principal Town (2,040 dwellings) and New Settlement (3,060 dwellings)	No	No
Option 5b	Principal Town (2,295 dwellings), New Settlement (2,295 dwellings) and KSC (510 dwellings)	No	No

Option	Description	Preferred Option	
		NWL	St Philips
Option 6b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (1,020 dwellings) and LSC (510 dwellings)	No	No
Option 7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)	Yes	Yes

Overall, St Philips generally **supports** the Council’s preferred approach with **Option 7b** but **objects** to the preferred approach with **Option 3a**.

However, there is substantial concern with the rationale underpinning the formulation of the appraisal options and it is therefore considered that additional options should be tested through the Sustainability Appraisal before progressing any further with the LPR. The concerns largely focus on the following issues:

- Insufficient growth at Sustainable Villages (‘SVs’); and
- Overreliance on New Settlement.

Insufficient Growth at Sustainable Villages

Principally, too few options comprise the distribution of housing towards SVs, as only Option 7a, 9a and 7b include directing growth towards these settlements. Moreover, these options that do direct growth to SVs do not direct enough growth when potentially more could be accommodated. St Philips considers that SVs should form a key part of the growth strategy for two reasons:

- 1 **Site variety:** SVs are identified as such given their sustainability credentials and are therefore well-placed to accommodate growth, even if such growth is limited in some options more than others. St Philips considers that to optimise housing delivery, the widest possible range of sites by both size and market location are required so that small, medium and large housebuilding companies have access to suitable land to offer the widest possible range of products. Including SVs in more options will ensure a diversified portfolio of housing sites, offering the widest possible range of products to households to access different types of dwellings to meet their housing needs.
- 2 **Sustainability impact:** there are more settlements identified as SVs, with 18 in total, than any other classification within the Settlement Hierarchy (DSOPO paragraph 3.11). This means that by distributing the same amount of growth to the SVs as that to another classification, the impact on the SVs individually will be less acute given the spread of growth across numerous settlements. It is noted that the distribution of housing to SVs formed part of the growth strategy of the adopted Local Plan, despite the Sustainability Appraisal considering that this “*would increase reliance on car travel to access jobs and services*”⁵. However, a notable shift in commuting patterns has since occurred following Covid-19 and research has found that over 50% of people would like to work from home either 0, 1 or 2 days a week from 2022 onwards⁶. St Philips therefore recommends testing the sustainability performance of more options which include SVs as it will potentially find that impact on travel will not be as significant as was previously found.

Overall, more options should include the distribution of housing to the SVs given the likely sustainability impacts and, of these options, the scale of growth to SVs should be increased to optimise housing delivery.

⁵ AECOM (June 2016) *Sustainability Appraisal (SA) of the North West Leicestershire Local Plan (Proposed Publication Version)*, paragraph 7.4.4

⁶ VoxEU & CEPR (March 2021) *Working from home is revolutionising the UK labour market*. Based on survey of 5,000 working adults in the UK in January and February 2021

For this reasons, St Philips **objects** to the preferred approach in taking forward **Option 3a** as it does not seek to distribute growth to the SVs. Conversely, it supports **Option 7b**, which seeks to direct 255 dwellings to SVs, and supports **Option 9a**, which seeks to direct 270 dwellings to SVs. Additionally, **Option 7a** could be **potentially supported** if it directed more growth the SVs.

Overreliance on New Settlement

It is understood the Council has identified the broad location for a new settlement at land south of East Midlands Airport which deliver up to 4,740 dwellings (paragraph 4.24) and is therefore considering this as a stand-alone growth option as well as in combination with other options (paragraph 4.25).

St Philips welcomes the Council’s recognition of the significant lead-in times associated with bringing forward a new settlement and supports the Council’s use of Lichfields’ *Start to Finish* research (paragraph 4.38 and 4.39).

However, there is still concern surrounding the Council’s assumed delivery rates of a new settlement in the plan period, even employing a cautious approach. Firstly, the Council estimates that delivery of a new settlement would not commence until 2028 at the earliest (paragraph 4.47), however this appears somewhat ambitious and St Philips considers that delivery would not realistically commence until around 2032/33, as set out below.

Date	Stage / Housing Delivery	Source
Mid-2024	Local Plan Adoption	NWL Local Development Scheme (January 2022) paragraph 4.4
2024/25	Application submitted	Lichfields assumption
2030/31	Application approval	Lichfields (2020) <i>Start to Finish</i> , Figure 4
2032/33	Delivery commences	Lichfields (2020) <i>Start to Finish</i> , Figure 4

In terms of build rate, the Council does acknowledge that the site promoter’s estimate of 250 dpa would be above the 160 dpa average suggested in *Start to Finish*⁷ (paragraph 4.47). Consequently, St Philips urges the Council to assume a cautious approach as such rates would yield between 1,120 and 1,750 dwellings from a commencement date of 2032/33 up to the end of the plan period in 2039, as set out below.

Date	Build-out rate (cumulative)	
	Lichfields (160 dpa)	Site Promoter (250 dpa)
2032/33	160	250
2033/34	320	500
2034/35	480	750
2035/36	640	1,000
2036/37	800	1,250
2037/38	960	1,500
2038/39	1,120	1,750

St Philips is therefore concerned that the Council’s preferred approach with Option 7b assumes the delivery of 1,785 dwellings up to 2039, as this would be predicated on an above-average assumption which is likely

⁷ Lichfields (2020) *Start to Finish*, Figure 7

unrealistic given the findings of *Start to Finish*⁸: “Even when sites have seen very high peak years of delivery, as Table 5 shows, no sites have been able to consistently deliver 300 dpa.”

By proceeding with an assumed delivery of 1,785 dwellings from a new settlement up to 2039 as per Option 7b, the Plan risks being found unsound at examination.

The Council should therefore revisit the assumptions made in respect of the total dwelling contribution from a new settlement within the plan period and consequently should redistribute such growth to other settlements including, for reasons set out above, Sustainable Villages.

Summary

Regarding the amount of housing growth, St Philips supports the Council’s preference towards the High 1 and High 2 Growth Scenarios at 9,728 dwellings (512 dpa) and 13,870 dwellings (730) respectively. However, St Philips recommends that the Council avoids a binary approach whereby one growth scenario is progressed over the other as, ultimately, the scale of growth will largely be dictated by the Plan’s contribution towards the HMA unmet need.

Consequently, until such time as the apportionment methodology is agreed, St Philips considers that progressing the LPR with either the High 1 or High 2 growth scenario carries significant risk as the contribution towards the HMA shortfall will only be predicated upon mere assumptions rather than evidence. It is therefore imperative that the HMA authorities establish an agreed methodology sooner rather than later.

Regarding the distribution of housing growth, St Philips supports Option 7b and Option 9a which seek to direct 255 dwellings and 270 dwellings respectively to Sustainable Villages. Generally, however, more growth should be directed towards the Sustainable Villages for the reasons set out above.

Moving forwards, St Philips would welcome a meeting with Officers following this consultation on the DSOPO, for the opportunity to explain the nature of environmental and technical information that is available to support the strategic promotion of the site.

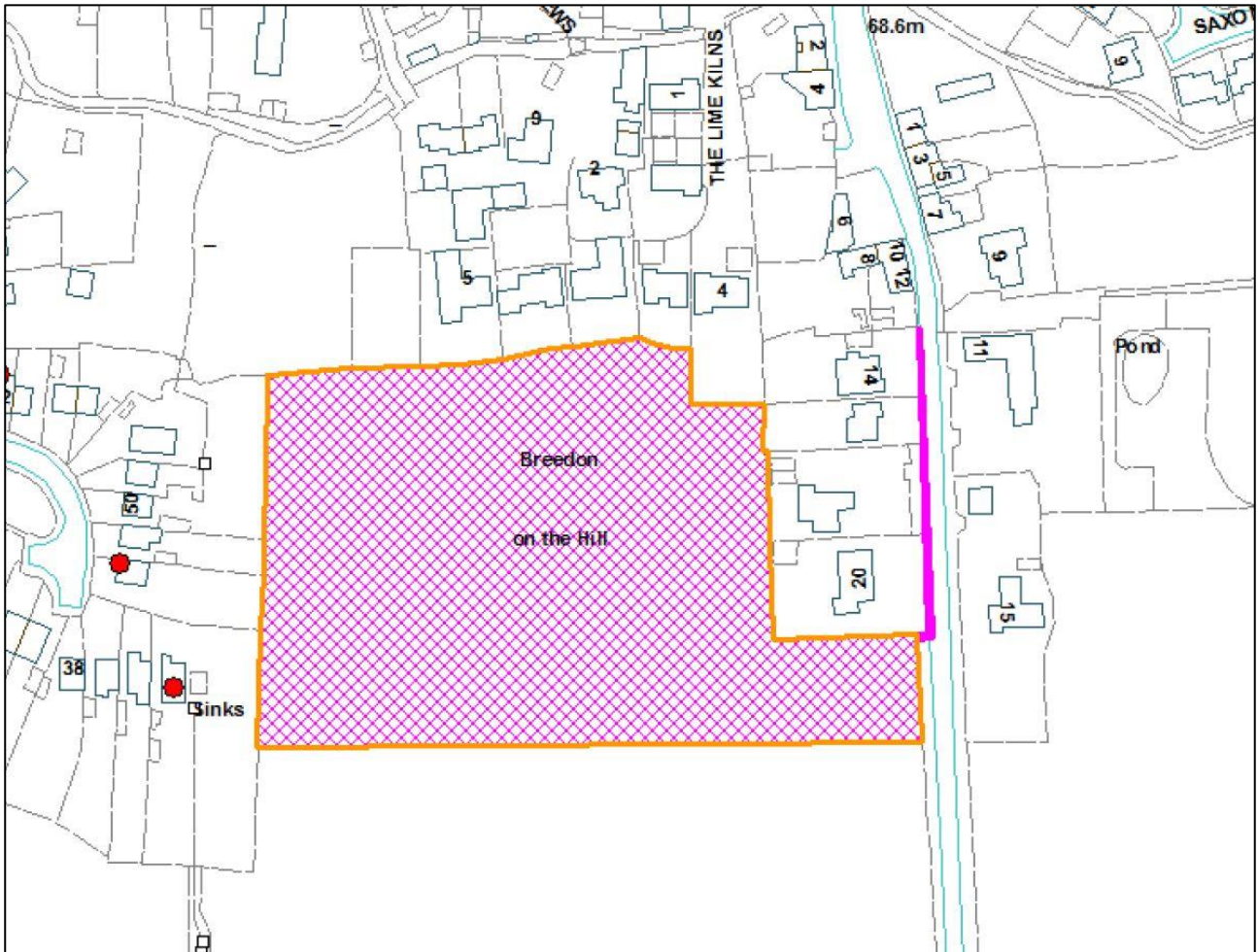
Yours faithfully



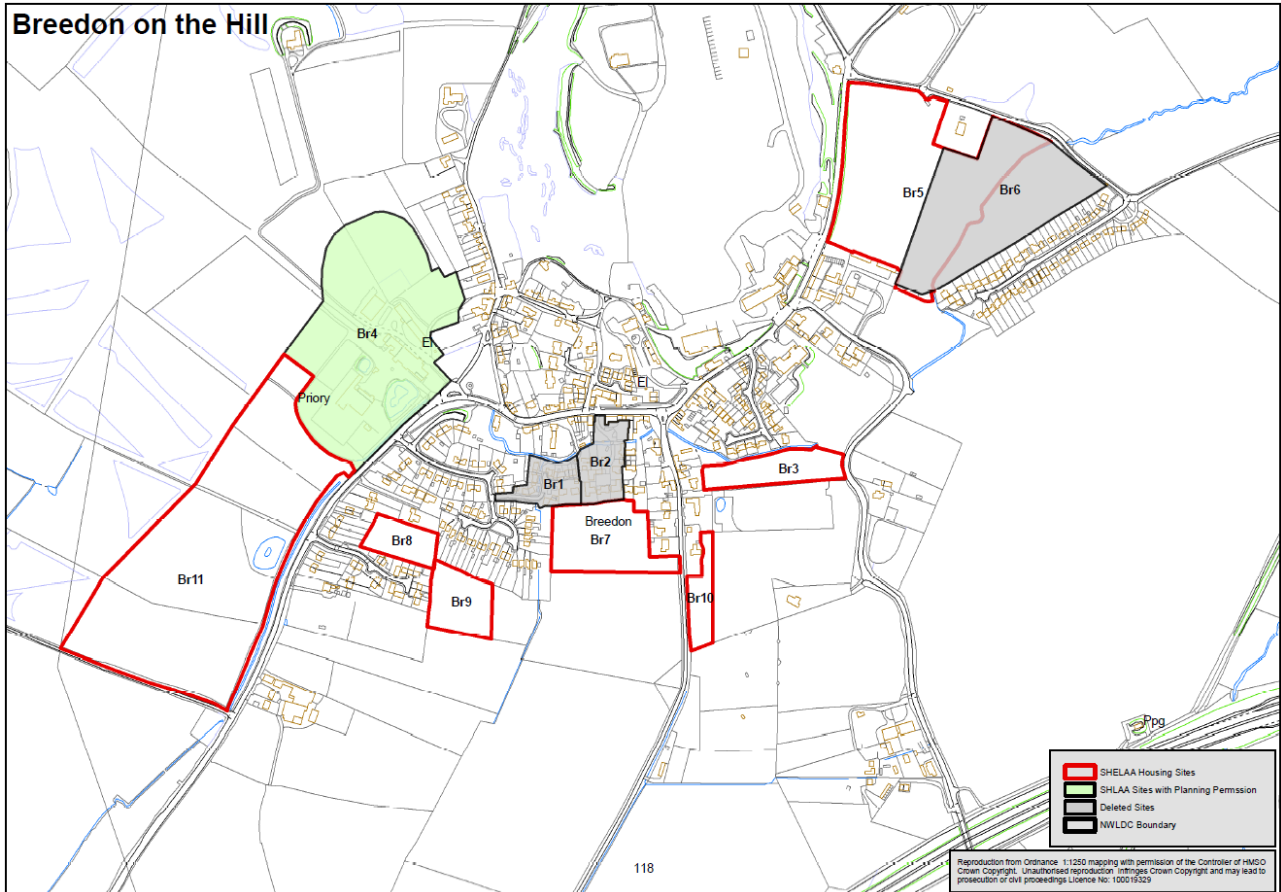
Jon Kirby
Senior Director

⁸ Lichfields (2020) *Start to Finish*, page 11

Annex 1: Site Location Plan



Annex 2: SHELAA Extract



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

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

Please see the enclosed documentation.

(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

Ben Ward

Date

14.03.2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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Representations to the North West Leicestershire Local Plan Review – Development Strategy and Policy Options

For and on behalf of Rosconn Strategic Land

March 2022



**Question 1 – Do you agree with the Local Plan Review Objectives? If not, why not?**

- 1.1. Rosconn Strategic Land (RSL) broadly agrees with the Local Plan Review Objectives but the Council should ensure these are reflected in the content of the Plan. We note, for example, Objective 6 which relates to enhancing the vitality and viability of the district's town and local centres. We agree that the existing towns and villages in the district should not be forgotten and the only way to support their long-term viability and vitality will be to ensure they accommodate a sufficient proportion of growth over the Plan period and that opportunities for growth in these places are not crowded out by a top-heavy growth strategy. We would also encourage the Council to ensure that the District's rural settlements have adequate opportunity to grow given the advice of National Planning Policy Framework (NPPF) paragraph 79 which supports growth in rural areas to maintain their long-term vitality and sustainability.
- 1.2. We would also suggest that Objective 10 is amended to ensure that it refers to the efficient use of land generally rather than just previously developed land which would be in line with the National Planning NPPF's approach to this topic.

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

- 1.3. RSL agrees with the settlement hierarchy set out in the Consultation Document. We would note this has been informed by proportionate and recent evidence (namely the Settlement Study of 2021) to establish the services and facilities available in each settlement as well as the relative availability of public transport opportunities in each settlement.

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.

- 1.4. Rosconn Strategic Land (RSL) agrees with and supports the preferred approach to the amount of housing growth, i.e. the "High 2" scenario.
- 1.5. The "High 2" scenario, equating to 730 dwellings per annum (dpa), is calculated by reference to the 2018-based household projections. Compared to the 2014-based projections and contrary the national trend, use of the 2018 projections suggests a significant increase in housing need for North West Leicestershire.
- 1.6. The Planning Practice Guidance (PPG) indicates that any method which relies on using household projections more recently published than the 2014-based household projections will not be considered to be following the Standard Method, but also says that deviation from the Standard Method is possible in "exceptional circumstances." We would therefore encourage the Council to investigate whether the 2014-based projections are a robust basis for calculating need in North West Leicestershire or whether these are underestimating likely future need.
- 1.7. Any "exceptional circumstances" argument regarding use of the 2018 household projections needs to be considered separately from the question of whether there are factors which indicate Plan's housing requirement should be higher than the Standard Method, noting the Planning Practice Guidance's advice that use of the Standard Method does not produce a housing



requirement. We consider that there are a number of such factors in North West Leicestershire including historic build rates, above trend economic growth and unmet need from Leicester.

Economic Growth

- 1.8. As the Consultation Document points out, build rates (which have averaged 619 dpa since 2011) are significantly in excess the “low scenario,” which is the base Standard Method figure of 368 dpa. Other evidence, including the Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA) 2017, suggests need is higher than the Standard Method both for the current plan period and beyond, as represented by the Consultation Document’s “Medium” scenario (448 dpa) and the “High 1” scenario (512 dpa), respectively.
- 1.9. The housing need figure identified by the 2017 HEDNA was in part informed by above-trend economic migration to North West Leicestershire which resulted in an upward adjustment to the housing requirement of 32 dpa.¹ Aside from one other authority, North West Leicestershire’s circumstances in this regard were unique within the Housing Market Area (HMA). We note that the Council expects above-trend economic growth to continue and possibly even intensify given significant market interest in commercial development within the District, in particular strategic scale warehousing. As such, any updated housing needs evidence should consider how above-trend economic growth will influence the need for new homes and the Plan’s housing requirement adjusted accordingly. We would encourage this potential adjustment to be considered robustly in the Plan’s evidence base and would observe that the methodology used in the 2017 HEDNA may need to be revisited to ensure this. The used approach should be sensitive to the particular local circumstances in North West Leicestershire regarding the planned scale of economic growth over Plan period rather than a standard economic forecast model.

Unmet Need

- 1.10. It is clear that unmet need from Leicester could exert upward pressure on the Plan’s housing requirement. We recognise that the authorities within the HMA have worked positively and proactively to produce a Strategic Growth Plan (SGP) for the area to consider needs across the HMA and this work forms the basis of the “High 1 Scenario” of 512 dpa which is, in turn, derived from the 2017 HEDNA. However, the 2017 HEDNA now considerably under-estimates the housing needs of Leicester given the current approach of the Standard Method which requires a 35% uplift to the city’s baseline housing need. The cities and urban centres uplift has not been considered within the SGP which was prepared prior to the current version of the Standard Method. The SGP similarly has not defined the extent of any unmet housing need arising or how this should be apportioned throughout the HMA. Significant uncertainty therefore remains for plan-making in the HMA and any increase in the housing requirement to account for this uncertainty is welcome.

¹This uplift was purely to factor in economic growth and separate from any affordability considerations



- 1.11. In RSL's view, the "High 2" growth scenario represents the best choice as the other options risk underestimating the scale of unmet housing needs from Leicester and the corresponding amount of new homes North West Leicestershire will need to accommodate. As a decision has yet to be made on the strategic apportionment of Leicester's unmet need to surrounding areas, it is necessary to be as robust as possible in formulating a buffer to address this matter as the scale of the unmet need, currently estimated at 18,000, is substantial. We also have reason to believe the true level of unmet housing need from Leicester could be higher than 18,000 as this figure appears to be derived from the Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (March 2021) which only accounts for needs to 2036. North West Leicestershire's Plan is likely to cover the period to 2039 and thus will have to deal with a higher unmet need figure. We would also note that the current unmet need figure is also based on Leicester City completely exhausting 100% of its "theoretical capacity" and delivering 100% of its projected housing growth to 2036 with seemingly no allowance for non-delivery which, particularly for an urban authority, is an unrealistic assumption.
- 1.12. For the above reasons, Rosconn Strategic Land supports the preferred housing requirement figure of 730 dpa in principle but would encourage the Council to commission robust evidence to substantiate this number which should consider whether use of the 2014 projections are appropriate in North West Leicestershire, the appropriate level of uplift to the housing requirement to account for economic growth and to comprehensively address other market signals that may not be captured through the Standard Method's affordability adjustment.

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.

- 1.13. Rosconn Strategic Land does not agree with the preferred approaches for the distribution of housing growth (i.e. Options 3a and 7b). Whilst we consider Option 3a to be the best performing of the alternatives presented for the "High 1" scenario, the majority of these are not realistic because they either include a new settlement impractically small size or concentrate new growth in only a few locations. Given the smaller quantum of growth necessary under the High 1 scenario, we would not expect any option under this scenario to include a new settlement. We would like to see alternative options tested and taken forward which both exclude a new settlement and introduce a realistically greater proportion of dispersal through apportioning some growth to the Sustainable Villages.
- 1.14. Similarly Option 7b under the High 2 growth option is the "best of a bad bunch" as there is only one realistic option (Option 3b) presented without a new settlement. Whilst it is our view that 3b performs better than 7b, and the SA process confirms this is so, we would like to see other alternatives tested that do not include a new settlement and apportion growth more equitably including to the Sustainable Villages. This is essential to underpin the justification for the chosen strategy as presently there is insufficient variation in the options presented as most include a new settlement with inadequate consideration of distribution options which do not. Our rationale is set out further below.



Deliverability of the New Settlement

- 1.15. The chosen growth option must be deliverable. As set out above and below most permutations of the various growth options identified include a potential new settlement to be brought forward at Isley Walton, south of East Midlands Airport. As the Council will be aware new settlements are challenging to deliver due to the upfront infrastructure costs and even where they are deliverable, take a considerable amount of time to come forward. It is welcome that the Consultation Paper's preferred Option 7b supplements the potential new settlement with more incremental growth at existing towns and villages. However, the new settlement should still be realistic, deliverable and justified. It should also not come forward over such a long time frame that it crowds out alternatives in future plan reviews. In addition to being deliverable, paragraph 73 of the National Planning Policy Framework (NPPF) indicates that new settlements must be supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). In planning for new settlements, the NPPF directs that local policy making authorities should ensure, amongst other things, that the size and location of new settlements will support a sustainable community with sufficient access to services and employment opportunities within the development itself without expecting an unrealistic level of self-containment. Having regard to this guidance it must be said that at 1,750 units at Isley Walton identified under the preferred option is on the low side when compared to other examples of new settlements in the country and this could be reasonably expected to limit the viable extent of self-containment possible.
- 1.16. A relevant Leicestershire comparator to Isley Walton is St George's Barracks in Rutland which was identified for a new settlement in the now abandoned Rutland Local Plan. At 2,000 dwellings this was of a similar size to the case in point and was unviable without £29m of funding from the Housing Infrastructure Fund (HIF). Even with the HIF funding and the significantly higher residential land values in Rutland (£2m per hectare in Rutland compared to £1.2m per hectare in North West Leicestershire²), the scheme income barely outstripped the costs.³ The previously developed nature of this site brought remediation, site holding and clearance costs that would not be applicable the possible option identified in North West Leicestershire, but even without these St George's would still not have been viable without alternative funding streams. St George's was also promoted by a government body, the Ministry of Defence, which would not be as constrained by commercial considerations as a private entity and thus more accepting of lower returns.
- 1.17. Lower residential land values in North West Leicestershire (the lowest in the HMA according to the 2017 HEDNA) combined with the high upfront cost of strategic infrastructure calls into question whether the new settlement option is deliverable. The Potential Strategic Sites Infrastructure Study report dated June 2020 considers the infrastructure that will be necessary to facilitate a new settlement at Isley Walton and references the need for "significant infrastructure and/or investment" across a number of areas including utilities, education, health, air pollution and bespoke mitigation arising from the site's proximity to East Midlands airport.

² MHCLG - Land value estimates for policy appraisal 2019 published 18th August 2020

³ See BBP Regeneration - St George's Rutland Viability Report published November 2019



We are therefore sceptical that there would be sufficient residual value to mitigate the proposal's impact and generate a sustainable level of self-containment. The viability of the proposals will need to be carefully considered against the infrastructure required to render the broad location sustainable and to mitigate the impact of strategic housing development in this location. To avoid abortive work and to reduce the Plan's chances of being found unsound at examination, would encourage the Council to undertake this exercise early on in the process and before a new settlement becomes embedded the Plan's strategy for growth.

- 1.18. We would note that the Potential Strategic Sites Infrastructure Study does not deal with wider impacts to the road network and the likely cost of ensuring a range of transport choices for future residents, in line with the NPPF. Whilst Isley Walton is relatively close to the strategic road network, access to the new settlement will be via local roads which could require significant improvement. The proximity of noise and disturbance generating uses (Donnington Park Circuit and East Midland's Airport) could add further costs for mitigation or mitigation measures may not be deliverable. Whilst it is recognised that the airport will have formal noise abatement obligations and procedures, the effects of Donnington Park Circuit will likely be harder to control and mitigate for not only because of the inherently noisy nature of motorsport, but because the controls that are in place (by planning condition) are likely to be influenced by the fact that residential uses in the vicinity are, at present, few and sporadic. Before leaving the noise point, we would draw the Council's attention to the case of Colworth Garden Village in Bedfordshire which was removed as a draft allocation from Bedford Borough Council's then emerging local plan on the basis that the promoters could not reach an agreement on noise mitigation with an adjacent motorsport venue. The potential constraint posed by the site's proximity to Donnington Park Circuit should not be underestimated and should be fully understood before work processes much further.

Reasonable Alternatives

- 1.19. Aside from the practical aspects of deliverability, reasonable alternatives to a growth strategy should be properly considered. We are not confident that the Sustainability Appraisal (SA) has achieved this as most of the alternatives assessed include a new settlement at various scales and in some cases at such a small scale that it would patently be unable to achieve any meaningful level of self-containment. Case law is clear that the alternatives chosen for appraisal should be realistic.⁴ The Strategic Environmental Assessment (SEA) Directive also states that the SA should provide an outline of the reasons for selecting the alternatives dealt with which the SA seeks to do on page 5 through the identification of four general principles. Whilst these principles are sound on the whole, they do not adequately contextualise the options presented and some cases even undermine them. For example, the first principle states that development should be dispersed around the District rather than just in one category of settlement yet the SA tests Option 8 where all growth over the Plan period would be concentrated in a new settlement. Other options tested

⁴ See for example *Ashdown Forest Economic Development LLP v Secretary of State for Communities and Local Government* [2014] EWHC 406 (Admin) (21 February 2014) at paragraph 5.14



such as 2b would exclude all but two tiers of settlements from accommodating growth. Given the first principle in sketching reasonable alternatives is that growth should be dispersed, it is hard to see why some options are considered as reasonable alternatives.

- 1.20. Under the “High 1 scenario” all but two of the options presented include a new settlement but at such a small scale (350 to 600 dwellings) that it clearly will not be able to achieve any meaningful level of self-containment contrary to the advice of the NPPF quoted above. Of the remaining two options (2a and 3a), 2a would result in a level of concentration at the top of the settlement hierarchy that is unrealistic for the reasons acknowledged in the Consultation Document and 3a is the preferred option taken forward for assessment. Whilst we would agree that of the options presented under the “High 1” scenario Option 3a is the best performing, the other options are not realistic due to their incorporation of impractically small new settlements and, in Option 2a’s case, excessive concentration of development at the top of the settlement hierarchy. We would submit the alternatives tested are not reasonable alternatives to the growth strategy or at the very least can be easily discounted so do little to justify the preferred approach
- 1.21. In closing on the “High 1” scenario we would observe that Option 2a has been discounted for resulting in an excessive concentration of growth in a limited number of settlements but we would submit the differences in level of concentration in the upper two tiers of the settlement hierarchy between Option 2a and 3a (some 200 dwellings) is negligible and 3a could just as easily be discounted for the same reason. A permutation of Option 3a should therefore be tested under the “High 1” scenario omitting a new settlement (as per the existing Option 3a) and introducing meaningfully higher level of dispersal including some apportionment of growth to the Sustainable Villages.
- 1.22. Turning to the “High 2” scenario we would note that all but two options include a new settlement albeit this time at a more realistic scale of at least 1,750. In our view, there is only one reasonable alternative option to a new-settlement led spatial strategy identified (Option 3b) and it has been discounted on the basis of Coalville being unable to sustain the build rate required to deliver the level of growth apportioned to it under this option. Against this we would make two points, Firstly, the build rate required in Coalville of 301 dwellings per year is not significantly higher than the 267 dwellings per year achieved between 2016 and 2021. Secondly, there is no reason to believe that a new settlement would perform any better in this regard and unlike Coalville which has an established record of delivery, the actual build rates achievable at Isley Walton is an unknown. We therefore consider that Option 3b should not be discounted and should be taken forward as a reasonable alternative to the preferred strategy. We would suggest that the SA process considers a permutation of Option 3b omitting a new settlement as it does currently and increasing the level of dispersal to include some growth at the Sustainable Villages. Clearly such an approach could also overcome the Council’s original concern with Option 3b by redirecting some growth away from Coalville and towards the Sustainable Villages.
- 1.23. Aside from Option 3b, Option 7b (the preferred strategy under the “High 2” scenario) achieves the most equitable and deliverable pattern of growth but its inclusion of a new settlement results in it



generating a number of potential significant negative effects. We would request that a permutation of this option without the proposed new settlement is tested that would see a proportionate increase to growth in the Key Service Centres, Local Service Centres, and Sustainable Villages. This would aid in underpinning the justification for the Plan's preferred spatial strategy as the alternatives tested would be genuinely reasonable and may even reveal a better performing growth option resulting a more sustainable pattern of development which can then be taken forward.

- 1.24. In summation, we take issue with the "reasonableness" of many alternatives identified within the consultation document and the SA. We would suggest new options are considered and tested as per our recommendations above.

Sustainability Appraisal

- 1.25. Significant positive effects have been identified arising from Option 7b against Objective SA4 by virtue of its equitable distribution of housing across the entire District yet options that would see a similar pattern of dispersal (such as Option 3b) are not associated with the same significant positive effects in the SA. It stands to reason that if Option 3b was adjusted to introduce a greater element of dispersal through re-apportioning some growth away from Coalville and towards the Sustainable Villages as suggested above, this option would perform better against Objective SA4.
- 1.26. The Sustainability Appraisal identifies *three* possible significant negative effects associated with Option 3b. These include significant negative effects associated with Objective SA1 (Health and Wellbeing) due to limited accessibility to active travel currently in the district, SA2 (Reducing Inequalities) due to constraints around access to employment and education capacity at Local Service Centres, and SA8 (Travel Reduction) due to infrequent public transport services at Local Service Centres. Against this it should be noted that Option 7b (the Council's preferred option) would result *five* potential significant negative effects and it is far from evident how this option would outperform Option 3b vis-à-vis Objectives SA1 and SA8, in particular. Both objectives relate to active travel opportunities and given that Option 7b would include a new settlement outside of existing conurbations that would require significant investment in public transport infrastructure to render sustainable, it is not clear how this outperforms a strategy that would concentrate more growth in settlements with established public transport infrastructure not to mention established services and facilities. Clearly new growth within such settlements, including the Local Service Centres, could facilitate improvements to public transport infrastructure to the benefit of existing communities.
- 1.27. The SA assesses Option 7b against Objective SA6 (enhancing the viability and vitality of existing towns and villages) as resulting in a possible significant positive effects as it will maintain and enhance the services and facilities available in existing urban areas. We cannot see how 7b outperforms 3b in this regard when the former would direct growth and the benefits of growth away from existing centres in need of regeneration and re-vitalisation towards a new settlement which can reasonably be expected to draw footfall and investment away from existing communities.



- 1.28. We therefore consider that notwithstanding the fact that even on the existing SA assessment Option 3b outperforms Option 7b with regards to the number of significant negative effects, the significant positive effects of 7b have been overstated and that Option 3b, particularly as adjusted to include an element of dispersal to the Sustainable Villages as with 7b, would result in a pattern of development that would outperform 7b and in our view should be chosen as the Council's preferred spatial strategy.
- 1.29. Prior to concluding on this matter we would observe that our recommendations of modifying the growth strategies to include a sustainably greater level of dispersal are supported by paragraph 79 of the NPPF (which refers to supporting rural areas through new growth) and paragraph 69 which refers to the benefits of achieving a mixed portfolio of small and medium sized sites.

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

- 1.30. Whilst we welcome the Council's efforts to proactively address the District's needs for self and custom build housing, we do not agree with the proposed self-build and custom housebuilding policy.
- 1.31. The policy seeks to encourage custom and self-build homes on sites that would be suitable, in principle, for general market housing. Given that custom and self-build housing is an emerging market, it is highly unlikely that developers will bring forward custom and self-build plots on sites that are otherwise suitable general market housing in planning policy terms. As such this limb of the policy is likely to make a negligible contribution to the District's supply of self and custom build plots.
- 1.32. The Policy states that the Council will seek provision of custom and self-build plots on sites capable of providing more than 50 or more dwellings despite the Consultation Document noting at paragraph 5.11 of that the Council had previously deemed this approach undesirable due to "practical issues." The Consultation Document does not elaborate further but there are undoubtedly practical issues involved in delivering self and custom build plots as a proportion of strategic housing sites. Such difficulties include:
- Slower delivery that can affect the pace at strategic sites come forward
 - Given the slower pace of custom and self-build delivery construction continuing on long after market and affordable plots have been occupied generating long term disturbance for residents
 - Practicalities of site management related to hours of work, storage of materials as well as ensuring the consistent observance of planning controls
- 1.33. Other issues likely to be encountered with a "one size fits all" approach will be the excessive provision of custom and self-build plots against likely need. It is not clear how the threshold of 50 dwellings relates to the scale of need likely to arise over the plan period, but if demand is lacking all the policy in its current form will achieve is a reversion to standard market housing after the prescribed period of marketing. Not only will this approach fail to deliver self and custom build plots but it will delay the provision of market housing.



- 1.34. Despite the above, it should not be automatically assumed that all strategic-scale sites are unsuitable for self and custom build plots, but policy requirements for these should be set and implemented on a site by site basis having regard to the specific circumstances such as viability, the aspirations of the site promoter as well as the scale of the need for custom and self-build likely to arise over the plan period. There are two alternative approaches we would encourage the Council to consider:
1. Allocate specific sites for self and custom build housing
 2. Identify specific allocations that are suitable to deliver a proportion of new homes as custom and self-build plots
- 1.35. We would recommend the allocation of specific sites for custom and self-building on the basis that this is most likely to bring forward a sufficient supply of custom and self-build plots when they are needed. Self-build plots brought forward as part of strategic sites, if they come forward at all, will be slower to deliver given the longer lead-in time for larger scale development as well as the potential need for upfront infrastructure. Given the requirement to ensure needs for custom and self-build are met on a three year rolling basis in line with the Planning Practice Guidance (PPG) and legislation, the clear need for this type and tenure of housing in the District, and the lack of any effective policy mechanism to bring forward these plots in the interim, we would respectfully suggest that our suggested approach is a more suitable to North West Leicestershire.



Land Adjacent Sparkenhoe Estate, Heather

Site Delivery Statement

March 2022





1.0 Introduction

- 1.1. Rosconn Strategic Land (RSL) is promoting land adjacent Sparkenhoe Estate, Heather (the Site) for a residential development of approximately 89 dwellings. The Site has previously been promoted through the 2018 call for sites and is assessed in the 2021 edition of the Strategic Housing and Economic Land Availability Assessment (SHELAA) under reference H3 where it is considered to be available and potentially suitable for residential development.
- 1.2. The purpose of this Statement is to set out how the Site is deliverable, offering a suitable location for residential development and how its delivery will afford wider economic, social and environmental benefits. The Statement also explains the design process undertaken to date and how this has been informed by an understanding of the Site's opportunities and constraints. The structure of this Statement is as follows:
 - Site Description and Context
 - Planning Policy
 - Site Assessment
 - Place-making Opportunities
 - Landscape and Green Infrastructure
 - Flooding and Drainage
 - Highways, Transport and Sustainability
 - Ecology
 - Minerals
 - The Framework Masterplan
 - Conclusion
 - Availability and Viability
 - Deliverability
 - Summary

2.0 Site Description, Context and Planning History

- 2.1. The Site lies within the context of a consolidated pattern of residential development and wraps around Heather's Limits to Development. A recently constructed residential development lies to the south and is accessed off Swepstone Road. A belt of established juvenile woodland extends to the north and to the south of the Site beyond which lies the open countryside. The Site itself comprises two arable agricultural fields separated by mature hedgerows and semi-mature/mature trees.
- 2.2. The Site is 4.77ha in gross area and incorporates gently undulating topography. It is situated within Flood Zone 1. There is a strong network of recreational routes, public footpaths and bridleways around Heather that provide access to the surrounding countryside. Notably, PRoW Q65 runs across the north eastern edge of the Site and connects Normanton Lane to Main Street. Nearby PRoW Q45 runs to the west of the Site connecting Normanton Lane to Swepstone Road.
- 2.3. As the Council is aware an outline planning application (16/00967/OUTM) for up to 135 dwellings was submitted on the Site plus the additional parcel to the south (now built out) in 2016. An appeal



was submitted pursuant to this application but later withdrawn. The recently built out Site to the south was taken forward for 36 dwellings under reference 16/00832/OUTM and this was allowed at appeal on 17th July 2017. Reserved Matters Approval was subsequently granted and the Site built out.

3.0 Planning Policy Context

- 3.1. The statutory development plan for the area is the North West Leicestershire Local Plan which was originally adopted in November 2017 and subsequently amended by a Partial Review adopted in March 2021. Policy S2 of the Local Plan identifies a settlement hierarchy to be used when assessing the suitability of settlements for new development with the general principle being that those settlements higher up the hierarchy will accommodate more growth than those lower down.
- 3.2. The settlement hierarchy set out through Policy S2 identifies Heather as a Sustainable Village. Sustainable Villages 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.”
- 3.3. The Council is currently consulting on a Substantive Review to its adopted Local Plan which will seek to meet development needs arising in the District to 2039. This document is submitted further to the Regulation 18 consultation on the Substantive Review which identifies a number of options in terms of the scale and distribution of growth over the plan period. RSL’s views on the various options identified have been provided in our separate responses to the consultation questions.
- 3.4. We would note that as part of the Substantive Review the Council will be reviewing its settlement hierarchy to ensure that it remains a robust basis for distributing growth and that the preferred option identified is for Heather to remain classified as a “Sustainable Village.” We agree and consider that this choice is well-evidenced and robust. However, for the reasons set out in our responses to the consultation questions, we consider that specific site allocations should be made in the Sustainable Villages and this would mean that delivery of new homes should not solely be restricted to within Development Limits.
- 3.5. The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England. Of particular note here is the requirement for the planning system to actively manage patterns of growth in support of achieving locational sustainability and to focus significant development on locations which are or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes (paragraph 105).
- 3.6. We would also draw the Council’s attention to paragraph 69 of the NPPF which sets out the benefits of small and medium sized sites given that these can make an important contribution to meeting the housing requirement of an area and that these can be built-out relatively quickly.
- 3.7. Finally, We would note the advice of paragraph 79 which states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
- 3.8. The Site would clearly facilitate the above objectives of local and national planning policy as it is adjacent and accessible to a sustainable settlement and provides for connections to some day-to-day services and facilities thereby reducing the need to travel. Given its relatively small size and the fact it does not need enabling infrastructure to come forward, the Site is capable of delivering new homes rapidly which can support housing delivery in the early years of the plan period. This will be important to balance out the longer lead-in times associated with strategic-scale sites.
- 3.9. As such, we consider there is a strong planning case for allocating the Site for residential development although this will in part of course depend on non-site specific factors such as the chosen scale and distribution of growth over the plan period.



4.0 Site Assessment

- 4.1. Appendix 1 contains a Development Framework Plan for the Site which demonstrates how it might come forward should it be allocated development. Whilst this plan is by definition high level at this stage, it articulates several place-making opportunities which we elaborate on below alongside a general assessment of the relevant technical constraints and how these can be addressed.

Place-Making Opportunities

- 4.2. As with the consented parcel to the south the Development Framework Plan envisages a generous amount of public open space and new landscape planting which will afford opportunities for biodiversity net gain and recreation. The public rights of way within the Site can be integrated into the development proposals seamlessly and sustainable connections provided to the surrounding built-up area to allow for sufficient permeability and connectivity, allowing for existing as well as future residents to access the generous amount of open space provided.
- 4.3. The Site entrance is envisaged as contributing towards a gateway feature made possible through extensive green space and soft-landscaping to respect the existing public right of way to the front of the Site and also providing opportunities for key buildings to contribute to the scheme's overall design quality and legibility. An open space buffer is also provided to the north eastern boundary incorporating new woodland planting and the public right of way with opportunities for new homes to be arranged positively to address this space while the new tree planting will soften views from Normanton Lane.
- 4.4. The Development Framework allows opportunities for housing to be set back from the Site's edges and for lower density housing to be provided around the perimeter of the Site to facilitate a sensitive transition to the surrounding open land. A view corridor is incorporated through the Site on a north west/south east axis to allow views towards the Church of St John the Baptist from the north west which will promote local distinctiveness and contribute to quality place-making.
- 4.5. The Development Framework Plan provides opportunities for connectivity with a variety of pedestrian accesses possible to the Site from the adjacent built-up area. The quality of the green infrastructure strategy and the coherent response to routes through and around the Site will promote well-being and healthy lifestyles as well as encouraging active travel.

Landscape and Green Infrastructure

- 4.6. The Site has previously been subject to a Landscape Visual Appraisal which accompanied the 2016 planning application. Whilst this is now dated, it is clear that the Site is well-contained from the wider landscape by existing woodland planting and closely influenced by the existing built-edge of Heather. The Site and its immediate surrounding area are not subject to any designations for landscape quality. The Site itself does not contain any landscape features of particular note or value nor are there any in the vicinity.
- 4.7. There are clear opportunities to retain the existing vegetation along the field margins and to reinforce these where required with new structural planting. New structural planting can also screen and filter views of the new built form and form soft landscape edges to the open countryside where required.
- 4.8. New and appropriate native planting can be considered alongside any illustrative landscape strategy for the Site which can be submitted alongside an updated Landscape and Visual Appraisal at the outline planning stage to achieve an integrated approach between landscape and visual effects and the proposed mitigation. The outline landscape strategy can also consider how to deliver and maximise biodiversity net gain across the Site made easier through the incorporation of generous areas of public open space demonstrated by the Development Framework Plan.



Flooding & Drainage

- 4.9. The Site has a low probability of fluvial and surface water flooding and lies within Flood Zone 1. Previous site investigation work has established that the use of infiltration techniques will be inappropriate thus a restricted water discharge to an existing tributary flowing along the western boundary is the favoured method of surface water disposal.

Highways, Transport and Locational Sustainability

- 4.10. We would note the Local Highway Authority's observations in the SHELAA that Heather has no bus services and that therefore residents would rely heavily on car travel. Paragraph 105 of the NPPF is clear that whilst the planning system should seek to "actively manage patterns of growth," opportunities to maximise sustainable transport solutions will vary between urban and rural areas, and this should be taken into account in plan-making.
- 4.11. Bringing forward growth within rural settlements such as Heather has benefits that need to be weighed in the balance against the inherent transport limitations of rural settlements. Through new growth at rural settlements, for example, the viability and vitality of existing services and facilities can be supported via an influx of new residents. We would note that Heather has many such services which are within easy walking and cycling distance of the Site including a two public houses, a church, a village hall and a primary school.
- 4.12. The Site will take its principal vehicular and pedestrian access from the estate road to the south constructed as part of the recently built-out residential development which is, in turn, accessed from Sweptstone Road. The estate road is of sufficient dimensions to accommodate a safe and effective access to the Site.

Ecology

- 4.13. A Preliminary Ecological Appraisal (PEA) was prepared in 2016 to assess the presence of any important habitats or species. Whilst the results of this are clearly dated and cannot now be relied upon substantially, they do provide an indication of current ecological potential. The 2016 PEA concluded that overall the Site is of very limited wildlife interest, with limited flora and fauna and species diversity and offering only limited value for invertebrates, small mammals and foraging birds.
- 4.14. An updated Preliminary Ecological Appraisal and associated surveys can be undertaken to support any future outline planning application which can, in turn, inform necessary mitigation measures. However, owing to previous work is not expected that there will be any fundamental ecological barriers to the Site coming forward for development.

Minerals

- 4.15. We note from the SHELAA the Site is within a Mineral Consultation Zone due to the potential presence of brick clay. The SHELAA states that Leicestershire County Council would need to be contacted regarding the potential sterilisation of this mineral resource arising from the Site's possible development.
- 4.16. We have reviewed the Leicestershire Minerals and Waste Local Plan which covers the plan period up to 2030. The Plan states that the County Council will aim to ensure a steady and adequate supply of brick clay by maintaining a landbank of at least 25 years of permitted reserves. Priority for extraction is given to existing brickworks sites and extensions to existing brickworks. Of the five brickworks in Leicestershire, sufficient supplies exist at Desford Brickworks until the end of 2030, Ellistown Brickworks until 2042, Measham Brickworks through a consented extension to a quarry which would allow for a lifespan of around 22 years, and Ibstock Brickworks which would provide reserves up to 2059. As such, it is evident that ample supply of this mineral resource is available in the County in excess of the minimum 25 year landbank. Furthermore, the Site is too close to existing residential development to support a viable extraction operation without



generating adverse impacts to neighbouring amenity. As such it is unlikely that mineral resources issues will preclude development of the Site.

5.0 The Development Framework Plan

- 5.1. The above included at Appendix 1 illustrates a developable area of 2.98ha. Applying the SHELAA's average net density assumptions of 30 dwellings per hectare (dph) this would equate to 89 dwellings though, as reflected on the Development Framework Plan, the Site as a whole could be split into two phases – a smaller phase of 30-40 dwellings and a larger phase for the remainder. The discreet field patterns that comprise the Site would render this a logical approach as the middle parcel ("Phase 1" on the Development Framework Plan) could come forward in isolation should the entire Site not be required in this plan period.
- 5.2. The Development Framework Plan demonstrates how the Site can be brought forward with a generous amount of public open space to provide recreational opportunities and biodiversity net gain as well as providing a softer treatment to the Site's interface with the open countryside. High quality new and retained pedestrian routes will promote active travel and development of the Site provides the opportunity for the existing PRowS to be retained and enhanced through new landscape planting and introducing natural surveillance by creating active frontages onto these key routes.
- 5.3. The Development Framework Plan also allows for a generous degree of permeability and connectivity to the surrounding residential areas and the wider settlement via proposed pedestrian accesses which would promote links to the services and facilities available in Heather as well as promoting active travel patterns.

6.0 Conclusion

Availability and Viability

- 6.1. The Site is available immediately as part of our agreement with the landowner to promote the Site for development. Rosconn is an experienced land promotion partner and has an enviable track record of achieving viable, deliverable and high quality planning permissions and achieving rapid onward sale to a suitable developer following the grant of outline planning permission. Rosconn is careful to ensure that the documents lodged at outline planning stage appropriately articulate design quality expectations while also retaining a sufficient degree of flexibility to ensure the end product reflects the initial vision.
- 6.2. The Site is economically viable and can support a policy-compliant level of affordable housing and an appropriate mix of housing to meet local needs. The previous work on the 2016 planning application demonstrated that developing the Site would be associated with no abnormal costs and its location close to an existing settlement means it can be brought forward without any significant enabling works or new infrastructure being required.

Deliverability

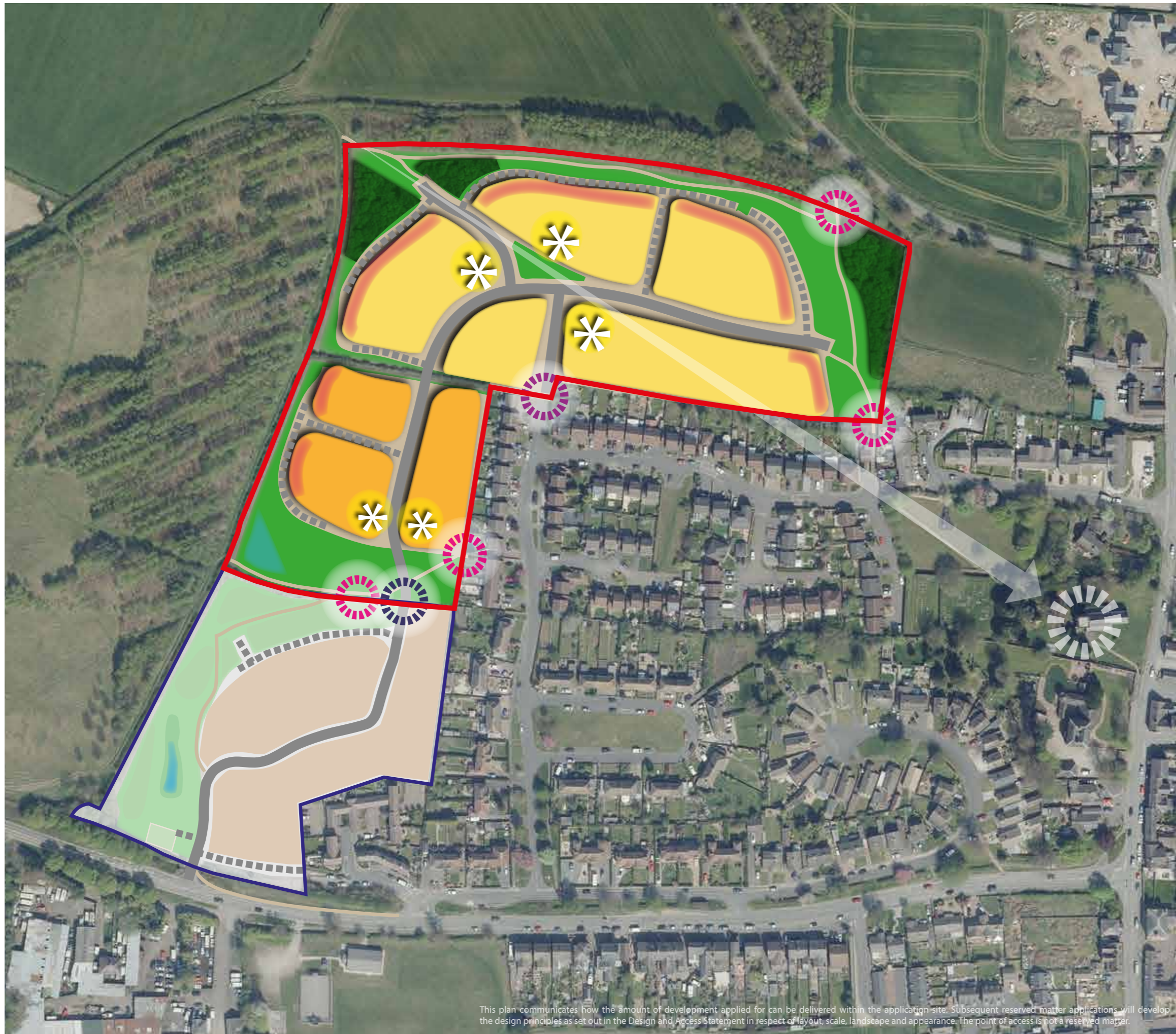
- 6.3. Given the above and subject to the Site's allocation in a local plan, we consider the Site is deliverable as it is available now, offers a suitable location for development now and will be achievable with a realistic prospect that housing will be delivered on it within five years. The Site will be able to commence delivery within the first five years of plan period to support the District's five year housing land supply.

Summary

















- 6.4. This Site Delivery Statement is provided by Rosconn Strategic Land (RSL) in support of the proposed allocation of Land Adjacent Sparkenhoe Estate, Heather. It demonstrates clearly that the Site is deliverable, suitable, achievable and capable of coming forward quickly. A high quality scheme of up to 89 dwellings can be brought forward in this sustainable location with no material harm arising.

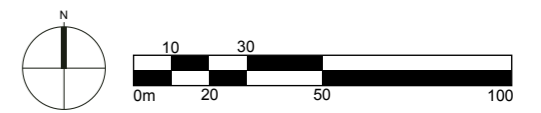


Appendix 1: Development Framework Plan



LEGEND

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



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

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



Land South of Curzon Street, Ibstock

Site Delivery Statement

March 2022





1.0 Introduction

- 1.1. Rosconn Strategic Land (RSL) is promoting land South of Curzon Street, Ibstock (the Site) for a residential development of approximately 126 dwellings. The Site has previously been promoted through the 2018 Call for Sites and is assessed within the 2021 edition of the Strategic Housing and Economic Land Availability Assessment (SHELAA) under reference Ib24 where it is considered to be available and potentially suitable.
- 1.2. The purpose of this Statement is to set out how the Site is deliverable, offering a suitable location for residential development and how its delivery will afford wider economic, social and environmental benefits. The Statement also explains the design process undertaken to date and how this has been informed by an understanding of the Site's opportunities and constraints. The structure of this Statement is as follows:
 - Site Description and Context
 - Planning Policy
 - Site Assessment
 - Place-making Opportunities
 - Landscape and Green Infrastructure
 - Flooding and Drainage
 - Highways, Transport and Sustainability
 - Ecology
 - Minerals
 - The Framework Masterplan
 - Conclusion
 - Availability and Viability
 - Deliverability
 - Summary

2.0 Site Description and Context

- 2.1. The Site lies within the context of a consolidated pattern of residential development and adjoins Ibstock's Limits to Development to the north and to the west. To the east of the Site lies allotments and the wider countryside. Open countryside also lies to the south where there is also sporadic agricultural development and a large area of woodland. A small agricultural operation lies to the north west of the Site.
- 2.2. The Site is 6.85ha in area and comprises pastureland. It hosts a watercourse along its western boundary and is mostly situated within Flood Zone 1 aside from a portion in its western part which is designated as Flood Zone 3. The edge of the watercourse is well-vegetated and provides a buffer between the Site and the adjacent residential development.
- 2.3. Beyond the Site's eastern boundary lies an established public right of way (PRoW) which is bound by hedgerow that also runs along the Site's eastern boundary. The eastern PRoW runs parallel to the Site extending to the south where it connects to the wider public right of way network



providing routes to the main body of the settlement to the west and to the woodland to the southeast.

- 2.4. Aside from hedgerows and the watercourse the Site is relatively unconstrained by physical features.

3.0 Planning Policy Context

- 3.1. The statutory development plan for the area is the North West Leicestershire Local Plan which was originally adopted in November 2017 and subsequently amended by a Partial Review adopted in March 2021. Policy S2 of the Local Plan identifies a settlement hierarchy to be used when assessing the suitability of settlements for new development with the general principle being that those settlements higher up the hierarchy will accommodate more growth than those lower down.
- 3.2. The settlement hierarchy set out through Policy S2 identifies Ibstock as a Local Service Centre. Local Service Centres are defined as “Settlements which provide some services and facilities primarily of a local nature meeting day-to-day needs and where a reasonable amount of new development will take place.”
- 3.3. The Council is currently consulting on a Substantive Review to its adopted Local Plan which will seek to meet development needs arising in the District to 2039. This document is submitted further to the Regulation 18 consultation on the Substantive Review which identifies a number of options in terms of the scale and distribution of growth over the plan period. RSL’s views on the various options identified have been provided in our separate responses to the consultation questions.
- 3.4. We would note that as part of the Substantive Review the Council will be reviewing its settlement hierarchy to ensure that it remains a robust basis for distributing growth and that the preferred option identified is for Ibstock to remain a “Local Service Centre.” We agree and consider that this choice is well-evidenced and robust.
- 3.5. It is clear, therefore, that the Substantive Review as well as the existing development plan see Ibstock as a sustainable location for further housing growth.
- 3.6. The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England. Of particular note here is the requirement for the planning system to actively manage patterns of growth in support of achieving locational sustainability and to focus significant development on locations which are or can be made sustainable, through limiting the need to travel and offering genuine choice of transport modes (paragraph 105).
- 3.7. We would also draw the Council’s attention to paragraph 69 of the NPPF which sets out the benefits of small and medium sized sites given that these can make an important contribution to meeting the housing requirement of an area and that these can be built-out relatively quickly.
- 3.8. Finally, We would note the advice of paragraph 79 which states that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.
- 3.9. The Site would clearly facilitate the above objectives of local and national planning policy as it is adjacent and accessible to one of the District’s most sustainable settlements and provides for connections to day-to-day services and facilities thereby reducing the need to travel by car. Given its relatively small size and the fact it does not need enabling infrastructure to come forward, the Site is capable of delivering new homes rapidly which can support housing delivery in the early years of the plan period. This will be important to balance out the longer lead-in times associated with strategic-scale sites.



- 3.10. As such, we consider there is a strong planning case for allocating the Site for residential development although this will in part, of course, depend on non-site specific factors such as the chosen scale and distribution of growth over the plan period.

4.0 Site Assessment

- 4.1. Appendix 1 contains a Development Framework Plan for the Site which demonstrates how it might come forward should it be allocated development. In formulating the Framework Plan we have sought to follow the advice of the SHELAA in regard to maintaining a 10m buffer zone to the woodland to the south east and retaining 5m buffers to hedges and trees. Whilst this plan is by definition high level at this stage, it articulates several place-making opportunities which we elaborate on below alongside a general assessment of the relevant technical constraints and how these might be addressed.

Place-Making Opportunities

- 4.2. An arterial public right of way (PRoW) lies beyond the Site's eastern boundary. This is properly surfaced and affords a high standard of amenity for users. Development of the Site offers the opportunity to respect and enhance this route through new structural planting and landscaping with new development potentially able to front onto it in order to provide a good degree of natural surveillance. We also envisage an opportunity to provide new, high quality public rights of way through the Site which can connect into the existing network. Through the Framework Plan we have demonstrated how an integrated network of proposed and existing routes can be delivered which can be surfaced appropriately and provided with high quality landscape treatments to encourage walking, cycling and healthy living for both new and existing residents.
- 4.3. The parts of the Site at flood risk are naturally a constraint to development but also provide an opportunity to create high quality public open space within these areas as well as new wetland and other habitats to support a biodiversity net gain. The generous amount of public open space afforded on the Site as illustrated through the Framework Plan will allow enhanced recreational opportunities and community benefits such as equipped play areas and/or local food growing.
- 4.4. Related to the above the watercourse can provide opportunities for a new waterside path through this landscape-edge which will contribute to the quality of the place-making approach as well as encouraging active travel and permeability through the Site.
- 4.5. The Framework Plan envisages a set-back from Curzon Street which will allow for an attractive gateway to the Site potentially integrating the watercourse and sustainable urban drainage systems alongside new landscaping. This would support the quality of the public realm along Curzon Street as well as providing opportunities for key buildings to "frame" the Site's entrance. In line with the NPPF's advice on tree planting, this could also integrate with a tree-lined boulevard that could form the development's Spine Road thereby providing a legible and attractive development.

Landscape and Green Infrastructure

- 4.6. The Site is not subject to any local or national landscape-designations. Its relatively flat, level and visibility limited to near views. The Site is prominent along Curzon Street but seen within the context of the existing built-envelope of development. As set out above, consideration can be given to creating a green frontage to Curzon Street and this would ensure that the Site contributes to the quality of the street scene thereby and helping to "frame" the adjacent, existing public right of way to the east.
- 4.7. There are clearly opportunities to retain the existing vegetation along the existing field margins and to reinforce these it where required with new structural planting. New structural planting



could also screen and filter views of the new built form where required and form soft landscape edges to the open countryside where needed.

- 4.8. New and appropriate native planting can be considered alongside any illustrative landscape strategy for the Site which can be submitted alongside an Landscape and Visual Appraisal at the outline planning stage to achieve an integrated approach between landscape and visual effects and proposed mitigation. The outline landscape strategy could also consider how to deliver and maximise biodiversity net gain across the Site. This would be facilitated through the retention of generous areas of public open space as demonstrated by the Framework Plan.

Flooding & Drainage

- 4.9. As mentioned above part of the Site lies within Flood Zone 3. As per the Development Framework Plan included at Appendix 1 development of this part of the Site can be avoided and the area enhanced for green infrastructure and biodiversity.
- 4.10. Flood risk mitigation and the specific drainage strategy can be considered through detailed work at the outline planning stage via a Flood Risk Assessment (FRA) which will set forth an appropriate strategy dealing with surface water in observance of the drainage hierarchy. We would note that there are no fundamental constraints in regard to flooding and drainage which would prevent the majority of the Site from being developed.

Highways, Transport and Locational Sustainability

- 4.11. We would note the Local Highway Authority's observations in the SHELAA that there are no fundamental constraints that would affect a suitable access from being achieved to the Site. We have commissioned a suitably experienced and qualified highways engineer to undertake a preliminary access appraisal who has confirmed that a suitable means of access can be achieved delivering the appropriate visibility splays. A new pedestrian access to the Site can also be achieved and can link to existing footway provision along Curzon Street.
- 4.12. The Site is sustainably located and is in walking and cycling distance of a number of services, facilities and amenities. The nearest bus stop is located 0.3km from the likely Site access point. The Site is located 0.3km away from the High Street which offers a variety of retail and employment opportunities as well as a public house and a day nursery. It is also 0.6km away from Ibstock Community College and Ibstock Leisure Complex. Brookside Industrial Estate is less than 150m away and this provides for both employment opportunities and access to services.
- 4.13. Owing to the above, the Site's locational sustainability credentials are excellent and development on the Site would reduce the need to travel by car and offer a genuine choice of transport modes in line with the advice of the NPPF.

Ecology

- 4.14. The Site is ecologically unremarkable and it is likely that areas of ecology interest will be limited to the field margins which can be enhanced through any future landscape strategy submitted in support of outline proposals. The watercourse will likely be of some biodiversity interest and this can also be retained and enhanced as part of the proposals. Alongside this, the generous level of public open space allowed for in the Framework Plan offers an opportunity for biodiversity enhancements to achieve on-site net gains.
- 4.15. A Preliminary Ecological Appraisal and associated surveys can be undertaken to support any future outline planning application which can, in turn, inform necessary mitigation measures. However, it is not expected that there will be any fundamental ecological barriers to the Site coming forward for development.

Minerals

- 4.16. We note from the SHELAA that a small part of the northern portion of the Site is within the Mineral Consultation Area due to the potential presence of brick clay. The SHELAA states that



Leicestershire County Council would need to be contacted regarding the potential sterilisation of this mineral resource arising from the Site's possible development.

- 4.17. We have reviewed the Leicestershire Minerals and Waste Local Plan which covers the plan period up to 2030. The Plan states that the County Council will aim to ensure a steady and adequate supply of brick clay by maintaining a landbank of at least 25 years of permitted reserves. Priority for extraction is given to existing brickworks sites and extensions to existing brickworks. Of the five brickworks in Leicestershire, sufficient supplies exist at Desford Brickworks until the end of 2030, Ellistown Brickworks until 2042, Measham Brickworks through a consented extension to a quarry which would allow for a lifespan of around 22 years and Ibstock Brickworks which would provide reserves up to 2059. As such, it is evident that ample supply of this mineral resource is available in the County in excess of the minimum 25 year landbank. Furthermore, the Site is too close to existing residential development to support a viable extraction operation without generating adverse impacts to neighbouring amenity. As such it is unlikely mineral resources issues will preclude development of the Site.

5.0 The Development Framework Plan

- 5.1. The above included at Appendix 1 illustrates a developable area of 3.80ha. Applying the SHELAA's average net density assumptions of 30 dwellings per hectare (dph) this would equate to 114 dwellings though there could be opportunities to make more efficient use appropriate parts of the Site.
- 5.2. The Development Framework Plan demonstrates how the Site can be brought forward with a generous amount of public open space to provide recreational opportunities and biodiversity net gain as well as providing a softer treatment to the Site's interface with the open countryside. High quality new and retained pedestrian routes will promote active travel and development of the Site provides the opportunity for the existing PRowS to be retained and enhanced through new landscape planting and introducing natural surveillance through creating active frontages onto these key routes.
- 5.3. The Development Framework Plan also incorporates a generous set-back to Curzon Street which creates opportunities for gateway features such as new tree planting and key buildings to frame the entrance to the Site and the adjacent PRow. This approach can complement the creation of a tree-lined Spine Road which can contribute towards the legibility and design quality of the development and wider public realm.

6.0 Conclusion

Availability and Viability

- 6.1. The Site is available immediately as part of our agreement with the landowner to promote the Site for development. Rosconn is an experienced land promotion partner and has an enviable track record of achieving viable, deliverable and high quality planning permissions as well as achieving rapid onward sale to a suitable developer following the grant of outline planning permission. Rosconn is careful to ensure that the documents lodged at outline planning stage appropriately fix design quality expectations while also retaining a sufficient degree of flexibility to ensure the end product reflects the initial vision.
- 6.2. The Site is economically viable and can support a policy-compliant level of affordable housing and an appropriate mix of housing to meet local needs. Our initial survey work demonstrates that developing the Site would be associated with no abnormal costs and its location close to existing services, facilities and infrastructure means it can be brought forward without any significant enabling works.



Deliverability

6.3. Given the above and subject to the Site's allocation in a local plan, we consider the Site is deliverable as it is available now, offers a suitable location for development now and is achievable with a realistic prospect that housing will be delivered within five years. The Site will be able to commence delivery within the first five years of plan period and support the early delivery of housing to help maintain the Council's five year housing land supply.

Summary

6.4. This Site Delivery Statement is provided by Rosconn Strategic Land (RSL) in support of the proposed allocation of Land South of Curzon Street, Ibstock. It demonstrates clearly that the Site is deliverable, suitable, achievable and capable of coming forward quickly. A high quality scheme of between 114 and 126 dwellings can be brought forward in this sustainable location with no material harm arising.



Appendix 1: Development Framework Plan



KEY

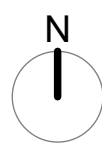
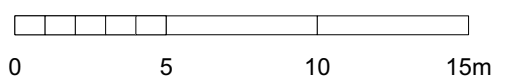
- Site Boundary 6.85 Ha
- Residential Development 3.80 Ha
- Indicative Vehicular Route
- Vehicular Access

Green Infrastructure

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

NOTES

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10718
Ibstock, Leicestershire
Rosconn Group

Development Framework Plan

S3 1:2500@A3
07 MARCH 2022 DV / EAF
10718-FPCR-XX-XX-DR-L-0001 issue P02
Project Code - Originator - Zone - Level - Type - Role - Drawing Number

fpcr

masterplanning
 environmental assessment
 landscape design
 urban design
 ecology
 architecture
 arboriculture

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The Coal
Authority

North West Leicestershire District Council - Local Plan Review - Development Strategy Options and Policy Options Consultation

Contact Details

Planning and Development Team

The Coal Authority

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

Planning Email:

Planning Enquiries:

[REDACTED]
[REDACTED]

Date

14th March 2022

Dear Planning Policy Team

Local Plan Review - Development Strategy Options and Policy Options Consultation

Thank you for your notification received on the 17th January 2022 in respect of the above consultation.

The Coal Authority is a non-departmental public body sponsored by the Department of Business, Energy & Industrial Strategy. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development plans in order to protect the public and the environment in mining areas.

Our records indicate that there are recorded coal mining features present at surface and shallow depth within the North West Leicestershire area including; mine entries, shallow coal workings and reported surface hazards. These features pose a potential risk to surface stability and public safety.

The Coal Authority's records also indicate that surface coal resource is present on the site, although this should not be taken to imply that mineral extraction would be economically viable, technically feasible or environmentally acceptable. As you will be aware those authorities with responsibility for minerals planning and safeguarding will have identified


where they consider minerals of national importance are present in your area and related policy considerations. As part of the planning process consideration should be given to such advice in respect of the indicated surface coal resource.

It is noted that this current consultation asks a series of questions, seeking opinions on the contents of the document which relate to development strategy and policy options. This relates mainly to potential development sites, development strategy and quantum of development required to be included in the Local Plan review document. I can confirm that the Planning team at the Coal Authority have no specific comments to make at this early stage in the process.

As you are aware we do provide the LPA with downloadable GIS data in respect of Development Risk and Surface Coal resource plans and we would expect any sites being considered for allocation for future development to be assessed against this data. This should ensure that any constraints or issues arising relating to coal mining legacy features are identified at an early stage in the process.

Please do not hesitate to contact me should you wish to discuss this further.

Yours faithfully



Melanie Lindsley *BA (Hons), DipEH, DipURP, MA, PGCertUD, PGCertSP, MRTPI*
Development Team Leader (Planning)



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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Neil
Last Name		Cox
[Job Title]		Planning Director
[Organisation]	Bloor Homes	Evolve Planning
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... to:

**Q1,2,3,4,5,6,7,8,9,10,11
16,17,18,20,23,24,25,26**

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

All answers to the above are set out in the supporting representations submitted alongside these forms.

(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

14/03/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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.

NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW

DEVELOPMENT STRATEGY & POLICY OPTIONS

LAND SOUTH OF HEATHER

ON BEHALF OF BLOOR HOMES



TOWN & COUNTRY PLANNING ACT 1990 (AS AMENDED)
PLANNING AND COMPULSORY PURCHASE ACT 2004

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APPENDIX 1: Promotional Document

APPENDIX 2: Landscape Summary Report



1. Introduction

1.1 This representation, submitted on behalf of Bloor Homes, responds to the Regulation 18 'Development Strategy Options and Policy Options' consultation document and accompanying published evidence, having regard to the national and local planning policy context. It relates specifically to Land South of Heather where Bloor Homes has secured land interests. A Promotional Document is attached at **Appendix 1** which provides further details of this site.

1.2 The representations are framed in the context of the requirements of Local Plans to be legally compliant and sound. The tests of soundness are set out in the National Planning Policy Framework (NPPF), paragraph 35. For a Development Plan to be sound it must be:

- **Positively prepared** – providing a strategy which, as a minimum, seeks to meet objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- **Effective** – deliverable over the Plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the Framework and other statements of national planning policy, where relevant.

1.3 These representations also give consideration to the legal and procedural requirements associated with the plan-making process.

2. Planning Policy Context

2.1 Bloor Homes supports North West (NW) Leicestershire District Council in progressing with a substantive review of the current adopted Local Plan as required by the recently reviewed and updated Policy S1. This provides the opportunity for the Council to comprehensively review the following matters:

- NW Leicestershire's own objectively assessed housing need over an extended plan period and the potential for housing supply within the District to meet this need.
- The potential role of housing supply options within the District to meet unmet cross boundary needs from the wider Leicester and Leicestershire Housing Market Area (HMA).
- Employment land requirements for NW Leicestershire.
- NW Leicestershire's potential role in meeting any wider unmet employment needs through the Duty to Co-operate.
- The appropriateness of the existing settlement hierarchy and the strategic distribution of growth in light of new housing and employment needs.

2.2 The National Planning Policy Framework (NPPF 2021) requires local planning authorities to keep policies in their Local Plans up to date by undertaking a review at least once every five years.

2.3 Bloor Homes supports the Council's proactive approach in continuing with a review of the Local Plan to ensure that an up-to-date policy framework exists within the District to guide growth to 2039 and to ensure that development is genuinely plan-led.

2.4 Bloor Homes support the collaborative approach that has been taken through the preparation of the Leicester and Leicestershire Strategic Growth Plan (SGP) (Dec 2018) to understand the overall distribution of need across the HMA. Given the arising housing needs across the HMA, Bloor Homes endorse the continued need for joint-working between authorities to address future housing needs and determine appropriate LPA housing requirements.

3. Local Plan Review Objectives

3.1 Bloor Homes supports the approach taken by NW Leicestershire District Council in reviewing the overarching objectives contained within the adopted Local Plan and agrees with the approach of consolidation.

Question 1: Do you agree with these Local Plan Review Objectives? If not, why not?

3.2 Bloor Homes generally supports the proposed Local Plan Review Objectives, however the following comments are offered:

- **Objective 2** – In addition to local housing needs this objective should also recognise the role of the District in meeting unmet needs from elsewhere within the wider HMA.
- **Objective 4** – This objective should also recognise the need to protect and maintain services and facilities within settlements to ensure continued levels of sustainability within communities, rather than specific reference to the delivery of dedicated new infrastructure.
- **Objective 5** – This objective should also recognise the importance of a joined-up strategy in balancing the delivery of housing and job creation to assist in achieving sustainable travel patterns.
- **Objective 6** – Whilst the importance of regeneration within Coalville is supported, the vitality and viability of the District’s lower level settlements, including the identified sustainable villages, should be recognised as being of importance.
- **Objective 11** – This objective should seek to maintain and also ‘protect’ access to services and facilities.

4. Settlement Hierarchy

4.1 Bloor Homes notes that the only minor change to the categorisation of settlements in the proposed hierarchy is the renaming of Small Villages and Hamlets. It is also acknowledged that the evidence base includes an up-to date assessment of services and facilities to inform a revised settlement hierarchy.

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

4.2 Bloor Homes supports the settlement hierarchy which is informed by the relative sustainability of villages within NW Leicestershire.

4.3 Bloor Homes supports the identification of Heather as a Sustainable Village which is served by a range of services and facilities including primary school, convenience store, public houses, community hall and recreational facilities.

4.4 However, it is considered that the 'Access to Employment' score afforded to Heather within the Settlement Study 2021 should be increased to '2.' Heather has the benefit of an employment site. Whilst the employment site falls outside the current Limits to Development it forms part of the built-up area of the settlement, is contiguous with the Limit to Development and is connected to the village via an existing footway.

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

4.5 Paragraph 78 of the NPPF emphasises that "where there are groups of smaller settlements, development in one village may support services in a village nearby", with paragraph 79 adding that planning policies should avoid the development of isolated homes in the countryside, subject to a number of exceptions.

4.6 Bloor Homes wish to raise concerns with the identification of Local Housing Need Villages on the basis these represent unsustainable locations that would not ordinarily be appropriate for open market housing. Focus instead should be placed on securing the vitality and viability of services and facilities contained within the Sustainable Villages where existing services and facilities are most susceptible to being lost through a lack of modest growth.

5. Development Strategy Options for Housing

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.

- 5.1 The High 2 growth scenario is supported by Bloor Homes at this stage, in advance of further evidence being published to determine unmet need across the HMA, notably within Leicester City, and an agreed approach to apportioning any unmet need within the HMA, including within NW Leicestershire.
- 5.2 The High 1 growth scenario of 512 dwellings per annum is based upon the Leicester and Leicestershire Strategic Growth Plan 2018 (SGP). This was published prior to the changes to the Government's 'standard method' for calculating local housing needs. The revised standard method introduces an uplift of 35% to urban centres, including Leicester. As a result this uplift has increased the annual need in Leicester to 2,341 dwellings per annum. By comparison the 2018 SGP identified a notional housing need for Leicester of 1,668 dwellings per annum.
- 5.3 It is also worthy to note that past annual completion rates in NW Leicestershire have been higher than the need identified through the High 1 growth scenario. On this basis, High 1 is not considered reflective of the current demand or increased local housing needs across the wider HMA introduced as a result of changes to the Governments standard method.
- 5.4 The High 2 growth scenario of 730 dwellings per annum is derived using the latest 2018 household projections which represents the most up to date evidence for determining local housing needs. Notably the figure of 730 dwellings per annum reflective of past rates of housing delivery over the last few years, as evidenced by the latest Housing Delivery Test (HDT) (2021) which concludes, for NW Leicestershire, an average delivery of 723 dwellings per year over the past 3 years. Furthermore, the HEDNA estimated the annual need for affordable housing in NW Leicestershire to be 199 dwellings per annum (2011-2031) representing 41% of the total housing requirement (481 per annum). In reality affordable housing completions have been significantly below this requirement for the past 8 years.
- 5.5 The uplift to the standard method for Leicester has resulted in an unmet need across the HMA of approximately 18,000 homes (an increase of 10,000 to previous identified unmet needs). How this figure is to be distributed between the authorities remains undecided at this stage, however it is clear NW

Leicestershire will be required to meet some of this additional need and the High 2 growth scenario provides a level of headroom and flexibility to appropriately accommodate this, subject to the outcome of discussions across the HMA and further evidence (High 2 would give a buffer of 362 dwellings per annum above the minimum local housing need).

- 5.6 NW Leicestershire is a net importer of labour; a trend which is expected to continue into the future. Bloor Homes considers that the imbalance between out and in-commuting to and from the District is further justification for upward adjustments to the housing requirement to assist in achieving a sustainable balance between jobs and the number of economically active residents within the District to create a greater degree of self- containment and achieve sustainable travel patterns.
- 5.7 Bloor Homes would wish to make further comment upon publication of any future evidence in respect to unmet needs within the HMA. However, based on current evidence, High 2 growth scenario is preferred over High 1 as it is considered to be the most representative of the current needs in NW Leicestershire whilst being consistent with previous levels of delivery. Again, based upon existing evidence, Bloor Homes considers the High 2 growth scenario is the only growth option identified that would demonstrate the plan is effective and positively prepared.

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.

- 5.8 Bloor Homes welcomes the Council's approach to testing reasonable alternative spatial distribution options in line with the identified settlement hierarchy, including review through the Interim Sustainability Appraisal Report (ISAR) (Sept 2021). However, Bloor Homes consider that the Council has not fully tested all reasonable alternatives, with insufficient justification in relation to the options and preferred options identified.
- 5.9 It is accepted that there is the potential for further options to be developed once the unmet needs arising within Leicester have been established and the redistribution of this unmet need is agreed across all HMA authorities. Notwithstanding this, Bloor Homes wish to make the following comments to ensure that the approach being taken is sound.
- 5.10 The ISAR has considered 9 spatial distribution options under the High 1 and High 2 growth scenarios. These options were identified through a number of assumptions to guide the choice of 'reasonable alternatives', which are set out

within the ISAR. This report also explains that consideration has been given to a possible new settlement following the findings of the SGP which identified a very broad area known as the 'Leicestershire International Gateway', with reference to 3 large scale sites in the vicinity of East Midlands Airport and Castle Donington that have been promoted through the Council's 2019 SHELAA as possible options for a new settlement of around 5,000 dwellings.

- 5.11 There appears to be some level of disparity between the ISAR 'assumptions' contained at section 2.1 and the distribution options identified. The assumptions place little emphasis on the delivery of a new settlement, instead placing emphasis on dispersed growth across the District. However, there is heavy reliance upon a new settlement throughout the majority of the options tested and where options do not include a new settlement (Options 2 and 3), these do not reflect the assumption of dispersed growth across the whole settlement hierarchy. Option 1 is a continuation of the adopted Local Plan but is clearly ruled out due to low and medium scenarios being inappropriate.
- 5.12 In summary, no option has been tested under the High 1 and 2 growth scenarios that disperses growth across the whole settlement hierarchy without reliance upon a new settlement.
- 5.13 Given the typical lead-in times associated with the delivery of new settlements, the option of a new settlement should not be overly relied upon to assist in meeting needs within the plan period. Bloor Homes agrees that any strategy should not be wholly reliant on a new settlement to meet residual needs (Option 8), but rather any new settlement must form part of a wider distribution of growth with primary focus on existing settlements in order to ensure delivery of the housing requirement and to assist in meeting housing needs prevalent across the District.
- 5.14 Paragraph 22 of the NPPF is clear that *"where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery"*.
- 5.15 There is currently little justification to rely on the delivery of homes from a new settlement within the emerging plan period. Whilst the SGP does identify that the Leicestershire International Gateway (LIG) has the potential to accommodate 11,000 new homes (spanning a number of local planning authority areas), there is no justification that this should translate to the delivery of a new settlement within NW Leicestershire. The Council, in conjunction with Charnwood District, prepared a Joint Topic Paper to inform

the Charnwood Local Plan on the LIG, which does not suggest a new settlement, rather that *“growth in the LIG sub-area should deliver new jobs and affordable homes and infrastructure to support both existing and new residents.”* The Topic Paper also states that growth in the LIG area *“should support regeneration in Shepshed (Charnwood) and Coalville (NW Leicestershire) and will be supported by sustainable means of travel to create a network of linked settlements benefitting from not only employment opportunities but an extensive range of services and facilities.”*

- 5.16 With regards to the LIG, the SGP itself recognises that *“the provision for strategic new housing developments in Ashby, Coalville and Loughborough need to be completed as a matter of priority to provide the opportunity for people to live close to their places of work. At the same time, some parts of the LIG area (e.g. the centres of Coalville and Shepshed) are in need of regeneration and the physical fabric needs to be improved”*. There is no suggestion that the appropriate approach for the LIG relates to the delivery of homes through a new settlement.
- 5.17 Bloor Homes accepts that the LIG sub-area does have the potential to accommodate new housing over the longer-term in conjunction with the wider economic proposals for the area, notably a Freeport in association with East Midlands Airport. However, given the embryonic position of the LIG, any aspirations for the delivery of a new settlement within this location should be a matter for a future Local Plan review as there is insufficient justification to specifically rely upon a new settlement within the LIG as part of the spatial distribution for NW Leicestershire within the proposed plan period at this stage.
- 5.18 Turning to the identified spatial options under the High 1 growth scenario, which seeks to meet a residual requirement of 1,000 dwellings, Option 3a represents the Council's preferred spatial distribution. Option 3a sets out a distribution of 500 dwellings to the Principal Town (Coalville), 300 dwellings to the two Key Service Centres (Ashby de la Zouch and Castle Donington) and 200 dwellings to the three Local Service Centres (Ibstock, Kegworth, Measham). Option 3a proposes to focus no growth to the Sustainable Villages, nor to the Small Villages.
- 5.19 Under the High 1 growth scenario the Council rules out Options 4a – 9a on the basis that they would include a new settlement option which would not be appropriate or viable given the limited scale of growth at 1,000 dwellings. Whilst this is agreed, removing these options leaves 2a and 3a, with 2a seeking a less disbursed strategy restricted to 600 dwellings to the Principal Town and 400

dwellings to the Key Service Centres. The Council sets a preference for Option 3a over 2a given additional benefits new development could offer to the Local Service Centres.

- 5.20 No option within the High 1 growth scenario excludes a new settlement and includes an element of growth focused to the Sustainable Villages. Options 7a and 9a include an element of growth within the Sustainable Villages (and Small Villages in the case of 9a) yet were excluded on the basis that both options included a new settlement. Whilst Bloor Homes does not consider that the High 1 growth strategy should be preferred, as suggested earlier in this representation an additional option should have been tested which focused modest growth to the Sustainable Villages as part of an option that excluded reliance on a new settlement.
- 5.21 The High 2 growth scenario is considered at this stage to represent the most appropriate growth option by Bloor Homes. Out of the six options tested under High 2, four include reliance on a new settlement.
- 5.22 It is noted that Option 7b, which is the Council's preferred option under the High 2 growth scenario, apports a lesser amount to a new settlement, yet this still represents 35% of the total residual requirement under this option and therefore remains a significant proportion of the proposed growth. Reliance on a new settlement would restrict the potential for wider distribution of growth across the District, to include development focused towards the Sustainable Villages to assist in retaining and strengthening their future sustainability and vitality.
- 5.23 Option 7b only allocates 255 dwellings to the Sustainable Villages. This figure is insignificant on the basis it would be distributed between the 18 Sustainable Villages identified within the proposed settlement hierarchy i.e. this represents, on average, 14 dwellings per village over the 20 year plan period. This compares to 510 dwellings allocated to the Local Service Centres, which if evenly spread across each of the 3 LSVs, would equate to 170 dwellings per settlement.
- 5.24 The Sustainable Villages are considered by Bloor Homes to be the most at risk category of settlements within the identified hierarchy for diminishing sustainability. The Plan should be effective by seeking greater opportunities to support the viability and vitality of services and facilities that support general day to day needs of residents through additional proportionate housing growth. In this regard 255 homes distributed across 18 Sustainable Villages over a 20 year plan period would not go far enough to support the important role these villages play in respect of the services and facilities they offer, meeting affordable needs and supporting a balanced housing market through

the provision of open market choice and consequently additional homes for younger people, an ageing population and families.

- 5.25 This is represented by the Council's Local Housing Needs Assessment (Oct 2019) which considered the demographic trends and projections for each sub-area in the District over the 2020-2039 period. This identified a policy off apportionment of growth of 84 dwellings to Heather over this plan period based upon a lower housing requirement of 480 dwellings per annum. In addition, it was found that there was a net need for 41 additional affordable homes within Heather over the same period. The Assessment also found that Heather has a high level of detached (47.2% - Census 2011) and larger properties.
- 5.26 The figure of 84 dwellings for Heather is based on a lower housing requirement of 480 dwellings which is now superseded by latest evidence on housing needs across the District; notably under the High 1 and 2 growth scenarios, which seek to plan for 512 and 730 dwellings per annum respectively. In this regard the Council's Local Housing Needs Assessment should be updated to reflect these high growth scenarios.
- 5.27 This example demonstrates the position for just 1 of the 18 Sustainable Villages, highlighting that the need for growth within the Sustainable Villages has not been sufficiently tested through any of the spatial distribution options.
- 5.28 The benefits associated with the principle of increased distribution is recognised in the ISAR through Objective SA4; providing good quality homes that meet local needs in terms of number, type and tenure in locations where it can deliver the greatest benefits and sustainable access to services and jobs. In assessing Option 7b (the most dispersed strategy that was considered) the Interim SA finds that there is a *"potential significant positive as under this option development is spread across the entire District rather than in a limited number of locations, ensuring that there is an increase in the number and mix of housing whilst also providing an element of affordable housing to meet the needs of the population particularly at this higher quantum of growth."*
- 5.29 In seeking to address this issue a spatial option should be identified that focuses a greater level of housing growth to the Sustainable Villages. It is noted that Option 9b was tested through the ISAR which focused 27% of the growth (1,377 dwellings) to the Sustainable Villages as well as 1,785 dwellings to a new settlement, 459 dwellings to the Key Service Centres and 255 dwellings to the Local Service Centres. The ISAR recognises that this option would provide a significant number, mix and proportion of affordable housing across the District. It is noted that the ISAR found that Option 9b, along with 7b tended to

perform better and have more significant positive effects compared with other options.

- 5.30 It is noted that Table 5 of the Local Plan Review: Development Strategy Options and Policy Options document excludes Option 9b. However, Option 9b is discussed at paragraph 4.56, being *“a significant departure from the current strategy given it focusses more development on lower order settlements”*. The Council considers that Option 7b can also do this but to a lesser extent and with greater benefit to existing town and local centres.
- 5.31 Whilst Option 7b can achieve this, there is a great disparity between the proportion of dwellings tested for the Sustainable Villages between Options 7b and 9b. Option 7b identifies only 255 dwellings to the Sustainable Villages (5% of total growth) compared with Option 9b which identifies 1,377 dwellings to the Sustainable Villages (27%). Given both Options 7b and 9b perform better than other options through the ISAR, it would be appropriate for the Council to test these options further by identifying further ‘middle ground’ options that would also direct development to the lower order settlements. As discussed above, the limited focus of 255 dwellings to the Sustainable Villages through Option 7b is considered insufficient.
- 5.32 The effects of each option are assessed against the ISAR objectives. Regarding climate change (SA11) both Options 7b and 9b are assessed as having a potential significant negative effect due to the *“likely higher level of growth in potential areas at risk of flooding.”* However, Bloor Homes raise concerns with this blanket negative assessment as opportunities are available in villages such as Heather that would pose no additional flood threat.
- 5.33 Options 7b, 9b and 6b all include reliance upon a new settlement to deliver 1,785 dwellings within the 20 year plan period. As explained earlier, there is currently little justification for a new settlement as informed by the SGP and LIG. Furthermore, new settlements, by their nature, have significant lead-in terms with many challenges to delivery, notably relating to infrastructure provision. Whilst this Local Plan review could establish aspirations for a new settlement to assist in meeting longer-term growth requirements, it should not be relied upon within the plan period and should be a matter for further consideration through a future review if further evidence becomes available.
- 5.34 Bloor Homes considers that the residual need of 5,100 dwellings under the High 2 growth scenario could more appropriately be met across a range of existing settlements rather than the need to place reliance upon the delivery of a new settlement which is not justified at this stage. A range of sites, with a greater distribution of sites across sustainable settlements, including Sustainable

Villages would provide greater flexibility and a more resilient approach to delivery. Bloor Homes recommends testing additional variants around Option 9b given the significant positive effects identified through the ISAR and its ability to meet needs across a greater range of settlements.

- 5.35 In summary, Bloor Homes considers that the Council through the ISAR should test an additional option(s) under growth scenario High 2 which seeks the delivery of housing distributed across the Principal Town, Key Service Centres, Local Service Centres and Sustainable Villages with increased growth to the lower order settlements above that within Option 7b, notably to the 18 Sustainable Villages. Additional growth is required within the Sustainable Villages above that preferred by the Council through Option 7b in order to maintain services and facilities. The positives of this are recognised through the findings of Options 7b and 9b in the ISAR. In addition, evidence demonstrates that there remains strong level of need, including affordable needs, within the Sustainable Villages, including Heather, with a need for smaller homes to create a balanced housing market and respond to demographic change.

6. Housing

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

- 6.1 National Planning Policy Guidance notes a responsibility for 'relevant authorities' to maintain a self-build and custom housebuilding register. In understanding the need for self and custom build the PPG recognises the role of the Strategic Housing Market Assessment in understanding the size, type and tenure of housing needed for different groups including people wishing to self-build or custom build their own homes.
- 6.2 The Council's Local Housing Needs Assessment does not consider the needs associated with self and custom build properties.
- 6.3 The Council maintains a Self and Custom Build Register, and as of January 2022 there were 78 individuals on the list. The self-build register only needs to include the name and address of the lead contact and the number of serviced plots of land they are seeking to acquire- no information is requested on the financial resources. 'Demand' could be an expression of interest rather than actual demand.
- 6.4 Turning to supply, outline planning permission has been granted for 30 self and custom build plots at Land off Hepworth Road, Woodville. A subsequent reserved matters application was approved in December 2021 which determines these 30 plots will comprise custom build plots.
- 6.5 The policy direction does not suggest a specific percentage of self and custom build homes will be required on allocated sites, instead seeking the provision of serviced plots for self-build and custom housebuilding as part of an appropriate mix of dwellings on all major developments. Bloor Homes considers this to be a proportionate response to the evidence that has been published.
- 6.6 If custom and self-build requirements are to be set out in policy, Bloor Homes agrees there needs to be a mechanism identified to allow for such plots to come forward for market housing if demand is not present. Bloor Homes supports the proposed policy approach that if serviced plots for self-build and custom housebuilding have been made available and marketed for 12 months and have not sold, plots can be used for delivery of general market housing.

6.7 Practical difficulties of facilitating self and custom-build plots on larger sites should also be recognised, creating issues with health and safety and the need for independent construction access point.

6.8 In light of the above, if demand does increase, it would be preferable for specific sites to be identified which are more suitable for self and custom build plots. Such sites would appear to be supported by the market as the proposal in Woodville demonstrates.

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

6.9 Bloor Homes wish to object to the internal floorspace policy direction.

6.10 The Nationally Described Space Standards (NDSS) were published by the Department of Communities and Local Government on 27 March 2015. Its publication was accompanied by a Planning Update issued as a Written Ministerial Statement to Parliament by the Rt. Hon. Sir Eric Pickles MP on 25th March 2015.

6.11 In introducing the standards, the Written Ministerial Statement outlines:

"New homes need to be high quality, accessible and sustainable. To achieve this, the government has created a new approach for the setting of technical standards for new housing. This rationalises the many differing existing standards into a simpler, streamlined system which will reduce burdens and help bring forward much needed new homes."

6.12 However, the Written Ministerial Statement is also clear that the standards are optional, and that compliance cannot be required outside of a relevant current Local Plan policy:

"From 1 October 2015: Existing Local Plan, neighbourhood plan, and supplementary planning document policies relating to water efficiency, access and internal space should be interpreted by reference to the nearest equivalent new national technical standard. Decision takers should only require compliance with the new national technical standards where there is a relevant current Local Plan policy."

6.13 This is to ensure that the need for the application of the standards through planning policy is fully evidenced and that the impact on viability is considered alongside all of the other policies contained in the Plan:

“The optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the National Planning Policy Framework and Planning Guidance.”

- 6.14 The reference to the National Planning Policy Framework relates to paragraph 130 which states planning policies should:

“create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.”

- 6.15 Footnote 49 makes it clear that use of the Government’s optional technical standards should be used where this would address an identified need for such properties and the need for an internal space standard can be justified.

- 6.16 National Planning Guidance states:

“Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:

need – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.

viability – the impact of adopting the space standard should be considered as part of a plan’s viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.

timing – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.”

- 6.17 The Guidance is therefore clear that the application of the NDSS requires a Local Plan policy which has been fully evidenced, including identification of need and the consideration of any impact on viability.

- 6.18 The Local Housing Needs Assessment and the Leicester and Leicestershire HEDNA prepared in 2017 provide no commentary or evidence in respect of NDSS.
- 6.19 It is clear current evidence does not provide justification for the imposition of the optional NDSS within North West Leicestershire. The Council must provide adequate evidence of need if it is to require the application of NDSS through the Local Plan review.
- 6.20 Consideration should also be given to any unintended consequences of requiring minimum internal floorspace standards, which could result in extra floorspace that is not required and reflecting in increased costs that would be passed on to house buyers. Higher house prices will not assist in reducing affordability issues currently experienced within the District.
- 6.21 If optional NDSS standards are introduced this would need to be considered through a whole Plan viability assessment.

Question 8: Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?

- 6.22 The Preferred Option pursues a policy of requiring 100% of all homes to meet optional M4(2) requirements. M4(2) dwellings are described as making:

“reasonable provision for most people to access the dwelling and incorporate features that make it potentially suitable for a wide range of occupants, including older people, those with reduced mobility and some wheelchair users.”

- 6.23 The Local Housing Needs Assessment includes a high-level assessment of the need for specialist accommodation for older people and the potential requirements for housing to be built to M4(2) and M4(3) housing and technical standards.
- 6.24 The LHNA concludes that, in general, North West Leicestershire District has an ageing population. Figure 4.1 demonstrates that the District has a slightly younger age structure (in terms of older people) compared with Leicestershire as a whole and a lower percentage of those aged 75 and over than the wider East Midlands region and England. It is recognised that the older person population is likely to increase over the plan period, however an ageing population affects the whole country and is not an issue specific to North West Leicestershire. If the Government had intended that evidence of an ageing population alone justified adoption of optional standards, then such

standards would have been incorporated as mandatory in the Building Regulations, which is not the case.

- 6.25 The LHNA identifies a need for around 420 dwellings to be for wheelchair users (meeting optional technical standard M4(3)). No figure is stipulated in respect of accessible and adaptable homes (optional technical standard M4(2)). Bloor Homes considers that whilst there is justification for 5% of the affordable supply to meet the optional M4(3) standards, the evidence provided does not establish the necessary justification for implementing optional M4(2) standards to all remaining homes to be delivered.

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

- 6.26 Bloor Homes considers that the requirement for optional M4(3) dwellings should be restricted to those properties where nomination rights will be in place. Therefore, this requirement should not apply to open market provision.

7. Development Strategy Options for Employment

Question 10: Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?

- 7.1 Bloor Homes recognise the importance to ensure that sufficient jobs are provided in the right locations alongside the delivery of new homes. The Plan should continue to pro-actively support jobs growth by allocating sufficient employment land to meet necessary requirements over the plan period. By providing a greater level of certainty for the delivery of employment land this ensures a joined up and effective strategy to balance homes and jobs in line with the need to achieve sustainable patterns of travel.

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

- 7.2 It is considered that in light of the answer to Question 10, Options 1 and 2 would provide the greatest level of certainty to the delivery of employment land.

8. Health & Wellbeing

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

- 8.1 Bloor Homes recognises the need for development to address unacceptable impact on health infrastructure. It is recommended that engagement with the CCG informs further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.

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

- 8.2 Bloor Homes agrees with the need to include a policy relating to Health Impact Assessments (HIA). It is recognised that HIAs play an important role in addressing health impacts of planning decisions on communities in line with the social objective of sustainable development as set out in the NPPF.

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?

- 8.3 Bloor Homes considers that the policy must be clear on which development proposals an initial Health Impact Screening Statement will be required. The option for 'any other proposal considered by the Council' is too ambiguous. Government guidance on Health Impact Assessments in spatial planning leaves much of the policy and guidance to the discretion of the LPA, however, the policy must be clear on local triggers for a HIA.

9. Renewables & Low Carbon

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

- 9.1 Bloor Homes supports the direction of travel in respect of carbon reduction and consider that planning has an important role in the delivery of new renewable and low carbon energy infrastructure. However, policies should ensure that they follow nationally consistent set of standards/timetables and are implementable. Bloor Homes considers the success of achieving a low carbon future is by standardisation rather than individual council's specifying their own policy approach to energy efficiency.
- 9.2 Changes to building regulations (Part L) to deliver the Government's 'Future Homes Standard' means that from mid-2022, new homes will have a 31% reduction in CO² when compared to current standards. Further changes are due in 2025 that will mean a 75% reduction in CO² when compared to today, along with a new focus on rating primary energy efficiency as well as CO².
- 9.3 Bloor Homes already applies a 'fabric first' approach in their house type design. The fabric first approach has a number of clear benefits, notably that it is built into the property for its whole life ensuring that every occupier will benefit from a reduced electricity bill and it reduces CO² emissions.
- 9.4 Any standards imposed through policy will need to consider the impact on overall scheme viability and deliverability through a whole Plan Viability Assessment.

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

- 9.5 Whilst it is commendable to deliver renewable and low carbon energy, Lifecycle Carbon Assessments and policy approaches to overheating as part of a proposal, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF.
- 9.6 The ability for large developments to source a certain percentage of their energy supply from on-site renewables will need to be balanced with the burden of delivering other infrastructure requirements that will be required to support the chosen spatial strategy to ensure the delivery of sustainable communities.

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

- 9.7 Bloor Homes agree with the need for reducing carbon emissions and that this should be a clear objective of the NW Leicestershire Local Plan. However, it is important that local planning policies do not accelerate beyond requirements of building regulations, setting onerous requirements on development particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. This would need to be considered through viability evidence.
- 9.8 As a general observation, the Plan should limit the number of policies relating to climate change. Rather than individual separate policies relating to energy efficiency, overheating, Lifecycle Carbon Assessment and reducing carbon emissions, these could all be condensed into one policy with clear criteria on each matter for developments to be assessed against.

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

- 9.9 Whilst it is commendable to deliver water conservation and efficiency, it is important that local planning policies do not accelerate beyond requirements of building regulations, particularly without evidence to support that such requirements are deliverable and will not prevent the speedy delivery of housing in accordance with the aspirations of the NPPF. Optional new national technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the PPG. This evidence does not appear to be present.
- 9.10 The policy approach should be informed by a Water Cycle Study to determine whether the scale, location and timing of planned development within the District would give rise to issues from the perspective of supplying water and wastewater services and preventing deterioration of water quality in receiving waters.

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

- 9.11 Bloor Homes consider that in parallel to identifying the appropriate housing requirement for the District across the Plan period, the Local Plan should also

be giving consideration to the components of housing supply to meet such requirements.

- 9.12 The consultation document focusses upon the distribution of development, however is silent on the components of housing supply to ensure that future requirements can be effectively met. With regards to housing supply consideration needs to be given to an appropriate buffer coupled with rates of non-implementation across the District.
- 9.13 Furthermore, the Local Plan should be considering the role of reserve sites as part of the overall strategy, particularly where there is heavy reliance on larger strategic sites and any new settlement(s). Reserve sites are capable of releasing land for immediate development where there is a need to address housing land supply issues and to ensure that a robust rolling five year housing land supply can be maintained through the plan period. Bloor Homes consider that the identification of reserve sites would ensure that the plan is positively prepared and effective.
- 9.14 It is recognised that policies for affordable housing, housing mix and sites for allocation will be covered in future consultations, however Bloor Homes consider that it would also be helpful if the future consultations include consideration of a housing trajectory to ensure that the requirements of the District can be effectively met by way of a robust housing supply and monitored accordingly.

10. Land South of Heather

10.1 This Chapter sets out a brief description of the site, followed by an assessment of the site against each of the Council's site selection criteria, as defined within the Housing Site Selection Topic Paper.

Site Description

10.2 Bloor Homes has current land interests to the South of Heather.

10.3 The site comprises four field parcels accessed off Newton Road.

10.4 An illustrative masterplan has been prepared by Pegasus Group and is included within a promotional document at **Appendix 1** to this representation.

10.5 The illustrative masterplan identifies the following key elements:

- Provision of approximately 120 homes that has the ability to be delivered in two phases of approximately 60 homes. The second phase could be identified as a reserve site in the emerging Local Plan to provide additional flexibility in housing land supply;
- Provision of approximately 4 hectares of green infrastructure, evenly distributed throughout the site, including provision of a trim trail and a Locally Equipped Area of Play (LEAP);
- Provision of SuDS; and
- Provision of pedestrian and cycle paths to link with existing infrastructure.

Landscape & Visual Sensitivity

10.6 Bloor Homes has commissioned Golby + Luck to consider the baseline landscape and visual setting of the site and provide an assessment of the landscape and visual sensitivity of the site to the south of Heather.

10.7 The site is located at the immediate southern settlement edge of Heather and is not the subject of any environmental designations that would suggest an increased value or sensitivity to change. The site is also not the subject of any statutory or non-statutory designation that would prohibit its development for residential purposes and does not contain features that are considered to be of notable value.

- 10.8 The site is contained by a framework of settlement and highway infrastructure to the north and east, industrial development to the north-west, and maturing National Forest planting to the south and west.
- 10.9 The site and wider settlement extend across the western ridge of the valley setting to the River Sence, occupying an elevated location that is entirely in keeping with local settlement character. The site falls from the ridgeline towards a localised valley setting to the south where the maturing forestry planting separates it from the wider valley setting that extends further south.
- 10.10 There are two public rights of way that provide access across the site and into the wider setting of farmland to the south of Heather. Beyond this the site is maintained as farmland and does not provide any defined access or recreation function.
- 10.11 Heather and the site form part of the Leicestershire Coalfields landscape comprising a typical mixture of settled rolling farmland interspersed with maturing woodland planting associated with the National Forest.
- 10.12 The site has been assessed as part of the Districts landscape sensitivity assessment (LSA) as part of land parcel 16HEA-B assessed as being of medium landscape and visual sensitivity to housing development. In contrast land parcel 16HEA-A to the northern fringes of the settlement is assessed as medium to low landscape and visual sensitivity, and 16HEA-C to the east medium landscape sensitivity and medium to low visual sensitivity.
- 10.13 Land parcel 16HEA-B assesses the site as part of the wider land parcel that includes the Grade II listed Heather Hall and its associated remnant parkland setting. The hall and its landscape are specifically identified in the assessment as being of increased value and sensitivity to change, with the sensitivities of the site being comparable to the settlement boundaries to the north and east of the settlement.
- 10.14 The Landscape Summary Report, attached at **Appendix 2**, confirms a finding of medium to low landscape sensitivity for the site when considered in isolation from the wider land parcel 16HEA-B. In relation to its visual setting and correlating sensitivity:
- The site is visually contained to the north with receptor groups including private views from the settlement edge, views from the public highway and rights of way, and views from the recreation ground and village hall. These receptor groups are typical of the settlement edge and are not considered to be of greater value or sensitivity when compared to any other location;

- To the east the visual setting is contained to the immediate settlement, Newton Road and sections of public footpaths Q58 and Q59. Development within the site will present as part of the established settlement in these views, within what is already a settled landscape;
- To the west the site is contained by the heavily treed setting at the eastern boundary of the remnant parkland setting of Heather Hall. This boundary is also defined by the established industrial setting that is a detracting element; and
- To the south the site is substantially screened in views from the wider farmed valley setting. Development within the site will sit below the established setting of housing to the south of the site that defines the visual horizon. The maturing forestry planting will heavily screen views of development within the site, providing in-situ landscape mitigation that developments are often reliant upon to secure a long-term reduction in visual effects.

Impact on the Historic Environment

- 10.15 Bloor Homes has commissioned Orion to prepare a heritage report, which draws together the available archaeological, historic, topographic and land-use information in order to clarify the heritage significance and archaeological potential of land proposed for development.
- 10.16 The assessment establishes that there are no designated heritage assets (World Heritage Sites, Scheduled Monuments, Listed Buildings, Registered Battlefields, Registered Historic Parks or Conservation Areas) within the study site, and that development of the study site will not affect the significance of any designated heritage assets, nor their settings, in the surrounding area.
- 10.17 In summary, the technical work undertaken to date concludes there are no heritage constraints to the allocation of the site for residential development.

Surface Water Flooding

- 10.18 The site lies within Flood Zone 1 which has the lowest probability of flooding.
- 10.19 A Sustainable Drainage Strategy (SuDS) is proposed:
- To efficiently drain the site whilst not causing flooding down stream;
 - To create suitable habitats to promote biodiversity;

- To create ecological corridors across the site;
- To create an aesthetically pleasing setting for development; and
- To promote the site as a sustainable place to live and work.

Highways (Accessibility to the Site)

10.20 Vehicular access into the development is proposed to be served via a new priority junction with Newton Road with the existing track to White House Farm stopped up and realigned to form a junction with the new proposed access road.

10.21 Existing Public Rights of Way exist within the site and are incorporated within the proposal.

Impact on Current Land Use

10.22 The site currently comprises several parcels of land utilised for agricultural use. The site contains no publicly accessible open spaces or community uses that would be lost as a result of development, however it is recognised that a Public Right of Way (PRoW) crosses the site. This PRoW can be incorporated within any development proposal and remain in situ.

10.23 The proposal would deliver new public open space and community facilities that would benefit Heather, including a new trim trail and equipped play area.

Impact on Natural Environment

10.24 There are no statutory designated sites of nature conservation value within or immediately adjacent to the site. The nearest SSSI is Newton Burgoland Marshes SSSI which is located approximately 1.32km south of the site. This SSSI is designated for marsh and wet grassland vegetation communities.

10.25 The River Mease Special Area of Conservation (SAC) is located approximately 2.9km to the northwest of the site and a developer contribution scheme (DCS) is in place to provide mitigation for any new development which results in a net increase in phosphorus load being discharged into the River Mease SAC. Development within Heather would not result in additional wastewater via the mains sewerage network to a sewage treatment works which discharges in the catchment of the River Mease SAC.

10.26 The nearest Local Nature Reserve (LNR) is Snibston Grange LNR which is located over approximately 4km northeast of the site. This LNR is separated

from the site by open countryside, minor and major roads and existing residential development, and as such, it is not considered there will be any direct or indirect adverse effects on this statutory designated site.

- 10.27 There are no known non-statutory designated sites within or immediately adjacent to the site.
- 10.28 There are a number of hedgerows present within the site which define boundaries to the central and western field parcels.
- 10.29 A full ecological survey can be undertaken upon request to determine the presence or absence of notable species.
- 10.30 The agricultural land contained within this site is believed to be a mixture of Grade 3 (split of 3a and 3b is unknown at this time), and Grade 2 (which is land of best and most versatile value).
- 10.31 However, the same is true for the majority of land around Heather and therefore should not reflect negatively against this site.

Impact on Environmental Quality

- 10.32 The agricultural site is unlikely to have significant issues in relation to contamination, and the surrounding context of the site is not considered to represent constraints in relation to air quality and noise.
- 10.33 Whilst it is accepted that development is unlikely to improve the environmental quality of the site, as there are no existing issues of contaminated land, development would not give rise to any further environmental quality issues.

Suitability

- 10.34 The information set out above, read in conjunction with the appended concept masterplan and promotional document, demonstrates that Land South of Heather is a suitable site.

Deliverability

- 10.35 There are agreements in place between the landowners and Bloor Homes to facilitate the development of the site.
- 10.36 Bloor Homes intends to undertake further technical work to demonstrate the deliverability of land south of Heather, however information gathered to date concludes that there are no physical or other constraints likely to render the

site undeliverable within the proposed Plan period to 2039. The site is available now.

- 10.37 The site is deliverable and immediately available and subject to allocation, could start to deliver homes and associated community benefits within the next 5 years.

11. Conclusion

- 11.1 This representation is made by Evolve Planning on behalf of Bloor Homes to the North West (NW) Leicestershire Local Plan Review, Development Strategy & Policy Options (Regulation 18) consultation. This representation relates to land south of Heather, which Bloor Homes is promoting for residential-led development.
- 11.2 These representations are framed in the context of the requirements of Local Plans to be legally compliant and sound in line with the tests of soundness within the NPPF. Bloor Homes supports NW Leicestershire District Council in progressing with a substantive review of the current adopted Local Plan.
- 11.3 Bloor Homes supports the settlement hierarchy which is informed by the relative sustainability of villages within NW Leicestershire, including the identification of Heather as a Sustainable Village.
- 11.4 Regarding the amount of housing growth, the High 2 growth scenario is supported by Bloor Homes at this stage, in advance of further evidence being published to determine unmet need across the HMA, notably within Leicester City, and an agreed approach to apportioning any unmet need within the HMA, including within NW Leicestershire.
- 11.5 Bloor Homes reserve the right to make further comment upon publication of any future evidence in respect to unmet needs within the HMA. However, based on current evidence, the High 2 growth scenario is preferred over other growth scenarios as it is considered to be the most representative of the current needs in NW Leicestershire whilst being consistent with previous levels of delivery. The High 2 growth scenario is the only growth option identified that would demonstrate the plan is effective and positively prepared.
- 11.6 Bloor Homes welcomes the Council's approach to testing reasonable alternative spatial distribution options in line with the identified settlement hierarchy, including review through the Interim Sustainability Appraisal Report (ISAR) (Sept 2021). However, Bloor Homes consider that the Council has not fully tested all reasonable alternatives, with insufficient justification in relation to the options and preferred options identified, particularly its reliance on a new settlement coming forward within the plan period.
- 11.7 The Council should test an additional option(s) under growth scenario High 2 which seeks the delivery of housing distributed across the Principal Town, Key Service Centres, Local Service Centres and Sustainable Villages with increased growth to the lower order settlements above that within Option 7b, notably to

the 18 Sustainable Villages. Additional growth is required within the Sustainable Villages above that preferred by the Council through Option 7b in order to maintain services and facilities. The positives of this are recognised through the findings of Options 7b and 9b in the ISAR. In addition, evidence demonstrates that there remains strong level of need, including affordable needs, within the Sustainable Villages, including Heather, with a need for smaller homes to create a balanced housing market and respond to demographic change.

- 11.8 Bloor Homes also provide responses to draft policies and questions relating to housing standards, employment land, health and well being and renewables and low carbon.
- 11.9 In particular, Bloor Homes object to the policy direction suggested with regards to internal floorspace as current evidence does not provide justification for the imposition of the optional NDSS within North West Leicestershire. The Council must provide adequate evidence of need if it is to require the application of NDSS through the Local Plan review.
- 11.10 Bloor Homes consider that the Local Plan should be giving consideration to the components of housing supply to ensure that future housing requirements can be effectively met across the Plan period. This includes the consideration of reserve sites.
- 11.11 Bloor Homes has current land interests to the South of Heather, comprising four field parcels accessed off Newton Road. An Illustrative Masterplan has been prepared which demonstrates how a scheme of approximately 120 homes can be delivered across two phases of approximately 60 homes.
- 11.12 Information gathered to date concludes that there are no physical or other constraints likely to render the site undeliverable within the proposed Plan period to 2039. It is a suitable site for residential development.
- 11.13 The site is deliverable and immediately available and subject to allocation, could start to deliver homes and associated community benefits within the next 5 years. It is therefore submitted that the site South of Heather, be identified as an allocation to meet housing needs through the new Local Plan for NW Leicestershire.

APPENDIX 1

Promotional Document



LAND SOUTH OF HEATHER

PROMOTIONAL DOCUMENT

BLOOR HOMES[®]

BLOOR HOMES[®]



Prepared by Evolve Planning & Design Ltd
on behalf of Bloor Homes in March 2022.

Project code EP043
Document ref EP043_PromoDoc_100322
Contact: Neil Cox

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PROPOSALS**

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INTRODUCTION AND DOCUMENT PURPOSE

1





SWEPSTONE ROAD

NEWTON ROAD

INTRODUCTION AND DOCUMENT PURPOSE

Introduction

- 1.1 Land south of Heather, accessed via Newton Road, represents a logical and appropriate extension to the Sustainable Village of Heather.
- 1.2 The site is well located to access existing services and facilities within the village and offers an opportunity to deliver new homes alongside supporting infrastructure.
- 1.3 This promotional document seeks to bring together the initial technical and environmental studies that have been undertaken by Bloor Homes' consultant team and explains the initial masterplanning proposals for land south of Heather. What is presented in this document is not intended to be a fully worked-up scheme but has been prepared for illustrative purposes to be used as the basis for engagement with the key stakeholders, including the Council, through the Local Plan Review process.
- 1.4 The information provided demonstrates the site as suitable and available and the development for new homes achievable.

Bloor Homes

- 1.5 Established in 1962, Bloor Homes is one of the UK's largest privately owned house building companies, completing in excess of 2,500 new homes each year. The Company has considerable experience in promoting and delivering strategic residential development sites across the country, ranging in size and complexity from those of around 50 dwellings to substantial mixed use urban extensions of over 5,000 dwellings.

Document Purpose

- 1.6 North West Leicestershire District Council ("NWLDC") is currently undertaking a substantive review of the Local Plan adopted in November 2017. This review will take into account changes that have occurred since adoption, including updated national policy. The review process will identify housing need to 2039 and identify new housing allocations to satisfy this identified housing need.
- 1.7 This Promotional Document demonstrates that the site to the south of Swepestone Road and the west of Newton Road forms a logical and suitable extension to the Sustainable Village of Heather.
- 1.8 This document establishes a vision and development principles for the site, informed by consideration of constraints and opportunities. A Concept Masterplan demonstrates how the vision can be achieved through a well-designed scheme.
- 1.9 Overall, this Promotional Document presents a suitable and achievable proposal to support the site's allocation through the current review process.
- 1.10 This document has been prepared with input from the following consultant team:

Planning
Evolve Planning & Design



Urban Design
Pegasus Group



Access and Movement
Capricorn Transport Planning



Flood Risk & Drainage
PJA



Landscape
Golby + Luck



Ecology
FPCR



Heritage
Orion Heritage



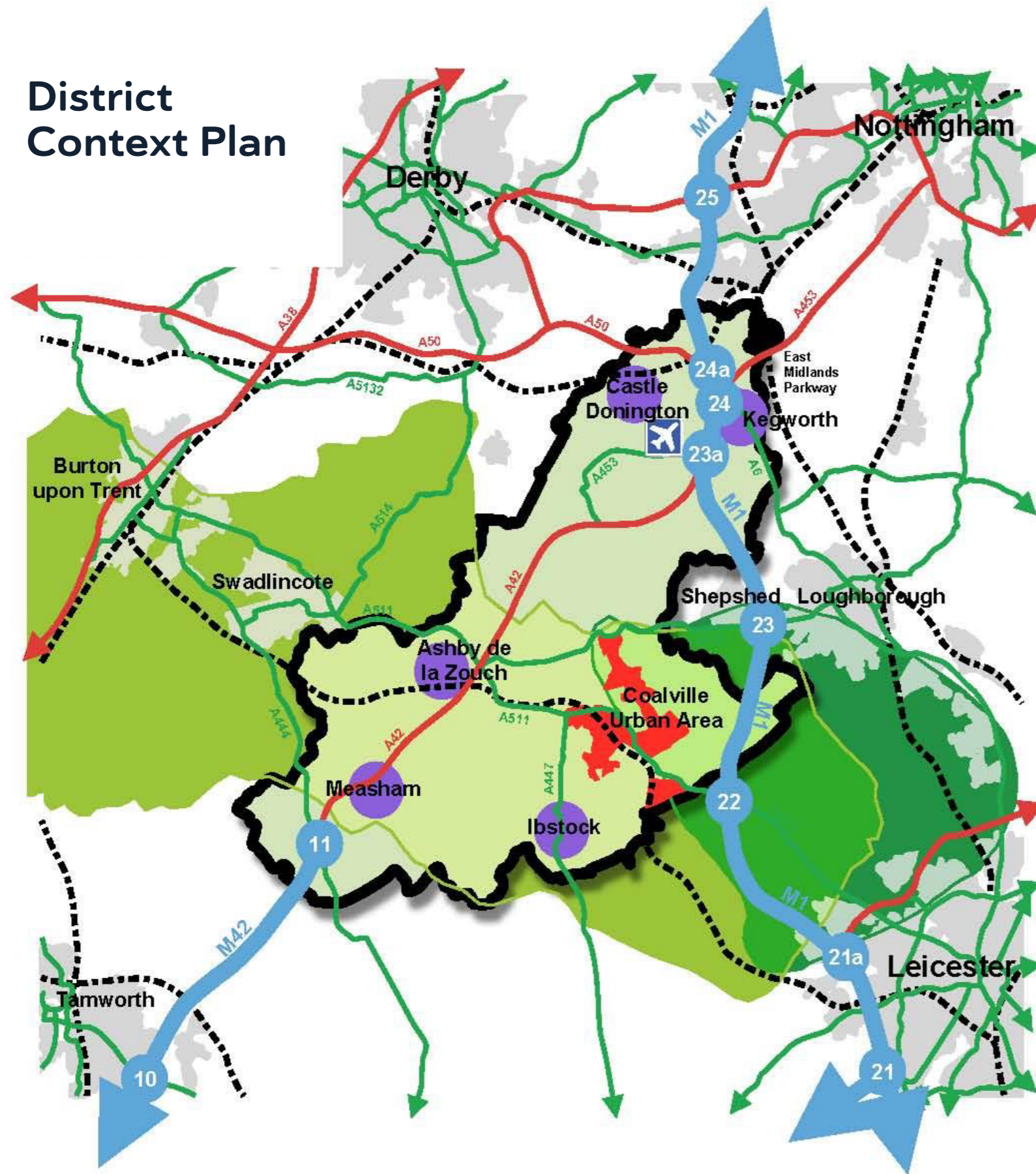


PLANNING POLICY CONTEXT











2



District Context Plan



Key

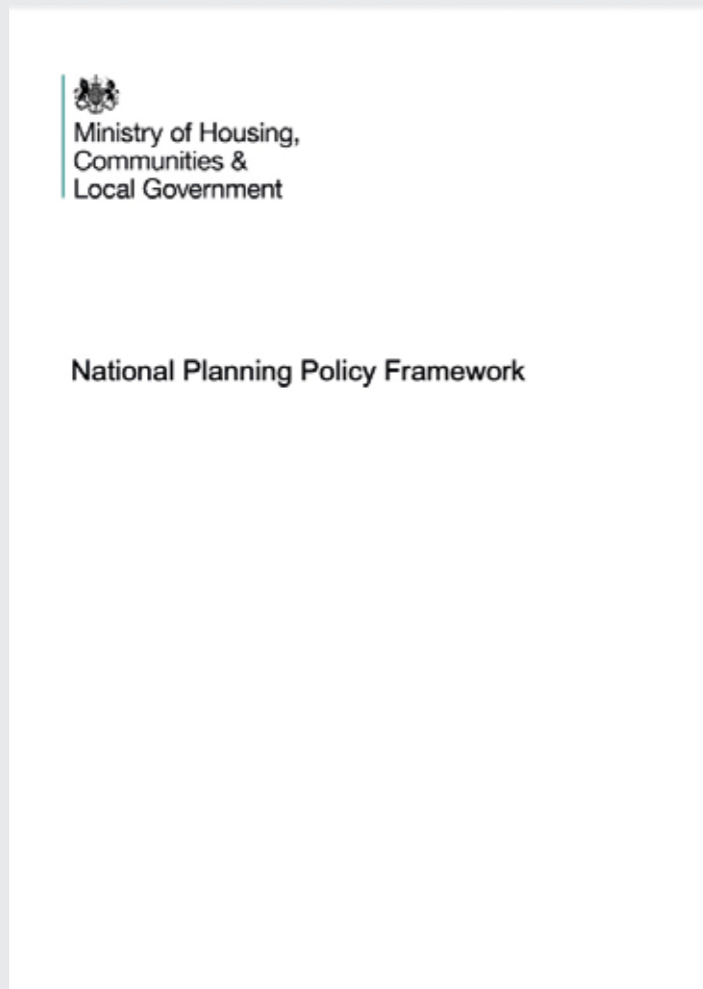
-  North West Leicestershire District
-  Motorway
-  Trunk Road
-  A Road
-  Railway
-  East Midlands Airport
-  Coalville Urban Area
-  Other main settlements
-  National Forest
-  Charnwood Forest Regional Park

©North West Leicestershire District Council

PLANNING POLICY CONTEXT

National Policy

- 2.1 The latest National Planning Policy Framework (NPPF) was introduced in July 2021. The Government recognises that the planning system should be genuinely plan-led, with succinct and up-to-date local plans providing a positive vision for each District; a framework for addressing housing needs and other economic, social and environmental priorities that span a minimum 15 year period from adoption.



- 2.2 The NPPF requires local authorities to identify a sufficient amount and variety of land, that can come forward where it is needed, to support the Government's aim of significantly boosting the supply of homes. To determine the number of homes needed a local housing need assessment is required, conducted using the 'standard method.' This standard method identifies a local housing need for North West Leicestershire District of 359 dwellings per annum, including an uplift to take account of market signals and affordability. The Planning Practice Guidance states that 'the standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure.' For example, any needs that cannot be met within neighbouring areas should also be taken into account.

Current Development Plan

- 2.3 The North West Leicestershire Local Plan 2011 to 2031 provides the current planning policies for the district. The Local Plan was adopted in November 2017 and a partial review completed in March 2021.
- 2.4 Policy S1 of the adopted Local Plan commits the District Council to progressing a replacement Local Plan (the Substantive Review), to be submitted for Examination within 18 months of the date of whichever is the sooner of either:
- A Statement of Common Ground (SoCG) being agreed by the HMA/FEMA authorities; or
 - 21st May 2021
- 2.5 A Neighbourhood Development Plan has not been prepared in respect of Heather parish.

Local Plan Review

- 2.6 North West Leicestershire District Council has commenced the Substantive Local Plan Review. The review will update the adopted Local Plan 2017 (as amended by the Partial Review) and is intended to cover a plan period to 2039.
- 2.7 The Local Plan Review provides an opportunity for the Council to comprehensively review the vision, strategic objectives, development requirements, spatial development strategy and policies for shaping detailed development proposals. The review process will also ensure consistency with the new National Planning Policy Framework (NPPF), which seeks a requirement for local planning authorities to keep their Local Plan up to date by undertaking a review at least every five years.
- 2.8 The Council has identified a number of housing growth and growth distribution options recognising that the higher scenarios (512dpa and 730dpa) perform the best and are most likely to cover the future requirements of the District until such time as the issue of the redistribution of unmet need from Leicester City has been agreed.
- 2.9 A range of spatial distribution options have been identified which vary the levels of growth focused to settlements, including the Sustainable Villages which includes Heather.



THE SITE AND SURROUNDING CONTEXT

3



THE SITE AND SURROUNDING CONTEXT



Local convenience store



The Crown Inn Public House



Heather Village Hall/playing field



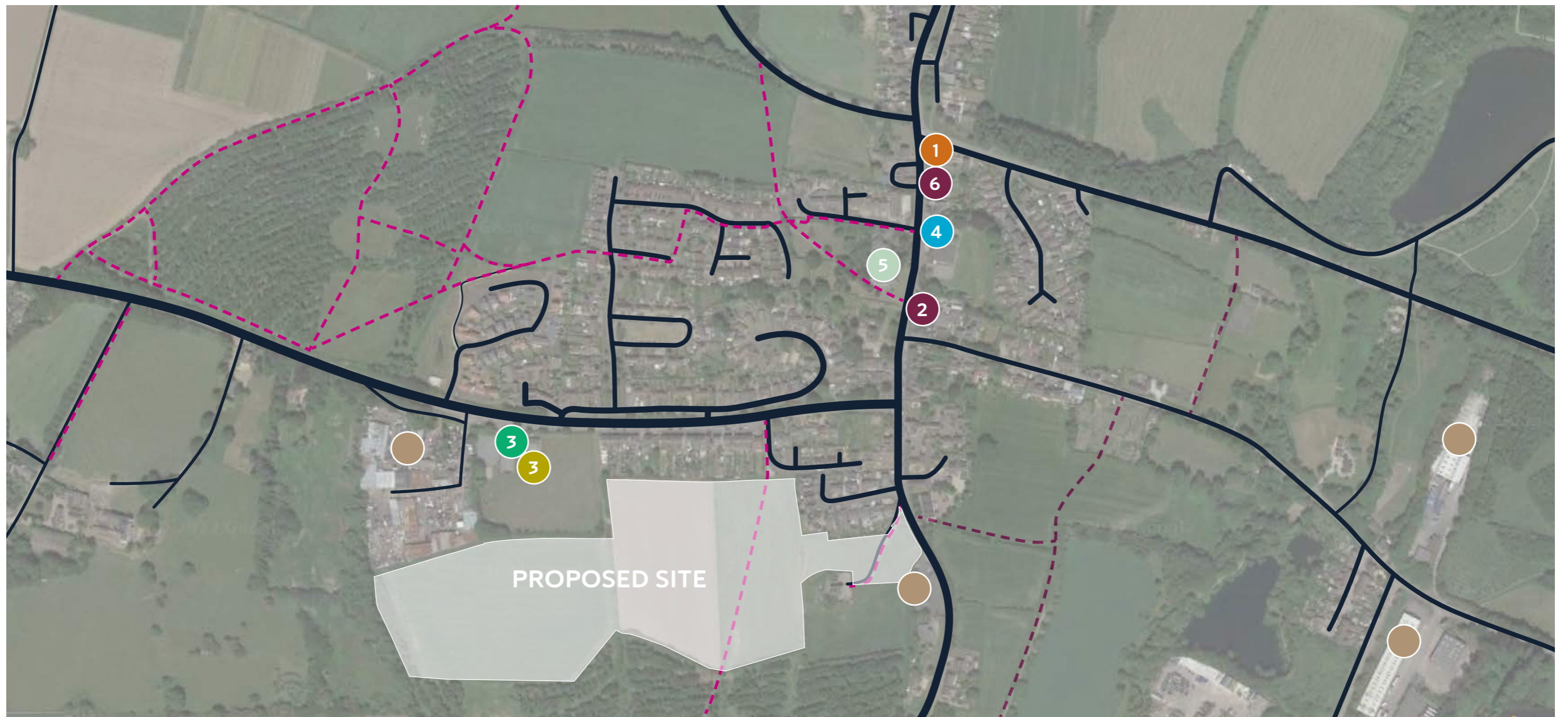
Heather Primary School



St John the Baptist Church



Queens Head Public House



Key ● Employment ● Public house ● Community facility ● Equipped play area ● Educational ● Retail ● Place of worship - - - Public right of way

Fig 3.1: Local Facilities Plan

Land South of Heather

- 3.1 The site is located to the south of Swebstone Road and the east of Newton Road. The site comprises four agricultural fields. The site is of Grade 2 and part Grade 3 agricultural land quality (Natural England regional records). The site is gently undulating with a slope down towards its southern boundary. There are mainly hedges to the field boundaries and there is a footpath running from Old Cow Sheds Drive across the site to the south. The site is within the National Forest. Adjacent uses include residential dwellings to part of the northern boundary and to the east, an industrial estate to the north west and public open space and play area associated with Heather Village Hall to the north. There is agricultural land to the south of the site.

Sustainable Transport

- 3.2 The site is located within the Sustainable Village of Heather. Within 1km distance from the centre of the proposed site are a range of services and facilities including the adjacent Village Hall with associated play and sports provision, Heather Primary School, a convenience store, two pubs and St John the Baptist Church. These facilities can be accessed via footways along the local highway network and traffic-free public footpaths.
- 3.3 National Cycle Route 52 runs along Newton Road in a north-south direction to the eastern edge of Heather. NCR 52 links Warwick with Coalville, via Coventry and Nuneaton.
- 3.4 Whilst there is currently no bus services operating through Heather, Demand Responsive Transport is available Monday to Friday (8am to 5pm) providing connectivity to higher order services and facilities within Ibstock and Coalville.

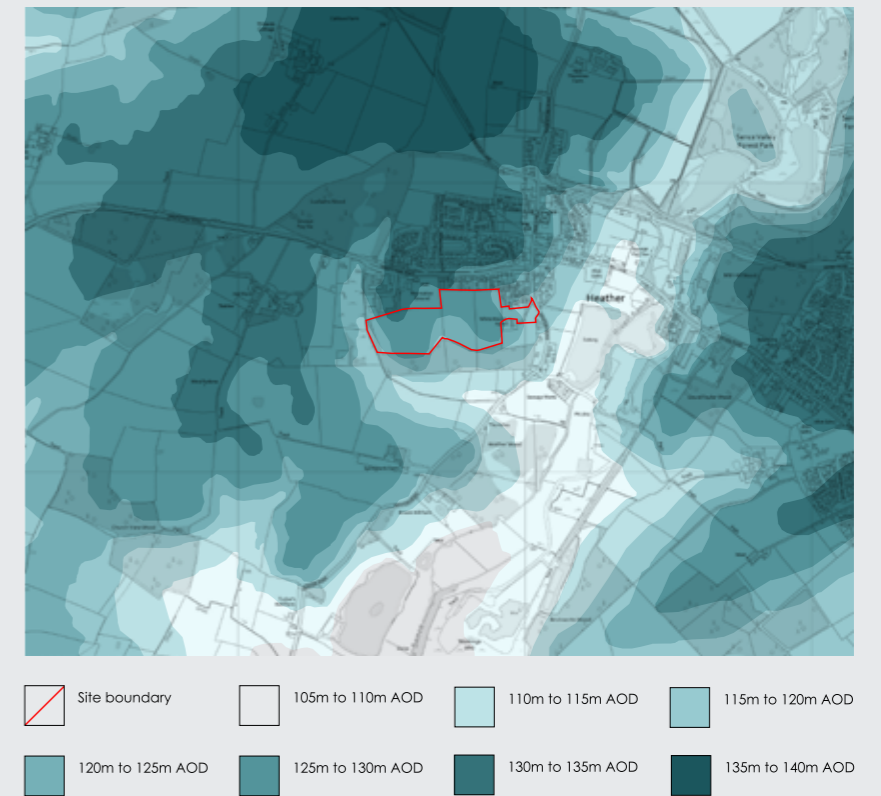
Topography

- 3.5 A detailed topographic survey was undertaken by NJC Surveys Ltd dated June 2021 which identifies that the site generally falls from north to south.
- 3.6 For the purposes of describing the Site's characteristics, the Site has been broken down in to 3 parcels as shown in Figure 3.1. The existing most western parcel of the Site has a high point of 129.44mAOD located along the middle of the northern boundary. Levels then fall away from this high point to 118.88mAOD in the south-west and 120.59mAOD in the south-east of the Parcel where there is a ditch present.
- 3.7 The central parcel also slopes from the north to the south-west corner where a ditch is identified, from a level of 129.95mAOD to a level of 121.01mAOD.
- 3.8 The eastern parcel falls from west to east from a level of 125.61mAOD to a level of 116.54mAOD.

Landscape and Visual

- 3.9 To the south Heather is viewed as a modern settlement extending east to west across the ridgeline. The existing properties fronting Swebstone Road are viewed across the woodland setting at the southern boundary of the site, with the site substantially contained from view. To the south the landform falls into the valley setting of a local watercourse that forms part of the wider catchment of the River Sence before rising towards a southern ridgeline at Springback Farm. The local setting of landscape and settlement is typical of the Coalfield landscapes.

Fig 3.2: 1m DTM LiDAR Extract



- 3.10 To the west of Heather is an existing industrial estate. The buildings within the industrial estate are generally quite low and a mature landscape setting provides containment limiting its effect on the setting of the wider landscape.
- 3.11 To the south of the site is an area of maturing woodland that appear typical of the wider setting of National Forest planting that has altered the character of the Coalfield landscapes over the last 25 years. This area of woodland has matured to provide a relatively high level of containment to the site, separating it from the wider valley setting. It also provides screening to the existing settlement edge in views from the south.

Landscape Designations

3.12 The site is located at the immediate southern settlement edge of Heather and is not the subject of any environmental designations that would suggest an increased value or sensitivity to change. The site is also not the subject of any statutory or non-statutory designation that would prohibit its development for residential purposes and does not contain features that are considered to be of notable value.

Landscape Setting

3.13 At a national level the Natural England Character Area Profile study identifies the site as being located within the Leicestershire and South Derbyshire Coalfield (NCA71). A number of the key characteristics associated with this character area are visible in the landscapes surrounding the site, notably the presence of mining settlements, the mixed arable and pastoral setting of farmland, and emerging setting of woodland associated with the National Forest initiative.

3.14 At a local level the LSA includes a more detailed assessment of the landscape surrounding the key settlements within the District that includes Heather. Three sensitivity parcels are identified at the settlement edge that cover the northern fringes (16HEA-A), the southern and western fringes (16HEA-B) that includes the site, and the eastern fringes (16HEA-C). Parcel 16HEA-B is assessed as being of medium landscape and visual sensitivity to housing development.

3.15 This assessment finding alone is not indicative of the landscape and visual sensitivity of the site, or the wider immediate settlement edge of Heather. This assessment parcel extends to include the wider landscape setting of Heather Hall that artificially elevates the sensitivity of the site. Heather Hall benefits from a contained landscape setting to the west of the settlement that is both separate due to its wooded framework, and distinct due to its remnant parkland character that contrasts with the wider setting of arable farmland and maturing National Forest planting at the settlement edge.

3.16 Given that the landscape associated with Sweptone Road includes the site and recent housing development to the north it is clear that this landscape is of reduced susceptibility to change when compared to the landscape associated with Heather Hall and given the contained remnant parkland setting to the Hall it can be concluded that its increased sensitivity does not extend to the site or immediate settlement edge.

3.17 When considered in isolation the landscape and visual sensitivity of the site should have been correctly assessed in this report as medium-low sensitivity.

Visual Setting

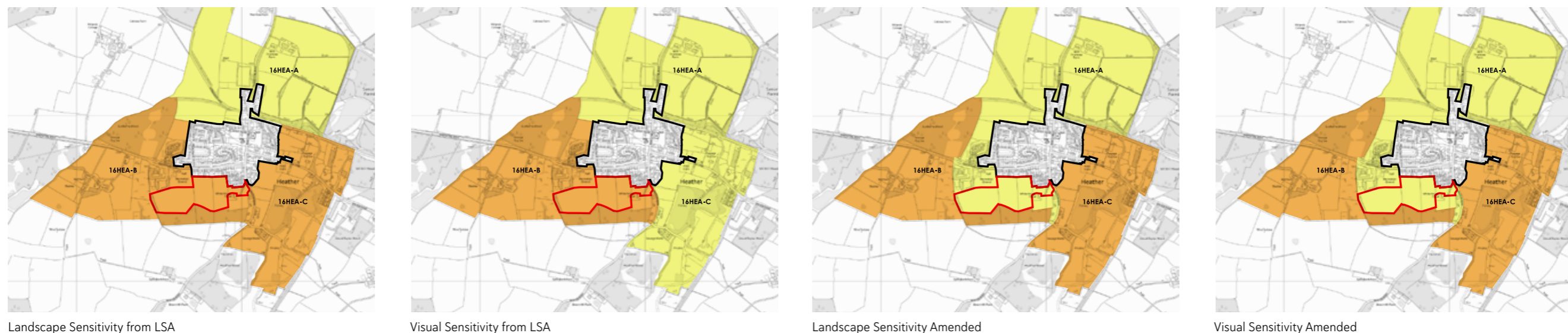
3.18 The landscape setting to the south of Heather is accessed via a network of public rights of way and local highways. Local receptor groups to the site include:

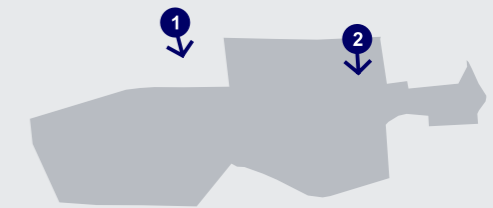
- Open views from the properties backing onto the site at Sweptone Road;
- Open views from the recreation ground and Heather Village Hall;
- Open views from the sections of public rights of way crossing the site;
- Open and filtered views from sections of Newton Road and associated properties to the east of the site;
- Open and filtered views from sections of the public rights of way to the east of the site; and
- Filtered views from sections of the public rights of way, Newton Road, and Springback Farm to the south of the site.

3.19 To the north the visual setting of the site is contained by the existing settlement edge at Sweptone Road.



Fig 3.3: Landscape Sensitivity



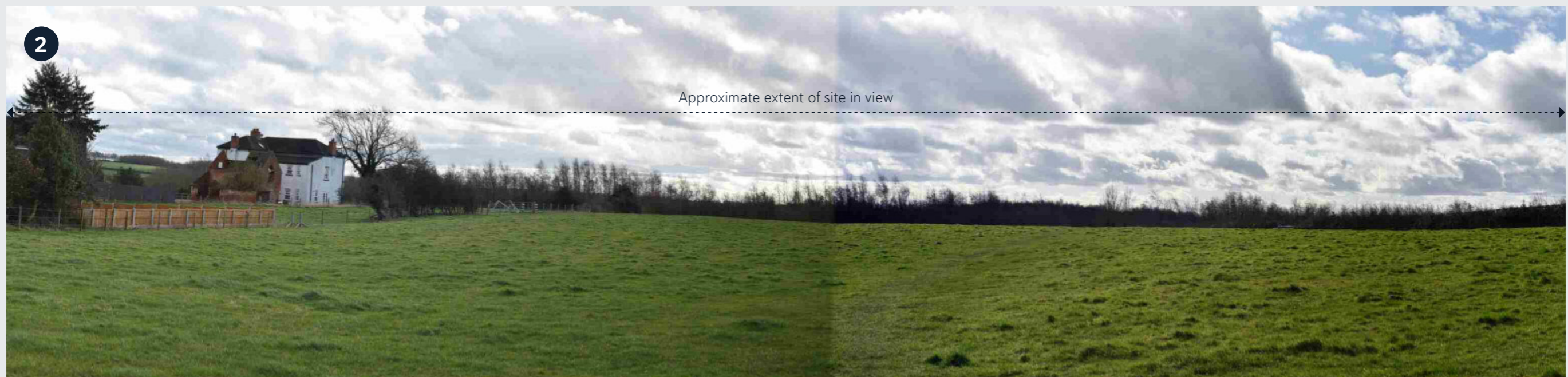


Viewpoints



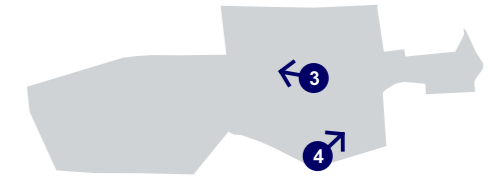
View 1 - View from the recreation and Heather Village Hall to the south of Swebstone Road looking south-east

Taken from the recreation ground adjacent to Heather Village Hall looking out across the northern boundary of the site with the valley setting beyond. The established residential setting to the north of the site provided as backdrop to the site, as does the industrial setting to the north-west. White House Farm is visible within the site to the south-west. The wider setting of the site is framed by the maturing forestry planting at the southern boundary that partially screens views of the valley setting beyond.



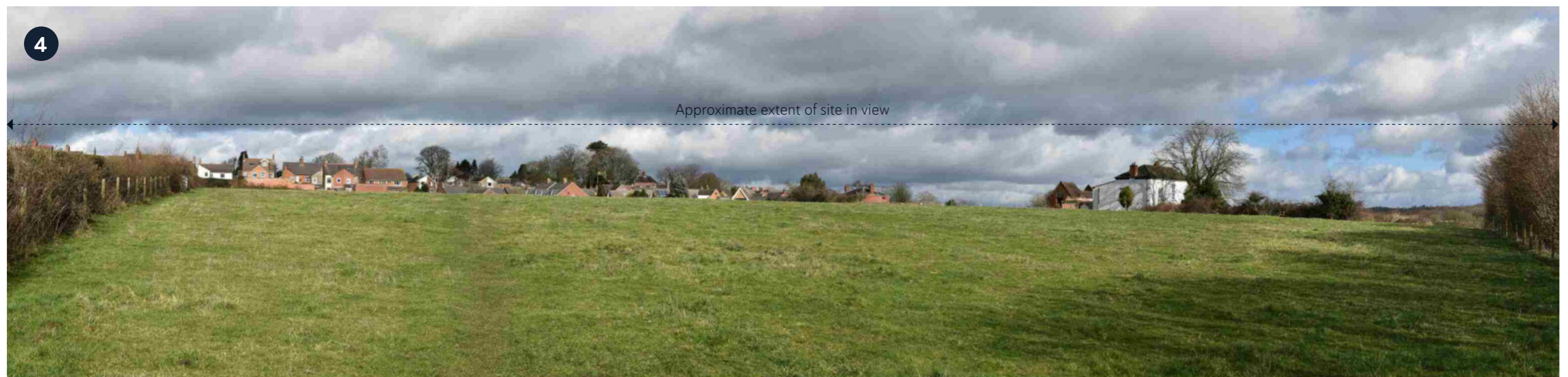
View 2 - View from public footpath Q60 at the north boundary of the site adjacent to Old Cow Shed Drive looking south

Taken from public footpath Q60 at the northern boundary of the site. The eastern field within the site sits slightly lower in the landscape, affording an established framework of settlement to the north and north-east. White House Farm is visible to the south with views of the wider valley setting to the south almost entirely screened by the intervening maturing woodland cover.



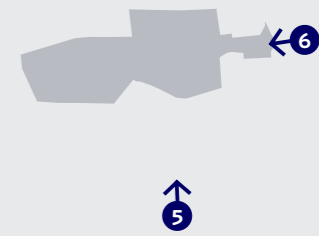
View 3 - View from public footpath Q60 at the mid-slope of the site looking west towards Heather Village Hall and the industrial setting beyond

Taken from public footpath Q60 at the mid-slope of the site looking across the western field towards the industrial setting at the north-west corner of the site. The established residential setting to the north is openly visible, and Heather Village Hall is visible just above the field gate. From the mid-slope of the site there is a limited appreciation of the wider landscape setting.



View 4 - View from public footpath Q60 at the southern boundary of the site looking north towards the modern settlement edge

Taken from public footpath Q60 at the southern boundary of the site looking back towards the settlement edge and White House Farm. The lower southern slopes of the site are visually contained affording a limited appreciation of the wider landscape setting.



View 5 - View from public footpath Q60 approximately 330m from the site looking north

A key view taken from public footpath Q60 close to the junction with Newton Road. It is from this broad location that the view for consideration is identified in the LSA. From this location the site is contained by the setting of maturing forestry planting to the south that screens views of the existing agricultural land. This in turn foreshortens the view between the forestry planting and existing settlement edge with the site almost becoming hidden. If development for housing, the new properties would likely sit below the existing roofscape, substantially screened in wider views from the valley to the south. This would be the case even in months with limited leaf cover as illustrated in this view



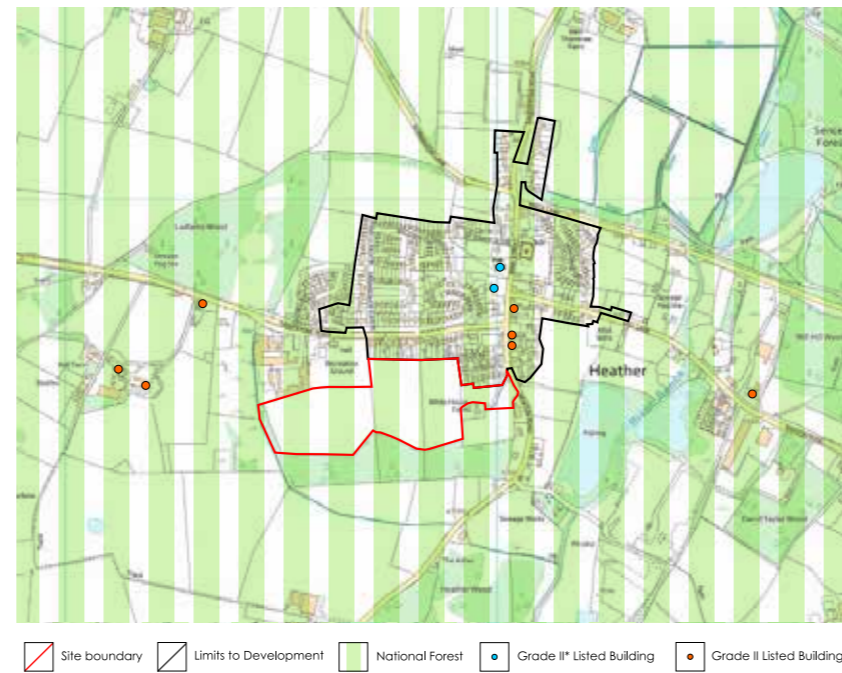
View 6 - View from public footpath Q59 approximately 80m from the site looking east

Taken from public footpath Q59 to the east of the site and Newton Road. From this location the sloping farmland setting to the east of White House Farm is visible within the site, set within an established framework of residential and commercial development. Development within the site would be openly visible from this location altering the setting of the ridgeline to the west. However, this change would not introduce a new or visually discordant element, and instead alter the arrangement of existing features that currently define the visual setting of this landscape.

Heritage and Archaeology

- 3.12 There are no designated or non-designated built heritage assets present within the site (see Fig. 3.4).
- 3.13 Heather Hall to the west of the site includes a Grade II listed 18th Century farmhouse and associated Grade II listed stables block and lodge. Heather Hall is relatively contained to its grounds as woodland, hedgerows and hedgerow trees encompass it.
- 3.14 Grade II Beresford House lies to the north east of the site and comprises a late 18th Century Farmhouse that has been converted into flats. The former farm buildings to the south of the former farmhouse are also Grade II listed and have now been converted to dwellings. Intervisibility between land south of Heather and these listed buildings is limited by intervening buildings.
- 3.15 An historic environment desk-based assessment has been undertaken by Orion. A review of the available evidence has confirmed that the site has the following potential, all of local-regional significance:
- A known potential to contain elements of a Prehistoric enclosure and a moderate potential to contain further Prehistoric features
 - A low potential to contain finds and features relating to the Roman period
 - A low potential to contain finds and features relating to the Saxon, early medieval, medieval and post medieval periods
- 3.16 Based upon the available evidence, below ground heritage assets are unlikely to represent a design constraint to proposed development of the site. However, given the potential for Prehistoric remains, a geophysical survey can be completed to further support any future application for development. Subject to the results of the geophysical survey, it is recognised that the LPA Archaeologist may request further investigation in the form of evaluation trial-trenching.

Fig 3.4: Listed Building plan



Ecology

- 3.17 There are no designated ecological sites within the site boundary and no potential Biodiversity Action Plan habitats have been identified. A Great Crested Newt Survey or entry into the GCN District Level Licensing Scheme would be required. Development should include a 5m buffer zone along significant hedges, as part of open space, to ensure habitat continuity and retain connectivity.
- 3.18 The central and western field parcels are arable bounded and delineated by hedgerows. These hedgerows are ecologically valuable having a range of species and being thick and intact. The western field parcel comprises semi-improved grassland.
- 3.19 There are opportunities to protect habitats of highest ecological importance and enhance the site's importance for ecology and deliver biodiversity net gain through creation of new habitats in line with Local BAP targets within the multi-functional green infrastructure provision.

Flood Risk and Drainage

- 3.20 The site lies wholly within Flood Zone 1 (see Fig. 3.6), outside the maximum extents of flooding during the 1 in 100 year (Flood Zone 3) and 1 in 1,000 year event (Flood Zone 2) from any nearby watercourses, including the River Sence which lies approximately 300m east of the site. Given the site location in Flood Zone 1, fluvial flood risk is considered low.
- 3.21 From a review of the publicly available, Long-Term Flood Risk - Flood Risk from Surface Water Map, the site is at Very Low Risk from Surface Water Flooding (see Fig. 3.7).
- 3.22 Based upon a review of readily available information, food risk from all sources is not thought to pose a significant risk to development.
- 3.23 A proposed surface water drainage strategy will be designed to include SuDS which aim to provide multifunctional benefits to the development site including limiting surface water flows to the existing greenfield discharge rates for all storm events up to, and including, the 1 in 100 year plus 40% climate change event. An indicative strategy has been designed (see Fig. 3.5).

Other Matters

- 3.24 The site is within a Coal Development Low Risk Area and the area may contain unrecorded coal mining related hazards which will need to be reported if encountered during development.
- 3.25 The site is within a Minerals Consultation Zone and the County Council will need to be contacted regarding the potential sterilisation of the Mineral resource.

Fig 3.5: Appendix A from Flood Risk Note

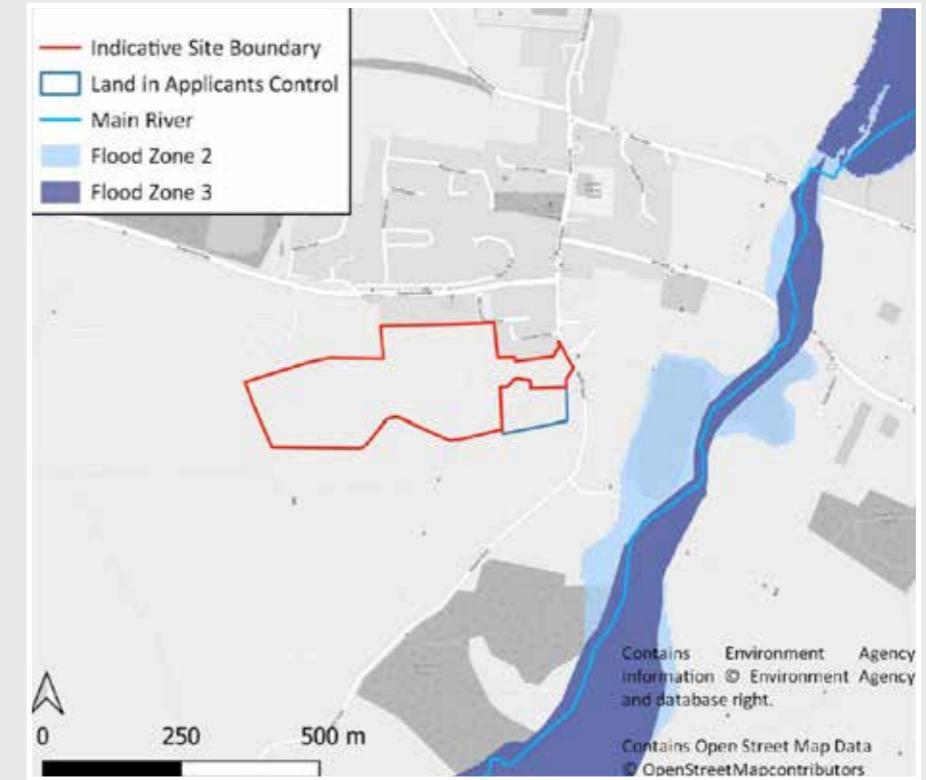


Fig 3.6: Flood Map

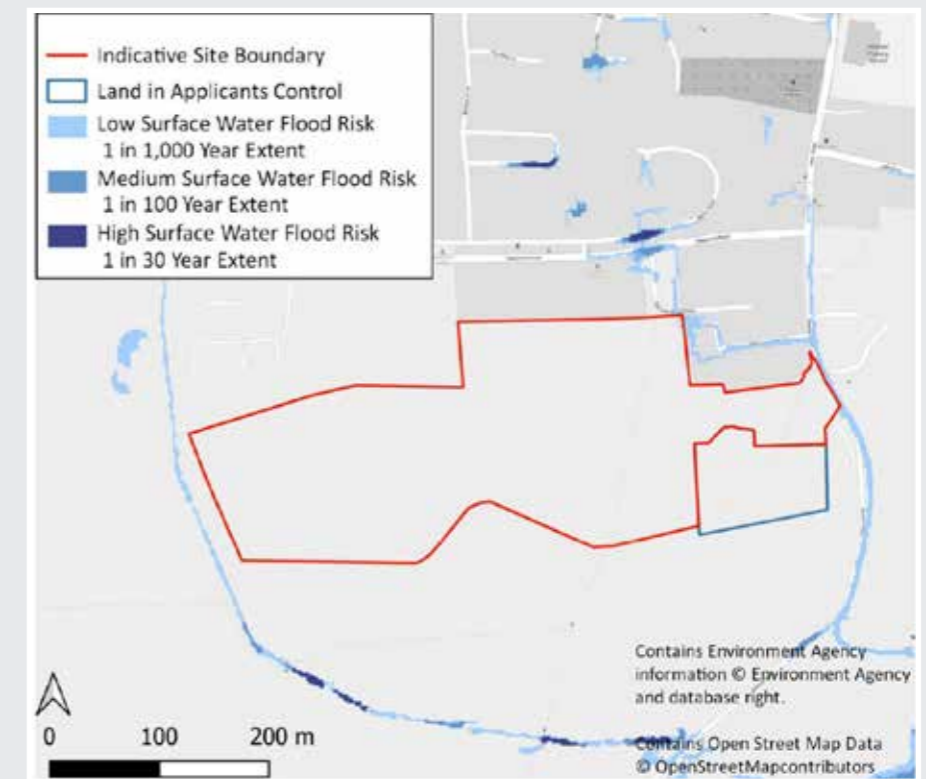


Fig 3.7: Flood Risk



10
Bolton Place

EMERGING PROPOSALS

4

Key

















-  Site Boundary (8.20 Ha)
-  Land in Applicants Control (1.02 Ha)
-  Development Area
3.62 Ha @ 33dph = circa. 120 dwellings
-  Illustrative Drainage
-  Play Area (LEAP)
-  Realigned and Resurfaced Driveway to No.8 Cotsmore Close
-  Illustrative Primary Street
-  Illustrative Lane
-  Illustrative Private Drive
-  Public Right of Way
Q60/3 and Q59/1
-  Illustrative Cycle/Pedestrian Routes
-  Potential Site Access
-  Potential Pedestrian Links
-  Existing Tree
-  Existing Hedgerow
-  Illustrative Tree



Fig 4.1: Concept Masterplan

SITE VISION

Development Quantum

- 4.1 The proposed development quantum equates to 120 dwellings in total, with a first phase of approximately 60 dwellings and a subsequent phase of approximately 60 dwellings.
- 4.2 The net development area of the proposal is approximately 3.62 hectares.
- 4.3 Taking into account the latest local housing needs evidence and contextual analysis, an average density of 33 dwellings per hectare has been applied.
- 4.4 The proposed density allows for the creation of a sustainable and balanced residential development, comprising a mix of house types and tenures. In accordance with the most up to date housing needs assessment.
- 4.5 Lower density residential development is proposed to be located along outer edges of the development, with outward facing frontages facing onto green corridors and landscaped greens, ensuring edges of the development remain soft.
- 4.6 All development parcels are outward facing, providing natural surveillance of new landscaped greens, green corridors and adopted roads.
- 4.7 The development will comprise character areas incorporating house types, materials and landscape designs which draw upon the local vernacular of Heather, reflecting the sites landscape surroundings.

Access Strategy

- 4.8 Vehicular access into the development will be provided via a new access off Newton Road.
- 4.9 The existing farm track to White House Farm is to be stopped up to vehicular traffic at Newton Road and realigned to form a junction with the development access.
- 4.10 Provision is made for the creation of a hierarchy of streets, ranging from principal tree lines routes to secondary shared surfaces and tertiary lanes and drives.
- 4.11 The arrangement of new streets and routes is influenced by the landform of the site.
- 4.12 A comprehensive network of pedestrian and cycle routes are proposed within the development, also providing a potential link to existing play and sports facilities adjacent to Heather Village Hall.
- 4.13 Existing Public Rights of Way (PRoW) are incorporated within the proposal.

Landscape and Open Space Strategy

- 4.14 A robust framework of green space is proposed at the southern boundary of the site, securing a wide offset between the woodland and development that can accommodate a variety of new habitats and leisure recreation opportunities allied to the existing network of public footpaths and permissive paths. This framework will secure a biodiversity net gain for the development, as well extend the network of accessible greenspace available for the local community. Features such as trim trails and play areas will form part of an extended network of greenspace connected to the village hall and recreation ground.

- 4.15 The opportunity exists to create a second smaller green at Old Cow Shed Drive where public footpath Q60 enters the site. This will allow development to front the existing streetscape, creating an attractive setting and inviting gateway to users of the public right of way. It will also provide an offset between the proposed housing and the lower bungalow/lodge setting at the end of Cotsmore Close.
- 4.16 The main highway access is proposed from Newton Road to the east of the site. It is the intention to restrict development from the eastern extent of the site, retaining the setting of White House Farm, and protecting wider views from the surrounding countryside where the sloping eastern edge of the site is visible. This space will secure further accessible greenspace with new play facilities and sustainable drainage/wildlife ponds set within a gateway landscape to the development.
- 4.17 To make the most efficient use of the land within the site some hedgerow loss may be required. However, any loss can be fully mitigated through the reinstatement of historic boundaries lost to farming intensification.
- 4.18 The existing village hall and recreation ground is located to the south of Newton Road with development to the north, east and west. The site current forms an open boundary, but development presents the opportunity to create a more formal green setting to this asset framing it within the settlement. The development can also provide further upgrades to facilities and management in a similar way to the recent development to the north.
- 4.19 Provision of a range of new open spaces including a community orchard, areas of equipped play and trim trail. A new network of recreational paths provide access to existing play and sports facilities.
- 4.20 New Locally Equipped Area of Play (LEAP).
- 4.21 New network of recreational paths providing access to existing play and sports facilities.

Fig 4.2: Landscape Framework Plan



KEY BENEFITS

4.22 The proposed scheme will deliver 120 dwellings and will generate a number of economic, social and environmental benefits, both during the build phase and once the homes are built and occupied. These benefits are outlined below:

CONSTRUCTION	 <h3>Temporary employment</h3> <p>Over the expected 2.5-year build time frame, an estimated 128 temporary jobs could be supported per annum. This includes on-site jobs and employment supported in the wider economy via supply chain effects. Construction supports around 3,500 jobs in NW Leicestershire¹ and the sector is likely to see new employment opportunities created by the scheme.</p>	OPERATIONAL	 <h3>Attracting economically active people to North West Leicestershire</h3> <p>It is estimated that 145 economically active and employed residents could live in the new homes, of which around 52% could be working in higher value occupations.</p>
	 <h3>Contribution to economic output</h3> <p>The build phase could generate around £20.1million (current prices) in gross value added, which is a proxy for economic output.</p>		 <h3>Generating additional expenditure</h3> <p>Annual household expenditure from the scheme is estimated to be around £3.5million, of which approximately £1.6million is estimated to be spent on food & drink, leisure etc. This could support around 10 jobs in the wider economy.</p>
	SOCIAL		 <h3>120 new homes</h3> <p>To support a balanced housing market by providing open market choice, including additional homes for younger people, an ageing population and families.</p>
 <h3>Affordable Homes</h3> <p>The provision of 36 additional affordable homes (based upon current affordable housing policy). This will assist in meeting the affordable housing need of 41 dwellings for Heather identified within the Local Housing Need Assessment.</p>		 <h3>Council Tax revenue</h3> <p>Once built and fully occupied, the scheme is estimated to generate approximately £230,900 on an annual basis in Council Tax payments, or around £2.3million over 10 years at 2021/22 rates³.</p>	
 <h3>High Quality Open Spaces</h3> <p>The provision of over 4 hectares of new publicly accessible open space to include the provision of new equipped play areas, trim-trail and community orchard. These high quality open spaces provide amenity value and opportunities for residents to meet up and socialise.</p>		 <h3>Biodiversity</h3> <p>The proposal provides an opportunity to achieve biodiversity net gain through the strengthening of existing and creation of new habitats.</p>	

¹ Based on data from the 2020 Business Register & Employment Survey, published by the Office for National Statistics. ² https://www.hbf.co.uk/documents/7876/The_Economic_Footprint_of_UK_House_Building_July_2018LR.pdf
³ Assumes the homes fall in Band D for Council Tax in Heather, North West Leicestershire, which is £1,923.87 as of 2021/22.

BLOOR HOMES[®]



Prepared by Evolve Planning & Design Ltd
on behalf of Bloor Homes in March 2022.

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Contact: Neil Cox

APPENDIX 2

Landscape Summary Report

Land off Newton Road, Heather

Landscape Summary Report

March 2022 – Issue 3

Client: Bloor Homes

Job Reference: GL1608



Report Issue 1: 21/02/2022

Status: Draft

Author: Jonathan Golby CMLI

Report Issue 2: 07/02/2022

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1 INTRODUCTION

- 1.1 The following landscape summary report has been prepared by Golby + Luck Landscape Architects following instruction by Bloor Homes to review the land to the west of Newton Road, Heather (the site); see **GL1608 01**.
- 1.2 This report has been carried out following field work completed in November 2021 and February 2022. Fieldwork included a walkover of the site following the network of existing public rights of way, and the wider consideration of the visual setting of the site from the local network of public rights of way and the public highway.
- 1.3 The purpose of this report is to:
- Consider the baseline landscape and visual setting of the site; and
 - Provide an assessment of the landscape and visual sensitivity of the site.
- 1.4 In the production of this report reference has been made to the following documents and information sources:
- North West Leicestershire District Council – North West Leicestershire Local Plan March 2021 (the Local Plan);
 - Natural England – National Character Area Profiles NCA 71 – Leicestershire and South Derbyshire Coalfield (NCA71);
 - North West Leicestershire District Council – North West Leicestershire Landscape Sensitivity Study – prepared by Gillespies July 2019 (the LSA);
 - The National Heritage List – Historic England
 - DEFRA Magic Database;
 - Ordnance Survey information Explorer 1:20,000 and Street Plus 1:10,000;
 - Google Earth aerial photography; and
 - Historic mapping reference online.



2 SITE CONTEXT & DESCRIPTION

- 2.1 The site extends to approximately 8.2 hectares of arable farmland comprising three fields and an existing farmstead (White House Farm) at the southern settlement edge of Heather in Leicestershire; see **GL1608 01**.
- 2.2 The site adjoins the existing modern residential settlement to the north associated with Swebstone Road, Old Cow Sheds Drive, and Cotsmore Close. To the north-west is an existing industrial area that extends south from Swebstone Road, separated from the housing to the east by an existing recreation ground and Heather Village Hall. To the east the site is bound by Newton Road that provides access to White House Farm located in the easternmost field within the site. Ribbon development extends south along Newton Road from the main body of the settlement that includes mixed commercial and residential development. To the south and west the site is bound by an area of maturing National Forest planting.
- 2.3 In terms of settlement, Heather is a medium size village located to the west of Ibstock and south-west of Coalville. It forms part of the settled coalfield landscape that extends west from the M1 motorway where settlement and industrial development are common elements within the landscape, often located on the ridgelines that extend between localised valleys.
- 2.4 Heather is historically a linear settlement extending north to south along Main Street between the junction with Pisca Lane to the north, and White House Farm to the south. By the early twentieth century ribbon development had extended along Swebstone Road to the west with modern infill development occurring between the 1960's to early 2000's to create the settlement that seen today. Most recent development has occurred at the western edge of the settlement on the north side of Swebstone Road extending the settlement up to the National Forest planting further to the west.
- 2.5 The Church of St John the Baptist (Grade II*) sits central to the village set on the western slopes of the localised valley that extends between Heather and Ibstock to the east. The Manor House (Grade II*) is located just to the south of the church fronting Main Street with 31-35 Main Street (Grade II), Beresford House with former farm buildings (Grade II) located further to the south; see **GL1608 02**.
- 2.6 The valley setting between Heather and Ibstock was the former location of the Heather Brick and Terra Cotta works and a flour mill, with the Heather Colliery to the north all



- connected by the former alignment of the Ashby and Nuneaton Branch of the London & North West and Midland Railway. The valley continues to be the setting of local industry with the former colliery to the north having been restored as the Sence Valley Forest Park.
- 2.7 To the north St John's Park and Heather St John's Football Club define the gateway to the settlement along Ravenstone Road. To the west of the settlement is Heather Hall with its associated remnant parkland setting. To the south the landscape is defined by the mosaic of farmland, maturing National Forest planting, and waterbodies more closely associated with the lower slopes of the Sence Valley that are a reminder of the former minerals extraction activity.
- 2.8 In terms of infrastructure, Heather is located approximately 9km to the west of Junction 22 of the M1 motorway, and approximately 5km to the east of Junction 12 of the A42. Pisca Lane and Mill Lane extend east to connect with Ibstock and Coalville, Swepstone Road extends west to connect with Measham, Newton Road extends south to connect with Newton Burgoland, and Ravenstone Road extends north to connect with Ravenstone.
- 2.9 In terms of land use and vegetation cover, Heather is surrounded by a mixture of predominantly arable farmland, maturing National Forest planting, pockets of industrial development, artificial waterbodies generally located to the east in the lower setting of the Sence Valley, and the wooded setting of the Sence Valley Forest Park to the north-east. The traditional vegetation pattern comprises native hedgerows creating a medium scale geometric field pattern with intermittent tree cover that generally comprises oak and ash. This pattern has become fragmented through the development of a more structured network of woodland planting delivered as part of the National Forest initiative. In the lower reaches of the valley setting to the River Sence there is an increase in pasture with a more varied field pattern and riparian vegetative setting.
- 2.10 In terms of landform and hydrology, the local landscape setting is defined by a rolling valley setting created by a network of local watercourses, notably the River Sence that runs to the east of Heather. The settlement extends between the 115m above ordnance datum (AOD) contour to the east of the settlement to approximately 130m to the north and west; see **GL1608 03**. The landform continues to rise to the west of the settlement to a local high-point of approximately 137m AOD at Cattows Farm.
- 2.11 The site falls from the southern edge of the settlement at approximately 130m AOD to a low-point of approximately 115m AOD at the south-east boundary adjacent to Newton



Road. Beyond the site to the south the landform falls to approximately 110m AOD before rising towards Springback Farm at approximately 125m AOD.

- 2.12 In terms of access and recreation, the site is crossed by two public rights of way; see **GL1608 01**. Footpath Q60 crosses the site between Swepstone Road to the north and Newton Road to the south. Footpath Q59 crossed the eastern field within the site connecting between Newton Road and footpath Q60. Beyond the site footpath Q61 extends west from footpath Q60 towards Heather Hall. To the east of the site there are a number of footpaths associated with the valley setting that extends between Heather and Ibstock.
- 2.13 In terms of designation, the site is not covered by any landscape designation that would suggest an increased value or sensitivity to change and is not covered by any statutory or non-statutory designation would prohibit its development for residential purposes; see **GL1608 02**.
- 2.14 Heather does not have a designated Conservation Area and Heather Hall to the west is separated from the site by the contained vegetated setting of its remnant parkland. The development of the site would not have a negative impact on the historic core of the settlement and its associated heritage assets.



3 LANDSCAPE & VISUAL BASELINE

Landscape Setting

3.1 At a national level the Natural England Character Area Profile study identifies the site as being located within the Leicestershire and South Derbyshire Coalfield (NCA71). The key characteristics of NCA71 are identified as:

- *“The landscape is unenclosed with shallow valleys, subdued sandstone ridges and a gently undulating plateau.*
- *There are heavy, poorly draining soils over the Coal Measures and mudstones of the Mercia Mudstone Group, and free-draining soils on the sandstone ridges.*
- *The area forms part of a regional watershed between the River Mease to the south and the River Soar to the east and has many minor, swift flowing streams draining the area, for example Saltersford Brook and Rothley Brook. Flooded clay pits and mining have resulted in many subsidence pools or flashes, which in combination with Thornton Reservoir provide valuable open water sites for nature conservation and recreation.*
- *The area has a developing woodland character that is heavily influenced by the work of The National Forest initiative, which augments locally dense riparian woodland and prominent amenity trees around settlements with developing woodland on former colliery sites.*
- *Small- to medium-sized fields occur with a wide variation in field pattern, including some narrow, curved fields that preserve the strips of the open field system. Where arable production predominates, fields have been enlarged. Hedgerows are low with a few scattered hedgerow trees and in places show the effects of former open cast workings.*
- *Agriculture comprises a mixture of arable and mixed sheep and beef units and, to a lesser extent, dairy. Combinable crops are grown on the freer-draining soils. Potatoes are grown in rotation on the heavier soils around Measham and Packington.*
- *There is remnant acid grassland over sandstone with neutral grassland in the valleys, and acid heathland on open mosaic habitats on previously developed land, particularly colliery spoil. The River Mease SSSI and SAC has internationally*



important spined loach and bullhead fish and nationally important white-clawed crayfish, otter, and aquatic plants such as water crowfoot.

- *Rich heritage assets include Ashby-de-la-Zouch medieval castle and industrial heritage including the Ashby Canal and Moira Furnace, one of the best examples of an early 18th-century blast furnace. Archaeological assets include a moated medieval village at Desford and the Roman town at Ravenstone.*
- *Traditional vernacular is predominately locally manufactured red brick with tile or slate roofs. Some older buildings are of stone. Locally characteristic around Measham is a double-sized brick of the late 18th century known as the 'Measham gob'. There are many three-storey brickbuilt farmhouses.*
- *The settlement pattern is dominated by mining settlements. Isolated hamlets along the roadsides and small villages centred on a church contrast with extensive areas of 20th-century housing and prominent industrial and commercial distribution warehouses at the edge of larger centres, notably Ashby-de-la-Zouch, Measham and Coalville.*
- *Around Coleorton, a more dispersed pattern of settlement associated with small-scale bell pit mining of the 13th century, spoil heaps, small fields, a dense network of footpaths and a fine example of historic parkland landscape contribute to the distinctiveness of this part of the coalfield landscape.*
- *The area is easily accessible by major roads and rail and is close to East Midlands Airport. Long-distance recreational routes include the Ivanhoe Way, the Leicestershire Round, and a wide network of local trails and footpaths associated with the recreational assets of The National Forest. The Ashby Canal also provides a link to the wider area."*

3.2 These key characteristics are visible in the landscapes surrounding the site, notably the presence of mining settlements, the mixed arable and pastoral setting of farmland, and emerging setting of woodland associated with the National Forest initiative.

3.3 At a local level the LSA includes a more detailed assessment of the landscape surrounding the key settlements within the District that includes Heather. Three sensitivity parcels are identified at the settlement edge that cover the northern fringes (16HEA-A), the southern and western fringes (16HEA-B) that includes the site, and the eastern fringes (16HEA-C); see **GL1608 04**.



- 3.4 16HEA-B is assessed as being of medium landscape and visual sensitivity to housing development. This compares to 16HEA-A to the north of the settlement that is assessed as medium-low landscape and visual sensitivity to housing development, and 16HEA-C to the east that is assessed as medium landscape sensitivity and medium-low visual sensitivity.
- 3.5 This assessment finding alone is not indicative of the landscape and visual sensitivity of the site, or the wider immediate settlement edge of Heather. This assessment parcel extends to include the wider landscape setting of Heather Hall that artificially elevates the sensitivity of the site. Heather Hall benefits from a contained landscape setting to the west of the settlement that is both separate due to its wooded framework, and distinct due to its remnant parkland character that contrasts with the wider setting of arable farmland and maturing National Forest planting at the settlement edge.
- 3.6 A more detailed consideration of the assessment analysis for 16HEA-A and 16HEA-B reveals that the landscape and visual issues relative to each settlement edge are comparable, except for the increased sensitivity identified in the landscape associated with Heather Hall. The assessment text states:
- “The grounds of Grade II Listed Heather Hall are particularly susceptible to change as they form an important landscape setting for the listed building and there are a number of TPOs. There is some sense of tranquillity, however this is reduced in proximity to Sweptone Road and the settlement edge, including a new housing development and an industrial estate to the south of Sweptone Road.”*
- 3.7 Given that the landscape associated with Sweptone Road includes the site and recent housing development to the north it is clear that this landscape is of reduced susceptibility to change when compared to the landscape associated with Heather Hall, and given the contained remnant parkland setting to the Hall it can be concluded that its increased sensitivity does not extend to the site or immediate settlement edge.
- 3.8 When considered in isolation the landscape and visual sensitivity of the site should have been correctly assessed in this report as medium-low sensitivity. The Landscape Sensitivity plan in this report illustrates how 16HEA-B should be amended to exclude the site, the adjoining industrial site, recent housing development to the north of Sweptone Road, and housing/office development extending south along Newton Road, none of which can be classified as medium to high sensitivity; see **GL1608 04**.



- 3.9 The LSA also details mitigation considerations for Heather. The plan identifies the site as being an area of higher visual sensitivity to development with a key view identified from public footpath Q60 to the south.
- 3.10 Heather is by its very nature a ridgeline settlement, with housing extending from the 115m AOD contour to above the 130m AOD contour. The site sits at a similar elevation to the western edge of the settlement with the northern and western fringes rising higher across the broader section of plateau that extends between Heather and Cattows Farm. The housing on the southside of Swepstone Road comprises a row of late twentieth century semi-detached and terraced properties that are tall and provide a defined settlement backdrop to the site. To the south the maturing National Forest planting extends vertically beyond the ground plane of the site to the extent that views into the site are substantially screened even in winter months with limited leaf cover. This in turn foreshortens any view across the site from the south with the settlement edge presenting at the edge of the woodland. The view is further influenced by the industrial setting to the west of the site that is a detracting element, further reinforcing the developed nature of the skyline in view.
- 3.11 The overlooking properties and users of the local footpath network are of increased susceptibility to change within the site, but this is no different to the visual setting at any other part of the settlement edge. Whilst the southern edge of the settlement may present in a view from the wider valley the site affords screening from the established woodland setting and is framed by an established setting of housing and industrial development that defined the skyline. The only way that the site could be considered of higher visual sensitivity is to development that would introduce a new or visual discordant element into the land landscape, or by development that would extend well beyond the established developed skyline.
- 3.12 A more detailed consideration of the value and associated sensitivity of the site can be confirmed through its assessment against the range of factors set out under Table 1 in Technical Guidance Note 02/21 Assessing landscape value outside national designations (TGN02/21) published by the Landscape Institute in February 2021.

Table 1 – Evaluation of Landscape Value

Contributing Factor	Evaluation	Local Value	Site Value
Natural heritage	The site does not contain any designated natural heritage assets, and its features that include sections of native hedgerow, limited tree cover and	Medium to low	Medium to low



	managed farmland are not considered to be of any greater than local value.		
Cultural heritage	The site does not contain or adjoin any designated heritage assets, and does not contain any undesignated landmarks, structures, or features. The industrial heritage is evident in the landscape to the east of the settlement, and to the south-west the remnant parkland setting contains Heather Hall. These features are considered to be of local value. Farming is the dominant land use with the evolution of agricultural practice diluting any appreciable dimension of time and depth in this landscape. The large tracts of maturing woodland create a sense of modification and restoration that again further dilutes any sense of time of depth.	Medium	Medium to low
Landscape Condition	Again, the presence of maturing woodland throughout this landscape instils a sense of modification and restoration that affects perceptions of condition and quality. The reality is that the farmland associated with the site and wider landscape is well maintained, although the intensification of farming practice has clearly impacted on the condition and quality of boundary hedgerows and likely to have resulted in a loss of mature tree cover. The new woodland areas also appear well maintained. However, the over perception of condition and quality is moderate to low.	Medium to low	Medium to low
Associations	There are clear association between the wider landscape setting of Heather and its former industrial past, notably to the east of the settlement in the valley setting between Ibstock, and to the north-east where the Sence Valley Forest Park provides interpretation of the mining history of this landscape. There are however no such association with the site.	Medium	Medium to low
Distinctiveness	Beyond proving what can be described as a relatively typically setting common to much of the wider farmed Coalfield landscape, the site and wider framework of open farmland interspersed with maturing woodland is not particularly distinctive. The Sence Valley Forest Park comprises a large area of woodland in and otherwise settled farmland making a more distinctive contribution. The site and its immediate setting has no distinctive features beyond the rather negative contribution of the industrial area.	Medium	Medium to low



Recreational	The recreation ground to the north of the site will be of local value, as will the public rights of way crossing the site. The Sence Valley Forest Park to the north-east of the settlement will be of increased value providing a rural recreational resource to the wider County.	Medium	Medium
Perceptual (Scenic)	The immediate setting of settlement and industry combined with the modified woodland setting of the National Forest establish a level of intervention at a site and local level that diminishes the perceived scenic quality of this landscape.	Medium	Medium to low
Perceptual (Wilderness and tranquillity)	The immediate setting of settlement and industry in combination with the wider settled nature of the surrounding landscape limits any associated wilderness and tranquillity value. Perceptual qualities increase over distance from the settlement, except when moving east from Heather towards Ibstock where there is a constant relationship with both settlements and the industrial setting that exists between them.	Medium	Medium to low
Functional	Beyond its existing use as farmland the site does not provide any other recognised landscape function.	Medium to low	Medium to low

3.13 These findings confirm that the immediate setting of the site is of medium to low landscape value and given the established setting of settlement and local industry can only be considered as being of relatively low susceptibility to change in the form of residential development, leading to an overall sensitivity of medium to low; see **GL1608 04**.

Visual Setting

3.14 The landscape setting to the south of Heather is accessed via a network of public rights of way and local highways. Local receptor groups to the site include:

- Open views from the properties backing onto the site at Sweptstone Road;
- Open views from the recreation ground and Heather Village Hall;
- Open views from the sections of public rights of way crossing the site;
- Open and filtered views from sections of Newton Road and associated properties to the east of the site;



- Open and filtered views from section of the public rights of way to the east of the site; and
 - Filtered views from sections of the public rights of way, Newton Road, and Springback Farm to the south of the site.
- 3.15 This report includes a series of representative views taken from the local highway, public rights of way, and publicly accessible land in the vicinity of the site; see **GL1806 05** to **07**. View locations are identified in the Site Location plan; see **GL1806 01**.
- 3.16 To the north the visual setting of the site is contained by the existing settlement edge at Swebstone Road. View 1 is taken from the recreation ground adjacent to Heather Village Hall looking out across the northern boundary of the site with the valley setting beyond. The established residential setting to the north of the site provided as backdrop to the site, as does the industrial setting to the north-west. White House Farm is visible within the site to the south-west. The wider setting of the site is framed by the maturing forestry planting at the southern boundary that partially screens views of the valley setting beyond.
- 3.17 View 2 is taken from public footpath Q60 at the northern boundary of the site. The eastern field within the site sits slightly lower in the landscape, affording an established framework of settlement to the north and north-east. White House Farm is visible to the south with views of the wider valley setting to the south almost entirely screened by the intervening maturing woodland cover.
- 3.18 View 3 is taken from public footpath Q60 at the mid-slope of the site looking across the western field towards the industrial setting at the north-west corner of the site. The established residential setting to the north is openly visible, and Heather Village Hall is visible just above the field gate. From the mid-slope of the site there is a limited appreciation of the wider landscape setting.
- 3.19 View 4 is taken from public footpath Q60 at the southern boundary of the site looking back towards the settlement edge and White House Farm. The lower southern slopes of the site are visually contained affording a limited appreciation of the wider landscape setting.
- 3.20 View 5 is a key view taken from public footpath Q60 close to the junction with Newton Road. It is from this broad location that the view for consideration is identified in the LSA. From this location the site is contained by the setting of maturing forestry planting to the south that screens views of the existing agricultural land. This in turn foreshortens the view between the forestry planting and existing settlement edge with the site almost becoming



hidden. If development for housing, the new properties would likely sit below the existing roofscape, substantially screened in wider views from the valley to the south. This would be the case even in months with limited leaf cover as illustrated in this view.

- 3.21 The maturing forestry planting provides what can be described as in-situ mitigation that most developments are reliant upon to make them acceptable in landscape terms. The forestry planting contains the setting of the site making it a separate visual component from the wider valley setting that contrasts in its open farmland character. This demonstrates that the LSA has incorrectly identified the site as being of any greater visual sensitivity when compared to the landscapes to the north, east and west of the settlement.
- 3.22 View 6 is taken from public footpath Q59 to the east of the site and Newton Road. From this location the sloping farmland setting to the east of White House Farm is visible within the site, set within an established framework of residential and commercial development. Development within the site would be openly visible from this location altering the setting of the ridgeline to the west. However, this change would not introduce a new or visually discordant element, and instead alter the arrangement of existing features that currently define the visual setting of this landscape.



4 SUMMARY AND CONCLUSIONS

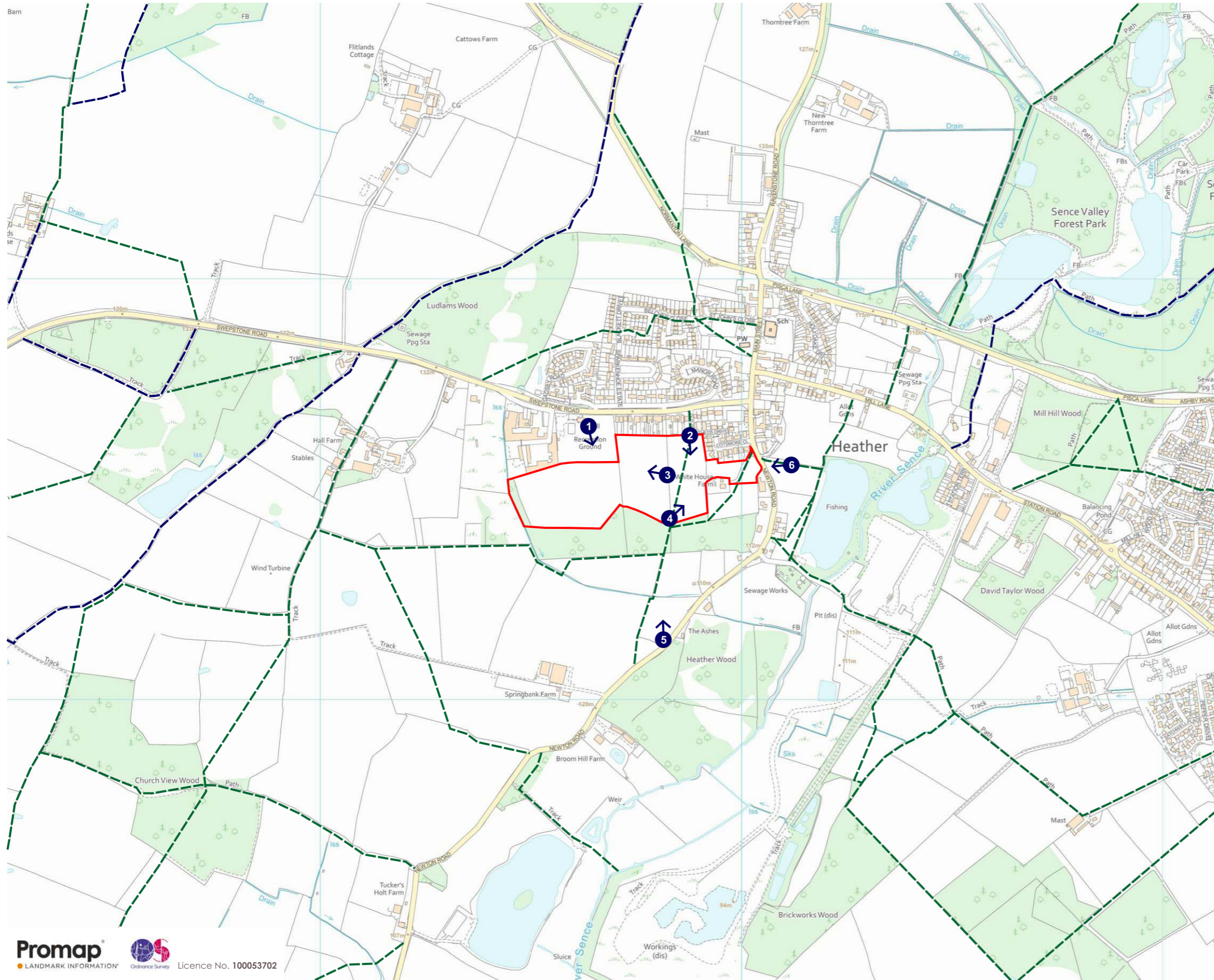
- 4.1 The site is located at the immediate southern settlement edge of Heather and is not the subject of any environmental designations that would suggest an increased value or sensitivity to change. The site is also not the subject of any statutory or non-statutory designation that would prohibit its development for residential purposes and does not contain features that are considered to be of notable value.
- 4.2 The site is contained by a framework of settlement and highway infrastructure to the north and east, industrial development to the north-west, and maturing National Forest planting to the south and west.
- 4.3 The site and wider settlement extend across the western ridge of the valley setting to the River Sence, occupying an elevated location that is entirely in keeping with local settlement character. The site falls from the ridgeline towards a localised valley setting to the south where the maturing forestry planting separates it from the wider valley setting that extends further south.
- 4.4 There are two public rights of way that provide access across the site and into the wider setting of farmland to the south of Heather. Beyond this the site is maintained as farmland and does not provide any defined access or recreation function.
- 4.5 Heather and the site form part of the Leicestershire Coalfields landscape comprising a typical mixture of settled rolling farmland interspersed with maturing woodland planting associated with the National Forest.
- 4.6 The site has been assessed as part of the Districts landscape sensitivity assessment (LSA) as part of land parcel 16HEA-B assessed as being of medium landscape and visual sensitivity to housing development. In contrast land parcel 16HEA-A to the northern fringes of the settlement is assessed as medium to low landscape and visual sensitivity, and 16HEA-C to the east medium landscape sensitivity and medium to low visual sensitivity.
- 4.7 Land parcel 16HEA-B assesses the site as part of the wider land parcel that includes the Grade II listed Heather Hall and its associated remnant parkland setting. The hall and its landscape are specifically identified in the assessment as being of increased value and sensitivity to change, with the sensitivities of the site being comparable to the settlement boundaries to the north and east of the settlement.







- 4.8 This report includes an assessment of landscape value and sensitivity specific to the site that confirms the findings of medium to low landscape sensitivity.
- 4.9 The LSA also identifies the site as being an area of higher visual sensitivity, with a view identified from footpath Q60 to the south for consideration.
- 4.10 This report includes a series of representative views from the landscape surrounding the site and concludes the following in relation to its visual setting and correlating sensitivity:
- The site is visually contained to the north with receptor groups including private views from the settlement edge, views from the public highway and rights of way, and views from the recreation ground and village hall. These receptors groups are typical of the settlement edge and not considered to be of greater value or sensitivity when compared to any other location;
 - To the east the visual setting is contained to the immediate settlement, Newton Road and sections of public footpaths Q58 and Q59. Development within the site will present as part of the established settlement in these views, within what is already a settled landscape;
 - To the west the site is contained by the heavily treed setting at the eastern boundary of the remnant parkland setting of Heather Hall. This boundary is also defined by the established industrial setting that is a detracting element; and
 - To the south the site is substantially screened in views from the wider farmed valley setting. Development within the site will sit below the established setting of housing to the south of the site that defines the visual horizon. The maturing forestry planting will heavily screen views of development within the site, providing in-situ landscape mitigation that developments are often reliant upon to secure a long-term reduction in visual effects.
- 4.11 It is clear that when considered in isolation from the wider land parcel 16HEA-B the site is of medium to low landscape sensitivity and given the up-to-date field based evidence detailed in this report cannot be considered as a landscape possessing an increase visual sensitivity. Equally, development within the site is unlikely to adversely effect views from the wider landscape setting to the south given the scale and nature of maturing forestry planting that defines its southern boundary.



Figures



Key

-  Site boundary
-  Public footpath
-  Public bridleway
-  Photographic view locations

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north

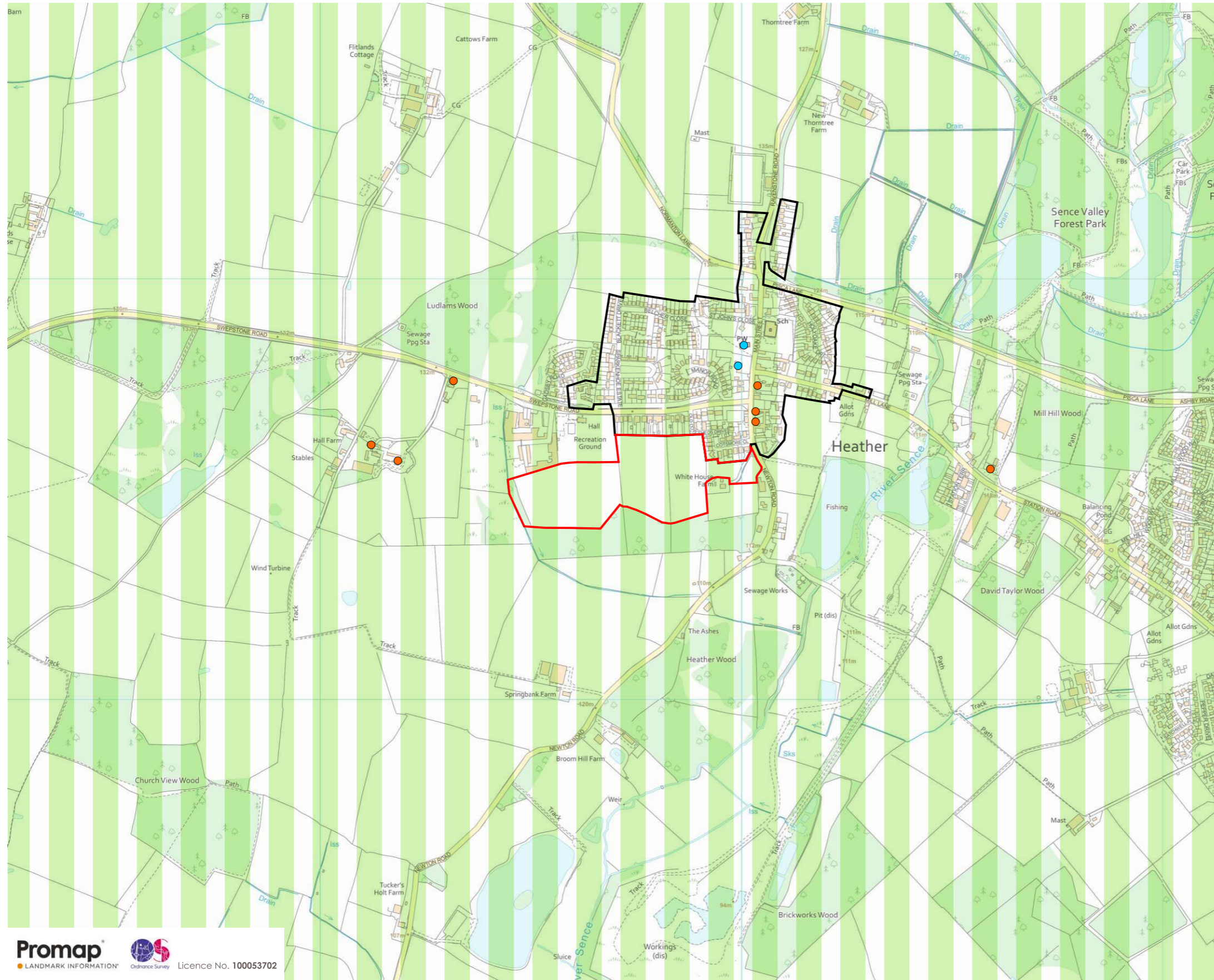
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Number/Figure
GL1608 01
Scale
1:10000@A3
Date
12/02/2022
Checked
SG

Project
Newton Road, Heather
Drawing title
Site Location
Client
Bloor Homes

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landscape architects



Key

-  Site boundary
-  Limits to Development
-  National Forest
-  Grade II* Listed Building
-  Grade II Listed Building

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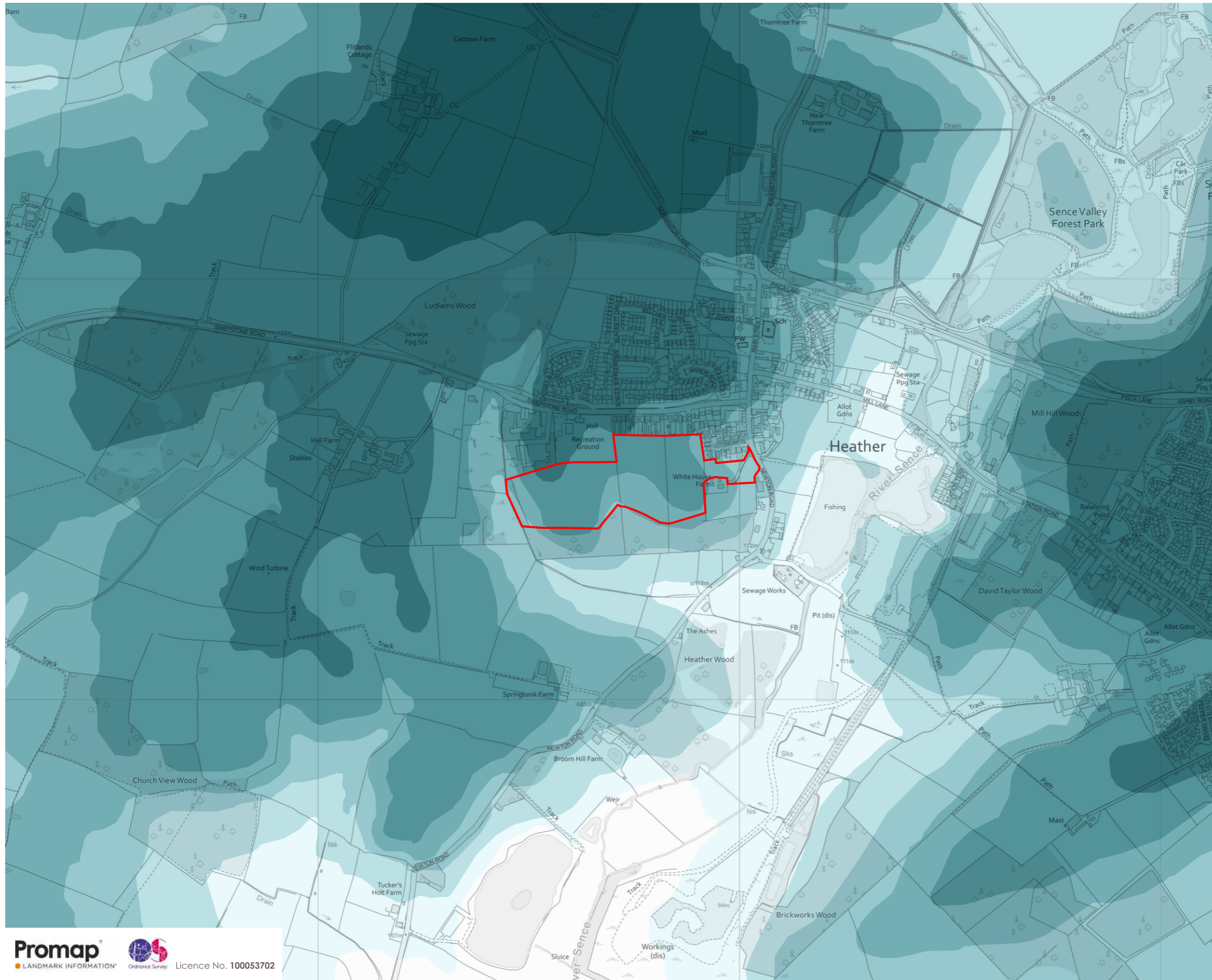
north

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Number/Figure GL1608 02	Project Newton Road, Heather
Scale 1:10000@A3	Drawing title Designations
Date 12/02/2022	Client Bloor Homes
Checked SG	

golby+luck
landscape architects



Key

-  Site boundary
-  105m to 110m AOD
-  110m to 115m AOD
-  115m to 120m AOD
-  120m to 125m AOD
-  125m to 130m AOD
-  130m to 135m AOD
-  135m to 140m AOD

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Number/Figure GL1608 03	Project Newton Road, Heather
Scale 1:10000@A3	Drawing title Topography
Date 12/02/2022	Client Bloor Homes
Checked SG	

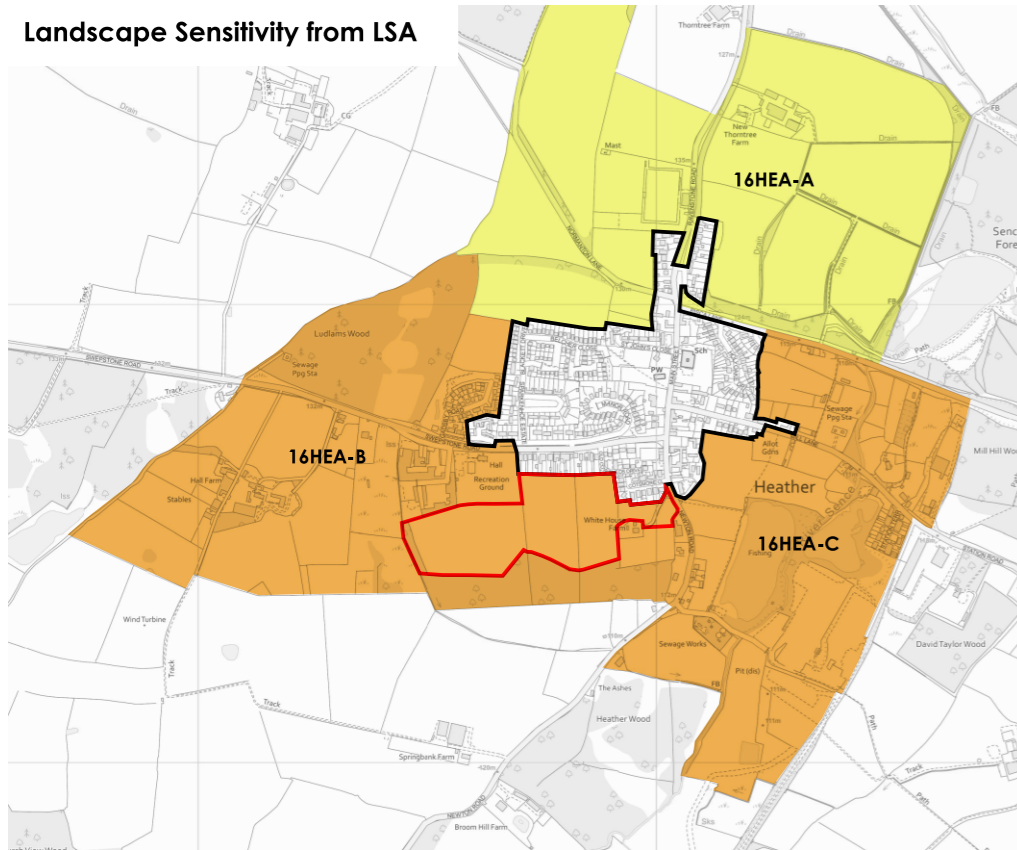
north

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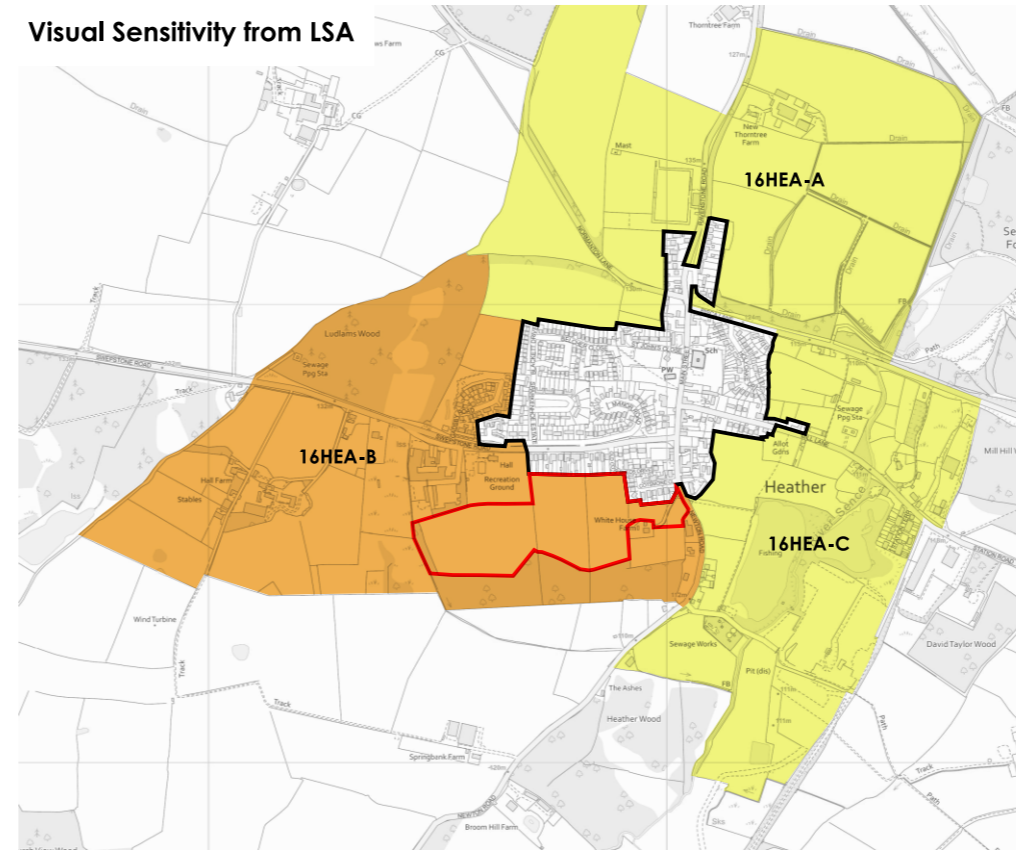
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



Landscape Sensitivity from LSA



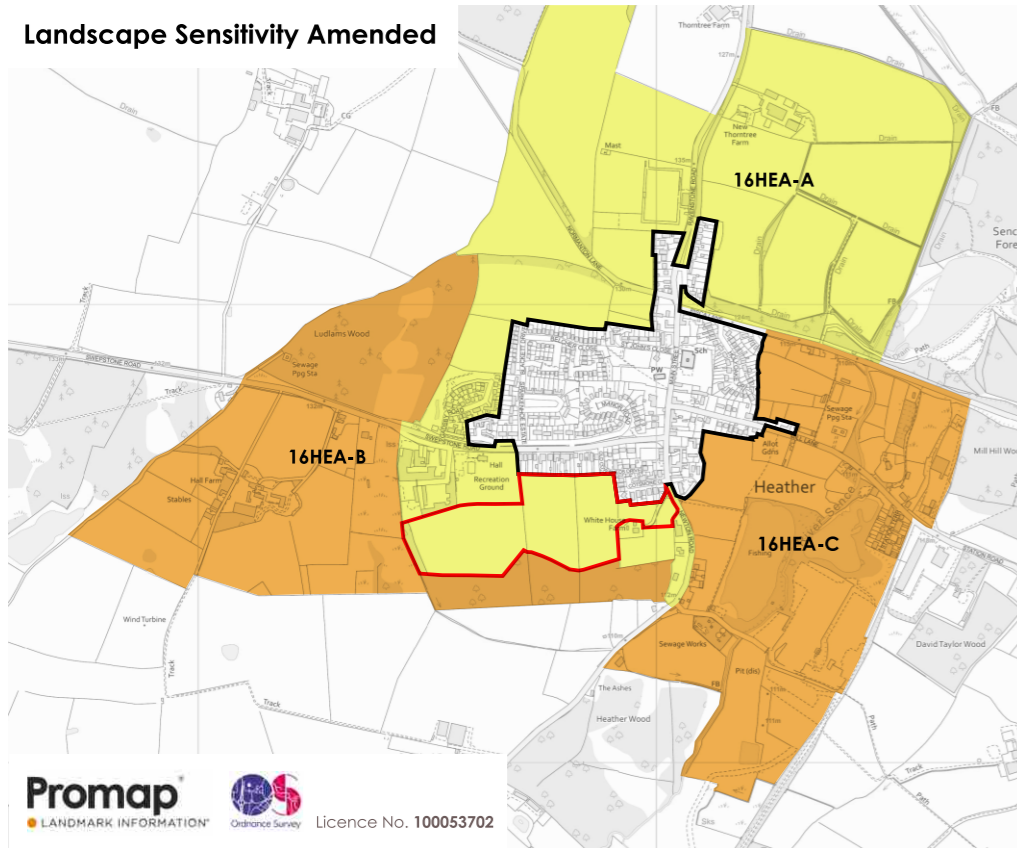
Visual Sensitivity from LSA



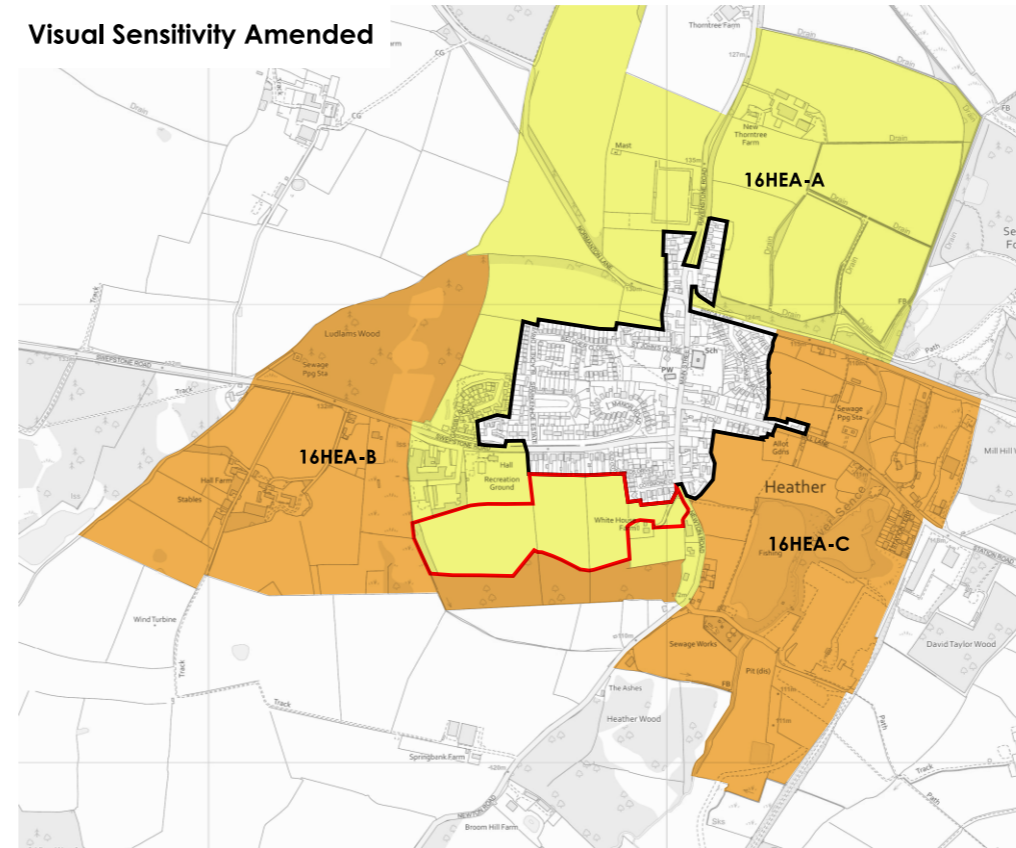
Key

-  Site boundary
-  Limits to Development
-  Medium Sensitivity
-  Medium - High Sensitivity

Landscape Sensitivity Amended



Visual Sensitivity Amended



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Number/Figure
GL1608 04
Scale
NTS@A3
Date
12/02/2022
Checked
SG

Project
Newton Road, Heather
Drawing title
Landscape Sensitivity
Client
Bloor Homes

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Approximate extent of site in view



View 1 - From the recreation and Heather Village Hall to the south of Swebstone Road looking south-east

Approximate extent of site in view



View 2 - From public footpath Q60 at the north boundary of the site adjacent to Old Cow Shed Drive looking south

Number/Figure
GL1608 05
Scale
NTS@A3
Date
12/02/2022
Checked
SG

Project
Newton Road, Heather
Drawing title
**Photographic Views
1 & 2**
Client
Bloor Homes

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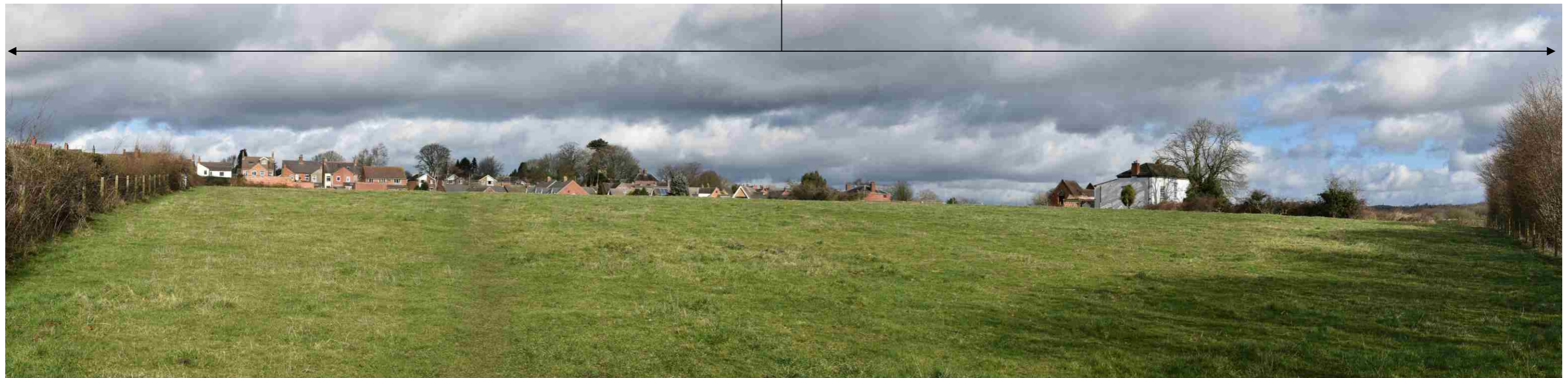
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Approximate extent of site in view



View 3 - From public footpath Q60 at the mid-slope of the site looking west towards Heather Village Hall and the industrial setting beyond

Approximate extent of site in view



View 4 - From public footpath Q60 at the southern boundary of the site looking north towards the modern settlement edge

Number/Figure
GL1608 06
Scale
NTS@A3
Date
12/02/2022
Checked
SG

Project
Newton Road, Heather
Drawing title
**Photographic Views
3 & 4**
Client
Bloor Homes

Approximate extent of site in view



View 5 - From public footpath Q60 approximately 330m from the site looking north

Approximate extent of site in view



View 6 - From public footpath Q59 approximately 80m from the site looking east

Number/Figure
GL1608 07
 Scale
 NTS@A3
 Date
 12/02/2022
 Checked
 SG

Project
 Newton Road, Heather
 Drawing title
**Photographic Views
 5 & 6**
 Client
 Bloor Homes

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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...

Q1

The National Forest Company welcomes the reference to conserving and enhancing the National Forest at objective 9 of the Local Plan objectives.

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

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

The National Forest Company supports the policy and part (v) in particular as this can be met through the creation of green infrastructure.

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

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...

Q19

The National Forest Company supports the policy as it seeks to increase the levels of renewable and low carbon energy generation.

The National Forest Company considers that setting pro rata targets across the plan period for renewable energy will not respond quickly enough to the climate change emergency. The National Forest Company would suggest that an initially higher renewable energy target should be set to encourage renewable energy generation to be created sooner.

The National Forest Company considers that part 2c) needs to be rewritten to ensure that a broad range of landscape and biodiversity enhancements are secured, not just linked with any impacts.

The National Forest Company considers that part 2) should include that where public rights of way pass through or near to the site, planning applications will need to ensure mitigation and enhancement of public rights of way.

The National Forest Company considers that the preference at part 4) for solar farms to be on previously developed land is overly restrictive, particularly given the information provided within paragraph 9.12.

The National Forest Company is supportive of part 5. It is considered that the proportion of the development's energy needs to be met in this way should be included in the 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...

Q24

The NFC is supportive of a policy which requires a reduction of carbon emissions.

The National Forest Company considers that this could be combined with part 5 of the renewable energy policy, or perhaps cross referenced.

The National Forest Company considers that part 3 of this policy could include an expectation of using timber in construction to lock away carbon and increase demand for timber construction products.

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

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...

Q25

The NFC is supportive of a policy for water efficiency standards.

(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

Y

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

Eilish Gardner

Date

14/03/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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.

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

On behalf of Davidsons and Western Range.

Date: 14 March 2022 | Pegasus Ref: EMS.2774

Author: Guy Longley





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1. Introduction

- 1.1. These representations have been submitted by Pegasus Group on behalf of Davidsons Developments Limited and Western Range, in response to the Development Strategy and Policy Options consultation.
- 1.2. Our clients wish to make a number of comments on the emerging development strategy, particularly in relation to the options for the future scale and location of housing development. We also comment on the proposed approach to policies relating to housing matters and renewables and low carbon.
- 1.3. These representations are made in relation to our clients' interests at Land off Leicester Road, Ibstock.
- 1.4. Our clients have previously engaged in the preparation of the plan including submissions to the Call for Sites. Appendix 2 details of our client's land interests and updates the previous SHLAA site plan for the site (SHLAA reference Ib18) ahead of the site assessment process. The additional land to be added to Ib18 is show with a blue line and provides the opportunity to deliver further benefits as part of the site.
- 1.5. Appendix 3 provides an up-to-date indicative concept plan showing how the extended site could deliver suitable and sustainable development of between 400-500 homes to help meet the Council's future housing requirements. It would also deliver a new school, community building extra care facility, link road, biodiversity net gain, formal open space and recreation.
- 1.6. The following sections respond to the relevant questions in the Options consultation.

2. Representations

- 2.1. The following sections set out our representations in relation to specific topic areas and proposed policies set out in the consultation document.

3. Settlement Hierarchy

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

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

- 3.1. The Options Paper sets out a revised settlement hierarchy, proposing amendments to the current hierarchy to rename Small Villages as Local Housing Needs Villages and Hamlets as Other Villages/Settlements and some adjustments to villages falling within the lower levels of the hierarchy.
- 3.2. Ibstock continues to be identified as one of three Local Service Centres, along with Kegworth and Measham, the third level of the hierarchy below the Principal Town of Coalville and the Key Service Centres of Ashby and Castle Donington.
- 3.3. The Settlement Study, 2021 sets out the findings of the review of the proposed settlement hierarchy. This shows that Ibstock performs well against the assessment criteria set out relating to the availability of convenience stores, access to education, employment, public transport accessibility and services and facilities scores. The settlement scores as well as the proposed Key Service Centres of Ashby de la Zouch and Castle Donington other than in relation to the numbers of convenience stores available. The settlement contrasts with the other Local Service Centres of Kegworth and Measham in having both primary schools and the Ibstock Academy.
- 3.4. Paragraph 5.6 refers to Ibstock not having full education provision but with Ibstock Community College catering for 11-14 years. However, under Project 24 – Age Range Changes, Ibstock Community College will transition to 11-16 years in August/September 2022. As a result, it will provide the same educational access as Castle Donington. With the provision of secondary education in the settlement, Ibstock is distinct from the other Local Service Centres of Kegworth and Measham.
- 3.5. The level of services in Ibstock, including educational provision, justify its inclusion as a Key Service Centre alongside Ashby de la Zouch and Castle Donington and the proposed settlement hierarchy should be amended accordingly.

4. Development Strategy Options for Housing

How Much Housing Should be Provided For?

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

- 4.1. The Options Paper explains that a number of options in relation to the scale of housing provision have been developed including:
 - 368 dwellings a year as a 'low scenario' based on the standard method;
 - 448 dwellings a year based on HEDNA, 2017 as a 'medium scenario';
 - 512 dwellings a year taken from the Leicester and Leicestershire Strategy Growth Plan as a 'high 1 scenario';
 - 730 dwellings a year based on the 2018 household projections as a 'high 2 scenario'.
- 4.2. The Paper sets out an assessment of these options and concludes that the high 1 and high 2 scenarios cover the most likely future requirement until such time as the issue of Leicester's unmet needs and its distribution is resolved. The 'high 1 scenario' would require some additional 1,000 dwellings to be allocated and the 'high 2 scenario' and additional 5,100 dwellings.
- 4.3. The key issue for North West Leicestershire and other authorities within the HMA is the issue of Leicester's unmet needs and reaching an agreement on its distribution. The anticipated scale of the unmet need at some 18,000 dwellings is significant and will have serious implications for authorities in preparing sound Local Plans. There remains an urgent need for the constituent authorities to reach an agreement on the distribution of unmet needs.
- 4.4. In addition to the issue of Leicester's unmet needs, the Council should also plan for a degree of flexibility in the plan to allow for changes in circumstances and the failure of components of supply to deliver the expected numbers of homes. The Local Plans Expert Group report, 2016 continues to provide a useful and relevant baseline in identifying the level of flexibility local planning authorities should look to build into their plans. The Report recommended a 20% allowance of developable reserve sites to provide extra flexibility to respond to change. Locally an example of flexibility provision in a plan is the Harborough Local Plan where a 15% contingency over and above their minimum housing requirement was included. The Local Plan Inspector specifically commented that this was to provide resilience and was not to be regarded as the Council's contribution to meeting Leicester's unmet needs.
- 4.5. On this basis the 'high1 scenario' is not likely to make sufficient provision to provide for a component of Leicester's unmet needs and provide sufficient flexibility to deal with uncertainty. In taking forward the plan the Council should plan for a minimum provision of 11,700 dwellings or 615 dwellings a year, requiring a residual provision of at least 2,900 dwellings. The 'high 2 scenario' is considered to represent a much more robust basis for taking the plan forward pending the HMA authorities agreement on the distribution of Leicester's unmet needs.

Where Should New Housing be Located?

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

- 4.6. The proposed Option 7b for the high 2 growth strategy is supported, however this option should be adjusted to reduce the reliance on Coalville Urban Area and increase the scale of housing proposed in the other sustainable settlements, in particular Ibstock, to take account of sustainable opportunities which will support housing delivery over the plan period.
- 4.7. In terms of the spatial options for the distribution of housing growth, the Options Paper considers 9 spatial options reflecting the proposed settlement hierarchy and also including a New Settlement option reflecting landowner promotion of land to the south of East Midlands Airport to provide a 4,740 home new settlement.
- 4.8. The nine options are combined with the alternative scales of growth to provide 16 options that have been assessed through the Sustainability Appraisal.
- 4.9. The overall conclusion of the Options Paper is that the following two options should be taken forward for further consideration.
- 4.10. Extract from Options Paper

Table 6 - options to be taken forward

Option	Description
High 1 scenario (1,000 dwellings)	
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
High 2 scenario (5,100 dwellings)	
Option7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

- 4.11. In preparing plans local planning authorities are required to ensure that their plans are sound, including that they are justified, with an appropriate strategy taking into account reasonable alternatives based on proportionate evidence (para 35 b)). The range of options selected appear to present a range of alternative development scenarios that reflect range of reasonable alternatives.
- 4.12. To ensure the delivery of the identified housing requirement, it is important that the plan provides for a suitable mix of sites in terms of both location and size to support the effective delivery of housing, particularly if the strategy is likely to include a new settlement option. Experience in Leicestershire in relation to the delivery of strategic sites is that they tend to have long lead in times and this needs to be considered in preparing a robust housing trajectory for the plan. The proposed strategy therefore needs to consider the provision of a range and mix of sites to ensure delivery in the early part of the plan period.
- 4.13. Under the 'high 1 scenario' the Options Paper discounts options 4a to 9a as they involve a new settlement option but at a scale too small to be likely to be viable. Paragraph 4.35 of the Options

Paper concludes that given the greater opportunity afforded by Option 3a for growth in villages, only this option should be taken forward.

- 4.14. For the 'high 2 scenario', which provides for a more appropriate scale of housing growth, Option 7b is proposed to be taken forward. Along with development directed towards the Coalville area as the Principal Town and a New Settlement, this option provides for new housing in Key Service Centres, Local Service Centres and Sustainable Villages. This approach to the spatial distribution of housing is supported as it allows for the allocation of a range of sites of different sizes in a range of locations, helping to provide a strategy that should ensure the delivery of housing in the early part of the plan period.
- 4.15. It is critical to the success of the Local Plan, that land availability, deliverability and opportunity to avoid significant negative impacts are also considered alongside the overall sustainability of individual settlements in distributing development.
- 4.16. The consultation document highlights significant doubts about the ability of the market to deliver a significant scale of growth in the Coalville Urban Area based on recent build rates and an understanding the market interest there. Whilst development in the Coalville Urban Area will form an important part of the overall strategy, the constraints in this area will mean the scale of development proposed here will need to be reduced and supported by greater scale of development in the sustainable service centres like Ibstock to ensure the Council can maintain a five year supply.
- 4.17. Option 7b should be adjusted to reflect the evidence of land availability, suitability and achievability. The current figure of 1,785 homes should be reduced and the figure for the other sustainable settlements should be correspondingly increased. This would maintain the key aspects of Option 7b, which led to it being identified as the preferred option, whilst ensuring the Council can maintain a five year supply and meet housing needs.
- 4.18. It is also important that the relative sustainability of settlements within each tier of the hierarchy is considered, for example Ibstock should be considered in terms of sustainable locations ahead of Measham and Kegworth for the reasons set out under question 2.
- 4.19. In terms of Davidsons and Western Range land interests at Land off Leicester Road, Ibstock, this site provides a suitable location for allocation as part of this spatial strategy to help deliver housing over the plan period. Details of the site are included at Appendix 2 with concept masterplan provided at Appendix 3.
- 4.20. The site lies on the northern edge of Ibstock, well related to the existing settlement form and close to the range of services and facilities available in the settlement. In our response to Question 2 we consider that Ibstock should be upgraded to a Key Service Centre, reflecting the range of key services and facilities available including both primary and secondary education.
- 4.21. The site offers the opportunity to provide between 400–500 high quality homes, including up to 100 affordable homes with the opportunity to deliver a new school, community building, extra care facility, link road to relieve pinch points in the village, biodiversity net gain, formal open space and recreation. The site is well located to deliver sustainable development on a site which can be delivered without any significant adverse impacts. The site is within walking distance of existing employment.

5. Housing

Self-Build and Custom Housing

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

- 5.1. The suggested policy for self-build and custom housing is to seek the provision of land for self-build and custom housing on sites capable of providing 50 or more dwellings, where there is evidence of demand and where servicing and site arrangements can be made suitable and attractive.
- 5.2. The proposed policy to seek self-build and custom-build plots on developments of 50 units or more where there is a proven need, is not supported. Inspectors have rejected proposed policies in other plans that sought to require a specific percentage of self-build on allocated sites (see Blaby Part 2 Local Plan Inspector's report). That approach ignores the clear issues over the delivery of self-build plots as part of larger market housing sites.
- 5.3. This policy approach will not boost the housing supply and creates practical issues that should be given careful consideration. It is essential that consideration is given to health and safety implications, working hours, length of build programme and therefore associated long-term gaps in the street-scene caused by stalled projects. There is the potential for unsold plots and the timescale for reversion of these plots to the original housebuilder creates practical difficulties in terms of co-ordinating construction activity on the wider site.
- 5.4. The Plan should support the delivery of self-build housing and encourage provision on strategic sites, recognising the potential difficulties and the need for robust evidence of need.

Space Standards

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

- 5.5. The Options Paper sets out an assessment of options for including a policy relating to Nationally Described Space Standards in the plan, concluding that it would be appropriate to include a policy requiring all new residential developments to meet Nationally Described Space Standards as a minimum. The Paper notes that the impact of the standards on viability will need to be assessed through the Local Plan Viability Assessment before publication of the Regulation 19 plan.
- 5.6. The Planning Practice Guidance is clear that local planning authorities will need to gather evidence to determine whether there is a need for additional standards in their area and justify setting policies in their local plans and that local planning authorities should consider the impact of using the standards as part of the Local Plan viability assessment, considering need, viability and timing.
- 5.7. The Council's limited evidence to date, an assessment of a sample of residential applications since 2015, would suggest that the majority of developments exceed the Nationally Described Space Standards. The Options Paper recognises that further evidence and testing will be required, including the Local Plan Viability Assessment to be prepared prior to the publication of the Regulation 19 version of the plan.
- 5.8. There is a clear risk that the proposed inflexible policy approach to this issue will impact on affordability and effect customer choice. Smaller dwellings have always played a valuable role in

meeting specific needs for both market and affordable housing.

- 5.9. If sufficient evidence is presented to justify the proposed policy approach, the Council will need to include transitional arrangements so that the provisions are not applied to any outline, detailed or reserved matters applications or approvals prior to a specified date.

Accessible and Adaptable Housing

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

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

- 5.10. The Options Paper presents the preferred policy approach to accessible and adaptable housing, proposing that all new build residential developments will be required to meet at least part M4(2) standards of the Building Regulations, regardless of the size of the site. In addition, the proposed policy would require 5% of all new affordable dwellings to meet Part M4(3)(b).
- 5.11. Paragraph 16f of the NPPF advises that Local Plans should avoid unnecessary duplication. If the Government implements proposed changes to Part M of the Building Regulations, the Council's proposed approach would represent an unnecessary duplication of Building Regulations and is not supported.
- 5.12. If the Council wishes to adopt the optional standards for accessible and adaptable dwellings, sufficient robust evidence would need to be presented to justify this approach in accordance with paragraphs 31 and 130f of the NPPF, and the Planning Practice Guidance which outlines the evidence necessary to justify a policy requirement for optional standards.
- 5.13. It should be noted that many older people living in the district are unlikely to move home. The HBF in its submission points to research by Savills that shows that over 60s households are less inclined to buy a new home than a second-hand one. Given the size of the Council's existing stock, the Council should recognise that adaptation of existing stock is a key issue that would result in more positive outcomes than solely focusing on new build.
- 5.14. Any proposed policy should be considered as part of the Local Plan Viability Assessment to ensure that any proposed approach does not compromise viability of development.
- 5.15. It is important to note that the Planning Practice Guidance is clear that site specific factors that may make a site less suitable for M4(2) and M4(3) dwellings should be taken into account, and where step-free access is not viable, neither optional requirements in Part M should be applied.
- 5.16. In terms of Part M4(3) (a), this requirement should not be applied to market housing. The requirement for Part M4(3) should only be required for dwellings over which the Council has housing nomination rights, as outlined in the Planning Practice Guidance.

Health Impact Assessment Policy Options

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

Q18 – Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?

- 5.17. The Options Paper sets out a proposed policy on Health Impact Assessments where Health Impact Screening Statements must be undertaken on various development types, including residential development proposals of 30 dwellings or more, or residential sites with an area of 1 ha or more. Paragraph 8.21 of the Options Paper explains the proposed threshold for residential development on the basis that it does not apply to small and medium sized builders, defined as having a turnover of up to £45m, although the latter criteria is not referenced in the suggested policy.
- 5.18. The evidence to support the suggested threshold of 30 dwellings is not clear. If the intention is to not place a burden on medium housebuilders, this low threshold is likely to catch a number of developments medium housebuilders are involved in. In the absence of clear evidence to justify a lower threshold, it is considered that a threshold of 100 dwellings or 2.5 hectares would be more reasonable.
- 5.19. It is not appropriate that, having set a threshold, the policy should introduce an arbitrary category allowing the Council to require Screening Statements in other unspecified instances. The policy should clearly set out the criteria and thresholds where Screening Statements would be required so that there is clarity and transparency for all parties.

Energy Efficiency

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

- 5.20. The Options Paper sets out one proposed policy covering a number of aspects relating to the reduction of carbon emissions to contribute to the Council's aim for a carbon neutral district by 2050. Bullet 1 of the policy requires all development to follow a sequential energy hierarchy prioritising fabric first and achieving 31% reduction in regulated CO2 emissions.
- 5.21. The proposed policy is not supported. The policy is not necessary as it repeats the Building Regulations 2021 Part L Interim Uplift. The Government's intention is clear to set standards for energy efficiency through Building Regulations. The Council does not need to set local energy efficiency standards to achieve the shared net zero goal due to the higher levels of energy efficiency standards for new homes set out in the 2021 Part L Interim Uplift and proposals for the 2025 Future Homes Standard.

Overheating

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

- 5.22. The Options Paper Option sets out a preferred option for a policy to require major developments to address overheating through an industry recognised assessment and minor developments to use a simple checklist to demonstrate that the risk of overheating has been considered.
- 5.23. This approach of having a simple checklist in place to demonstrate that risk of overheating has been considered as part of the house design appears reasonable and is supported.

Water Efficiency

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

- 5.24. The proposed policy for water efficiency standards requires all proposals for new residential development to achieve the national water efficiency standard of a maximum of 110 litres of water



per person per day.

- 5.25. The proposed policy for water efficiency standards is supported. .To adopt the tighter optional standard of 110 litres, the Council will need to provide sufficiently robust evidence to justify this in accordance with the Planning Practice Guidance. The evidence that is available does not provide sufficiently clear evidence to justify a local need for the application of the optional standards. Davidsons already design our homes to achieve a maximum of 110 litres of water per person per day.

Appendix 1 – Consultation Form Details



DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

January 2022

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

Personal Details	Agent's Details (if applicable)
Title	Mr
First Name	Guy
Last Name	Longley
[Job Title]	Executive Director
[Organisation]	Davidsons Homes and Western Range
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Address Line 2	██████████
Address Line 3	██████████
Address Line 4	██████████
Postcode	██████████
Telephone	██████████
Email address	██



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

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

Declaration

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

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

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

Signed

[Redacted signature box]

Date

14/03/22

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

The deadline for responses is the end of Monday 28 February 2022 (updated to 14/03/22)

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

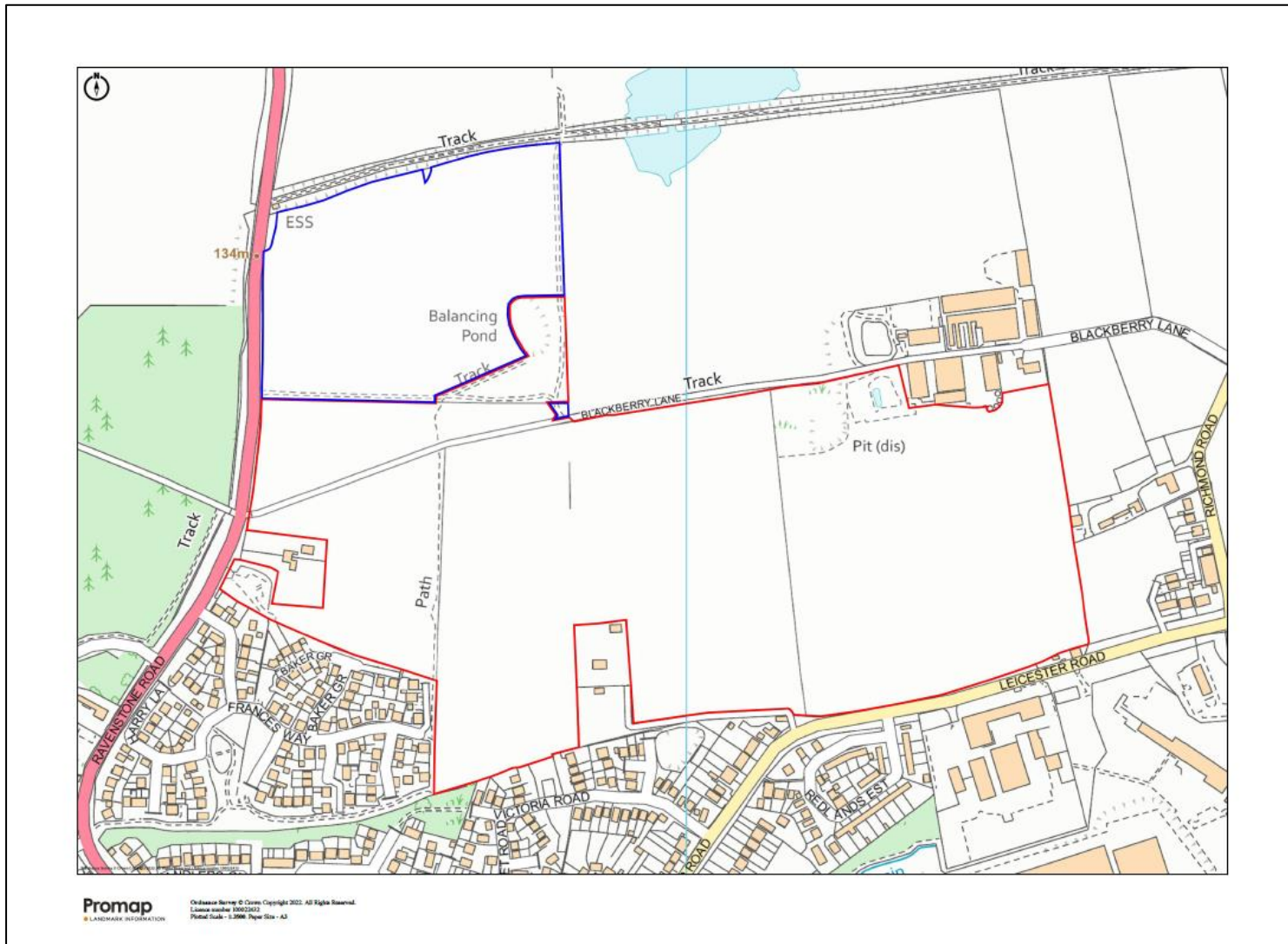
The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004, save for requests of such information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

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Appendix 2 –SHLAA Update to Land off Leicester Road Site Plan



NB: Red line shows the current SHLAA site Ib18 boundary and the blue line shows the new land to be added.

Appendix 3 – Concept Masterplan for Land off Leicester Road Road, Ibstock



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

East Midlands

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From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Fwd: Local Plan Review. Consultation Response
Date: 14 March 2022 15:04:22

Name: Sarah Jayne Fearn

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.

Yours Faithfully,

Sarah Jayne Fearn



**BDEVELOPMENT STRATEGY
OPTIONS & POLICY OPTIONS**
January 2022

Consultation Response Form

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	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Colin
Last Name		Danks
[Job Title]		Director
[Organisation]	Barwood Development Securities Limited (Barwood Land)	Copperfield L&P Limited
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

Please see attached report for answers to each of the relevant questions.

(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

y

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

14.03.2022

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

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

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North West Leicestershire Local Plan Review

Development Strategy and Policy Options Consultation 2022

Response on behalf of: Barwood Development
Securities Limited

Ref: CP0043

Date: March 2022

Rev: /

Client: Barwood Development Securities Limited

Copperfield - Leigh Court - Pill Road - Abbots Leigh - Bristol - BS8 3RA

E: info@copperfieldltd.co.uk

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Project ref: CP0043

Document ref: LP Consultation Options 22

Document Control

Project Name:	North West Leicestershire Local Plan
Project Reference:	CP0043
Report Title:	Development Strategy and Policy Options 2022
Doc Reference:	CP0043_NWL_REG18 REP_210310

	Name	Position	Signature	Date
Prepared by:	CD	Director	CD	08.03.22
Approved by:	AT	Director	AT	10.03.22

For and on behalf of Copperfield L&P Ltd

Revision	Date	Notes	Prepared	Approved
-	-	-	-	-

This report and the content herein have been prepared by Copperfield L&P Ltd for the client and project described in the particulars of the instruction.

This report has been prepared in accordance with the professional services appointment related to the project.

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Project ref: CP0043

Document ref: LP Consultation Options 22

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2.	Response to the Spatial Options Consultation Questions	4
3.	Conclusion.....	16

Appendices

Appendix A: SHELAA Site C46, Land at Broom Leys Farm, Coalville

1. Introduction

1. Copperfield L&P Ltd has been instructed by Barwood Development Securities Limited ('Barwood Land'), to provide a response to the North West Leicestershire Local Plan Review (Development Strategy and Policy Options). We very much welcome this opportunity to respond to the emerging plan. The comments in this submission are underpinned by experiencing those aspects of local plans that work well and those that have been less successful in achieving their stated aspirations.
2. Our client, Barwood Land, is a national land promotion company. Barwood Homes is the housebuilding sister company, with a joint Head Office based in Northamptonshire. They have delivered several residential-led sites over recent years in the East Midlands, and are currently promoting several more, and therefore have a keen interest in the way that this emerging development plan is formulated.
3. Copperfield and Barwood Land would very much like to engage with the planning authority as early as possible to help support the production of a sound plan that responds to housing and economic growth needs alongside environmental and sustainable community requirements.
4. In the case of the North West Leicestershire Local Plan Review (NWLLPR), one of the most important aspects is to understand and comprehensively plan for cross boundary growth, especially related to Leicester City. Various documents such as the Leicester and Leicestershire 2050 Vision recognise the role that NWL needs to play in meeting unmet housing need. In this context, places like Coalville, as the principal settlement have an important role to play in the delivery of sustainable new growth which can utilise existing facilities, services and infrastructure. This representation expands on this further below.
5. When formulating a spatial strategy for NWL, it is also important to be aware of the risks and delivery complications of 'new settlements'. They can often struggle to be viable propositions and rely on building-in sustainability rather than the support infrastructure at existing towns. In our view sustainable urban extensions at places like Coalville will offer support for the high street, employment growth and enhancements to local infrastructure for the existing community. Already significant investment (£42m) has been secured for road improvements around Coalville and along the A511. Further support and investment could be encouraged by focusing growth at the town, as was the business case for receiving the £42m infrastructure investment.
6. In summary, a single comprehensive plan which focuses most growth at Coalville and responds to the cross boundary needs of Leicester City is generally supported. Sites like our client's land at Broom Leys Farm (SHELAA Ref C46) (Appendix A), which could accommodate around 250

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dwellings should be a focus for meeting some of the needs of the NWL and as the promoter, Barwood Land would be pleased to discuss the merits and opportunities this site offers.

2. Response to the Spatial Options Consultation Questions

Legal Compliance, Duty to Co-operate, Sustainability Appraisal and Plan Period

7. Support is given to the on-going cooperation between the Leicestershire authorities especially regarding meeting the identified 18,000 dwelling unmet need for Leicester City. The effect of this on the housing requirement for North West Leicestershire is discussed later in this submission. It is however important to understand whether NWL has sought to co-operate with its other neighbours including authorities in Derbyshire, Staffordshire, Nottinghamshire and Warwickshire, specifically:
 - Lichfield
 - South Derbyshire
 - Erewash
 - Rushcliffe
 - North Warwickshire
8. All these authorities adjoin NWL and whilst documents like the HEDNA only focus on Leicestershire, the Duty to Co-operate is applied to neighbouring authorities as a whole. There is clearly capacity within NWL to accommodate unmet needs in accordance with the reasonable alternative growth options presented in Table 3 of the emerging plan.
9. The early production of a Sustainability Appraisal at the Regulation 18 stage to inform the selection and assessment of growth options is supported, providing that this remains a 'policy off' assessment going forward.
10. It is noted that the Local Plan Substantive Review is seeking to extend the plan period to 2039. Providing that the Substantive Review is adopted by 2024, then it would address the minimum 15 year time horizon set out in paragraph 22 of the NPPF2021. It would however seem logical to extend the plan period to 2040 and for the Vision to align with the Leicester and Leicestershire 2050 Vision for Growth. Places like Coalville play a significant economic function in the 2050 Vision, and this should be carried forward in the emerging Substantive Review.

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

11. Broadly the objectives of the emerging plan are supported. Barwood Land is pleased to see that the Council recognises the importance of responding to the housing crisis through the second

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objective. It is important however that in the context of cross boundary needs (Leicester City), the plan not only provides for local needs, but also those within the wider Leicestershire area as part of the 2050 Vision. Barwood Land suggests that to avoid any misinterpretation, the word ‘local’ should be removed from Objective 2.

12. It would also be helpful to add an objective around addressing the unmet needs from Leicester City, something which is acknowledged in other parts of the emerging plan.
13. The objective to become Carbon Neutral by 2050 is also welcomed as it aligns with the Government’s expectations in this regard. Whilst it is important to achieve carbon neutrality as soon as practical, there is a transition process at a national level which aligns with technology changes, product availability and skills transitioning. However, NWL can also support this process simply by locating development in the right places to reduce travel. The diagrams below from Datashine Commute illustrate the influx of employees to Coalville from other settlements which could be reduced by the delivery of the right type of housing at the settlement. As travel represents circa 25% of carbon emissions, this is any easy way to achieve a carbon reduction.

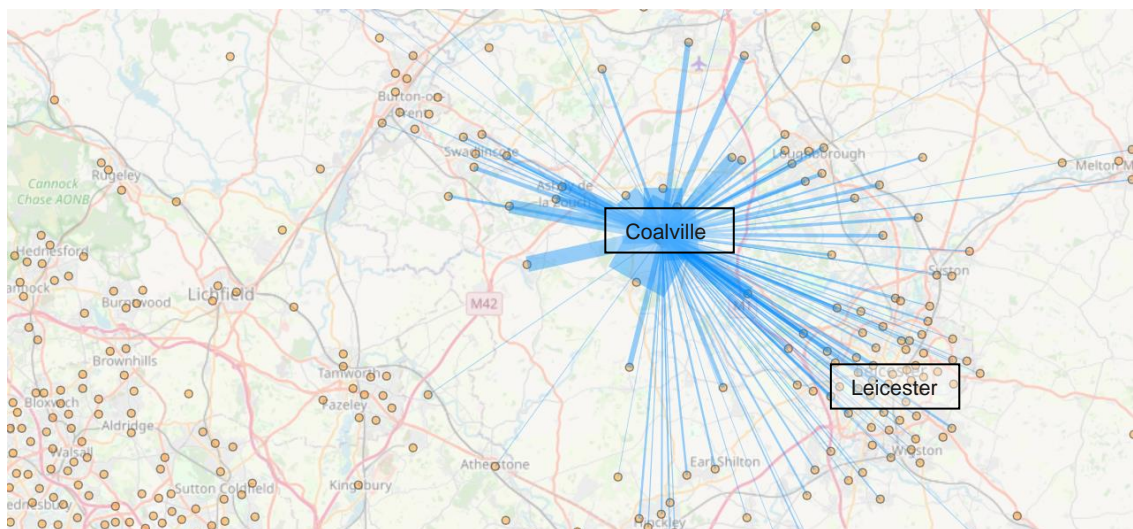


Figure 1: Inward travel to work destinations at Coalville.

Source: Datashine Commute

14. The above Figure also illustrates the close connection between residents wishing to live in Leicester but working in Coalville. Again, this shows the sustainable nature (in travel terms) of meeting some of Leicester City’s unmet housing need at Coalville.

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

15. Generally, the settlement hierarchy is supported provided that the emerging plan also supports a level of growth that is aligned with Coalville's role at the Principal Town. Some of the growth options appear to focus growth elsewhere and objection would be raised if NWL chose to pursue a new settlement over expanded sustainable growth at Coalville especially given the levels of committed investment in infrastructure (such as the A511 improvements). It is noted that Coalville is described as the urban area comprising Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone, Whitwick and Bardon employment areas. Whilst these locations may make up 'greater Coalville' it is important that this plan recognises the further away from the main centre and facilities these urban areas are, the more travel is needed to access services. Some greenfield sites within the wider Coalville urban area such as land at Broom Leys Farm is far more likely to provide a positive and measurable reduction in travel, (and thus carbon usage) than say a brownfield site at Thringstone. Barwood Land would be pleased to explain this further in subsequent representations if necessary.

16. It is also important to note that the business case for the A511 growth Corridor Scheme was to:

"...unlock homes and jobs in the area..."

"...support future growth..."

Given that the £42m funding is also reliant on a further £7m from developer contributions, the benefits to Coalville of this level of strategic investment should be maximised through the emerging local plan.

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

17. The approach to defining local housing need in paragraph 3.10 of the emerging plan seems at odds with the definition in the Objectives section. This is confusing for users of the plan. The criteria a-e are also unnecessarily restrictive and will prevent some villages from thriving and growing organically. They also fail to recognise the link between affordable housing delivery and open market housing that subsidises this. Lord Taylor (Taylor Review of the Rural Economy and Affordable Housing 2008) refers to this type of approach to villages as the sustainability trap, stating:

"Beneficial development can only be approved if the settlement is considered sustainable in the first place. Failure to overcome this hurdle essentially stagnates the settlement- freezing it in time- potentially for the life of the adopted plan"

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18. In this context there may be circumstances where modest development which meets the local needs of NWL is highly supportive of new facilities at villages which in turn supports their sustainability and ability to respond to matters such as reduced travel and climate change in their own right.

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.

19. The Low, Medium, High 1 and High 2 housing scenarios are noted as is the reference to the Standard Method housing figure and the level of buffer that would be provided. However, the scenarios cannot be considered in isolation of the wider cross boundary matters in Leicestershire as whole and specifically Leicester City's unmet needs.

20. The 2018 Leicester and Leicestershire 2050 Vision for Growth expected at least 512 dwellings per annum to be delivered in North West Leicestershire which is the same as the High 1 scenario. Since the production of the HEDNA in 2017 and the 2050 Vision in 2018, the Standard Method housing requirement for the Leicestershire authorities as a whole has grown from 4,764 per annum to 5,440 per annum (+676 per annum). As acknowledged in paragraph 4.19 of the emerging Local Plan, it seems unlikely therefore that 512 dwellings per annum in the High 1 scenario will address enough of the unmet needs of Leicester City which has significantly grown since the Vision 2050 document was produced. Whilst it is for the Duty to Cooperate to establish the agreed level of uplift, a proportional approach would see an OAN for NWL in excess of 600 dwelling per annum without any economic uplift of buffer.

21. A figure of 600 dwelling per annum to address NWL Standard Method requirement plus unmet need from Leicester City would provide only the absolute minimum based on the Standard Method with no buffer. It is therefore important that the plan and evidence base presents the housing requirement as follows:

- ***Standard Method minimum requirement for NWL plus:***
 - Percentage uplift for indigenous economic growth within NWL
 - Any additional buffer
- ***Unmet need from neighbouring authorities (Leicester City etc) plus:***
 - Any further percentage uplift to support the economic growth of neighbouring authorities
 - Any additional buffer

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22. This approach would be much more transparent than the growth scenarios and buffers suggested in the emerging plan and is likely to go to the heart of soundness. That said NWL must be commended for acknowledging the need to meet cross boundary housing growth and providing the emerging plan is clear about how this is derived, then Barwood Land may be in position to support the next version of the emerging plan in this regard.
23. Given that the Leicestershire Authorities are committed to the Midlands Engine Strategy and no doubt the Levelling Up Agenda as well, this plan should not limit itself to minimum growth scenarios which seems to be the case with the 'High 1' approach in light of the above. Barwood Land would encourage more alignment with the 'High 2' scenario to achieve a sound plan.

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

24. NWL has suggested that under the High 1 scenario growth option 3a would be preferred and under the High 2 scenario, growth options 7b would be preferred. Rather than comment on all the growth options, this set of representations focuses on the benefits and issues of each of the chosen scenarios and concludes with some suggested alterations.
25. Firstly, the fact that NWL is taking forward both the High 1 and High 2 scenarios suggests there is belief that the underlying housing need will justify growth somewhere between these. As set out above, Barwood Land believes High 2 to be closest to the right housing need figure when unmet needs are properly accounted for alongside buffers and economic factors.

Comments on Growth Option 3a:

26. Whilst Barwood Land does not support the High 1 growth scenario for reasons outlined above, it notes the focus of 50% of the residual requirement at Coalville. What it fails to recognise is that growth at Coalville has to some extent been constrained by previous uncertainties about the A511 highway upgrade works and perhaps should have grown to a greater extent in the preceding plan period. Sites like our client's land at Broom Leys Farm was the subject of a undetermined planning application by another developer for 6 years before being 'disposed', yet it could now deliver a highly sustainable modest urban extension of 250 dwellings well within the first half of the plan period. The chosen Growth Option should therefore recognise the removal of the A511 as a historic development constraint.
27. The suggestion in paragraph 4.32 that a growth level of 600 dwellings at Coalville is challenging to the market is also unfounded and should not represent a reason for pursuing Option 2a. It undermines the likely need to accommodate the needs of the High 2 scenario which concludes

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under Option 7b, that Coalville can deliver 1,785 dwellings. There is no doubt that Coalville and in particular our client's site can be delivered to support a higher growth figure for the town.

28. Were the Council to pursue the High 1 growth scenario, then it is suggested that a reasonable alternative that has not been considered in the Sustainability Appraisal would be:

- Coalville 600 dwellings
- Key Service Centre 300 dwellings
- Local service Centres 100 dwellings

29. That said, Barwood Land does not support the High 1 growth scenario over High 2.

Comments on Growth Option 7b:

30. Growth Option 7b delivers less than 50% of new housing to the Principal Settlement under this scenario and does not proportionally support Coalville's role in this regard. Concerns is expressed in all scenarios where a new settlement is suggested for two main reasons:

- At 1,785 dwellings any new settlement would be unable to support enough services and facilities to ensure it is sustainable and to support a reduction in travel due to a lack of viable local services.
- At 2,295-5,100 dwellings there is real concern in North West Leicestershire that as a major single component of a modest housing requirement, any delivery delays would fundamentally undermine the plan.

31. Barwood Land would therefore support Option 2b which in the Council's own view performs well against the Sustainability Appraisal. The apparent delivery risks on large-scale sites cited as the main reason not to pursue this option are unfounded and contradictory to the chosen 7b option for the following reasons:

- By definition, a new settlement of 1,785 dwellings represents a single, very large site with the added problem of no infrastructure support. Its inclusion contradicts the Council's very reason for dismissing Option 2b (saturated market risk). There are many examples of stand-alone new settlements of this scale in far more buoyant housing markets areas stalling because they are either unviable or unable to start due to the need for early infrastructure delivery. As such, one or more urban extensions at Coalville will be far more likely to be delivered on time and in accordance with the SA. They are also more likely to represent a better sustainable development option.

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- Barwood Land would be pleased to discuss the early delivery of a modest urban extension to Coalville at Broom Leys Farm. As an East Midlands business with a strong track record, they represent confirmation that sites like this can be delivered quickly in the Coalville market without risk to the emerging plan. Barwood Land would be pleased to present demonstrable evidence of the deliverability of Broom Leys Farm for circa 250 dwellings.

32. If the principal reason for rejecting Option 2b is unfounded, then it should in alignment with our submission, be reinstated as the most sustainable way of addressing the High 2 growth scenario.

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

33. Whilst custom build properties have their place as part of the wider housing market, the emerging policy raises some concerns which should be addressed to make it capable of being sound. With NPPF2021 requirement to identify 10% of the Council's housing supply on small sites, it is inevitable that some of these will be suitable for custom or self-build properties. In the first instance it is therefore suggested that this option is explored before relying on parts of larger sites to be reserved. Regarding the proposed policy wording the following observations are also made:

- There is no evidence to explain why a threshold of 50 dwellings has been chosen as the scale at which custom or self-build homes plots should be made available. This excludes smaller sites which tend to be far more attractive to custom and self-builders.
- There is no clear guidance on the percentage of custom and self-build homes expected as part of any housing mix on a given site. This leaves the proposed policy too ambiguous.
- If the Council is concerned about the speed of housing delivery it needs to be mindful that self-build and custom houses can take considerably longer to deliver and often represent a site construction conflict for larger-scale developers. It is noted in relation to Option 4 (using their own land) that the Council concludes there is "relatively limited demand for serviced plots when compared to other housing needs and demands in the district" and questions the relative risk to themselves and the benefits. This applies to all landowners and developers not just the Council.
- In some cases to support the viable delivery of housing sites custom and self-build plots can represent a proportion of affordable housing within the definition of "other affordable routes to home ownership" as set out in Annex 2 of the NPPF2021. The policy could enable developers to pursue this option.

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34. Barwood Land's overall preference would be not to repeat national policy within a local plan, but perhaps signpost support for the provision of self and custom build homes.

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

35. On the basis that the Council wishes to implement the Nationally Prescribed Space Standards, it is important that other aspects of plan viability are carefully considered and where necessary cost impacts are managed. Changes to Building Regulations and the response to important matter such as climate change and net bio-diversity gain add to the cost of developing sites. The Council should therefore be satisfied that the selection of sites that underpin its delivery strategy remain viable following the application of the space standards.

Q8 Do you agree with the proposed policy on accessible and adaptable housing? If not, why not? and Q9 Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?

36. As with many of the other policies in the Core Strategy Review, Barwood Land is generally supportive of moves to address accessibility and the application of the M4(2) accessibility standards which is becoming an industry standard.
37. It is also noted that the Council is seeking to apply M4(3) standards to 5% all new housing. It is noted that the NPPG (ID 56-008-20150327) only requires this for dwellings over which the Council has housing nomination rights. Therefore, whilst it should be encouraged across all developments, it should only be required in these specific circumstances. This is to prevent many housing schemes suffering viability concerns given that cost increase estimates provided to the Government's Housing Standards Review by EC Harris estimated £15,691 per apartment and £26,816 per house. Again, this is something that should be considered as part of the whole plan viability exercise which is encouraged by national policy.
38. Barwood Land suggest that NWL produce a whole plan viability assessment to demonstrate the range of measure it wishes to implement are achievable when added to the current cost of planning obligations and requirements. Without a whole plan viability assessment, it is not clear whether the proposals could render more costly urban and brownfield development unviable?

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

39. Generally, Barwood Land is supportive of a health and well-being policy of the nature described at paragraph 8.15 of the emerging plan. Two comments are however made at this time:
- It is the responsibility of the Clinical Commissioning Groups within NHS England to ensure that they work with NWL at this early plan making stage to align the provision of medical facilities with the growth of populations through housing development. Developers are

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unable to require the CCGs to commission new primary care facilities and as such criterion iv) of the draft policy should be reviewed in light of this.

- Criterion b) of the draft policy should only relate to unallocated sites. It is for the plan making process to assess the impacts of proposed allocations upon existing services and facilities relating to health, social wellbeing, culture and recreation and to determine a suitable development strategy to meet housing and other development obligations in a sustainable manner. The need to re-assess this at the application stage would add an unnecessary burden to allocated sites.

40. Aside from the policy commentary above, it is worth noting that Barwood Land's site at Broom Leys Farm is immediately adjacent to Coalville Hospital and Broom Leys Surgery as well as leisure facilities such as Coalville Rugby Football Club and various leisure routes. It would represent a good location in respect of addressing health and wellbeing.

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

41. In October 2020 Public Health England published 'Health Impact Assessment in Spatial Planning' This sets out screening criteria for the preparation of HIAs and the scope of HIAs in three bands (comprehensive, rapid and desktop). This supports the guidance in the NPPG on prompting healthy and safe communities. Paragraph ID 53-005-20190722 of the PPG explains that HIAs are a useful tool to use where there are expected to be significant impacts resulting from development. It applies to both plan making and planning applications.

42. In the above context, the plan making process should be underpinned by a HIA where the effects of the plan may give rise to significant health impacts. The plan should highlight where mitigation is needed for allocated sites in a comprehensive manner across NWL and any cost implications should form part of the plan viability process. Carrying out a HIA as part of the plan making process should reduce the burden, delay and potential inconsistency of mitigation that could arise from separate HIAs at the planning application stage on sites that have already been chosen as representing an appropriate strategy having taken account of reasonable alternatives.

43. Providing that, in accordance with the PPG and 'Health Impact Assessment in Spatial Planning' document, a comprehensive HIA is carried out at the plan making stage, the need for individual HIAs at a planning application stage should only be necessary when two criteria are both met:

- A proposal is for development that is not allocated in the adopted plan and
- It could give rise to likely significant health impacts.

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44. Were both criteria to be met then a HIA could be requested.
45. In terms of its scope, the emerging policy should explain the three types of HIA and in most cases that a rapid assessment is most likely (subject to screening) for non-allocated sites.

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?

46. This approach does not appear to be justified given the guidance referred to above. A decision to request a HIA must be based on the likelihood of significant health impacts resulting from development.

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

47. Barwood Land supports energy efficient development and both technology and regulations are in a state of flux. Building Regulations which align with the Future Homes Standard will be mandatory before this local plan is adopted. They have been through a rigorous and thorough consultation process aligned with available technology, skills, and affordability.
48. Option 3 appears to suggest new development should exceed the Part L 2020 building regulations without any clear indication about what that may mean and an evidence base to demonstrate how this is practically achievable or whether it would impact the viable delivery of development? Conversely the proposed carbon emission policy seeks to match the 2020 Part L Building Regulations. In this context some clarification is needed.
49. Barwood Land would support a policy that is aligned with planned changes to the Building Regulations that will be in force when the emerging plan is adopted.

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

50. Lifecycle Carbon Assessment (LCAs) are emerging as part of the London Plan but are not widely sought elsewhere. Whilst it is an important topic for NWL, it is suggested that all developments as a minimum are expected to complete a carbon lifecycle checklist, but formal assessments should remain discretionary at this early stage in their development. As part of the 5 year local plan review cycle, this could be an area of change when there is a wider range of businesses offering to complete LCAs and a greater knowledge within the LPA to interpret them.

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

51. As with Lifecycle Carbon Assessments, it is suggested that Overheating Assessments remain a discretionary part of any planning applications. As part of the 5 year local plan review cycle, this could be an area of change when there is a wider range of businesses offering to complete Overheating Assessments and a greater knowledge within the LPA to interpret them.

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

52. As set out in paragraph 9.50 the Government has established mandatory standards for energy use and CO2 emissions. As part of the emerging plan, it is not clear whether any detailed assessment has been given to the viability impact of going beyond these nationally set requirements? Furthermore, the use of additional BREEAM or HQM standards and assessments seems to add another layer of unnecessary bureaucracy to the planning process which will only serve to delay development which complies with the latest Part L Building Regulations.

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

53. Barwood Land supports a fabric first approach to reducing carbon emissions in order to move towards carbon neutral by 2050. Likewise, support is given to the reduction of carbon emissions in alignment with the latest part L Building Regulations (as set out in the emerging policy).
54. Concern is however raised about the requirement to use HQM on all major developments and this should be set out as an option, allowing other forms of assessment to also be used.
55. Concern is also raised with regard to the use of onsite renewable energy generation or where not maximised, then a payment to the Council's own carbon off-setting fund. There are many alternative carbon off-setting funds available, and the development plan should not tie developers into a single method of off-setting. The policy wording should seek carbon off-setting to be demonstrated and secured through appropriate planning obligations as a reasonable alternative to the Council's own fund for which no details are currently known.

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

56. In alignment with paragraph ID 56-015-20150327 of the PPG, Local authorities can apply tighter water efficiency standards where there is evidence to support this. It is therefore incumbent on the LPA to show a clear need based on:

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- Existing sources of evidence
- Consultation with the local water and sewerage company, the Environment Agency and catchment partnerships
- Consideration of the impact on viability and housing supply of such a requirement.

57. Providing that the above is presented as part of the local plan evidence base then a change from 125l to 110l of water consumption per person per day may be justified. As this stage there is however not sufficient evidence to show that along with other requirements, that the plan as a whole is viable and Barwood Land may wish to comment further when more details are known.

3. Conclusion

58. Barwood Land is supportive of the Council's commencement of this local plan review and there are significant parts of the objectives and the general approach that appear to accord with national planning policy and other guidance. However, some of the options and policies need further review or evidence to support them. These representations conclude that:

- The plan should be clear about its role within the wider Leicestershire area and how co-operation with neighbours outside of Leicestershire has been undertaken.
- The objectively assessed need for housing should be clear about what is required to meet NWL needs and what is required to meet unmet needs of neighbouring LPAs (such as Leicester City).
- It is anticipated that growth scenario High 2 is most likely to align with the above housing need.
- The spatial strategy should continue to focus growth at Coalville at the principal settlement which offers the greatest access to local services and facilities.
- The emerging plan should recognise that the A511 improvement programme will increase and enhance the town's connectivity from 2024 onwards including public transport operations as well as encouraging the use of sustainable transport. The main purpose of the growth corridor scheme to "unlock further homes and jobs in the area" should materialise now through the emerging local plan policy context.
- Concerns are raised about the inclusion of any form of New Settlement both from a sustainability and deliverability perspective.
- NWL should not be concerned about increasing growth at Coalville or its delivery potential. In our client's case, land at Broom Leys Farm is available and deliverable early within the plan period. SHELAA Site C46 can deliver circa 250 dwellings at Coalville.
- Barwood Land generally support some of the changes to technical policies relating to climate change, health and wellbeing, but further work is needed in these new areas of planning policy.
- It is important to ensure development remains viable when applying new areas of planning policy and a greater evidence base is needed to support some of the options standards that are being sought.
- NWL may consider this plan to representation a transitional phase for some policies, making aspects optional at this stage and moving towards mandatory requirements over the first 5 years of its operative life (during which time it will be reviewed).

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59. In summary, Barwood Land would be pleased to work with the planning authority regarding the delivery of Land at Broom Leys Farm and to show how this opportunity for growth represents sustainable development. Should the Council have any questions about the clarifications within this consultation response, please do not hesitate to contact us. Thank you for this opportunity to be consulted.

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Appendix A

SHELAA Site C46, Land at Broom Leys Farm, Coalville



Promap v2
LANDMARK INFORMATION

Ordnance Survey © Crown Copyright 2019. All Rights Reserved.
License number 100021212
Printed Scale - 1:6000. Paper Size - A4

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

Local Plan Review. Consultation Response

Name Cherie Sisson

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

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

16. Conclusion and Planning Integrity. 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,

Cherie Sisson



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

Consultation Response Form

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

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

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Thomas Taylor Planning Ltd
First Name		
Last Name		
[Job Title]		
[Organisation]		
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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...

Q10

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

We strongly support Option 4 for ensuring a continuity of employment land supply by retaining Policy Ec2(2) which provides a criteria-based policy for the assessment of proposals coming forward on unidentified/unallocated sites. This is especially relevant to proposals for the provision of road-related transport, haulage and associated small-scale storage uses which cannot compete with high-value industrial land-uses and are seldom welcome or suitable on land allocated for business park development. There is already evidence of pressure for haulage and road-related development on unidentified sites. Despite the critical role these uses play in the distribution of goods and services within the local and wider economy, the Local Plan does not identify road-related transport, haulage and associated small-scale storage uses as a particular employment sector. We consider that they should also be recognised as forming part of the “general employment” uses set out at paragraph 6.2.

Option 4 would provide a policy framework enabling each proposal to be assessed on its own planning merits in accordance with the policies of the development plan whilst also taking into account other material considerations relevant to that particular proposal. This option would have the advantages set out in the consultation document. Whilst it would not provide control over the timing of, and circumstances when, sites would come forward, it would provide the flexibility for sites to come forward to meet need when required depending on the circumstances of the sector. The development management process could assess the timing and needs issue depending on the circumstances relating to each individual proposal and its wider context.

(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

Thomas Taylor Planning Ltd

Date

14/3/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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.



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[Organisation]		
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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...

Q11

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

So far as the strategy for the distribution of general employment land is concerned, we consider that Option 1 should be preferred but, whichever option is selected, there should be an acknowledgement that road-related transport, haulage and associated small-scale storage uses should also follow this general strategy with a preference for sites that are well-related to the strategic road-network and an acknowledgement that unidentified sites will be assessed through the development management process in accordance with Policy Ec2(2) which seeks to ensure continuity of supply

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

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

Yes

No

Declaration

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

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Signed

Thomas Taylor Planning Ltd

Date

14/3/2022

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

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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

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

So far as Policy Ec2(2) we have already set out elsewhere that road-related transport, haulage and associated small-scale storage uses appear to be excluded from general employment uses and to that extent, the Local Plan is considered to be out of step with the NPPF direction for policies to be “flexible enough to accommodate needs not anticipated in the plan.

We consider that Option 2 (no change) to be the preferred option for Policy Ec2(2) given the disadvantages identified for the other Options. If there is a genuine need that can be demonstrated through the development management process, then in the absence of other available sites that are also suitable then the proposal would not be inappropriate development. It would be wholly unreasonable to expect an applicant for smaller-scale proposals to search for alternative sites outside the District which might lead to the loss of employment opportunities.

(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

Thomas Taylor Planning Ltd

Date

14/3/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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.



North Warwickshire
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This matter is being dealt with by

: Mike Dittman

Direct Dial : [REDACTED]

Your ref : |

Our ref : |

Date : 11th March 2022

Dear Sir/Madam,

Local Plan Review - Development Strategy Options and Policy Options (Regulation 18) Consultation

Thank you for consulting the Borough Council on the Development Strategy Options and Policy Options (Regulation 18) Consultation January to March 2022. Please note the summary below, listing the Borough Council responses and comments to the specific questions asked in the Options Consultation document.

In addition, I have also attached a copy of the Local Plan Review Consultation Document in Appendix 1 with the Borough Council's responses and comments to the consultation questions at the end of each section, where relevant and where there is sufficient space to add the comments. Where this is not possible, Appendix 2 has a completed response form for Questions 13 and 14.

The summary list of questions and the Borough Council responses and comments are as follows;

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

Answer - There is broad agreement from the Borough Council, however, the NWLDC should make thorough and robust efforts to ensure that the Strategy and Policy Options consider, accord with, and address these objectives fully.

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

Answer -Yes

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

Answer -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.

Answer -Yes

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.

Answer - The Borough Council broadly agrees with the approach taken, nevertheless, we would consider that Sustainable Villages and Small Villages should be avoided as locations for major growth, over and above their own local or affordable needs, which should be established by appropriate local housing needs assessments, given the limited infrastructure, services and facilities available in these settlements.

The SA scores for the various options highlights the relevance of North Warwickshire Borough Council's comments and concerns for options to accord with the LPR Objectives in Chapter 2. These re-enforce the Brough Council's concerns over the potential traffic and service/infrastructure impacts and implications that spreading down and distributing development towards the Sustainable Villages and Small Villages, particularly along/near the edge of the Borough/District Boundary. In the event such a Strategy Option was preferred by NWLDC, the Borough Council would ask that the impacts on settlements and road infrastructure in the North of our Borough are assessed, both in traffic impacts on the transport network and on services such as education (primary schools) capacities and health services and facilities. This would be now as part of the Local Plan process but also when planning applications are submitted. It is likely this will result in requests for contributions / improvements to highways and other services or infrastructure in North Warwickshire.

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

Answer - Yes, consider hybrid solution probably best option and achievable.

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

Answer - Yes. Currently Seeking to adopt the standards in the Borough through Design SPD.

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

Answer – Yes

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

Answer – Yes

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

Answer - Consider this a matter mainly for NWLDC to determine its preference but would suggest Options 1 and 2 or a hybrid would provide the District with greater control over location and delivery.

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

Answer - Similar response to that in Q5. Concerns over Options that enable major employment development, over and above local needs or diversification in rural areas, and the potential transport infrastructure and traffic flow implications and impacts on North Warwickshire, particularly around Junction 11 / M42 and the A444 and B5493, unless evidenced and justified by clear regional or national studies that identify the site as an appropriate, sustainable location subject to transport infrastructure improvements, that may necessitate contributions to highways and other infrastructure improvements in the Borough being sought.

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

Answer - There are a number of issues and concerns the Borough Council consider NWLDC should be aware of as part of the consideration of the above options.

- (i) The potential for the Hinckley NRFI to address the rail-served requirement for Strategic Warehousing should be caveated by the difficulty of requiring site operators/ users to use the Rail Freight services and will therefore still have a significant impact and implication for HGV traffic levels and transport infrastructure. The Borough Council's experience and appeal decision for the Birch Coppice SRFI showed that conditions and legal requirements for users and operators within Strategic Employment/Logistics sites to be Rail freight served/based (solely or partly) are unenforceable and likely to be removed as an element of any Decision Notice or S106 Legal Agreement. The traffic and transport implications must still be assessed as if the Rail freight element did not apply/exist.
- (ii) At the recent Local Plan examination for the North Warwickshire Local Plan, despite the potential for other sites in the Sub-region to address these Strategic site needs the Inspector still required the Borough to address the issue of strategic need through a separate policy on wider than local need. The Borough Council would therefore urge North West Leicestershire to adopt a similar Policy approach to address this issue in the emerging Local Plan review.

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

Answer - In terms of the options to deal with employment land proposals the Borough Council would re-iterate the need for a specific, flexible, criteria-based policy that addresses the pressure and need for strategic employment sites, covering more than just warehousing/logistics needs.

In terms of specific option comments, with regard to option 3's suggestion of having a specific end user policy it is considered this may be difficult to enforce and would limit flexibility and policy responsiveness. We have found that where a site is earmarked for a specific end user sometimes especially in appeals this amount of land has then been discounted from the employment figures as it is not open to the market although it is clearly delivering for an employment land need.

In regard to Options 5 to 7, addressing and/or including assessment and availability/capacity of sites outside the District, demonstration of exceptional need not simply demand, could all be addressed through a Criteria based policy.

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

Answer - No preference indicated.

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

Answer - No policy preference indicated, action for skills/education provision can be part of normal Development Management Policies for services/infrastructure/S106 needs.

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

Answer - Public health and well-being should be a thread or hook in the Plan that all policies can reflect, and/or include, without necessarily requiring a specific stand-alone Policy.

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

Answer - No comment or preference indicated.

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?

Answer - No comment or preference indicated.

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

Answer - Broad agreement with Option 2 approach.

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

Answer - No comment or preference indicated. Viability and cost implications should be noted/addressed in any Policy.

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

Answer - No comment or preference indicated, but Option 3 would be most pragmatic and viable option.

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

Answer - No comment or preference indicated.

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

Answer - No comment or preference indicated, but Option 3 would be most pragmatic and viable.

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

Answer - No comment or preference indicated.

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

Answer - No comment or preference indicated but aiming to achieve Best Practice in an area of water stress is supported.

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

Answer - The Policy Options coverage does not appear to include or refer to any Options around Gypsy and Traveller needs and how to address pitch supply issues? It was noted that it was the Council's intention to plan to meet the identified District need through the production of a specific Gypsy and Traveller Site Allocation Development Plan Document (DPD), but following a meeting of the District Council's Local Plan Advisory Committee on 7 November 2018 it was agreed that the needs of Gypsies and Travellers should now be addressed as part of the Local Plan review rather than through a separate Development Plan Document. The Borough Council are querying whether this is still the intention, in light of the lack of reference to Gypsy and Traveller needs in the Options consultation or whether this issue will be addressed through an alternative process/route?

No further comments from the Borough Council.

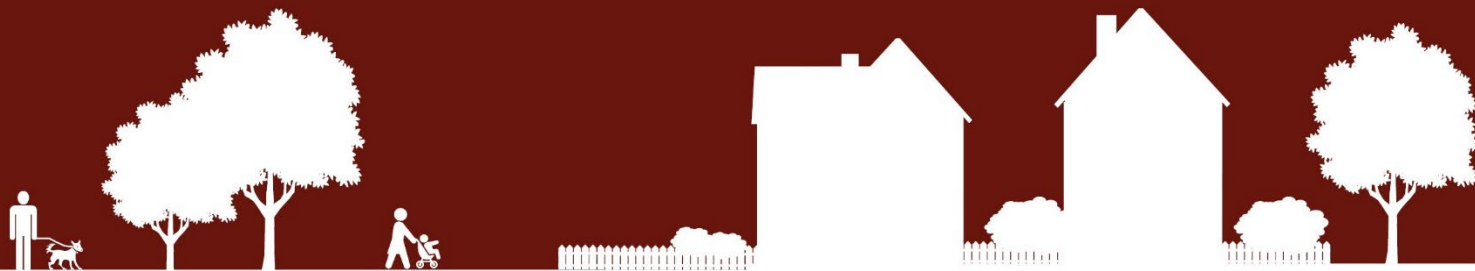
I trust that you will find the above comments and responses to the Local Plan Review Consultation Document and the attached response forms useful.

Yours faithfully,



Mike Dittman
Senior planning policy officer
Forward Planning Team
North Warwickshire Borough Council

LOCAL PLAN



North West Leicestershire Local Plan Review

Development Strategy and Policy Options

January 2022

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1. Introduction to the consultation

What has happened so far?

- 1.1. The [North West Leicestershire Local Plan](#) was adopted in November 2017. It is a comprehensive plan which sets the spatial strategy for the district, allocates land for development and provides policies to guide planning application decisions. It covers the period up to 2031.
- 1.2. Policy S1 of the adopted Local Plan required the council to undertake an early review of the plan. A first stage [Issues consultation](#) ran from February to April 2018 and a summary of the feedback we received was reported to [Local Plan Committee on 22 June 2018](#). The [Emerging Options consultation](#) followed between November 2018 and January 2019 and a [summary of responses](#) received was published. The council then decided to progress the plan review in two parts:
 - a 'Partial Review' concerned with amendments to Policy S1 only; and
 - the 'Substantive Review' which is a wider ranging review of the adopted Local Plan taking into account changes that have occurred since adoption and the implications of extending the plan period to 2039
- 1.3. The examining Inspector found the Partial Review sound, subject to modifications, in February 2021. The North West Leicestershire Local Plan (as amended by the Partial Review) was adopted in March 2021.
- 1.4. Throughout this time, the 'substantive' Local Plan Review (now referred to simply as 'the Local Plan Review') has been progressing. Amongst other work, we had a 'Call for Sites' inviting people to submit potential housing and employment sites for us to consider for inclusion in the Local Plan Review. This latest Call for Sites closed on 21 October 2020.

Changes since the Local Plan was adopted

- 1.5. Notable changes which have occurred since the Local Plan (2017) was adopted include those described below.
 - a. the [National Planning Policy Framework](#) (NPPF) was revised in 2018 and 2021;
 - b. In September 2020 significant changes were made to the [Use Classes Order \(UCO\)](#), the result being to allow for greater flexibility for some uses to change without the need to obtain planning permission, whereas other changes have introduced restrictions against the loss of community uses;
 - c. Leicester City Council has declared an unmet need for both housing and employment land. The Leicester and Leicestershire authorities are working together to resolve how this unmet need can best be addressed;
 - d. the Government published its [Planning for the Future White Paper](#) in Autumn 2020 although the detail of any reforms and when they might be introduced is currently uncertain; and
 - e. more specifically, the Government changed its standard method for calculating housing requirements in December 2020 which resulted in a significant increase in Leicester City's unmet need. More recently the Government has indicated it may

further revise or replace its standard methodology for calculating local housing need requirements.

- 1.6. In respect of proposed Government changes, the council has chosen not to wait these to be confirmed before moving forward with its Local Plan Review. To do otherwise would result in unacceptable delay to the plan's preparation. The council will re-evaluate the position as and when further Government announcements are made.

Evidence and supporting documents

- 1.7. A foundation of the Local Plan Review will be its up-to-date **evidence base**. The studies prepared so far are listed in Appendix 1 and are available on the council's website nwleics.gov.uk/local_plan_review_evidence_base.
- 1.8. Effective plan-making is central to the achievement of sustainable development and a key way that the sustainability credentials of an emerging plan are tested is through a **Sustainability Appraisal (SA)**. The SA [Scoping Report](#) contains baseline information about the environmental, social and economic characteristics of the district and sets out the 17 SA objectives in a Framework which will be used to assess the plan's emerging policies and proposals, as well as reasonable alternative approaches. To date we have completed a [Sustainability Appraisal of Spatial Options](#) which tests various housing strategy options in terms of both overall numbers of homes and geographical distribution. This topic is covered in Section 4. The SA process will also incorporate Equalities Impact Assessment and a Health Impact Assessment of the proposed Local Plan.
- 1.9. The Local Plan will also need to have regard to other strategies and documents produced by the Council and other partners, such as the [Leicester & Leicestershire 2050 Strategic Growth Plan](#), the [Health & Wellbeing Strategy](#) and the [Zero Carbon Roadmap](#) and [Action Plan](#).
- 1.10. Evidence studies to be completed and published in the future include whole-plan viability assessment, infrastructure assessment, strategic transport modelling and Habitat Regulations Assessment.

Duty to Co-operate

- 1.11. Throughout the preparation of the Local Plan Review, the council has a duty to co-operate with partner organisations on strategic matters that have cross boundary implications.
- 1.12. The Leicester and Leicestershire authorities have a strong track record of joint working. The Leicester and Leicestershire [Strategic Growth Plan](#) is an agreed vision and a strategy for the city and county up to 2050 to be delivered through individual authorities' local plans.
- 1.13. The authorities also collaborate to commission joint evidence on strategic matters. A strategic warehousing study was completed last year and an update to the Housing and Economic Needs Assessment (2017) is in preparation.
- 1.14. Statements of Common Ground between the authorities are agreed and updated to confirm shared positions on strategic matters. The matter of Leicester City's unmet needs is a key

issue for all the Local Plans currently being prepared in the county and one which the authorities are actively seeking to resolve.

- 1.15. The council also has a duty to engage with other expert agencies such as National Highways, Environment Agency and Natural England amongst others on strategic matters and also with the authorities in neighbouring counties - Derbyshire, Nottinghamshire, Warwickshire and Staffordshire - where there are relevant cross-boundary issues.

Local Plan Review timetable

- 1.16. This current document is a Regulation 18 stage public consultation, part of the plan preparation process. The current stage is highlighted in the overall draft timetable below.¹

Stage	Dates
Emerging options (Regulation 18)	November 2018 to January 2019
Development Strategy Options and Policy Options	January/February 2022
Consult on potential site allocations	Spring 2022
Consult on draft policies	Autumn 2022
Agree publication version (Regulation 19)	June 2023
Consult on Publication Local Plan (Regulation 19)	June/July 2023
Submission	October 2023
Examination	January 2024
Adoption	mid 2024

Format of this consultation document

- 1.17. This consultation document is structured into 8 sections covering broad topics, some of which are divided into a number of individual policy areas. Each of the policy sections sets out background to the policy area, including relevant national policy and guidance and local evidence, and goes on to consider reasonable alternative approaches. In some instances we have sufficient information to propose a preferred policy option and, on occasions, to put forward specific policy wording. There is a consultation question or questions at key parts of each section. The final question is a general question for you to make points which you have not been able to cover in your answers elsewhere. A single list of all the consultation questions is included in Appendix 2.
- 1.18. Section 10 sets out the 'next steps' for the Local Plan Review.

¹ This is subject to change. The Local Development Scheme containing an updated timetable is to be considered by the council's Local Plan Committee on 26 January 2021.

Responding to the consultation

- 1.19. Please answer the consultation questions. You do not need to answer each one; just the ones which are relevant to you. You can submit your response:
- online using our consultation portal consultation.nwleics.gov.uk/planning/local-plan-consultationjan2022
 - by email to planning.policy@nwleicestershire.gov.uk
 - by post to Planning Policy & Land Charges Team, North West Leicestershire District Council, Council Offices, Coalville, Whitwick Road, Coalville, Leicestershire, LE67 3FJ
- 1.20. Remember, we must receive your response by **the end of Monday 28 February 2022**.
- 1.21. If you have any difficulties accessing or responding to this consultation, please contact the Team directly by email at planning.policy@nwleicestershire.gov.uk or by phone on 01530 454676.

2. **Local Plan Review objectives**

Introduction

- 2.1. The Local Plan Review will contain a set of plan objectives. These overarching objectives describe, in overall terms, what the Local Plan Review aims to achieve and provides a guiding framework for the plan's policies and proposals. Each Local Plan policy should help achieve one or more of the objectives.

Background

- 2.2. The adopted Local Plan objectives are the starting point. We have re-visited them to take account of updated information and changes in circumstance since the adopted Local Plan was prepared. Relevant factors have included;
- the Sustainability Appraisal objectives from the [Sustainability Appraisal Scoping Report \(2020\)](#).
 - National Planning Policy Framework (NPPF) which has been revised since the Local Plan was adopted
 - the council's own [Delivery Plan](#) which provides an important local perspective. Whilst this covers a shorter timeframe than the Local Plan Review, it is a statement of the council's key priorities which strategic documents, such as the Local Plan, can help to deliver.
 - other key council strategies such as the [Health & Wellbeing Strategy](#) and the [Zero Carbon Roadmap](#) and [Action Plan](#)
 - the objectives in the [Leicester & Leicestershire 2050 Strategic Growth Plan](#)

Preferred approach

- 2.3. The proposed objectives are listed below. The number of objectives (11) is slightly less than in the adopted Local Plan (15) because some themes have been consolidated.

- 1 - Enable the health and wellbeing of the district's population.
- 2 – Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type.
- 3 - Achieve high quality development which is sustainable, which responds positively to local character and which creates safe places to live, work and travel.
- 4 - Reduce the need to travel and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure.
- 5 - Support the district's economy, including its rural economy, by providing for a range of employment opportunities which respond to the needs of businesses and local workers.
- 6 - Enhance the vitality and viability of the district's town and local centres which have an important role serving our local communities with a particular focus on the regeneration of Coalville.
- 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.
- 8 - Conserve and enhance the district's built, cultural, industrial and rural heritage and heritage assets.
- 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.
- 10 - Ensure the efficient use of natural resources and brownfield land, control pollution and facilitate the sustainable use and management of minerals and waste.
- 11 - Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way.

Consultation question

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

Answer - There is broad agreement from the Borough Council, however, the District Council should make thorough and robust efforts to ensure that the Strategy and Policy Options considered accord with and address these objectives fully.

3. Settlement hierarchy

Introduction: What is the settlement hierarchy?

- 3.1. The adopted Local Plan establishes (Policy S2) a settlement hierarchy which distinguishes between the roles and functions of different settlements with the respective position in the hierarchy determined by the availability of services and facilities that communities need (i.e. settlements with a similar range and level of services and facilities are at the same level in the hierarchy). In effect, the settlement hierarchy measures the sustainability of settlements relative to each other. The settlement hierarchy is used to guide the location of future development.
- 3.2. The current settlement hierarchy consists of the following categories of settlements:
 1. Principal Town
 2. Key Service Centres
 3. Local Service Centres
 4. Sustainable Villages
 5. Small Villages
 6. Hamlets
- 3.3. As part of the Local Plan Review it is necessary to consider whether the current settlement hierarchy should be retained or amended in anyway.

Background

- 3.4. The starting point for the review was to establish an up-to-date list of services and facilities available by settlement.
- 3.5. Having established a definitive list, we then developed a methodology to be able to assess the relative sustainability of settlements. Rather than simply being about what services and facilities are available within a settlement, it also considered accessibility to services and facilities elsewhere by public transport as such provision can contribute towards the sustainability of a settlement.
- 3.6. The following factors were assessed:
 - Access to convenience stores for food shopping;
 - Access to education facilities, both primary and secondary;
 - Access to employment locations;
 - Public transport access to higher order services outside of the settlement; and
 - Range of accessible community services and facilities (libraries, GPs, pharmacies, post offices, community venues, pubs, places of worship, and recreation facilities)
- 3.7. The methodology involved a system of scoring points depending upon how a settlement performed against the set criteria for each service and facility assessed. There then followed a series of steps to define those settlements which are considered to be sustainable to some degree and hence appropriate as potential locations for general market housing.

- 3.8. More details regarding the methodology, including the overall scoring, are set out in the [Settlement Study 2021](#) and the [Settlement Study Appendix B](#).

Outcome from the review

- 3.9. In terms of the current settlement categories, it is proposed to rename Small Villages as Local Housing Needs Villages and Hamlets as Other Villages/Settlements.
- 3.10. In terms of Local Housing Needs Villages, housing development in these would be restricted to those that meet the needs of somebody with a demonstrable local connection to the settlement concerned. We consulted upon this proposal as part of the [Emerging Options consultation](#) between November 2018 and January 2019 and the matter was considered by the Council's [Local Plan Committee on 26 June 2019](#) as part of the overall response to the consultation. The following local connection criteria are proposed:

- a) Existing resident in the parish within which the application is located for a continuous period of at least 10 years prior to an application being submitted; or
- b) The person requires frequent attention and/or care due to age, ill health, disability and/or infirmity as demonstrated by written evidence from a medical doctor or relevant statutory support agency and therefore has an essential need to live close to a close family member who currently reside in the parish within which the application is located and have done so for a continuous period of at least 10 years and; or
- c) The person has an essential need to provide support , as demonstrated by written evidence from a medical doctor or relevant statutory support agency, for a close family member who currently reside in the parish within which the application is located and have done so for a continuous period of at least 10 years; or
- d) The existing accommodation of the proposed occupant must be located within the parish and be no longer suitable for their needs due to its size or is difficult to get around due to ill health or disability as demonstrated by written evidence from a medical doctor or relevant statutory support agency; or
- e) No longer resident in the parish within which the application is located but has previously resided in the parish for a period of at least 10 years within the last twenty years.

3.11. The proposed settlement hierarchy is:

Settlement Classification
Principal Town Coalville Urban Area which comprises of Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone and Whitwick as well as the Bardon employment area.
Key Service Centres Ashby de la Zouch Castle Donington
Local Service Centres Ibstock Kegworth Measham
Sustainable Villages Albert Village, Appleby Magna, Belton, Blackfordby, Breedon on the Hill, Coleorton (the Lower Moor Road area only), Diseworth, Donisthorpe, Ellistown, Heather, Long Whatton, Moira (including Norris Hill), Oakthorpe, Packington, Ravenstone, Swannington, Woodville (part), Worthington.
Local Housing Needs Villages Battram, Boundary, Coleorton (the part not considered to be a Sustainable Village), Griffydham, Hemington, Lockington, Lount, Newbold, Newton Burgoland, Normanton le Heath, Osgathorpe, Peggs Green, Sinope, Snarestone, Swepstone, Wilson.
Other Villages/Settlements Settlements not named in the above categories

- 3.12. The hierarchy is virtually the same as that in the adopted Local Plan save for the following:
- The addition of that part of Woodville that is located within North West Leicestershire to the list of Sustainable Villages;
 - 1 village (Boundary) moving into the Local Housing Need Village designation); and
 - 2 villages (Spring Cottage and Tonge) moving to the Other Village/ Settlement designation from Small Villages.

Consultation questions

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

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

4. Development strategy options for housing

- 4.1. The National Planning Policy Framework (NPPF, 2021 paragraph 20) requires that strategic policies in plans should “set out an overall strategy for the pattern, scale and design quality of places and make sufficient provision for: a) housing (including affordable housing), employment, retail, leisure and other commercial development ...”.
- 4.2. Therefore, a key part of the local plan preparation process is to set out a development strategy that identifies both:
- the overall amount of new development that needs to be provided for, principally housing and employment; and
 - where this development should go.

How much housing should be provided for?

- 4.3. In 2018 the Government introduced a new way for calculating the minimum number of new homes that each local authority should provide for. This is referred to as the ‘standard method’. Further details about the standard method and how it is calculated is in [National Planning Practice Guidance](#) (PPG).
- 4.4. The NPPF is clear that “to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.” (paragraph 61).
- 4.5. Further guidance is provided by the PPG. This states “The standard method identifies a minimum annual housing need figure. It does not produce a housing requirement figure”.
- 4.6. In addition, the PPG identifies a number of circumstances when it might be appropriate to plan for a higher housing need figure 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); or
 - an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground; or
 - 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
- 4.7. From consideration of what the NPPF and PPG say, there are a number of factors which will influence whether a local housing need figure should be higher than the outcome from the standard method:
- demographic trends
 - build rates (market signals)

- unmet need
- deliverable growth strategies

4.8. These are considered in turn below.

4.9. **Demographic trends.** The latest demographic trends for the district are provided by the [2018-based Office for National Statistics household projections](#) which contain 5 different projections as set out below:

Table 1: 2018-based household projections

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

4.10. **Build rates (market signals).** The reference to market signals in the NPPF could be taken to refer to build rates as an indicator of market demand. Since the start of the adopted Local Plan (2011) build rates have averaged 619 dwellings per annum (2011-21), although a higher figure (770 dwellings) has been achieved since 2016/17.

4.11. **Unmet need.** There is an unmet need from Leicester City of about 18,000 dwellings. These will have to be accommodated somewhere in Leicestershire. The Leicester and Leicestershire authorities are working together to agree how this will be distributed.

4.12. Whilst there is not an agreement at this time, it is reasonable to assume that some of this is likely to be redirected towards North West Leicestershire.

4.13. **Deliverable growth strategy.** There is a [Strategic Growth Plan](#) (SGP) in place for Leicester and Leicestershire. This identifies a figure for North West Leicestershire for the period 2031-50 of 512 dwellings each year (i.e. more than the standard method).

4.14. All of the above suggests that any housing requirement included as part of the Local Plan will have to be higher than the standard method.

What options have been identified?

4.15. The following options have been developed.

- 368 dwellings (this is the result from the standard method) – referred to as **Low scenario**
- 448 dwellings (this is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA)) – referred to as **Medium scenario**
- 512 dwellings (this is the figure from the Leicester and Leicestershire Strategic Growth Plan) – referred to as **High 1 scenario**

- 730 dwellings (this is based on the 2018 household projections with an allowance for vacancy rates in dwellings) – referred to as **High 2 scenario**

4.16. We need to plan for the period 2020-39. However, we are not starting with a blank sheet of paper; a significant amount of new housing development is already committed, whether it has the benefit of planning permission or is an allocation in the adopted Local Plan. Taking account of the amount of development that was projected to be built in the 2020 housing trajectory, together with the total number of dwellings which it is projected will be built after the end of the current local plan period (2031), it is estimated that 8,784 would be built by 2039.

4.17. The implications for the various scenarios are shown in Table 2 below.

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

4.18. Each of the four growth scenarios were assessed against those factors highlighted in paragraph 4.7 with the results shown below.

Table 3 – Scenario assessment

Demographic trends	Build rates (market signals)	Unmet need	Deliverable growth strategy
Low scenario (368 dwellings per annum)			
This scenario is below each of the 5 main projections.	These are 68% more than this scenario. As such this must be regarded as being <i>“significantly greater than the outcome from the standard method”</i> as advised in the PPG	This scenario does not allow for the possibility of any unmet need from Leicester City being accommodated in North West Leicestershire. This scenario would conflict with national policy. This would raise significant issues for the Local Plan in respect of the Duty to Cooperate.	The growth envisaged in the SGP is significantly more than allowed for under this scenario and assumed a lower level of unmet need from Leicester City.

Medium scenario (448 dwellings per annum)			
This scenario is above the 10-year variant projection, but otherwise significantly below the other 4 projections, including being 58% below the Principal Projection.	These are 38% more than allowed for under this scenario which is based on a lower figure than the adopted Local Plan (481 dwellings) and is based on the 2017 Housing and Economic Development Needs Assessment.	Under this scenario there would be a reasonable buffer of 80 dwellings per annum compared to the standard method.	The growth envisaged in the SGP is more than allowed for under this scenario.
High 1 scenario (512 dwellings per annum)			
This scenario is above the 10-year variant projection, but otherwise significantly below the other 4 projections, including being 38% below the Principal Projection.	These are 21% more than allowed for under this scenario, even though it is based on a higher figure than the adopted Local Plan (481 dwellings).	Under this scenario there would be a reasonable buffer of 144 dwellings per annum compared to the standard method.	The growth allowed for in this scenario is the same as that in the SGP.
High 2 scenario (730 dwellings per annum)			
This scenario is above all the projections, other than the High International Migration projection. It is 3% more than the Principal Projection.	These are 18% less than allowed for under this scenario, although more recent rates are above this.	Under this scenario there would be a significant buffer of 362 dwellings per annum compared to the standard method.	The growth allowed for under this scenario is significantly more than envisaged in the SGP.

What is our preferred option?

- 4.19. Having regard to the various factors it is concluded that:
- **Low scenario** - this would not be an appropriate basis on which to continue planning for future provision as it performs poorly against all of the factors.
 - **Medium scenario** – Having regard to the above factors, it is considered that the medium scenario would not be an appropriate basis on which to continue planning for future provision. Whilst the level of growth would provide a buffer for accommodating any unmet need from Leicester City, over the plan period this would represent about 1,500 dwellings. However, the unmet need is about 18,000 dwellings and so the buffer may not be sufficient. Planning for this level of growth would represent a risk and potentially require additional work at a later date.

- **High 1 scenario** – this scenario is more balanced in terms of these factors than either the Low or Medium scenarios. The level of growth would provide a good buffer for accommodating unmet need from Leicester City, although it is not clear at this time whether it would be sufficient and so it would still represent a risk. This level of growth is consistent with the SGP. However, the level of growth is well below both demographic trends and build rates. On balance, it is considered that it represents a potentially suitable scenario.
 - **High 2 scenario** - Having regard to all of the factors, this scenario performs the best. It provides a very significant degree of flexibility to help address issues of unmet need. The PPG also notes that the standard method “does not attempt to predict the impact that future government policies, changing economic circumstances or other factors might have on demographic behaviour”. In terms of economic circumstances, the district is already a net importer of labour as measured using the Office for National Statistics job density rate which results in in-commuting to the district. This trend is almost certain to continue into the future. It is also worth noting that the [Housing and Economic Needs Assessment 2017](#) HEDNA which informed the adopted Local Plan housing requirement figure, included an upwards adjustment for economic need.
- 4.20. Overall it was concluded that at this time the High 1 and High 2 scenarios appear to cover the most likely future requirement until such time as the issue of the redistribution of unmet housing need from Leicester City has been agreed.
- 4.21. Therefore, when looking at where housing growth should be directed to, the amount of growth to be considered is:
- **High 1 scenario** – 512 dwellings each year, for which there is a residual requirement of about 1,000 dwellings
 - **High 2 scenario** – 730 dwellings each year, for which there is a residual requirement of about 5,100 dwellings

Consultation question

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.

Answer - Yes

Where should new housing be located?

- 4.22. In preparing the Local Plan we have to consider all reasonable alternatives. To do this we created a series of options for how growth might be distributed across the district.
- 4.23. The starting point for developing these potential distribution options was the settlement hierarchy established in the adopted Local Plan (Policy S2). As explained in Section 3, this distinguishes between the roles and functions of different settlements, with the respective position in the hierarchy determined by the availability of services and facilities that communities need (i.e. settlements with a similar range and level of services and facilities are at the same level in the hierarchy).

- 4.24. The council’s [Strategic Housing and Economic Land Availability Assessment 2019](#) (SHELAA) included the identification of two sites located south of East Midlands Airport and adjoining each other and which separately had been proposed as potential new settlements of 2,400 and 2,340 dwellings respectively (site references IW1 and IW2). Subsequently, the two site promoters agreed to work together to promote a single new settlement (site IW1 in the [2021 SHELAA](#)).
- 4.25. Therefore, it is considered appropriate to include a New Settlement as a potential option in combination with other options but also on its own. In total 9 options were developed as set out below.

Table 4 – spatial distribution options

Option 1	As per adopted Local Plan
Option 2	Principal Town and Key Service Centres
Option 3	Principal Town and Key Service Centres and Local Service Centres
Option 4	Principal Town and New settlement
Option 5	Principal Town, New settlement and Key Service Centres
Option 6	Principal Town, New settlement and Key Service Centres and Local Service Centres
Option 7	Principal Town, New settlement and Key Service Centres and Local Service Centres and Sustainable Villages
Option 8	New settlement
Option 9	Principal Town, New settlement and Key Service Centres and Local Service Centres, Sustainable Villages and Small Villages

- 4.26. These options were then combined with the growth scenarios identified at paragraph 4.15 to create a series of more detailed options including theoretical amounts of growth being assigned to the different settlement categories.
- As Option 1 would not require any new allocations (see Table 2) this option was only tested against the low and medium scenarios.
 - Options 2-7 and Option 9 were assessed against the High 1 and High 2 scenarios, whilst Option 8 (New Settlement) was only assessed against the High 2 scenario as the amount of development that needs to be provided for under the High 1 scenario (about 1,000 dwellings) would be too small to deliver the necessary infrastructure and supporting facilities and so was not considered to be a reasonable alternative.
- 4.27. In total this resulted in 16 options as set out in Table 5. The spatial options have been subject to [Sustainability Appraisal](#). The dwelling numbers included in the table are indicative at this stage for the purposes of testing the options. The final strategy will not necessarily reflect these figures exactly.

Table 5 – detailed distribution options

Option	Description
Low and Medium scenario (368-448 dwellings/annum)	
Option1	Baseline Option (Continuation of adopted Local Plan)
High 1 scenario (residual requirement = 1,000 dwellings)	
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)
New Settlement (residual requirement = 5,100 dwellings)	
Option8	New Settlement
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)

- 4.28. The following section sets out the council’s assessment of these options, with the exception of Option 1 which was discounted because it had been concluded that the low and medium growth scenarios were not appropriate.

Assessment of options

High 1 scenario (1,000 dwellings)

- 4.29. Options 4a to 9a all include the New Settlement as an element of the potential strategy. The overall potential scale of growth at the New Settlement is estimated to be about 4,700 dwellings. However, the scale of growth under options 4a to 9a is only 350 to 600 dwellings

(Table 5). On its own such a scale of growth is too small to be likely to be viable or to be able to deliver the necessary infrastructure. Therefore, they would need to be seen in the context of the New Settlement as a longer-term proposal, going well beyond the end of the plan period (2039).

- 4.30. A strategy which sought to defer the vast majority of development of a new settlement beyond the plan period carries an element of risk, not least in terms of the long-term commitment that this would require from the developer/landowner.
- 4.31. Therefore, it was, on balance, considered that that options 4a to 9a should not be taken forward under this growth option.
- 4.32. In terms of the remaining options (Options 2a and 3a), the results from the Sustainability Appraisal are summarised below.

Summary from Sustainability Appraisal

Option 2a

- 2 negative effects - SA1 (Health) and SA8 (Sustainable travel)
- 3 positive effects - SA4 (Housing), SA6 (Town Centres) and SA10 (Carbon emissions)

Options 3a

- 1 significant effect – SA8 (Sustainable travel)
- 2 negative effects - SA2 (Inequalities) and SA11 (Climate change)
- 3 positive effects - SA4 (Housing), SA6 (Town Centres) and SA10 (Carbon emissions)

These two options score virtually the same in terms of the SA assessment, save for option 3a scores a significant negative affect against SA8 (Sustainable travel) which reflects the fact that under this option growth would be dispersed down to Local Service Centres (Ibstock, Kegworth and Measham). The SA assessment notes that:

“This [is] due to public transport services being infrequent and there being fairly low levels of connectivity in the Local Service Centres, as well as lack of designated walkways and cycle paths linking settlements which may discourage sustainable travel.”

Whilst the level of public transport provision is not as significant in Local Service Centres, it is the case that all are served by services to higher order centres, not just those in the district but beyond (e.g. Derby, Leicester, Burton upon Trent and Loughborough). Development in these centres would also potentially provide an opportunity to enhance walking and cycling provision, something noted in the detailed assessment.

Similarly, there would be some benefits to the shops and other services of the Local Service Centres which would not arise from Option 2a, although this would be countered to some degree by fewer benefits for the town centres of Coalville, Ashby de la Zouch and Castle Donington if residents were to shop in the Local

Service Centres.

Both options score positively against SA4 (Housing).

Other considerations

- 4.33. Option 2a would result in development being concentrated in a more limited number of settlements and hence sites than Option 3a. This would not provide such a flexibility or choice in the housing market and represents a potential risk in terms of deliverability and would also provide fewer benefits from a housing perspective.
- 4.34. Both Options 2a and 3a would not provide much support for the NPPF advice to “*identify opportunities for villages to grow and thrive*” (paragraph 79), although Option 3a would provide slightly more opportunities than 2a.

Overall conclusion

- 4.35. Whilst there is not much to choose between Options 2a and 3a, it is considered that the concerns about deliverability and the greater opportunity afforded by Option 3a for growth in villages are such that it is considered that under the High 1 scenario that only **Option 3a** should be taken forward.

High 2 scenario (5,100 dwellings)

- 4.36. A key test for the Local Plan is that whatever is proposed must be deliverable.
- 4.37. The identification of land for a further 5,100 dwellings would inevitably require the allocation of some significant sites in terms of size, potentially including a New Settlement as allowed for in Options 4b, 5b, 6b, 7b, 9b and 8.
- 4.38. Large scale development such as a new settlement has the potential to deliver significant benefits in terms of new homes but also new infrastructure. However, such large schemes take a significant amount of time to bring to fruition.
- 4.39. Research published by Lichfields (2020) (an established and respected planning consultancy firm) found that large schemes can take 5 or more years to start, with sites of 2,000 or more dwellings taking on average 8.4 years from validation of the first planning application to the first dwelling being completed. This information is used in the assessments below.

Option 2b – Principal Town (3,060 dwellings) and Key Service Centres (2,040 dwellings)

Summary from Sustainability Appraisal

- 1 significant negative effect – SA2 (Inequalities)
- 2 negative effects – SA1 (Health) and SA8 (Sustainable travel)
- 3 positive effects - SA4 (Housing), SA6 (Town centres) and SA10 (Carbon emissions).

This option has the least number of significant negative effects of all the High 2 options.

Other considerations

- 4.40. Whilst Option 2b performs well against the SA, as development is limited to two settlement categories and 3 settlements (Coalville, Ashby de la Zouch and Castle Donington) this provides little flexibility or choice for the market which is important for ensuring sustainable delivery rates. If delivery rates are not sustained, then this represents a risk to the 5-year housing land supply which is required to ensure that the plan does not become out-of-date.
- 4.41. Historically, the housing market in the Coalville area has been weaker than other parts of the district. The build rate for Coalville (328 dwellings each year) would be significantly more than that achieved for the period 2011-21 (180 dwellings each year) and more than that achieved more recently (2016-21 – 267 dwellings each year). Therefore, there are significant doubts about the ability of the market to deliver such a scale of growth having regard to recent build rates.
- 4.42. The scale of growth is such that it is almost inevitable that some large-scale sites would be required. For example, looking at the Council’s recently published [Strategic Housing and Economic Land Availability Assessment 2021](#) (SHELAA) to accommodate growth in the Key Service Centres would be likely to require identifying an area of 1,400 dwellings west of Castle Donington or 800 dwellings at Packington Nook Ashby de la Zouch. As already noted, it takes time for large scale sites such as these to begin to deliver. Again, any slippage in delivery would impact upon the 5- year housing land supply, and so represents a risk to ensuring that the plan does not become out-of-date.
- 4.43. Therefore, for the above reasons it was considered that Option 2b should not be taken forward.

Option 3b - Principal Town (2,550 dwellings), Key Service Centres (1,530 dwellings) and LSC (1,020 dwellings)

Summary from Sustainability Appraisal

3 significant negative effect – SA1 (Health), SA2 (Inequalities) and SA8 (Sustainable travel)
1 negative effect – SA11 (Climate change)
3 positive effects - SA4 (Housing), SA6 (Town centres) and SA10 (Carbon emissions).

Overall, this option performs better than 4b but not as well a 2b.

Other considerations

- 4.44. Under Option 3b, growth would be more spread out than Option 2b with growth at 3 settlement categories and 6 settlements (Coalville, Ashby de la Zouch, Castle Donington, Ibstock, Kegworth and Measham) and so concerns about over concentration in a limited number of areas is less relevant.

- 4.45. As with Option 2b there are concerns regarding the required build rate in Coalville (301 dwellings each year) compared to what has been achieved 2011-21 (180 dwellings) and 2016-21 (267 dwellings). So once again there are significant doubts about the ability of the market to deliver such a scale of growth in Coalville having regard to recent build rates.
- 4.46. Therefore, for this reason it is considered that Option 3b should not be taken forward.

Option 4b - Principal Town (2,040 dwellings) and New Settlement (3,060 dwellings)

Summary from Sustainability Appraisal

4 significant negative effect – SA2 (Inequalities), SA12 (Bio/geodiversity), SA13 (Landscape/Townscape) and SA14 (Land Use)
2 negative effect – SA6 (Town Centres) and SA11 (Climate change)
2 positive effects - SA4 (Housing) and SA10 (Carbon emissions).

Overall, this option performs similar to other options, particularly in terms of the significant negative effects

Other considerations

- 4.47. This option raises questions regarding the deliverability of the new settlement element of this option (3,060 dwellings up to 2039). It is estimated that development would not commence until 2028 (at the earliest) with a build rate as estimated by the site promoter of 250 dwellings, (which would be higher than that suggested in the Lichfields report referred to at paragraph 4.38). This would result in 2,750 dwellings being built 2028-39. This is less than the number required under this option.
- 4.48. Whilst it would be possible to adjust the figures in this option (i.e. reduce the anticipated number from the new settlement and increase those anticipated from the Principal Town), it is focussed in just two settlement categories (Principal Town and New Settlement) which provides little flexibility or choice. It could also require delivery rates, which if not sustained, represent a risk to the 5-year housing land supply which is required to ensure that the plan does not become out-of-date.
- 4.49. Therefore, it is considered that Option 4b should not be taken forward.

Option 5b - Principal Town (2,295 dwellings), New Settlement (2,295 dwellings) and KSC (510 dwellings)

Summary from Sustainability Appraisal

4 significant negative effect – SA2 (Inequalities), SA12 (Bio/geodiversity), SA13 (Landscape/Townscape) and SA14 (Land Use)

2 negative effect – SA6 (Town Centres) and SA11 (Climate change) 2 positive effects - SA4 (Housing) and SA10 (Carbon emissions).

Overall, this option performs similar to other options, particularly in terms of the significant negative effects

Other considerations

- 4.50. Growth would be more spread out than Options 2b and 4b, but not as well spread out as Option 3b as it would be concentrated in 4 settlements (Coalville, new settlement, Ashby de la Zouch and Castle Donington) compared to 6.
- 4.51. As with other options there are concerns regarding the required build rate in Coalville (301 dwellings each year) compared to what has been achieved 2011-21 (180 dwellings) and 2016 -21 (267 dwellings). So once again there are significant doubts about the ability of the market to deliver such a scale of growth in Coalville.
- 4.52. Deliverability of the New Settlement is potentially of less concern than Option 4b, but there is not much flexibility for slippage.
- 4.53. In view of the number of significant negative effects and the concern regarding deliverability, it is considered that Option 5b should not be taken forward.

Option 6b - Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (1,020 dwellings) and LSC (510 dwellings)

Option 7b - Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

Option 9b - Principal Town (1,020 dwellings), New Settlement (1,785 dwellings), KSC (459 dwellings), LSC (255 dwellings), Sustainable Villages (1,377 dwellings) and Small Villages (204 dwellings)

Summary from Sustainability Appraisal

These options are considered together in view of the fact that their scores are very similar.

Option 6b

3 significant negative effects - SA11(Climate Change), SA12 (Bio/geodiversity) and SA13 (Landscape/Townscape)

2 negative effects – SA1 (Health and SA8 (Sustainable travel)

1 positive effect – SA4 (Housing)

Option 7b

5 significant negative effects – SA2 (Inequalities), SA11(Climate Change), SA12(Bio/geodiversity) and SA13 (Landscape/Townscape) and SA14 (Land

<p>use) 2 negative effects - SA1 (Health) and SA8 (Sustainable travel) 2 significant positive effects – SA4 (Housing) and SA6 (Town Centres)</p> <p>Option 9b 5 significant negative effect - SA2 (Inequalities), SA11(Climate Change), SA12(Bio/geodiversity) and SA13 (Landscape/Townscape) and SA14 (Land use) 2 negative effects – SA6 (Town Centres) and SA8 (Sustainable travel) 1 significant positive effect – SA4 Housing</p> <p>With the exception of Options 1, 2a and 3a, Option 6b has the least number of significant negative scores (3) all of which are common to the majority of options.</p> <p>In terms of Option 7b, only option 8 has more significant positive scores (3).</p> <p>The SA Report comments that in respect of Objective SA4, which is concerned with Housing, that with Option 7b <i>“SA4 (good quality homes to meet local needs) has been identified as a potential significant positive as under this option development is spread across the entire District rather than in a limited number of locations, ensuring that there is an increase in the number and mix of housing whilst also providing an element of affordable housing to meet the needs of the population, particularly at this higher quantum of growth”</i>. Similar wording is used in respect of Option 9b.</p> <p>In effect, 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.</p>

Other considerations

- 4.54. Option 6b results in the least dispersed pattern of development and would only be concentrated in Local Service Centres and above (including a new settlement). This would leave a significant number of settlements without any development, potentially to the detriment of those services and facilities in these settlements which rely upon regular customers. Such an approach would not sit comfortably with the NPPF (paragraph 79) which seeks to ensure that *“Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services”*. Conversely, the pressure upon services and facilities in the higher order centres would be much greater.
- 4.55. In contrast, Option 7b would include development in sustainable villages whilst Option 9b would also include development in small villages. Option 7b would, with the exception a new settlement, represent a continuation of the strategy in the adopted Local Plan; a strategy which has a demonstrable strong delivery record.
- 4.56. Option 9b would represent a significant departure from the current strategy as it would focus more development on the lower order settlements where there are fewer services and facilities. It would have the potential to provide a significant number of smaller sites which could benefit small and medium sized developers, something which the NPPF requires Local

Plans to support. However, Option 7b would potentially also provide such opportunities, albeit perhaps not to the same extent, as it would include development in Sustainable Villages. Option 6b would be likely to provide a more limited number of opportunities in this respect.

- 4.57. Having a greater number of sites in a greater number of locations as in Options 7b and 9b would also represent less of a risk in terms of deliverability.
- 4.58. On balance, it is considered that whilst Option 6b scores well from an SA perspective, the fact that it would result in development being concentrated in a more limited number of settlements and hence sites, it represents something of a risk in terms of deliverability. In addition, it would also provide less benefits from a housing perspective means that it should not be taken forward.
- 4.59. This leaves Options 7b and 9b. In SA terms they score virtually the same, although 7b would potentially provide greater benefit to existing town and local centres (SA4).
- 4.60. The NPPF is clear that *“all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects”*.
- 4.61. Whilst Option 9b would satisfy the requirements of paragraph 79 of the NPPF regarding promoting development in villages, it would result in a less sustainable pattern of development than Option 7b as it would put more development in those settlements with fewer services and facilities. In particular, the smallest settlements have very limited services and facilities compared to other more sustainable settlements, including more limited access to public transport, meaning that people would need to use cars on a regular basis. This would conflict with the aims of national policy to address climate change related issues.
- 4.62. Therefore, it is recommended that neither Option 6b or 9b be taken forward and that **Option 7b** be the preferred option under the High 2 growth scenario.

Option 8 – New Settlement (5,100 dwellings)

- 4.63. Under this option all new housing development (other than existing commitments) would be focussed on a single new settlement. This option performs well under the SA assessment with more positive scores than any other option (6) of which 3 are judged to be ‘significant positive effects’.
- 4.64. This strategy would be unlikely to satisfy the NPPF requirement regarding deliverability. This is because it offers no flexibility in the event that, for whatever reason, development did not proceed as envisaged and so would be a very high-risk approach. It would also conflict with the NPPF which states that *“it is important that a sufficient amount and variety of land can come forward where it is needed”* [emphasis added] (NPPF paragraph 60).

- 4.65. The NPPF requires (paragraph 73d) that assumptions about delivery rates need to be realistic when planning new settlements (or significant extensions to settlements). Having regard to the time taken for new large-scale development to come to fruition, deliverability of 5,100 dwellings by 2039 at the new settlement would be unrealistic. A build rate of 250 dwellings per annum, would only result in 2,750 dwellings being built by 2039.
- 4.66. Therefore, Option 8 was not a reasonable option to take forward.

Overall conclusion regarding distribution options

- 4.67. Having regard to a combination of the outcome from the SA and also other factors, it is considered that under the High 1 scenario Option 3a should be the preferred option at this stage whilst under the High 2 scenario Option 7b should be the preferred option at this stage. These are summarised below.

Table 6 - options to be taken forward

Option	Description
High 1 scenario (1,000 dwellings)	
Option3a	Principal Town (500 dwellings), Key Service Centres (300 dwellings) and Local Service Centres (LSC) (200 dwellings)
High 2 scenario (5,100 dwellings)	
Option7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)

Consultation question

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.

Answer - The Borough Council broadly agree with the approach taken, nevertheless, we would consider that Sustainable Villages and Small Villages should be avoided as locations for major growth, over and above their own local or affordable needs, which should be established by appropriate local housing needs assessments, given the limited infrastructure, services and facilities available in these settlements.

The SA scores for the various options highlights the relevance of North Warwickshire's comments and concerns for options to accord with the LPR Objectives in Chapter 2. These re-inforce the Borough Council's concerns over the potential traffic and service/infrastructure impacts and implications that spreading down and distributing development towards the Sustainable Villages and Small Villages, particularly along/near the edge of the Borough/District Boundary. In the event such a Strategy Option was preferred by NWLDC the Borough Council would seek the District to assess the impacts on settlements and road infrastructure in the North of our Borough, both in traffic impacts on the transport network and on services such as education (primary schools) capacities and health services and facilities.

This would be now as part of the Local Plan process but also when planning applications are submitted. It is likely this will result in requests for contributions / improvements to highways and other services or infrastructure in North Warwickshire.

5. **Housing**

Self-build and custom housebuilding

Introduction

- 5.1. Self-build and custom housebuilding is a key element of the government’s agenda to increase the supply of housing, both market and affordable. Its purpose is also to give more people the opportunity to build their own homes. The Self-Build and Custom Housebuilding Act 2015 (as amended by the Housing and Planning Act 2016) (‘the Act’) provides a legal definition of a self-build and custom housebuilding meaning the building or completion by individuals, an association of individuals or persons working with or for individuals, of houses to be occupied as homes by those individuals.
- 5.2. The adopted Local Plan does not include a policy for self-build and custom housebuilding.

Background

- 5.3. Legislation introduced in recent years places duties on councils relating to increasing the availability of land for self-build and custom housebuilding. The Act requires councils to keep and have regard to a self-build and custom housebuilding register which is a record of the individuals and associations of individuals seeking serviced plots of land in the area to self-build or custom build their own home.
- 5.4. The Act places a further duty upon councils to grant permission for enough suitable plots of land to meet the demand in their area. The level of demand is established by the number of entries added to the council’s register during a base period which runs from 31 October to 30 October each year. The local authority then has 3 years from the end of each base period in which to permit an equivalent number of plots.
- 5.5. The North West Leicestershire register was established in April 2016 and as of 30 October 2021 there are 72 individuals on the list. Using the prescribed base periods, for our district the number of entries, and therefore demand, equates to: -
- Permit 6 plots by October 2019.
 - Permit a further 10 plots by October 2020.
 - Permit a further 8 plots by October 2021.
 - Permit a further 14 plots by October 2022.
 - Permit a further 20 plots by October 2023.
 - Permit a further 14 plots by October 2024.
- 5.6. Since October 2021 we have to date received six additional entries which bring the cumulative total of individuals on the list to 78, overall demonstrating demand for self-build and custom housebuilding plots in the district.
- 5.7. The Planning Practice Guidance (PPG) on [Self-build and custom housebuilding](#) provides further guidance. It states that councils need to take into account the self-build and custom housebuilding register when preparing planning policies. The register is also likely to be a

material consideration when determining proposals for self- build and custom housebuilding plots.

- 5.8. This guidance also suggests how local authorities can best support self-build and custom housebuilding and increase the number of planning permission. For example, planning policies that require the provision of self-build and custom housebuilding plots. In addition, when considering local housing need for the district, this should include an assessment of people wishing to self-build or custom build their own homes.
- 5.9. However, there is nothing set out in legislation or guidance that says proposals for self-build and custom housebuilding plots should be treated any differently to applications for housing in general, for example, they will be expected to comply with general housing policies in the Local Plan.
- 5.10. Notwithstanding, there is a clear demand for self- build and custom housebuilding plots in the district. In light of this and national policy and guidance, this issue has been addressed in previous reports to the Local Plan Committee. This was initially considered at Local Plan Committee on [12 September 2018](#), primarily to investigate how a self-build and custom housebuilding policy could be included in the Local Plan Review.
- 5.11. We then consulted upon options as part of the [Emerging Options consultation](#) between November 2018 and January 2019, including the provision of a policy in respect of self-build and custom housebuilding plots. A meeting of the Local Plan Committee on [26 June 2019](#) considered all the responses to that consultation. It was agreed at this committee not to require the provision of self-build and custom housebuilding plots as part of general market developments, due to the practical issues with the application of such an approach and due to the lack of consistent support from Inspectors at examinations of Local Plans. Therefore, the Local Plan Committee agreed to give further consideration to the most appropriate form for such a policy and additionally agreed that not including a policy was not considered appropriate.
- 5.12. The matter was further considered in detail at Local Plan Committee on [27 May 2020](#) and the committee agreed the options and approach detailed below for consultation.

Policy Options

General Policy on self- build and custom housebuilding

- 5.13. The following are potential options for how the issue of self-build and custom housebuilding could be addressed in the Local Plan Review.
 - Option 1: Inclusion of a general policy on self-build and custom housebuilding.
 - Option 2: Inclusion of a general policy on self-build and custom housebuilding with a 'list of criteria' to identify the matters self-build and custom housebuilding development proposals should satisfy, for example, design, amenity and highway safety.
- 5.14. A summary assessment of the advantages and disadvantages of the two other options is set out in the following table.

ADVANTAGES	DISADVANTAGES
Option 1 – inclusion of a general policy on self-build and custom housebuilding	
<ul style="list-style-type: none"> • A general policy would explicitly state the council’s support for self-build and custom housebuilding and confirm its commitment to the maintenance of a self-build register. • Demonstrates the council’s commitment to this issue. 	<ul style="list-style-type: none"> • Not considered to add any value to the guidance contained in National Policy and Guidance and lacks a mechanism to deliver self-build and custom housebuilding plots.
Option 2 – inclusion of a general policy on self-build and custom housebuilding with a ‘list of criteria’	
<ul style="list-style-type: none"> • Demonstrates and explicitly states the council’s support for self-build and custom housebuilding. • Provides further detail on how such applications would be assessed in terms of design, amenity, highway safety etc 	<ul style="list-style-type: none"> • Question whether this would add value to National Policy and Guidance. • These issues are not unique to this form of development and are applicable to all new dwellings and housing development in the district. • It is advised that similar overarching policies would also be included within any future adopted Local Plan and would apply to all forms of development. Therefore, could result in an unnecessary duplication of policy.

Specific self-build and custom housebuilding housing allocations

5.15. In addition, to a general policy, the Local Plan Committee also gave consideration to the identification and allocation of land within the Local Plan, to be used solely as self-build and custom housebuilding plots. The number of allocations could be calculated having regard to the number of individuals or organisations on the council’s self-build register. Two options were considered to implement this approach, both detailed below along with the advantages and disadvantages of each.

- Option 3 - the identification and allocation of land within the Local Plan, to be used solely as self-build and custom housebuilding plots.
- Option 4 – council to bring forward and/or make land available solely to self-build and custom housebuilding plots.

ADVANTAGES	DISADVANTAGES
Option 3 – Identification and allocation of land specifically for self-build and custom housebuilding plots.	
<ul style="list-style-type: none"> • Approach would provide a specific mechanism for providing self-build and custom housebuilding plots. • Council could choose to go down this route as a landowner irrespective of any specific policy provision in the Local Plan. 	<ul style="list-style-type: none"> • Questions are raised over the justification for allocating sites specifically for self-build and custom housebuilding as opposed to general housing, particularly given there are no ‘special circumstances’ in planning policy terms for self-build and custom housebuilding. • Allocation would need to be in locations which are acceptable in planning terms.

	<ul style="list-style-type: none"> • Approach may not increase housing supply and could replace one form of housing (general) with another form of housing (self-build and custom housebuilding). Consequently, it could be at the expense of other forms of housing that meets a need. This issue could however be addressed if it is identified that the provision of any of these sites would not count towards the district's overall housing provision, reducing concern over their deliverability.
<p>Option 4 – Council to bring forward and/or make land available solely to self-build and custom housebuilding plots.</p>	
<ul style="list-style-type: none"> • Approach would provide a specific mechanism for providing self-build and custom housebuilding plots. 	<ul style="list-style-type: none"> • In addition, to the above issues, the council does not own significant areas of land and so it is questionable as to how many plots could be delivered. • Regards the acquisition of land, queries are raised as to whether the Council is in a position to be able to take on financial liabilities and risks to enable acquisition of land. • Relatively limited demand for serviced plots, when compared to other housing needs and demands in the district. Are the challenges and risks proportionate to the benefits?

Preferred Option

5.16. Having considered the potential impacts and benefits of the potential policy options, a hybrid approach is the preferred way forward.

5.17. The suggested policy has a number of elements:

- 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)
- Seeks the provision of serviced plots for self-build and custom housebuilding plots on larger housing sites/allocations, providing there is evidence of demand. By limiting this approach to sites of a specific size and where there is evidence this is considered to address some of the concerns identified by Inspectors at other Examinations.
- Identifies the site threshold for when self-build and custom housebuilding serviced plots are to be sought.
- Allows flexibility to facilitate the development of service plots that remain unsold for a period of time.

- 5.18. The suggested policy is set out below.

Policy XX - Self-build and custom housebuilding

Proposals which meet the definition of self-build and custom housebuilding will be supported in any location considered to be suitable for housing, in accordance with the policies of this Local Plan, including allocated sites, committed sites and windfall sites. Where there is clear evidence of demand in the district, as evidenced through the self-build and custom housebuilding register or other evidence submitted as part of any planning application, and where servicing and site arrangements can be made suitable and attractive for such homes, the Council will seek the provision of land for self-build and custom housebuilding plots on housing sites capable of providing 50 or more dwellings, as part of an appropriate mix of dwellings.

Where self-build and custom housebuilding plots are included as part of a larger scheme which also includes plots or dwellings available on the open market, and where the self-build and custom housebuilding plots have been made available and marketed appropriately for a period of at least 12 months but have not been sold, then the plots may either remain available for purchase on the open market or be built out by the developer for sale on the open market.

Consultation question

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

Answer - Yes, consider hybrid solution probably best option and achievable.

Space Standards

Introduction

- 5.19. The [Nationally Described Space Standards](#) (NDSS) are intended to provide a reasonable minimum level of internal living space, reflective of the proposed level of occupancy for that dwelling. It sets out requirements for the gross internal floor area of new dwellings and dimensions for key parts of the home such as bedrooms, the amount of built-in storage and ceiling heights. These standards are not part of building regulations and are solely within the planning system as a form of technical planning standard.
- 5.20. A number of benefits are associated with ensuring there are a minimum set of standards including improved family cohesion, reduced overcrowding, space for solitary activities such as studying or home working and suitable daylight and ventilation. These benefits have particularly become more relevant with increased agile working – which is likely to remain for many office-based workers – as a result of the COVID-19 pandemic.
- 5.21. Policy D1 of the adopted Local Plan includes the provision of appropriate storage and facilities for waste, recycling and bicycles, but there is no reference to space standards or other storage requirements.

- 5.22. The Council's [Good Design Supplementary Planning Document](#) (SPD), published in 2017, provides supplementary guidance to Local Plan policies for applicants relating to the Council's design aspirations for new developments. Amongst other matters it:
- seeks to ensure spaces are fit for purpose having regard to their intended use and maximum number of occupants.
 - encourages applicants to demonstrate that sufficient space is provided to include items that would reasonably be expected to be found within a particular room, along with the appropriate space to function in each room.
- 5.23. The SPD does not go as far as specifying the space standards required, however it is presently being reviewed. Further guidance and new policy on space standards should complement one another.

Background

- 5.24. To justify the inclusion of internal space standards the [PPG](#) states this involves providing evidence of need based on the type and size of development currently being built and assessing the impact on viability. Where a policy has been adopted, there should also be a reasonable transitional period to enable developers to factor the cost of space standards into future land acquisitions.
- 5.25. The PPG also advises that two main impacts could arise from adopting a space standard – the viability of an individual development and, as a consequence, the deliverability of potential site allocations for housing and implications on the housing land supply – and on affordability.
- 5.26. The PPG states councils should take account of the following to inform whether they should adopt the space standards:
- **Need** – evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed;
 - **Viability** – the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities also need to consider impacts on affordability where a space standard is to be adopted;
 - **Timing** – there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.
- 5.27. We have completed an initial assessment of floorspace from a small sample of dwellings using the Gross Internal Area (GIA) derived from floorplans and information submitted as part of planning applications since 2015. The majority of developments exceed the NDSS, although those that fell below the standards were developments in the smaller settlements of Moira and Ravenstone. To determine whether this is reflective of issues regarding viability, a range of site typologies reflective of the settlements and of comparable development sizes would need to be tested through the Local Plan Viability Assessment which will be completed prior to the Regulation 19 version of the plan.

Policy Options

- 5.28. We have considered the following policy options for incorporating space standards:
- 5.29. **Option 1** – Do not include a policy on NDSS and future developments would continue to meet the mandatory space standards required through Building Regulations.
- 5.30. **Option 2** – Consider applying space standards to developments of a certain size or tenure, where achieving the standards is less likely to impact on the viability of the development. The Council will test the NDSS through its Local Plan Viability Assessment, which will include testing a number of alternative development sizes and site typologies in different settlements in the settlement hierarchy.

Preferred Option

- 5.31. At this stage we consider it appropriate to include a policy that applies to all new dwellings and which clarifies that this includes conversions and subdivision of existing buildings. This option reflects the council's position that the NDSS should be the minimum standards and would see higher internal space standards than if the Local Plan Review stays silent on this matter. The impact of these standards on viability will need to be assessed through the Local Plan Viability Assessment.

Policy XX: Space Standards

Gross internal floor areas for all new residential developments, including conversions, will be required to meet the Nationally Described Space Standards, as a minimum, as set out in the Technical Housing Standards Nationally Described Space Standard, or successor.

Consultation question

Q7 - Do you agree with the proposed policy on Space Standards? If not, why not?
Answer - Yes. Currently Seeking to adopt the standards in the Borough through Design SPD.

Accessible and Adaptable Housing

Introduction

- 5.32. The NPPF makes clear that local planning authorities should seek to address the needs of different groups with specific housing requirements in their communities, including older people and those with disabilities.
- 5.33. Accessibility requirements for dwellings are set out in the Building Regulations (Part M, 2015). However, the [PPG](#) includes provisions for councils to consider requiring enhanced levels of accessibility, adaptability and wheelchair standards in new homes to help address the needs of specific groups. The categories – as set out in Building Regulations Part M10 are:

M4(2) Accessible and adaptable dwellings must be designed to enable most people to access and use the dwelling and incorporate features which:

- make it potentially suitable for a wide range of occupants, including older people and those with reduced mobility; and
- allow adaptation of the dwelling to meet the changing needs of occupants over time.

M4(3): Wheelchair user dwellings includes two different levels:

- a) Wheelchair adaptable dwellings which must be designed to allow simple adaptation of the dwelling to meet the needs of occupants who use wheelchairs.
- b) Wheelchair accessible dwellings which must be designed and built with the necessary features/adaptations included to enable it meets the needs of occupants who use wheelchairs.

5.34. The provision of wheelchair accessible and adaptable housing built from the outset to meet current and future demand enables people to live more independently and not have to move home and results in savings on a range of health and social costs in the long term.

5.35. Policy H6 of the adopted Local Plan (House Types and Mix) seeks to ensure that market housing meets the needs of the district's current and future residents, delivering a range of types and sizes. Notably, for development of 50 or more dwellings, the policy states the following will be provided: *"A proportion of dwellings which are suitable for occupation or easily adaptable for people with disabilities in accordance with Part M4(2) of the Building Regulations"*. No policy addresses the provision of wheelchair adaptable or accessible homes.

Background

5.36. The PPG states that an ageing population will see the numbers of disabled people continuing to increase and it is important to plan early and meet the needs throughout their lifetime. It advises that Local Plan policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling i.e. social housing. All other requirements apply to both market and social housing. The PPG draws a distinction between wheelchair accessible and wheelchair adaptable homes.

5.37. A [Local Housing Needs Assessment](#) (LHNA) report undertaken to support the Local Plan Review considered the needs of older people and those with disabilities and looks at the potential requirements for housing built to the accessibility and wheelchair technical standards in accordance with the PPG. The study identifies that over the period 2018-2036, the district is projected to see a notable increase in the older person population with the total number of people aged 65 and over increasing by 47% over this period. This compares with overall population growth of 13% and a modest increase in the under 65 population of 4%. The proportionate increase in the number of older people in the district is higher than that projected for Leicestershire and East Midlands Review considered the needs of older people and those with disabilities and looks at the potential requirements for housing built to the accessibility and wheelchair technical standards in accordance with the PPG. The study identifies that over the period 2018-2036, the district is projected to see a notable increase in the older person population with the total number of people aged 65 and over increasing by

47% over this period. This compares with overall population growth of 13% and a modest increase in the under 65 population of 4%. The proportionate increase in the number of older people in the district is higher than that projected for Leicestershire and East Midlands.

- 5.38. Taking account of future population growth there is projected to be an increase of 61% of the population aged 65 and over with mobility problems. Other notable findings from the report include a future need for all types of specialist housing for older people; a need for additional care bedspaces; and a need for around 400 dwellings to be for wheelchair users – meeting technical standard M4(3). The study concludes that there is a clear need to increase the supply of accessible and adaptable dwellings and wheelchair user dwellings as well as providing specific provision of older persons housing.
- 5.39. It recommends that the Council considers requiring all dwellings, in all tenures, to meet the M4(2) standards – this is compared to the adopted policy requirement only applying to applications for 50 or more dwellings. It also recommends at least 5% of homes meeting M4(3) for social housing.
- 5.40. The study also recommends that the Council should consider if a different approach is more appropriate for market housing and affordable homes, recognising that registered providers may already build to higher standards.

Policy Options

- 5.41. We have considered the following policy options:
- 5.42. **Option 1** – to roll forward the adopted Local Plan policy of seeking a proportion of dwellings to meet standard M4(2) for developments of over 50 dwellings. This would result in developments of less than 50 dwellings potentially not meeting a need for accessible and adaptable housing over the plan period.
- 5.43. **Option 2** - require all dwellings to meet the M4(2) standard for accessible and adaptable dwellings.

Preferred Option

- 5.44. Informed by the evidence on the need for adaptable and accessible homes, we will require all dwellings to meet the M4(2) standard for accessible and adaptable dwellings. This requirement goes further than the adopted Local Plan which requires this standard for developments of 50 or more dwellings. This is to ensure the future housing stock in the district is able to accommodate the increase in demand for accessible and adaptable housing, if needed, particularly in rural settlements where development proposals would not meet the adopted threshold.
- 5.45. We propose to take forward the recommendation in the LHNA to require at least 5% of affordable homes to meet the standard for M4(3) wheelchair adaptable and accessible dwellings. Furthermore, we will work with Registered Providers to identify what proportion of this requirement should be for wheelchair adaptable or wheelchair accessible dwellings.

Policy XX: Accessible and Adaptable Housing

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).

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.

Exceptions to these requirements will only be considered where it can be robustly demonstrated that it will not be possible to provide safe, step-free access.

Consultation questions

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

Answer - Yes

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

Answer - Yes

6. Development strategy options for employment

- 6.1. One of the key elements of the Local Plan Review will be to make sure there is a sufficient supply of new employment land in suitable locations to match the likely requirements of local businesses and inward investment. As for housing, there are choices to be made about the amount, types and location of future employment land. The selected approach must be an appropriate one having regard to both the evidence and realistic alternatives.
- 6.2. We use the term 'general employment land' to encompass the following uses:
- offices (use class E(g)(i))
 - research & development (use class E(g)(ii))
 - light industrial (use class E(g)(iii))
 - industrial (use class B2)
 - non-strategic warehousing (units up to 9,000sqm) (use class B8).
- 6.3. The needs of the strategic warehousing sector (units of more than 9,000sqm) are covered later in this section.

Need for general employment land

- 6.4. 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.
- 6.5. The market for new offices has been somewhat constrained. Whilst the number of office-based jobs in the district has increased, this has not been matched by the demand for actual new office space.
- 6.6. 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.
- 6.7. Table 7 shows how much additional office and industrial/smaller warehousing space will be needed between 2017-39 according to the Stantec study and also shows the land supply position at 31 March 2021. The assessment includes the following:
- a **losses allowance** to take account of future losses of employment land to other uses;
 - a **flexibility margin** equivalent to 5 year's annual average completions as insurance for uncertainty and changing business needs; and
 - the **plot ratios** used in the Stantec study. Plot ratios are used to estimate how much land will be needed to provide a certain amount of employment floorspace. The Stantec study uses plot ratios of 60% for offices and 40% for industry/smaller

warehousing. As an example, for 100sqm of offices the amount of land needed will be $100/0.6 = 167\text{sqm}$ of land

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	Total Requirement [A+B+C]	70,685	11.28	285,284	71.57
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	Total Supply [E+F+G]	68,750	20.4	119,540	38.39
	Residual requirement(+)/surplus(-) (2021-39) [H-D]	1,935	-9.12	165,744	33.18

- 6.8. 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**. At first look it appears that there is an over-supply of land for offices (9.12ha) but, from what we know from extant planning permissions etc, this will not be enough to accommodate the new office floorspace requirement in full. At a plot ratio of 60%, some 3,300sqm of land (0.3Ha) will be needed for up to 2,000sqm of office space.
- 6.9. There are two further matters which could impact on the amount and type of additional employment land that the Local Plan will need to identify:
- the Leicester and Leicestershire authorities have commissioned a replacement for the 2017 HEDNA. Amongst other things, this will contain an alternative assessment of employment land requirements for each authority area, including NWL. The study is due to be completed in Spring 2022 and we will consider the implications of its findings in due course.
 - Leicester City Council has declared an unmet need for some 23Ha of employment land. As with housing, how and where this unmet need should be addressed is the subject of discussion and negotiation between the Leicester and Leicestershire authorities with the intention that an agreed position will be set out in a revised Statement of Common Ground. Any implications for NWL's employment land requirements will be addressed through our plan-making process.

Continuity of supply

- 6.10. At 1 April 2021 there is some 53Ha of land allocated or with planning permission for general employment uses in the district. We have looked at the timescales for when these sites are likely to be developed and this reveals that there is some risk that the supply of suitable,

available employment land will tail off considerably (and could even reach zero) in the later years of the plan review period.

- 6.11. The additional land allocations which will be included in the plan will help the position but achieving an appropriate continuity of supply could still be an issue. There is no NPPF requirement to demonstrate a rolling supply of employment land but there is a risk that business growth could be frustrated by a lack of suitable sites post 2031. The NPPF confirms that “planning policies should... set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period” (paragraph 82b) (emphasis added).

Policy Options

- 6.12. In response, the following are potential ways of ensuring a continuity of supply in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
<p>Option 1 – identify reserve site/s. This would involve identifying specific additional site/s in the Local Plan Review, on top of those needed to meet the numerical requirements which would be released for development only in the specific circumstances of insufficient supply. The plan would include a policy setting out the triggers which would need to be met to justify the release of the site/s.</p>	
<ul style="list-style-type: none"> • it helps give certainty to users of the plan • it is a pro-active approach • it gives the council control over site selection 	<ul style="list-style-type: none"> • it may be difficult to make any policy triggers sufficiently definitive • the reserve site/s may not match every occupier’s site requirements (in terms of size, location etc)
<p>Option 2 – increase the requirement figures by an additional factor. This would involve increasing the numerical requirement for additional employment land by a certain amount or percentage and allocating a correspondingly more land in the plan.</p>	
<ul style="list-style-type: none"> • it increases the total quantity of employment land • it gives extra flexibility and choice to the market 	<ul style="list-style-type: none"> • it does not provide control over the timing of, and circumstances when, the additional land would become available. • it relies on the market reaching a natural balance to spread out delivery over the plan period.
<p>Option 3 – await the next review of the Local Plan. This is a ‘do nothing for now’ approach. As the issue potentially arises at the end of the plan period, and plans are subject to 5-yearly reviews, we would monitor our needs and supply position and reconsider whether additional land needs to be identified next time the plan is reviewed. This is the approach suggested in the Stantec study (starting at paragraph 6.5).</p>	
<ul style="list-style-type: none"> • it removes a risk of allocating more land than necessary in the short to medium term 	<ul style="list-style-type: none"> • it defers dealing with a known potential issue
<p>Option 4 – rely on Policy Ec2(2) or its equivalent. Policy Ec2(2) in the adopted Local Plan applies to proposals for employment development on unidentified sites in the countryside.</p>	

ADVANTAGES	DISADVANTAGES
If land supply becomes insufficient in the later part of the plan period, we would use Policy Ec2(2) or its equivalent to consider applications on such sites.	
<ul style="list-style-type: none"> it removes a risk of allocating more land than necessary in the short to medium term 	<ul style="list-style-type: none"> it does not involve a comprehensive assessment of which would be the 'best' sites it does not provide control over the timing of, and circumstances when, sites would come forward

Consultation question

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

Answer - Consider this a matter mainly for NWLDC to determine its preference but would suggest Options 1 and 2 or a hybrid would provide the District with greater control over location and delivery.

Strategy options for general employment land

- 6.13. In addition to the amount of additional land needed, we also need to consider how this should be distributed within the district.
- 6.14. As a starting point, the Table 8 shows the geographic distribution of the employment developments completed between 2017-21 as well as extant planning permissions and allocated land at April 2021. This is, in effect, the distribution delivered by the adopted Local Plan.

Table 8: Local Plan distribution of employment land

Area	Offices	Industry	Smaller B8	Industry + Smaller B8	Strategic B8
Measham/Appleby Magna area	4%	4%	-	2%	26%
Ashby area	57%	19%	42%	23%	5.2%
Castle Donington area (incl. Diseworth, Lockington)	23%	14%	20%	16%	58.7%
Coalville area (including Bardon)	12%	63%	34%	52%	-
Sawley	-	-	-	-	8.7%
Elsewhere (Heather, Kegworth, Moira, Sinope, Breedon)	4%	-	4%	7%	1.4%

- 6.15. This shows that the majority of recent/forthcoming employment development is in a relatively limited number of locations in NWL. For offices, completions and future supply is focused in Ashby, in particular at Ivanhoe Business Park (now complete) and at Money Hill, with a significant amount of office floorspace also permitted at Park Lane and EM Point at Castle Donington.
- 6.16. The main location for industrial uses has been the wider Coalville area including the recently completed Tungsten Park, Bardon and sites under construction at Victoria Road, Ellistown and east of Regs Way. The concentration of smaller scale warehousing at Ashby is accounted for by Money Hill, Land north of Lountside, Flagstaff Island and units at Ivanhoe Business Park. When the industrial and smaller warehousing figures are combined, Coalville has the greatest proportion of floorspace followed by Ashby and Castle Donington.
- 6.17. This pattern aligns with the settlement hierarchy in the adopted Local Plan with the majority of general employment provision at the most sustainable settlements of Coalville, Ashby de la Zouch and Castle Donington.
- 6.18. The Castle Donington area has been the focus for strategic scale distribution and Mercia Park accounts for the substantial amount of strategic distribution floorspace in the Measham/Appleby Magna area with significant developments also at Ashby (former Lounge site) and Sawley (Aldi).

Policy Options

- 6.19. We have devised 4 potential options for how the Local Plan Review could distribute future employment land. At this stage we have not identified a preferred option, pending the outcomes from the sustainability appraisal and the consideration of feedback from this current consultation.
- 6.20. **General Employment Land Strategy Option 1.** This would be a continuation of the adopted Local Plan distribution. General employment land allocations would be principally at Coalville, Ashby and Castle Donington (i.e. the settlements at the top of the settlement hierarchy). Features of this approach include:
- it could result in a choice of sites
 - the overall number of locations would be limited and mirror those where there is current supply
 - other settlements would not see any increase in supply
 - potentially the sites would be well related to labour supply
- 6.21. **General Employment Land Strategy Option 2.** This would involve allocating employment land at Coalville, Ashby and Castle Donington (like Option 1) and also at Measham/Appleby Magna as a 'new', expanding employment location. Features of this approach include:
- it could result in a choice of sites
 - the overall number of locations would be fairly limited and mirror those where there is current supply
 - other settlements would not see any increase in supply

- potentially the sites would be quite well related to labour supply and there may be particular benefits for Measham where there are known pockets of deprivation
- the strategy could include establishing J11A42 as a ‘new’, expanding employment location, capitalising on the profile of Mercia Park with the potential to share infrastructure
- however there is also likely to be strong competition from the strategic distribution sector in this location

6.22. **General Employment Land Strategy Option 3.** This approach would involve a more widespread distribution of employment land, including to locations which are currently less well provided for such as the Local Service Centres – Ibstock, Kegworth, Measham – and, potentially, Sustainable Villages. Key features of this approach include:

- it could result in a choice of both sites and locations
- Local Service Centre locations are unlikely to be as attractive to the market compared with Coalville, Ashby and the Castle Donington area
- the Stantec study recommends that we plan for “development opportunities at substantial sites, with critical mass and visibility, rather than relying on piecemeal development on scattered plots” (paragraph 6.13). This option may be more likely to result in the latter.

6.23. **General Employment Land Strategy Option 4.** This would involve allocating land in a single/new location for a high quality, mixed-use business park. The features of this option include:

- it could achieve the Stantec recommendation for development of a critical mass and visibility comprising modern, flexible high-specification space in an attractive environment (paragraphs 5.104, 6.13)
- it would result in a more limited choice of locations compared with other options
- potential locations could be in competition with the strategic distribution market
- this approach could be incorporated as part of a mix of uses in a new settlement, although this is likely to push delivery to the end of the Local Plan Review period and/or beyond
- there is already an opportunity for this approach at Money Hill (16Ha), if there is sufficient demand

Consultation question

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

***Answer - Similar response to that in Q5.
See the full response in Appendix 2 in the attached formal Response Form.***

Strategic warehousing: need and supply

6.24. Over recent years there has been considerable demand for new-build strategic warehousing (logistics) in NWL, that is units of 9,000sqm and above. This reflects the district’s exceptionally good strategic transport links, notably the M42/A42 transport corridor, the A50/Midland Main

Line and M1/A511. Since April 2011, permissions have been granted for some 423Ha of strategic warehousing including East Midlands Gateway (139Ha), plots at East Midlands Distribution Centre (22Ha), Mercia Park (97Ha), and Aldi at Sawley (39Ha). The level of provision in NWL alone has exceeded what was predicted for the whole of Leicester and Leicestershire up to 2031 in the [Strategic Distribution Study \(2017\)](#) which signals the particular market strength of this sector in the district.

- 6.25. With respect to the logistics sector specifically, the NPPF states that “planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for.... storage and distribution operations at a variety of scales and in suitably accessible locations” (paragraph 83). A key matter for the Local Plan Review will be to how to make an appropriate level provision for the strategic distribution sector in the face of continuing demand.
- 6.26. An updated assessment of this sector’s needs (2020-41) is provided in the [Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change \(April 2021\)](#) study (‘the study’) which was jointly commissioned by the Leicester and Leicestershire authorities. The study has a base date of 1st April 2020 and once the land supply position is updated to April 2021, there is a current supply of some 387,125 sqm of strategic distribution floorspace at rail served sites and 1,131,014 sqm at non-rail served sites in Leicester and Leicestershire. 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 ^{Ha}) at rail served sites and 334,986 sqm (96Ha) at non-rail served sites.
- 6.27. 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.
- 6.28. An application at Netherfield Lane, Sawley in NWL (20/00316/OUT) was approved in October 2021 and this adds some 33,675 sqm of strategic warehousing to the supply (and 32,051 sqm non-strategic units). Taking this into account results in a **shortfall of 301,293 sqm at non-rail served sites to 2041**. Also, permission has recently been granted on appeal for 89,200 sqm of industry (B2)/warehousing (B8) in Hinckley and Bosworth Borough (on the border with NWL). Depending on the split between uses, this would further reduce the shortfall to **at least 212,093sqm**.

Strategic warehousing: initial policy option

- 6.29. The Leicester and Leicestershire authorities are working together to assess how best the outstanding requirements can be met in a way which maintains an appropriate supply in terms of geography and trajectory, as recommended in the study.
- 6.30. To enable us to make progress whilst this joint working continues, we have decided to proceed on the basis of an initial option. Making no/minimal provision for strategic distribution would be unrealistic in view of the intensity of the development pressure in NWL for this sector. Importantly, any option at this stage is preliminary and does not signal the council’s commitment or agreement to take a particular share of the remaining Leicester and Leicestershire need.

- 6.31. **Initial Policy Option:** 50% of the outstanding road-served requirement to be met in NWL which would equal approximately 150,000sqm, or about 106,000sqm taking account of the recent appeal decision in Hinkley and Bosworth subject to confirmation with the other Leicester and Leicestershire authorities.
- 6.32. To put this in context, the higher of these two figures would be slightly less than the size of the Amazon unit at Beveridge Lane, Ellistown.

Consultation question

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

Answer - *There are a number of issues and concerns the* Borough Council consider NWL District should be aware of as part of the consideration of the above options.

(i) The potential for the Hinckley NRFI to address the rail-served requirement for Strategic Warehousing should be caveated by the difficulty of requiring site operators/users to use the Rail Freight services and will therefore still have a significant impact and implication for HGV traffic levels and transport infrastructure. The Borough's experience and appeal decision for the Birch Coppice SRFI showed that conditions and legal requirements for users and operators within Strategic Employment/Logistics sites to be Rail freight served/based (solely or partly) are unenforceable and likely to be removed as an element of any Decision Notice or S106 Legal Agreement. The traffic and transport implications must still be assessed as if the Rail freight element did not apply/exist.

(ii) At the recent Local plan examination for the North Warwickshire Local Plan, despite the potential for other sites in the Sub-region to address these Strategic site needs the Inspector still required the Borough to address the issue of strategic need through a separate Policy on wider than local need. The Borough would therefore urge North West Leicestershire to adopt a similar Policy approach to address this issue in the emerging Local Plan review.

7. **Employment**

- 7.1. The adopted Local Plan contains a suite of policies which support and direct employment-generating development. This section considers possible approaches to Local Plan Policy Ec2 – new employment sites and also discusses potential new policies for start-up workspace and local employment initiatives.

Policy Ec2(2) – New employment sites

Introduction

- 7.2. Policy Ec2 in the adopted Local Plan is concerned with new employment sites. Part 1 of the policy allocates up to 16ha of land at Money Hill, Ashby de la Zouch for employment. This is part of a wider allocation for housing, part of which has outline planning permission.
- 7.3. Part 2 deals with the circumstances where a planning application is submitted for additional offices, industry and/or warehousing on an unallocated site. We need to consider whether or not a similar type of policy to Ec2(2) should be retained in the Local Plan Review and, if so, what form it should take.

Background

- 7.4. The context for this is the plan's approach to flexibility to deal with unpredictable circumstances. The NPPF makes clear that the achievement of sustainable development is linked to three overarching objectives: an economic objective, a social objective and an environmental objective. With respect to the first of these, the planning system should "help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure" (paragraph 8, emphasis added)
- 7.5. The NPPF directs 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" (paragraph 82d).
- 7.6. 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.
- 7.7. In the preceding chapter, and in common with approaches elsewhere, we have added a flexibility margin to our need figures to help ensure a degree of flexibility and market choice of sites. We also set out options for how best to achieve a continuity of supply. There has been considerable market interest in employment development in the district over recent years, in particular for strategic scale warehousing, and it is likely that this demand pressure will

continue and could be different or stronger from what is currently predicted. The question now is whether the plan should also have a policy for employment land proposals on unidentified sites?

Policy Options

7.8. We have devised the following potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
<p>Option 1 - delete Policy Ec2(2) Applications for new employment floorspace on sites which are not allocated in the plan would be considered against the strategy/general policies contained in the Local Plan Review.</p>	
<ul style="list-style-type: none"> • overcomes the concern that Policy EC2(2) in its current form encourages unwarranted applications 	<ul style="list-style-type: none"> • it is less clear for all users of the plan which considerations will apply to a proposal for additional employment floorspace on an unallocated site • it is uncertain whether or not the approach would be sufficiently flexibility to accord with the NPPF although the supply continuity options which relate to reserve sites and adding to the requirement figures could help in this regard
<p>Option 2 – retain Ec2(2) in its current form (business as usual) Applications for new employment floorspace on sites which are not allocated in the plan would be considered against Ec2(2) plus any other relevant policies.</p>	
<ul style="list-style-type: none"> • provides clarity for all users of the plan about the criteria which will apply • demonstrates how the plan deals with the NPPF requirement for flexibility 	<ul style="list-style-type: none"> • does not overcome the concern that the existence of the policy encourages unwarranted applications • does not deal with the concern that the current policy is too permissive • the Stantec report suggests there is a risk of piecemeal development (paragraph 6.12) which would not provide the quality and scale of industrial space that high-value occupiers are looking for
<p>Option 3 – amend Policy Ec2(2) to make it more specific/restrictive (a) - include a requirement that the premises should be for a named end user</p>	
<ul style="list-style-type: none"> • enables the actual business requirements to be more easily explained and assessed through the planning application process 	<ul style="list-style-type: none"> • would exclude situations where there is a genuine market demand but no named end user and so may not be sufficiently flexible • firms can have genuine reasons for not wanting to publicise relocation plans before they are confirmed e.g. staff retention issues
<p>Option 4 – amend Policy Ec2(2) to make it more specific/restrictive (b) – amend the alternative sites test to include sites with planning permission Ec2(2) currently requires applicants to assess land allocated in the plan as potential alternative locations for the need/demand which has been identified. This could be expanded to also include sites which have planning permission.</p>	

ADVANTAGES	DISADVANTAGES
<ul style="list-style-type: none"> ensures that other suitable sites are explored with reasons given if they are discounted before an unidentified site could be deemed acceptable 	<ul style="list-style-type: none"> could be onerous for applicants (although a similar exercise is usually part of the Environmental Impact Assessment process)
<p>Option 5 – amend Policy Ec2(2) to make it more specific/restrictive (c) – amend the alternative sites test to potentially include sites outside the district Ec2(2) currently requires applicants to assess land allocated in the plan as potential alternative locations for the need/demand which has been identified. This could be expanded to potentially include sites which are outside the district but within the market area for the development.</p>	
<ul style="list-style-type: none"> may better reflect the ‘real life’ site search a business would undertake for strategic warehousing, this would better reflect the sub-regional nature of the market 	<ul style="list-style-type: none"> could be onerous for applicants (although a similar exercise is usually part of the Environmental Impact Assessment process) it will be difficult to justify the extent of the site search area the district council does not have planning control over sites outside the district
<p>Option 6 – amend Policy Ec2(2) to make it more specific/restrictive (d) - demonstrate that the need/demand is exceptional Ec2(2) currently requires evidence of an immediate need or demand. This could be expanded to require applicants to demonstrate that their need/demand is exceptional and that it was not/could not have been captured by the studies which the Local Plan Review relies upon.</p>	
<ul style="list-style-type: none"> captures a business-specific justification provides a policy framework for ‘needs not anticipated in the plan’ (NPPF paragraph 81d) to be addressed 	<ul style="list-style-type: none"> approach effectively invites applicants to challenge/undermine the council’s employment needs evidence base
<p>Option 7 – amend Policy Ec2(2) to make it more specific/restrictive (e) – omit the reference to ‘demand’ and refer to ‘need’ only</p>	
<ul style="list-style-type: none"> NPPF uses the single term ‘need’ and does not draw a distinction between ‘need’ and ‘demand’ 	<ul style="list-style-type: none"> excluding the term ‘demand’ could in effect exclude proposals that would meet a business-specific requirement and/or address a market gap. This could be considered to be out of step with the NPPF direction for policies to be “flexible enough to accommodate needs not anticipated in the plan” (paragraph 82).
<p>Option 8 – amend Policy Ec2(2) to make it more specific/restrictive – combination of Options 3-7.</p>	
<ul style="list-style-type: none"> overall, a more restrictive approach helps to address the concern that the current policy is insufficient to resist inappropriate development 	<ul style="list-style-type: none"> overall, a more restrictive approach could dissuade genuine investment opportunities which would have benefitted the local economy

Consultation question

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

Answer - See attached sheet / Response Form.

Start-up space

Introduction

- 7.9. In addition to the amount and location of new employment land, the Local Plan Review also has a role in helping to identify and cater for specific sector requirements, including where a specific business need is not being met by the market. A case in point is the concern that there is a shortage of premises suitable for start-up businesses. In response, one of the objectives in the Council's [Economic Growth Plan \(2019-21\)](#) is to ensure there is sufficient workspace and support for new enterprises and for business start-ups.

Background

- 7.10. Whilst the NPPF does not talk about start-up space specifically, it does emphasise that planning policies should work to meet anticipated needs over the plan period (paragraph 82b).
- 7.11. To understand the issue in more depth, we commissioned a [Start-up Workspace Demand Report](#) ('the report') which forms part of the evidence base for the Local Plan Review. The report found evidence of occupiers struggling to find small scale industrial units in NWL suitable for start-up firms. A link is made to viability issues; the development of small industrial space is constrained by low rental values and high building and fit-out costs, despite there being evidence of strong latent demand for such premises. Small businesses are also typically looking for shorter leases with more flexible terms and these are less attractive for many landlords. The study found that the existing small industrial units in the district are well occupied with little turnover or new stock.
- 7.12. An effect of this overall situation is that businesses may stay for too long in unsuitable accommodation which will impact on their productivity. An overall shortage of smaller scale space may mean that growing businesses do not vacate their start-up premises, blocking their availability for other new, fledgling businesses to move into, or it could mean they move out of the district completely to find suitable premises.
- 7.13. The Local Plan Review could help to deliver small workshop schemes (<100sqm) in the district, some of which could be available on flexible lease terms and with access to business support services. There is also a case to provide 'grow on' light industrial space of 150-500 sqm.

Policy Options

- 7.14. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 - allocate specific sites for start-up premises	
<ul style="list-style-type: none"> • this would be a clear and direct way for the Local Plan Review to address the shortage of start-up workspace in the district which the market has failed to provide 	<ul style="list-style-type: none"> • market factors (viability) may mean that the allocated site/s still do not come forward for development unless other forms of financial support are in place • it would be potentially difficult to justify which site/s should be selected for start-up premises and therefore excluded from general needs employment development • it is likely to result in provision being concentrated in a limited number of locations
Option 2 – specify a requirement for a proportion of start-up premises as part of the overall mix of employment floorspace on allocated employment sites only	
<ul style="list-style-type: none"> • this would be a clear and direct way for the Local Plan Review to address the shortage of start-up workspace in the district which the market has failed to provide • it should result in mixed employment sites with a range of business types/sizes 	<ul style="list-style-type: none"> • there could be a risk to the viability of the development as a whole • an on-site mix of units may be unfeasible for large scale/single operator sites (e.g. strategic distribution sites) • percentage requirements will require justification
Option 3 – generic policy which would apply to all employment sites, whether allocated or not, to require a proportion of units to be for start-ups and/or a financial contribution towards provision elsewhere	
<ul style="list-style-type: none"> • this would be a clear and direct way for the Local Plan Review to address the shortage of start-up workspace in the district which the market has failed to provide • it should result in mixed employment sites with a range of business types/sizes 	<ul style="list-style-type: none"> • there could be a risk to the viability of the development as a whole • site size thresholds and percentage requirements will require justification • accepting commuted sums would require the council to establish and resource a workspace delivery programme
Option 4 – policy to support the provision of start-up space on suitable sites	
<ul style="list-style-type: none"> • this would provide a clear statement of support for the development of start-up workspace • including criteria for judging a suitable site would make the policy more useful 	<ul style="list-style-type: none"> • on its own, it is unlikely to result in significant additional start up floorspace being provided. There is a risk that the plan would not be planning positively to address the identified need for start-up space.
<p>Option 5 – policy that would allow start-up premises as an exception on sites where development would normally be restricted. This would follow the same principle as a rural exceptions site policy for affordable housing and could be a continuation/adaptation of Policy S3 (Countryside) which allows for the expansion of rural businesses and small-scale employment generating development.</p>	

ADVANTAGES	DISADVANTAGES
<ul style="list-style-type: none"> there is a good prospect that the policy will bring forward additional sites although much will depend on how restrictive (or otherwise) the policy criteria are 	<ul style="list-style-type: none"> the development locations that result from this approach are likely to be less sustainable than for the other options
<p>Option 6 – no change. The Local Plan Review does not include a policy for start-up workspace.</p>	
<ul style="list-style-type: none"> there would be a reliance on the market to meet the need for this type of premises 	<ul style="list-style-type: none"> the plan would not be planning positively to address the evidenced need for start-up space. there would be a reliance on the market to meet the need for this type of premises

Consultation question

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

Answer - No preference indicated.

Local employment

Introduction

- 7.15. The Local Plan Review could include a policy dealing with local employment. This could include encouraging businesses to recruit locally and to offer training to raise the attainment level of their staff.

Background

- 7.16. Whilst the district has key economic strengths, it can be argued that action is needed to sustain its position. In the broadest sense, local employment initiatives can help ensure that local people benefit from new development and equally show that businesses are invested in the wellbeing of their communities. Developers often identify job creation as part of the supporting case for development and there is the opportunity to establish a local dimension to this overall jobs boost. Examples of existing initiatives in NWL include the Airport Academy at East Midlands Airport and the SEGRO Logistics Park employment group.
- 7.17. Nationally, the number of job vacancies is at an all-time high (July-September 2021) and care must be taken not to frustrate the local economy. More generally, increased local recruitment could also help to bear down on commuting distances, important in a district which is a net importer of labour and where 92% of journeys to work are by car (the national average is 78%).
- 7.18. The NPPF provides overall support for positive measures which benefit the economy. “Significant weight should be placed on the need to support economic growth and

productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future”. (paragraph 81)

Policy Options

- 7.19. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
<p>Option 1 – policy to encourage local employment initiatives in new, large-scale developments. Include a policy (or add a criterion to an existing policy) stating that for large scale developments (indicative thresholds would need to be confirmed), the council will encourage measures which support the recruitment of local workers and which promote skills development (for example apprenticeships) a) during construction; and/or b) in the end use where this is employment-generating. The policy could also encourage occupiers to prepare an ‘Employment & Skills Plan’ (or similar) which could be used to confirm and monitor the measures put in place.</p>	
<ul style="list-style-type: none"> • it signals that the council sees this as an important issue and one which applicants should actively consider as they are preparing planning applications. 	<ul style="list-style-type: none"> • it falls short of being a requirement so may be only modestly effective.
<p>Option 2 – policy to require local employment initiatives in new, large-scale developments. As for option 1, but it would be a specific policy requirement that needs to be met as opposed to option 1 which only encourages provision</p>	
<ul style="list-style-type: none"> • this could help ensure that local people benefit from new development and, equally, show that businesses are invested in the wellbeing of their communities. • it could support a generalised aim to reduce commuting distances • the inclusion of a Local Plan policy will ensure that applicants address the matter in planning applications 	<ul style="list-style-type: none"> • the policy would be more difficult to apply to speculative proposals where there is no identified end user. • it would also be important that compliance with the policy does not create recruitment barriers for businesses. • site size thresholds would need to be justified
<p>Option 3 – no change. Do not make specific provision in the Local Plan Review for local employment and/or skills development. Action on this issue would involve the council and its partners (such as Job Centre Plus, local colleges etc) engaging with new and expanding businesses to encourage and enable them to recruit locally and to improve local skills levels.</p>	
<ul style="list-style-type: none"> • it relies on existing, non-planning mechanisms 	<ul style="list-style-type: none"> • it would miss the opportunity which a planning application gives to engage with and influence employers at the earliest stage.

Consultation question

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

Answer - No policy preference indicated, action for skills/education provision can be part of normal Development Management Policies for services/infrastructure/S106 needs.

8. Health & wellbeing

Introduction

- 8.1. The Council's [Delivery Plan](#) includes as one of its aims that 'our Communities are safe, healthy and connected' and one of its key tasks is to 'Deliver the actions in our Health and Wellbeing Strategy.' The Council's [Health & Wellbeing Strategy](#) specifically identifies the role of planning policy in the delivery of the strategy, specifically to embed health and wellbeing in the Local Plan.
- 8.2. The planning process can help promote the health and wellbeing of its residents, workers and visitors to the district, and the Local Plan has a key role in shaping the built and natural environment. This can influence people's ability to follow healthy behaviour, facilitate development that supports and encourages active and healthy lifestyles and can have positive impacts on reducing inequalities.
- 8.3. The adopted North West Leicestershire Local Plan does not include a single policy addressing Health and Wellbeing. However this issue is addressed explicitly and implicitly in various policies throughout the Local Plan and health and wellbeing cuts across several themes, such as climate change, impacts of pollution, the public realm and access to recreation facilities.

Background

- 8.4. The social objective of the planning system is 'to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.' (NPPF paragraph 8b).
- 8.5. The planning system has a clear role to play in the creation of healthy communities and the NPPF (Para 92) expects that policies and planning decisions should aim to achieve healthy, inclusive and safe places, which:
 - Provide opportunities for social interaction
 - Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs.
- 8.6. Throughout the NPPF we can see examples of how the planning system can contribute to the health and well-being of our communities, and a range of issues are raised covering matter such as:
 - Provision of accessible green infrastructure;
 - Opportunities for sport and physical activity, including layouts that encourage walking and cycling;
 - Provision of sports facilities and allotments;
 - Access to healthier food;
 - Limit need to travel and opportunities for sustainable travel, to help reduce congestion, improve air quality and public health;
 - Securing well-designed, attractive and healthy places.

- 8.7. The National Planning Practice Guidance (NPPG): Healthy and Safe Communities, reaffirms that local health and wellbeing and health infrastructure are to be considered in plan making and in planning decision-making. It advises that: *“Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary and tertiary care, and the wider health and care system (taking into account the changing needs of the population).”* (Paragraph: 001 Reference ID:53-001-20190722).
- 8.8. This consultation seeks to consider ways that the Local Plan can contribute towards the creation of healthy places that support and enable healthy lifestyles. It is also however clear that the planning system has a role to play in the provision of health infrastructure, for example, GP surgeries, and this would be addressed by the Infrastructure Delivery Plan which will be prepared. This document will detail the strategic infrastructure required to deliver the planned growth within the Local Plan and to ensure that the right infrastructure is prioritised.
- 8.9. Like all parts of the country, the district faces several significant health and wellbeing challenges within its communities. The council’s Health and Wellbeing Strategy details that the council and a range of organisations, including its health partners, are working with their communities to support and improve health and wellbeing. When looking at the district, important issues include:
- Increasing levels of physical activity – Approximately one quarter of adults are not physically active and a further 11% are not meeting Chief Medical Officer guidelines of 150 minutes of physical exercise per week.
 - Healthy diet and weight – Over 70% of adults are overweight or obese which is significantly above the national average of 62.8%.
 - Child obesity rates (16.7%) are below the national average, but child rates increase significantly between reception and Year 6. By school Year 6 (final year of primary education), just over 30% of children are overweight or obese.
 - Social isolation – ensuring people have opportunities for social interaction and engagement with their community.
 - Access to appropriate healthcare services when required.
 - Mental wellbeing – for all ages
 - Healthy Ageing – supporting people to stay independent and active.
 - Residents to have the best possible start in life

(Source: Active Lives Survey 2021, Sport England [Active Lives | Sport England](#) and Public Health England 2021 [Local Health - Data - PHE](#))

- 8.10. The issue of health and wellbeing was considered as part of the [Emerging Options consultation](#) between November 2018 and January 2019. Responses received highlighted a good level of support for the inclusion of a health and wellbeing policy although there was some suggestion that such a policy could lead to the duplication of policy as this matter as dealt with throughout the Local Plan. There was also some support for the use of Health Impact Assessment Screening Statement.

- 8.11. Health and wellbeing was then considered in more detail at Local Plan Committee on [7 July 2021](#), and having considered various options, the committee agreed the policy approach to be consulted upon and this is detailed below.

Strategic Health and Wellbeing Policy Options

- 8.12. Two options have been considered, and are set out below:
- Option 1 – no specific policy on health and wellbeing
 - Option 2 – inclusion of a health and wellbeing policy
- 8.13. A summary assessment of the advantages/disadvantages of these two options is set out in the following table:

ADVANTAGES	DISADVANTAGES
Option 1 - no general policy on health and wellbeing. Health and wellbeing issues would continue to be addressed solely through a number of policies throughout the Local Plan	
<ul style="list-style-type: none"> • Health and wellbeing issues would continue to be addressed solely through a number of policies throughout the Local Plan. 	<ul style="list-style-type: none"> • could be a missed opportunity to explicitly embed health and wellbeing in the Local Plan and to show conformity with the NPPF and the Council’s Health and Wellbeing Strategy.
Option 2 – include a general health and wellbeing policy	
<ul style="list-style-type: none"> • The NPPF recognises the important role that planning can take in helping to address health and wellbeing issues associated with new development • Health and wellbeing would be explicitly addressed and embedded in policy and provides a greater opportunity to address the current challenges faced with respect to health and wellbeing. • Seeks to ensure that issues relating to health and wellbeing are considered as part of the planning process in order to positively improve outcome for the people who live, work and visit the district • Contributes towards the vision and priorities of the North West Leicestershire Health and Wellbeing Strategy 2018-2028. 	<ul style="list-style-type: none"> • Potential duplication of other policies

Preferred Option

- 8.14. The preferred approach is Option 2, the inclusion of some form of overarching policy, in conformity with national policy and guidance and supporting the Council’s role and responsibility in addressing health and wellbeing issues faced by its communities. This approach would allow the plan to build upon the NPPF’s principle of achieving sustainable development, to support strong, vibrant and healthy communities, and to take into account the health status and needs of the local population.

- 8.15. Suggested policy wording is set out below. Supporting text will also provide an explanation of the requirements in the policy as well as the relevant background and issues faced by the district.

Policy XX - Health and Wellbeing

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.

Consultation question

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

Answer - Public health and well-being should be a thread/hook in the Plan that all policies can reflect, and/or include, without necessarily requiring a specific stand-alone Policy.

Health Impact Assessment Policy Options

- 8.16. A Health Impact Assessment (HIA) is a process which ensures that the effect of development on both health and wellbeing inequalities are considered and responded to during the planning process. It seeks to identify the positive opportunities for health from a proposal as well as highlighting potential negative impacts that need mitigation. The Local Plan itself will be the subject of a HIA (as a component of the SA process) however it is also important that individual developments themselves help to ensure a healthy environment for local communities. Therefore, the purpose of this consultation is to focus on the potential use of HIAs on individual planning applications. The findings of a HIA of an individual planning application can be used to inform the decision-making process. Its role is not to provide a definitive answer on whether planning permission should be granted or not.
- 8.17. There are different types of HIA, including a desktop HIA, a rapid HIA and a comprehensive HIA, and the type of HIA undertaken could depend on the nature of the development proposed. For example, the size of a development or its intended use will determine the type and focus of a HIA. The three identified types of HIAs can be summarised as:

- Desktop - Involves engaging with a small number of stakeholders using their existing knowledge and available evidence to assess health impacts.
- Rapid - A brief assessment of health impacts, including a literature review of both quantitative and qualitative evidence available, and gathering additional knowledge and evidence from local stakeholders. This process may include the establishment of a small steering group and/or stakeholder workshop.
- Comprehensive - Most suited to complex and large proposals. An in-depth and resource intensive process, requiring extensive literature searches and data collection, work with multiple stakeholders and public engagement.

8.18. Potential options for how this matter could be addressed include the following:

- **Option 1** – no change and the Local Plan does not include a policy that seeks the submission of a Health Impact Assessment to support development proposals.
- **Option 2** – require a Health Impact Assessment to accompany all planning applications
- **Option 3** - require a form of Health Impact Assessment for planning proposals that meet a specified threshold, including the use of a Health Impact Screening Statement as a systematic way of deciding whether a full HIA is required.

8.19. A summary assessment of the advantages/disadvantages of these two options is set out in the following table:

ADVANTAGES	DISADVANTAGES
Option 1 – no requirement for a Health Impact Assessment	
<ul style="list-style-type: none"> • No additional cost implications for the applicant or the Council. 	<ul style="list-style-type: none"> • Whilst major applications which are of a scale that require a Strategic Environmental Appraisal would specifically address health issues, this does not apply to the majority of planning applications. • Missed opportunity to identify health and wellbeing issues, associated with a specific development proposal for the majority of applications. • Missed opportunity to address negative impacts as well as identifying positive impacts, for the majority of applications. • Contrary to the Council’s Health and Wellbeing Strategy which supports the use of Health Impact Assessments.
Option 2 – A Health Impact Assessment to accompany all planning applications	
<ul style="list-style-type: none"> • Ensures that the effect of development on both health and wellbeing inequalities are considered and responded to during the planning process for all planning applications. • Provides consistency and certainty for applicants as to what is expected 	<ul style="list-style-type: none"> • Such a requirement may not be proportionate to the size/scale of the development proposed and could result in disproportionate expense to applicants. • Resource implications with potential significant costs for Council as well as a

	high level of input from external health agencies to facilitate this approach.
Option 3 - Require a form of Health Impact Assessment for planning proposals that meet a specified threshold, including the use of a Health Impact Screening Statement as a systematic way of deciding whether a full HIA is required.	
<ul style="list-style-type: none"> • Ensures that the effect of development on both health and wellbeing inequalities are considered and responded to during the planning process for a number of planning applications. • Allows for the development of an understanding of health and wellbeing issues, at an early stage in the development process, so can be used to shape a development and allow for reasonable and appropriate amendments. • Recognises that the size of development will determine the type and focus of the Health Impact Assessment. • Provides consistency and certainty for applicants as to what is expected, as well as flexibility allowing an assessment to be proportionate to the type of development proposed. 	<ul style="list-style-type: none"> • Such a requirement may not be proportionate to the size/scale of the development proposed and could result in disproportionate expense to applicants, albeit potentially to a lesser degree than Option 2. • Resource implications with potential significant costs for Council as well as a high level of input from external health agencies to facilitate this approach, albeit potentially to a lesser degree than Option 2.

Preferred Option

- 8.20. Having considered the advantages and disadvantages of each approach, it is suggested that Options 3 allows for greater flexibility and opportunity for a HIA to be proportionate to the type of development that is proposed.
- 8.21. To progress this option further, consideration needs to be given to the thresholds and criteria applied when seeking the submission of a HIA Screening Statement. In suggesting a site threshold, we have had regard to a key element of government policy which is to provide support for small and medium sized builders. The option seeks to set a threshold that does not apply to small and medium sized builders and therefore minimise the burden on such developers. It is therefore suggested that the threshold be set as major developments and these be defined as:
- those of 1ha or more or 30 or more dwellings and not developed by a small to medium sized builder, defined as those having a turnover of up to £45m
- 8.22. Suggested policy wording is set out below. Supporting text will provide an explanation of the requirements in the policy as well as the relevant background and issues faced by the district.

Policy XX - Health Impact Assessment

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 F1)
- Leisure facilities (Use Class F2)
- Betting shops and pay-day loan shops (Sui Generis)

- 8.23. Whilst the above threshold/criteria would not cover all application types, the intention is to 'catch' those applications that are more likely to have an impact on health and wellbeing, whilst being flexible and proportionate to the development proposed. The range of development proposals are reasonable and comprehensive and focuses on the development types and uses that are more likely to have an impact on health and wellbeing issues.
- 8.24. The text of the Local Plan could provide information on the preparation of a screening statement and the type of issues that would need to be addressed. It could also provide information on what could trigger the need for a more comprehensive Health Impact Assessment. It is anticipated that the work currently being undertaken with Public Health England, would also provide some form of guidance to assist with the application of the policy.
- 8.25. There is a potential further option for this policy to include an additional criterion that specifies an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one. However, the disadvantage of this is that it would provide a level of uncertainty and questions could be raised about the application of this, for example, what circumstances may arise that may require 'other' proposals to require a screening statement.

Consultation questions

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

Answer - *No comment or preference indicated.*

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?

Answer - *No comment or preference indicated.*

9. **Renewables and low carbon**

Introduction

- 9.1. The council made a climate change emergency declaration on 25 June 2019 which set out the council's commitment to support the Government's net zero target to 2050 and its aim to achieve carbon neutrality for the council's own emissions by 2030. The Local Plan Review has a key role to play in seeking to minimise the impact of climate change arising from new development.

Background

- 9.2. To support climate change-related policies in the Local Plan, a [Renewable and Low Carbon Energy Study](#) was undertaken by consultants (AECOM) and published in 2021.
- 9.3. The AECOM Study builds on previous analytical work such as the [Renewable Wind Study](#) undertaken in 2016, and the local targets and commitments such as those laid out in the [Zero Carbon Roadmap](#) (2020).
- 9.4. The AECOM Study provides evidence on the likely technical potential for different forms of renewable energy and low carbon energy in the district having regard to best practice, planning policy guidance and the NPPF and which will be sufficient to inform policies and/or targets in the Local Plan Review.

Renewable Energy

Introduction

- 9.5. Energy consumption which is based on carbon from new development must be reduced in order to meet zero carbon targets. This means that demand will need to be sourced from renewable forms of energy.

Background

- 9.6. Policy Cc1 in the adopted Local Plan is concerned with renewable energy and sets out a range of criteria that planning applications must meet for renewable energy installations to be supported. This is principally concerned with proposals for wind turbines. Policy Cc1 does not establish a target for the amount of energy to be provided from renewable energy sources as there was a lack of any evidence regarding potential at that time.
- 9.7. Since the adoption of the Local Plan the NPPF has been updated and in relation to renewable energy it states that the planning system should "...support the transition to a low carbon future in a changing climate...and support renewable and low carbon energy and associated infrastructure" (paragraph 152).
- 9.8. Further, "to help increase the use and supply of renewable and low carbon energy and heat, plans should:
- a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts);

b) consider identifying suitable areas for renewable and low carbon energy sources, and supporting infrastructure, where this would help secure their development; and

c) identify opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems and for co-locating potential heat customers and suppliers” (paragraph 155).

9.9. Furthermore, with the council’s declaration of a Climate Change Emergency, it is clear that the Local Plan Review will need to do much more than is currently the case.

9.10. The AECOM study identifies that in terms of renewable energy that the main opportunities for NWLDC going forward will be wind energy, solar and heat pumps. It also notes that these are well-established technologies that currently represent the most cost-effective solutions for generating renewable electricity in the UK.

Wind Energy and Solar Energy

9.11. The provision of energy from wind was the subject of a [Written Ministerial Statement \(WMS\) \(HCWS42\)](#) of 18 June 2015. The council has identified potential areas that are suitable for wind energy on the Opportunities Maps for [Small Scale Wind Energy](#) and [Medium/Large Scale Wind Energy](#) (2016) that accompany the adopted Local Plan. The AECOM study considers it is appropriate to continue to use the 2016 Wind Energy Study Maps and, as such, the AECOM Study utilises the maps to inform their analysis of future renewable energy opportunities. The current Local Plan Policy Cc1 addresses the second bullet point requirement of the WMS in that it requires applicants to demonstrate that the local community support proposals for one or more wind turbines.

9.12. In terms of solar energy generation, the AECOM study confirms that Photovoltaic (PV) farms are among the most cost-effective ways of generating renewable electricity and can be installed more flexibly than many other low/zero carbon (LZC) technologies, and that they should be considered a key opportunity that can provide renewable energy for North West Leicestershire at a strategic scale.

9.13. The Zero Carbon Roadmap identifies the following targets:

- **Wind** - Set a formal target for wind capacity in NWL from 3MW today to at least 75MW by 2050 in the Local Plan.
- **Solar** - Set a formal target for solar capacity in NWL from 89MW today to at least 140MW by 2050 in the Local Plan.

9.14. These targets have been confirmed by the AECOM study as being achievable.

Policy Options

9.15. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 - to not include a solar and wind energy generation target	
<ul style="list-style-type: none"> • Simple approach 	<ul style="list-style-type: none"> • Would make it less likely that the zero-carbon target could be achieved
Option 2 – solar and wind energy targets as set out in the adopted Zero Carbon Roadmap	
<ul style="list-style-type: none"> • Provides clarity for all users of the plan about the criteria that will apply • Roadmap targets have been independently corroborated by AECOM who agree they are achievable 	<ul style="list-style-type: none"> • Will need to monitor provision
Option 3 – solar and wind energy targets higher than in the Roadmap	
<ul style="list-style-type: none"> • Provides clarity for all users of the plan about the criteria that will apply • Proactive approach to renewable energy in order to achieve 2050 zero carbon target and to respond to NWLDC declared climate emergency. 	<ul style="list-style-type: none"> • Will need to monitor provision
Option 4 –solar and wind energy targets lower than in the Roadmap	
<ul style="list-style-type: none"> • Lower target more likely to be met 	<ul style="list-style-type: none"> • Would make it less likely that the zero carbon target could be achieved • Will need to monitor provision

Preferred Approach

9.16. Option 2 is the preferred approach as these targets have been identified as achievable in the AECOM Study. The targets will need to be pro-rated to be consistent with the plan period. As the Roadmap was adopted in 2020, the pro-rated targets from 2020 to 2039 would be:

- **Wind target** would equate to 45.41MW from 2020 to 2039.
- **Solar target** would equate to 37.11MW from 2020 to 2039.

9.17. The proposed policy wording for renewable energy is:

<p>Policy XX - Renewable Energy</p> <p>The Council will aim to achieve the following renewable energy generation targets by 2039:</p> <ul style="list-style-type: none"> • 37.11 MW of energy generated by solar energy generation • 45.41 MW of energy generated by wind generation <p>To achieve this:</p> <ol style="list-style-type: none"> 1) The council will support renewable energy developments that are appropriate to their setting and make a positive contribution towards increasing the levels of renewable and low carbon energy generation in the district.

- 2) Planning applications for renewable energy including any new grid connection lines and any ancillary infrastructure and buildings associated with the development will be supported where:
 - a) There is no unacceptable impact on residential amenity in terms of noise, shadow flicker, vibration, topple distance and visual dominance; and
 - b) There is no adverse impact on the landscape character taking account of the special qualities set out within the individual National Character Areas; and
 - c) All impacts on biodiversity have been adequately mitigated or enhanced; and
 - d) Heritage assets and their settings are conserved or enhanced; and
 - e) Proposals take account of the cumulative effect that would result from the proposal in conjunction with permitted and existing renewable energy schemes; and
 - f) Proposals are accompanied by details to demonstrate how the site will be decommissioned to ensure the restoration of the site following cessation; and
 - g) Proposals for large-scale renewable energy should demonstrate that the economic, social and environmental benefits are for those communities closest to the proposed facility.
- 3) In addition to the above considerations, proposals for wind energy developments will be supported where:
 - a) The site lies within the 'Area Identified as potentially suitable for large or small scale turbines' as defined on the policies map; and
 - b) It can be demonstrated there is support from the local community or is set out within an area defined as being suitable for wind energy development within an adopted Neighbourhood Plan; and
 - c) All impacts on air traffic safety and radar and communications have been assessed and consulted upon.
- 4) In terms of proposals for solar energy developments including both mounted and standalone ground mounted installations and extensions or repowering of solar extensions, preference will be for sites which are focussed on previously developed land away from the best and most versatile agricultural land unless exceptionally justified.
- 5) All new developments will be required to incorporate proposals for on-site electricity and heat production from solar, wind and other renewable technologies so as to maximise renewable energy production.

We will consider the preparation of a Supplementary Planning Document to provide further guidance on this issue.

Consultation question

Q19 - Do you agree with the proposed renewable energy policy? If not, why not?
Answer - Broad agreement with Option 2 approach.

Energy Efficiency

Introduction

- 9.18. The adopted Local Plan does not include a policy relating to energy efficiency. This was primarily because the Planning and Energy Act 2008 had proposed that local authorities would no longer be able to set energy efficiency standards above the national building regulations. Since the adoption of the Local Plan, the government, in their 2019 Spring Statement, committed that (by 2025) it would introduce a Future Homes Standard (FHS) which would require new build homes to be future-proofed with low carbon heating and world-leading levels of energy efficiency.

Background

- 9.19. Under the FHS, new buildings would be required to meet significantly higher targets for energy efficiency and carbon savings. The Government consulted on two possible uplifts to start from 2020:
- Option 1: 20% reduction in carbon emissions compared to the current standard for an average home built to Building Regulations 2013 Part L requirements.
 - Option 2: 31% reduction in carbon emissions compared to the current standard for an average home built to Building Regulations 2013 Part L requirements.
- 9.20. As part of the [FHS Consultation](#) the Government confirmed that a 19-20% CO₂ reduction is viable on a national scale, it is the less ambitious of the two targets proposed within the FHS consultation. Option 2 – the 31% reduction – was the Government’s preferred option, on the basis that, amongst other things, it would deliver more carbon savings.
- 9.21. In January 2021 the Government published its response to the FHS consultation. This reconfirmed the FHS and made it clear that it will not come into force until 2025.
- 9.22. In December 2021 an uplift to the current Building Regulations was regulated for and the uplift standards of new homes producing 31% less CO₂ emissions is to come into force in June 2022.
- 9.23. The AECOM study states that the council should aim to set the highest standards for energy and CO₂ performance that can reasonably and viably be implemented, both for new and existing buildings. This is crucial in order to achieve the decarbonisation target.
- 9.24. The AECOM study suggests that an even higher target could potentially be set, which could include a requirement for any residual emissions to be offset via developer contributions.

Policy Options

9.25. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 – to not include an energy efficiency target.	
	<ul style="list-style-type: none"> • Does not respond to Council’s climate change emergency declaration • The plan would not be planning positively to support the government’s energy efficiency requirements
Option 2 - Require an energy efficiency target of 31% (to be required on adoption of the Local Plan or when updated building regulations come into force, whichever is the earliest).	
<ul style="list-style-type: none"> • Proactive and requires energy efficiency measures to be addressed immediately. • Positively responds to council’s climate change emergency declaration 	<ul style="list-style-type: none"> • Requires earlier action than government requirement
Option 3 – Energy efficiency target higher than 31%	
<ul style="list-style-type: none"> • Proactive approach • Positively responds to council’s climate change emergency declaration 	<ul style="list-style-type: none"> • Higher than government requirements
Option 4 – Energy efficiency target lower than 31%	
	<ul style="list-style-type: none"> • Lower than government target – may soon be superseded by a higher target. • Does not proactively respond to council’s climate change emergency declaration

Preferred Approach

9.26. It is considered that Option 3 would be the most pragmatic option and consistent with the AECOM study which states that “NWLDC should...look to set the highest level of building performance standards for new buildings that can reasonably be implemented and should do so as soon as possible”(Paragraph 5.1.1).

9.27. We have drafted a single, comprehensive policy that covers energy efficiency, reducing carbon, overheating and how new development can demonstrate that it is addressing climate change. It is included in this document at paragraph 9.55

Consultation question

Q20 - Do you agree with the preferred policy approach for energy efficiency? If not, why not?
Answer - No comment or preference indicated. Viability and cost implications should be noted/addressed in any Policy.

Reducing Carbon

Introduction

- 9.28. To help ensure that the targets for energy efficiency are met, it will be necessary for new developments to address issues in respect of what is referred to as ‘Embodied Carbon’. This is the carbon associated with both building materials and the construction and maintenance of a building throughout its whole lifecycle.
- 9.29. The current Local Plan includes (in Policy D1) a requirement that “(5) New development should have regard to sustainable design and construction methods”, however there are no specific requirements beyond this.

Background

- 9.30. The AECOM Study states that to reach Net Zero it will be necessary to implement policies that address a broader range of emissions that occur over the building’s lifecycle, at all stages of the supply chain.
- 9.31. The AECOM Study identifies that one way of addressing this would be for the council to require applicants to undertake a lifecycle carbon assessment (LCA) or otherwise demonstrate that they have taken steps to minimise lifecycle emissions. LCAs involve a holistic assessment of both operational and non-operational/embodied emissions. LCA is a multi-step procedure through the life stages of a building.
- 9.32. The AECOM Study notes that carrying out a whole LCA will incur significant design team fees which may be prohibitive in the context of minor developments, so this type of policy might be restricted to major developments. However, the council could consider requesting that applicants for minor applications complete a simpler checklist to demonstrate that they have given due consideration to this topic.
- 9.33. It is suggested that major residential developments be defined as:
- those of 1ha or more or 30 or more dwellings and not developed by a small to medium sized builder, defined as those having a turnover of up to £45m;
- and major non-residential developments be defined as:
- those sites of at least 0.25ha or 500 sq metres of floorspace

Policy Options

- 9.34. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 – to not include a policy requirement to require applicants to undertake a Lifecycle Carbon Assessment	
<ul style="list-style-type: none"> • There would be no additional burden on developments 	<ul style="list-style-type: none"> • xxDoes not address the need to reduce carbon emissions

Option 2 – include policy requirement for all developments to undertake a Lifecycle Carbon Assessment	
<ul style="list-style-type: none"> • It signals that the council sees this as an important issue and one which applicants should actively consider as they are preparing planning applications. 	<ul style="list-style-type: none"> • Cost to applicants, in particular to smaller developers. • Need for training of Development Management officers • Additional burden for officers to check assessments
Option 3 - include policy requirement for major developments to undertake a Lifecycle Carbon Assessment and minor developments to use a simple checklist to demonstrate that Lifecycle Carbon has been considered.	
<ul style="list-style-type: none"> • It signals that the council sees this as an important issue and one which applicants should actively consider as they are preparing planning applications. • Reduces potential costs for small developments 	<ul style="list-style-type: none"> • Cost to applicants • Need for training of Development Management Officers • Additional burden for officers to check a checklist

Preferred Approach

- 9.35. Of the options, Option 3 to include a policy requirement for major developments to undertake a Lifecycle Carbon Assessment and smaller developments to use a simple checklist to demonstrate that Lifecycle Carbon has been considered is the preferred option.
- 9.36. We have drafted a single, comprehensive policy that covers energy efficiency, reducing carbon, overheating and how new development can demonstrate that it is addressing climate change. It is included in this document at paragraph 9.55.

Consultation question

Q21- Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?
Answer - No comment or preference indicated, but Option 3 would be most pragmatic and viable.

Overheating

Introduction

- 9.37. There is not a specific policy in the current Local Plan regarding overheating however, there is text in both the Local Plan and in the Good Design SPD that refers to measures that can be used to reduce overheating.

Background

- 9.38. Overheating relates primarily to domestic properties and the UK Green Building Council identify that “*there is strong evidence that excessive or prolonged high temperatures in homes can have severe consequences for occupants*”. With summer temperatures predicted to rise

between 2 and 4 degrees by 2050, it poses an increased risk to the vulnerable of suffering from severe heat stress.

- 9.39. At the individual building level, the geometry, orientation and form of buildings can have a significant impact on overheating risk. Also, increasing levels of building airtightness and fabric efficiency require greater focus on the risk of overheating and strategies to mitigate this. The UK Green Building Council identify that it is not a choice between the two and that it is reasonable to expect efficient, low carbon homes which also minimise risks posed by overheating.
- 9.40. The NPPF states that *“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for...the risk of overheating from rising temperatures”*(Paragraph 153).
- 9.41. AECOM identifies that, at an individual building level, the priority should be to minimise unwanted heat gains before considering alternative cooling strategies. The AECOM Study recommends that the council should also consider:
- Requiring developments to follow a ‘Cooling Hierarchy’ that prioritises passive cooling measures. This could be demonstrated e.g., through the Design and Access Statement currently required by Policy D1 of the adopted Local plan.
 - Encouraging all schemes to consider overheating risk at an early stage, and to undertake a full appraisal if this indicates a high risk of overheating. Major developments should be required to undertake a full overheating risk assessment as standard. There are industry recognised assessments such as [The Good Homes Alliance Domestic Overheating Checklist](#) in the ‘Energy Assessment Guidance’ (2020).
- 9.42. The Government recognise the significance of overheating. In its response to the Future Homes Standard consultation the Government has set out proposals for requiring modelling of overheating risk in residential properties or for meeting pre-defined parameters for maximum glazing areas and window/shading design characteristics, as part of the update to Part L of Building Regulations for New Homes.
- 9.43. The Government has regulated for a new part to the Building Regulations (Part O) that covers overheating mitigation requirements. This is due to take effect in June 2022.

Policy Options

- 9.44. The following are potential options for how this issue could be addressed in the Local Plan Review.

ADVANTAGES	DISADVANTAGES
Option 1 – no change to the Local Plan	
<ul style="list-style-type: none"> • 	<ul style="list-style-type: none"> • Does not respond to Council’s climate change emergency declaration. • The plan would not be planning positively to government requirement for plans to take a proactive approach to the risk of overheating
Option 2 - include a policy to require applicants for major developments to address potential overheating.	
<ul style="list-style-type: none"> • Responds to requirements in NPPF for strategic policies to provision for plans to take a proactive approach to the risk of overheating 	<ul style="list-style-type: none"> • Additional requirements for applicants • Potential viability issues • Additional burden for officers to check a as part of planning applications
Option 3 – include a policy to require major developments to address overheating through an industry recognised assessment and minor developments to use a simple checklist to demonstrate that the risk of overheating has been considered.	
<ul style="list-style-type: none"> • Responds to requirements in NPPF for strategic policies to provision for plans to take a proactive approach to the risk of overheating 	<ul style="list-style-type: none"> • Additional requirements for applicants • Potential viability issues • Additional burden for officers to check a as part of planning applications

Preferred Option

- 9.45. Of the options, Option 3 is the preferred option.
- 9.46. We have drafted a single, comprehensive policy that covers energy efficiency, reducing carbon, overheating and how new development can demonstrate that it is addressing climate change. It is included in this document at paragraph 9.55

Consultation question

Q22 - Do you agree with the preferred policy approach for overheating? If not, why not?
Answer - No comment or preference indicated.

Demonstrating that new development is addressing climate change

Introduction

- 9.47. The building and construction sector has a crucial role to play in reducing carbon emissions. Some of the key components of this are reducing energy demand through efficient building fabric, reducing embodied carbon associated with the products and construction stages of development as well as measuring the in-use performance of low carbon technologies.
- 9.48. There are recognised industry assessments that can be used to assess the environmental performance of a building and how it contributes to residents’ wellbeing. Two of these standards are the Home Quality Mark (HQM) for residential developments and the Building

Research Establishment’s Environmental Assessment Method (BREEAM) for non-residential developments.

- 9.49. BREEAM and HQM adopt similar approaches by rewarding credits or points for actions that reduce the lifecycle environmental impacts of the building.

Background

- 9.50. Mandatory standards for energy use and CO₂ emissions are set out in Part L of the Building Regulations. As discussed above these are progressively updated and, despite the current policy uncertainty, will generally include more ambitious standards over time as the UK moves towards a Net Zero economy. In addition, there are various voluntary industry standards and assessment methods that set higher targets including BREEAM and HQM.
- 9.51. Requiring developments to incorporate appropriate measures is only part of the solution. It is important that when making decisions about proposed developments that the council has confidence that what is proposed will help to address the issues. One way to do this is through the use of recognised standards and assessment methods.
- 9.52. The AECOM Study identifies that the council could consider requiring or encouraging developers to meet some of these higher standards as part of a future Local Plan policy. This is an approach that has been widely adopted elsewhere in the UK. The use of BREEAM and HQM standards can help deliver buildings where energy efficiency is a key driver for the design and where as-built performance is more likely to align with the design intent.
- 9.53. AECOM identify that it is often the case that local authorities will only set BREEAM/HQM requirements for major developments, or certain types of schemes that are known to have fewer technical and viability constraints (e.g., large developments on greenfield sites). However, this would mean that not all developments are required to demonstrate how they would comply with any requirements.

Policy Options

ADVANTAGES	DISADVANTAGES
Option 1 – No change to the Local Plan	
	<ul style="list-style-type: none"> Not requiring specific assessment tools could result in confusion and inconsistency of approach
Option 2 – include policy to require applicants for all developments to undertake a recognised industry assessment - HQM for domestic properties and BREEAM for non-residential properties	
<ul style="list-style-type: none"> It signals that the council sees this as an important issue and one which applicants should actively consider as they are preparing planning applications. Requiring recognised assessment tools should ensure consistent approach and be easier to monitor 	<ul style="list-style-type: none"> Additional costs to developers could result in potential viability issues

<p>Option 3 - Include a policy to require applicants proposing major developments to undertake a recognised industry assessment - HQM for domestic properties and BREEM for non-residential properties</p>	
<ul style="list-style-type: none"> • It signals that the council sees this as an important issue and one which applications for major development should actively consider as they are preparing planning applications. • Requiring recognised assessment tools should ensure consistent approach and be easier to monitor 	<ul style="list-style-type: none"> • Additional costs to developers could result in potential viability issues • Not all developments would be required to produce an assessment, so there is no guarantee that developments will help to meet energy efficiency targets

Preferred Option

9.54. Of the options, Option 3 is the preferred option.

Consultation question

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

Answer - No comment or preference indicated, but Option 3 would be most pragmatic and viable.

9.55. We have drafted a single policy to cover energy efficiency, reducing carbon, overheating and how new development can demonstrate that it is addressing climate change.

Policy XX - Reducing Carbon Emissions

Development is required to achieve net zero carbon to contribute to the Council's aim for a carbon neutral district by 2050. To achieve this, all new development will be required to:

- 1) Reduce carbon dioxide emissions by following the steps in the energy hierarchy, within the design of new buildings by prioritising fabric first in the following sequence:
 - a) Energy reduction through 'smart' heating and lighting, behavioural changes, and use of passive design measures; then,
 - b) Energy efficiency through better insulation and efficient appliances; then,
 - c) Renewable energy of heat and electricity from solar, wind, biomass, hydro and geothermal sources; then
 - d) Low carbon energy including the use of heat pumps, Combined Heat and Power and Combined Cooling Heat and Power systems; then
 - e) Conventional energy.
- 2) Achieve a 31% reduction in regulated CO2 emissions against the Dwelling Emission Rate (DER) against the Target Emission Rate (TER) based on the 2013 Edition of

the 2010 Building Regulations (Part L) (or future equivalent legislation). This reduction is to be secured through on-site renewable and other low carbon technologies and/or energy efficiency measures.

- 3) demonstrate actions taken to reduce embodied carbon and maximise opportunities for reuse of materials.
- 4) demonstrate how development proposals have considered overheating risk at an early stage and followed the cooling hierarchy.
- 5) be designed to ensure that the proposed heating systems can be easily replaced with heat pumps or other low carbon energy systems at a later date, including the installation of the necessary infrastructure to facilitate future installation.

(Major) Residential proposals will be required to use the Homes Quality Mark scheme to show compliance with the above.

(Minor) Residential proposals will be required to submit a statement demonstrating how they satisfy requirements 1 to 5 above

Development proposals for non-residential development should demonstrate how they achieve BREEAM 'excellent'.

Where the use of onsite renewables to match the total energy consumption is demonstrated not to be technically feasible or economically viable, renewable energy generation should be maximised as much as possible; a financial contribution must be made to the council's carbon offset fund to enable residual carbon emissions to be offset by other local initiatives.

Consultation question

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

Answer - No comment or preference indicated.

Carbon Offsetting Fund

- 9.56. 'Carbon offsetting' refers to compensating for carbon dioxide (CO₂) or other greenhouse gas (GHG) emissions in one area by taking actions that reduce emissions elsewhere.
- 9.57. Depending on the type of development in question, it may not be feasible to deliver the requisite level of CO₂ emissions reduction onsite. In this instance, an option available to the council is to allow developers to make a financial contribution towards a carbon offset fund.
- 9.58. The money can then be used to pay for interventions off-site that would result in an equivalent amount of CO₂ being avoided (e.g., through energy efficiency measures or LZC projects) or removed from the atmosphere (e.g., through afforestation).
- 9.59. The AECOM Study states that "when developing a strategy for carbon offsetting, the most important guiding principle is that **it should be a last resort where other opportunities for reducing direct and indirect CO₂ emissions have been prioritised**" (paragraph 6.1.2).

- 9.60. The Council is currently considering the potential for a carbon offset fund.

Water Efficiency

Introduction

- 9.61. All new homes already have to meet the mandatory national standard of water efficiency as set out in Part G of the Building Regulations to limit consumption to 125 litres per person per day. To help manage demand for water, the [Optional Technical Standards for water efficiency](#) confirms that councils can set out Local Plan policies requiring new dwellings to meet the Building Regulations optional requirement of 110 litres per person per day, where there is a clear local need based on existing sources of evidence.
- 9.62. The higher standard could be met through either imposing maximum consumption rates for various fittings such as WCs, basin taps, and showers, or calculating the whole house water consumption using a 'water efficiency calculator' for new dwellings.
- 9.63. Water efficiency can bring a number of benefits including:
- Reducing water use automatically reduces water charges if a meter is installed;
 - There will be less waste water, reducing the risk of flooding and reducing the cost of treating the water;
 - It reduces a household's carbon footprint – contributing to national carbon reduction targets;
 - It preserves natural resources to help tackle climate change; and
 - Reducing the use of hot water and so reducing consumption will also deliver lower energy bills.
- 9.64. There is no policy in the adopted Local Plan requiring tighter water efficiency standards but Policy D1 (Design of New Development) requires development to have regard to sustainable design and construction methods. The supporting text encourages developers to consider the integration of environmental optional extra features for residential developments, including those that would exceed the environmental performance of new homes required by Building Regulations, although there is no explicit reference to tighter water efficiency standards for residential and non-residential buildings.

Background

- 9.65. The PPG states that a clear need for an alternative water efficiency standard can be informed by a range of evidence, including consultation undertaken with the local water and sewerage company, the Environment Agency and catchment partnerships, river basin and water resource management plans and the Environment Agency's Water Stressed Areas Classification. Councils should test the impact of applying the preferred standard on viability and housing supply.
- 9.66. The [Environment Agency's report on water stress areas](#) was updated in July 2021. The report provides formal advice to the Secretary of State on which areas in England are areas of serious water stress.
- 9.67. North West Leicestershire is located within the area covered by Severn Trent. This area has been classed as 'seriously water stressed' – the most significant classification. This is a change

from the 2013 classification of moderate stress across all demand scenarios with a ‘final stress’ of ‘not serious’. One of the reasons for the change in this classification is the use of the latest data from the Water Resource Management Plans (WRMP) published by the water companies in 2019 – including the [WRMP for Severn Trent](#).

- 9.68. Severn Trent is responsible for preparing the WRMP for managing supply and demand across its network. North West Leicestershire is located in the Strategic Grid Water Resource Zone. The WRMP indicates that in the absence of future investment, supply and demand shortfalls within the Strategic Grid are likely. However, the Strategy aims to tackle this predominantly by reducing leakage and connecting the grid to new supply sources. The WRMP also proposes several interventions for managing demand such as water efficiency advice and products.
- 9.69. The [Humber River Basin Management Plan](#) (RBMP) provides a framework for protecting and enhancing the benefits provided by the water environment. The RBMP highlights area of land and bodies of water that have specific uses that need special protection, such as those used for drinking water. A significant water management issues identified by the Plan, is the changes to the natural flow and level of water – affecting 6% of all water bodies in the Plan area. Reduced flow and water levels in rivers and groundwater caused by human activity such as abstraction or less rainfall than usual can result in reduced supply of drinking water and impact and damage habitats – including the potential impact on the River Mease Special Area of Conservation (SAC).
- 9.70. The RBMP sets how this issue can be managed by the various regulators, water management companies and policy makers. For councils, the Plan specifically states to make sure water is used efficiently, *“Local Government – sets out local plan policies requiring new homes to meet the tighter water efficiency standard of 110 litres per person per day as described in Part G of Schedule 1 to the Building Regulations 2010”* (Section 3.2, page 46).
- 9.71. The [North West Leicestershire Water Cycle Study](#) (WCS) was prepared to inform the adopted Local Plan. The WCS identifies long term solutions for preventing further deterioration in water quality and water resources facilitating development. It identifies water resources that supply the district are under significant pressure. As part of a wider strategy to address water efficiency, the study recommended that all new homes be built to the Code for Sustainable Homes (CSH) level 3/4 for water (105 l/h/d). The Government’s [optional technical water efficiency standards for housing](#) have superseded the CSH and so the 110 l/h/d is the alternative solution.
- 9.72. There is currently no nationally applied standard for water efficiency of non-domestic buildings, such as offices, industrial buildings and schools (only minimum performance requirements for individual water using fixtures). However, BREEAM sets out standards for minimum water performance of non-residential buildings. This is achieved using the BREEAM water calculation method (BREEAM Wat 01 calculator). This is the method for the assessment of water efficiency in most common types of new non domestic buildings and is considered to provide the most suitable equivalent mechanism to ensure high standards of water efficiency in new non-residential development

Policy Options

- 9.73. **Option 1** – Do not include a policy requiring a tighter water efficiency standard and maintain the Building Regulations requirement of 125 litres per person per day. The evidence is clear that since the adoption of the Local Plan, the District is located in an area of seriously water

stressed. This option would not contribute towards addressing the issue of water resource management in the Humber River Basin.

- 9.74. **Option 2** – At its meeting on [7 July 2021](#) the Local Plan Committee considered the option of requiring a more ambitious standard of no more than 105 litres of water to be consumed per person per day – reflecting the former Code for Sustainable Homes standard. The council will continue to test this option through the Local Plan Viability Assessment, however having reviewed this matter further at Local Plan Committee on [8 September 2021](#), it is considered appropriate that the proposed standard is consistent with the optional national water efficiency standard and the recommendation of the WCS.

Preferred Option

- 9.75. It is evident that the district is in area of serious water stress, and there is a clear need for the issue of water efficiency to be addressed by the responsible authorities. The council proposes that all new residential development will be required to achieve the national water efficiency standard of a maximum of 110 litres of water per person per day.
- 9.76. For all non-domestic buildings, the Council will require all proposals to achieve the maximum available credits under BREEAM Wat 01.

Policy XX - Water Efficiency Standards

All proposals for new residential development are required to achieve the national water efficiency standard of a maximum of 110 litres of water per person per day.

All proposals for new non-domestic buildings will be required to be designed to achieve the maximum available credits under BREEAM Wat 01 or equivalent best practice standard.

Consultation questions

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

Answer - No comment or preference indicated, but aiming to achieve Best Practice in an area of water stress is supported.

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

Answer - The Policy Options coverage does not appear to include or refer to any Options around Gypsy and Traveller needs and how to address pitch supply issues? It was noted that it was the Council's intention to plan to meet the identified District need through the production of a specific Gypsy and Traveller Site Allocation Development Plan Document (DPD), but following a meeting of the District Council's Local Plan Advisory Committee on 7 November 2018 it was agreed that the needs of Gypsies and Travellers should now be addressed as part of the Local Plan review rather than through a separate Development Plan Document. The Borough Council are querying whether this is still the intention, in light of the lack of reference to Gypsy and Traveller needs in the Options consultation or whether this issue will be addressed through an alternative process/route?

No further comments from the Borough Council.

10. Next steps

- 10.1. This consultation deals with a select number of issues and does not cover all the matters to be included in the Local Plan Review. Subjects which will be covered in future consultations include:
- sites proposed for allocation
 - amended Limits to Development around settlements
 - policies for the design of development and for development affecting the historic and natural environment including biodiversity net gain
 - policies for affordable housing, included First Homes, and housing mix
 - town centre policies
 - infrastructure requirements, including for transport
- 10.2. The responses to this consultation will help to inform the Local Plan. However, we will also need to have regard to a range of evidence. Some of this [evidence base](#) is already in place. Some is specific to North West Leicestershire however some of it relates to Leicester and Leicestershire, including an updated **Housing and Economic Needs Assessment** which is in preparation and which will help inform our decision about the amount of housing and employment development that needs to be provided for as part of the Local Plan. In addition, such decisions will also be informed by the outcome from our joint work to address the issue of unmet housing and employment needs in Leicester City as outlined in Sections 4 and 6 of this document.
- 10.3. A key part of the Local Plan will be to identify specific sites for development for housing or employment. Work to **assess and identify such sites** is underway and we anticipate that we will consult on our preferred sites in the spring of 2022.
- 10.4. It will be important to ensure that new development includes the provision of new infrastructure to minimise the impact upon existing communities and to meet the needs of new communities. We are preparing an **Infrastructure Delivery Plan** to address this. In addition, we have also commissioned a study to identify opportunities for the provision of new **Green Infrastructure**. We will need to balance all the infrastructure needs against the national policy requirement to ensure that new development is viable. We have commissioned a **Viability Study** which will undertake testing of the various policy options outlined in this consultation to ensure that this is the case.
- 10.5. In addition to these, we will also undertake further technical work, for example in relation to **space standards** and **Health Impact Assessments**, to ensure that policies are consistent with national policies. Policies will also be subject a **Sustainability Appraisal** to help ensure that the plan delivers sustainable development.

Appendix 1 – List of evidence documents

- [Strategic Housing and Economic Land Availability Assessment 2021](#)
- [Review of Existing Employment Sites](#)
- [Need for Employment Land Report](#)
- [Start-up Workspace Demand Report](#)
- [Strategic Distribution Study](#)
- [Retail and Leisure Capacity Study](#)
- [Retail Study Update Report](#)
- [Renewable and Low Carbon Energy Study - February 2021](#)
- [Local Housing Needs Assessment - Report 1](#) , [Report 2](#) and [Report 3](#)
- [Potential Strategic Sites Infrastructure Study](#)
- [Landscape Sensitivity Study - Part 1](#), [Landscape Sensitivity Study - Part 2](#), [Appraisal of Sites A, B, C and D](#) and [Further Landscape Sensitivity Study](#)
- [Area of Separation Study \(with Appendices 1 & 2\)](#) and [Area of Separation Study \(Appendix 3\)](#)
- [Sustainability Appraisal Scoping Report](#), [Appendix A](#) and [Appendix B](#)
- [Sustainability Appraisal of the Spatial Options.](#)
- [Settlement Study 2021](#) and [Settlement Study 2021 Appendix B](#)

Appendix 2 – List of consultation questions

Q1	Do you agree with these Local Plan Review Objectives? If not, why not?
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?
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.
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
Q6	Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?
Q7	Do you agree with the proposed policy on Space Standards? If not, why not?
Q8	Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?
Q9	Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?
Q10	Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?
Q11	Which general employment land strategy option do you prefer? Is there a different option which should be considered?
Q12	Do you agree with the initial policy option for strategic warehousing? If not, why not?
Q13	Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?
Q14	Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?
Q15	Which policy option for local employment do you prefer? Is there a different option which should be considered?
Q16	Do you agree with the proposed health and wellbeing policy? If not, why not?
Q17	Do you agree with the proposed Health Impact Assessment policy? If not, why not?
Q18	Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?
Q19	Do you agree with the proposed renewable energy policy? If not, why not?
Q20	Do you agree with the preferred policy approach for energy efficiency? If not, why not?
Q21	Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?
Q22	Do you agree with the preferred policy approach for overheating? If not, why not?
Q23	Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?
Q24	Do you agree with the proposed policy for reducing carbon emissions? If not, why not?
Q25	Do you agree with the proposed policy for water efficiency standards? If not, why not?
Q26	What additional comments do you have about the Local Plan Review not covered by the preceding questions?

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 11 & 13

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

The Borough Council welcome the opportunity to comment on the North West Leicestershire Development Strategy Options and Policy Options (Regulation 18) Consultation 2022. The following response relates to Q11 & Q13;

Q11 Comment -

Similar response to that in Q5. Concerns over Options that enable major employment development, over and above local needs or diversification in rural areas, and the potential transport infrastructure and traffic flow implications and impacts on North Warwickshire, particularly around Junction 11 / M42 and the A444 and B5493, unless evidenced and justified by clear regional or national studies that identify the site as an appropriate, sustainable location subject to transport infrastructure improvements, that may necessitate contributions to highways and other infrastructure improvements in the Borough being sought.

Q13 Comment -

In terms of the options to deal with employment land proposals the Borough Council would re-iterate the need for a specific, flexible, criteria-based policy that addresses the pressure and need for strategic employment sites, covering more than just warehousing/logistics needs.

In terms of specific option comments, with regard to option 3's suggestion of having a specific end user policy it is considered this may be difficult to enforce and would limit flexibility and policy responsiveness. We have found that where a site is earmarked for a specific end user sometimes especially in appeals this amount of land has then been discounted from the employment figures as it is not open to the market although it is clearly delivering for an employment land need.

In regard to Options 5 to 7, addressing and/or including assessment and availability/capacity of sites outside the District, demonstration of exceptional need not simply demand, could all be addressed through a Criteria based policy.

(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

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.

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


 Senior Planning Policy Officer
 Forward planning Team
 North Warwickshire Borough Council

Date

11/03/2022

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

The deadline for responses is the end of Monday 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.

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response
Date: 14 March 2022 15:51:27
Attachments: [page1image28568448.png](#)
[page1image28562496.png](#)

Local Plan Review. Consultation Response

Name MR GORDON STUART BULLOCH

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 Wharton 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 Whaddon], 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 regulations. Further the site does not meet the requirement of not being *“detrimental to ...nearby residential proper,es”*. 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

MR G S BULLOCH

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response
Date: 14 March 2022 15:53:42
Attachments: [page1image28568448.png](#)
[page1image28562496.png](#)

Local Plan Review. Consultation Response

Name MISS SARAH MINTON

Address [REDACTED]

Dear Sirs,

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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.

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Yours Faithfully,

Sign

MIS SARAH MINTON

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Review. Consultation Response
Date: 14 March 2022 15:55:38
Attachments: [page1image28568448.png](#)
[page1image28562496.png](#)

Local Plan Review. Consultation Response

Name MRS JANET MINTON

Address [REDACTED]

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From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Objection to this planning development.
Date: 14 March 2022 15:57:49

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

Local Plan Review. Consultation Response

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Address [REDACTED].....

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Sign...A J A Crowe.....

Local Plan Review. Consultation Response

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Address [REDACTED]

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

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Anna Rafter

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Objection to this planning development.
Date: 14 March 2022 16:02:48

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

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Address [REDACTED].....

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

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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 A N Crowe.....

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Objection to this planning Development.
Date: 14 March 2022 16:04:46

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

Local Plan Review. Consultation Response

Name Maureen Crowe.....
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...M Crowe.....

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

On behalf of Jelson Limited.

Date: 14 March 2022 | Pegasus Ref: P22-0513

Author: Clare Clarke





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1. Introduction

- 1.1. This representation is submitted by Pegasus Group on behalf of Jelson Limited, in response to the Local Plan Review – Development Strategy and Policy Options (Regulation 18) consultation.
- 1.2. This representation is made in relation to our client's land interests at Land adjacent to A42/south of Ashby de la Zouch.
- 1.3. The response form below sets out our clients comments on the proposed settlement hierarchy, growth scenarios and emerging distribution strategy, as well as the detailed policy proposals.
- 1.4. Our clients have previously engaged in the preparation of the plan including submissions the Strategic Housing Land Availability (SHLAA) Call for Sites. Appendix 1 shows the location plan of the site, SHLAA reference A18, and the extent of our clients land interest which are available for employment development, a total 29.5 hectares.
- 1.5. This land adjoins SHLAA site A7, promoted by Hallam Land Management for residential development. Both promoters recognise the wider potential for comprehensive development of these two sites and are working on a joint concept plan showing how the sites could collectively deliver suitable and sustainable development to help meet the Council's future employment and housing needs.
- 1.6. The two sites in combination could deliver a mix of local and strategic employment for the district, up to 1088 homes, a sports hub, local centre and new primary school. The sites in combination provide the opportunity for car free linkages between employment and housing growth, within walking distance of the town centre. There would be at least two main access points for a new bus service to penetrate the scheme and be commercially viable. This is a unique opportunity to deliver a strategic scale of development close to services and facilities in one of the district's most sustainable locations.



DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

January 2022

Consultation Response Form

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

Part A – Personal details

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

PART A – Personal Details

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

	Personal Details	Agent’s Details (if applicable)
Title	Mr	Mrs
First Name	Rob	Clare
Last Name	Thorley	Clarke
[Job Title]	Land and Planning Director	Associate Planner
[Organisation]	Jelson Limited	Pegasus Group
Address Line 1	████████████████████	████████████████
Address Line 2	██████	██████████
Address Line 3		████████
Address Line 4		████████
Postcode	██████	██████
Telephone		██████████
Email address		██

PART B – Your Representation

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

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

The proposed settlement hierarchy is not supported, it does not reflect the role and function of Ashby de la Zouch relative to other settlements. It is identified as a Key Service Centre alongside Castle Donington, however these two settlements are very different and provide very different opportunities for future growth. The hierarchy should be reviewed and Ashby de la Zouch identified as a Main Town in the second tier of the hierarchy separate to Castle Donington.

Ashby de la Zouch was historically categorised with Coalville, as one of the two main towns in the District. This changed when Coalville was elevated by the Regional Plan, and it is now identified as the Principal Town, comprising seven settlements and an employment area.

Ashby de la Zouch continues to be an important market town in the District, with a full range and choice of services and facilities which serves a wide area. The evidence which underpins the proposed settlement hierarchy, however, fails to fully take into account the level choice and size of services available in Ashby de la Zouch and compares it with the seven linked settlements of the Coalville Urban Area, which distorts the findings. The result of this is that the town of Ashby de la Zouch is categorised with Castle Donington as a Key Service Centre rather than as a Market or Main Town, which would better reflect its role.

All settlements should be reassessed to fully take account of the number of each service available, as well the types of services in order to fully understand the role of individual settlements. The assessment should also acknowledge and take into account the unique position of the Coalville Urban Area which is being assessed as a whole rather than as individual settlements first and then for their role as linked settlements. This will highlight that Ashby de la Zouch is very different to Castle Donington acting as a Main Town or Market Town, with Castle Donington much more closely associated with the Local Service Centres.

The findings of the Settlement Study (2021) already support this, despite hiding the full extent of service provision available in Ashby de la Zouch. In this study Castle Donington scored 20, only one point more than the Local Service Centre Ibstock (19) and three points less than Ashby de la Zouch (23). The three-point difference in the score between Ashby de la Zouch and Castle Donington is same score difference used to make the distinction between the Local Service Centre of Kegworth and the Sustainable Village of Moira. Recategorising Ashby de la Zouch as a Market or Main Town or Castle Donington as a Local Service Centre would therefore be a more consistent approach, based on the existing evidence.

The study methodology hides the full extent of the distinction between Ashby de la Zouch and Castle Donington. Whilst the study takes account of the number of convenience stores available within each settlement, the number and level of choice for the other services and facilities is not taken into account.

The importance of this level of detail is highlighted by the fact that the only distinction in the scores for the top four settlements – Coalville Urban Area (comprising seven settlements), Ashby de la Zouch, Castle Donington and Ibstock – is the number of convenience stores. Without this detail these four

settlements, which are identified as falling into three different tiers of the hierarchy, would all have scored the same.

Ashby de la Zouch not only has more variety, and larger, convenience stores available, including a large Tesco Extra and Aldi (compared to Castle Donington which has a Co-op and Spa), the table below highlights Ashby de la Zouch also has significantly more choice in the other services and facilities too. Ashby de la Zouch has five primary schools, two secondary schools and a greater number and choice of other services including chemists, public houses and places of worship (based on the findings of the Council's Settlement Study 2021) but also dentists, opticians, vets and gyms (established from our own desk top assessment). Ashby de la Zouch is much closer to Coalville in terms of service provision (excluding the linked smaller settlements). Coalville also has five primary schools, eight convenience stores and a choice of most key service and facilities like Ashby de la Zouch reflecting their roles as the main towns.

	Coalville (excluding linked settlements)	Ashby de la Zouch	Castle Donington
Convenience Store	8	6	3
Primary School	5	5	3
Secondary School	4	2	1
GP Surgery	3	1	1
Chemist/Pharmacy	5	4	1
Dentist	8	4	1
Optician	4	4	1
Vet	2	2	1
Public House	8	13	8
Place of Worship	12	7	4
Gym	6	5	2
Library	1	1	1
Post Offices	3	1	1
Community Venue	3	4	5
At least hourly buses	6	3	3
Employment Areas	6	3	5

The table above provides a comparison between the two settlements and clearly highlights that whilst both settlements have a good range of services and facilities, if the number of those services had been factored into the scoring, as it was for convenience stores, the distinction between the two settlements would have been much clearer.

The number of services available and therefore the choice available is a really important indicator of whether a settlement is serving the immediate settlements in its vicinity or drawing in people from a wider catchment. Ashby de la Zouch has a wider retail offer, a greater range of cafes and bars and far more of a destination for people within the wider area as a result.

The distinction is further reflected in the population difference between the two settlements (population of 12,385 in Ashby de la Zouch compared to just 6,350 in Castle Donington in the 2011 census). Castle Donington is a large village, with a Parish Council, offering with a good range of facilities

to residents. Ashby de la Zouch on the other hand is a market town, with a Town Council, offering a destination for people seeking higher order services from beyond its immediate area.

The settlement hierarchy evidence needs to be revisited to ensure the unique position of Ashby de la Zouch in the hierarchy is clear.

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

Yes, in particular, the High 2 scenario is supported. As the consultation document sets out, this growth scenario performs best having regard to all of the factors which need to be considered.

The Planning Practice Guidance sets out that standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. As the consultation document sets out, it does not predict the impact of changing economic circumstances or other factors on demographic behaviour or take account of unmet needs (Ref: 2a-010-20201216). With this in mind there are three key reasons why the High 2 growth scenario is the most appropriate for North West Leicestershire and these are set out below.

Economic Needs

The first relates to economic needs for new homes over and above those required to meeting demographic needs. The Leicester and Leicestershire Housing and Economic Needs Assessment (HEDNA 2017) found that the economy will drive above-trend economic migration to North West Leicestershire. The study recommended an upward adjustment to housing provision to support workforce growth. The Council's Local Housing Needs Assessment (2019) supported this evidence and found an uplift for economic needs would be appropriate.

As a net importer of labour and with significant economic growth continuing in the District, it is essential the housing requirement in the local plan reflects this and the Local Housing Need figure generated by the standard method is adjusted upwards for economic needs as proposed.

Household Projections

The second is the latest 2018-based household projections, published in June 2020, which showed a significant increase in likely household growth for North West Leicestershire over the period to 2043 when compared to the 2014-based projections used to inform the standard method. The latest projections further support the High 2 scenario being used to inform the housing requirement in the local plan.

North West Leicestershire is one of the authorities with the largest increase in household projections, identified as one of the top 10 authorities in the country, indicating that a higher housing requirement above the standard method is appropriate and necessary to meet needs in the area.

Whilst the latest projections are not used in the standard method, they are important in understanding the likely number of households arising in an area. The current national policy directs the increased need arising nationally to the twenty largest cities and urban areas, including Leicester City, instead of those areas where the need arises. This increase for Leicester City will however only increase the level of unmet need for the city area.

Unmet Housing Needs from Leicester

The third reason the High 2 scenario is the most appropriate option to inform the housing requirement in the local plan, is the level of unmet need arising from Leicester City mentioned above. The NPPF sets out that strategic policies should be informed by a local housing need assessment and in addition any needs that cannot be met within neighbouring areas (para 61). Leicester City have declared an unmet need and the consultation document suggests this is in the region of 18,000 homes.

The Leicester and Leicestershire Statement of Common Ground published in March 2021 states that work to inform the apportionment of Leicester's unmet need was due to be complete in Winter 2021/2022. An update to the Charnwood Local Plan Inspectors suggests this now expected in May 2022. This will provide more clarity on the distribution of Leicester's unmet need. Planning for unmet need in the interim is supported particularly in the context of the joint vision in the Leicester and Leicestershire Strategic Growth Plan. The Strategic Growth Plan identifies the north west of the County as a growth location, described as the Leicestershire International Gateway and identified as a focus of strategic levels of development, further supporting the High 2 scenario and the potential for unmet need to be apportioned to North West Leicestershire.

Overall the evidence supports a housing requirement above the standard method Local Housing Need figure without meeting any unmet needs from Leicester and ahead of applying a percentage uplift for flexibility to ensure delivery. The scale of uplift needs to be informed by the economic growth in the area, the latest household projections, and the role of the District in meeting Leicester's unmet need. The 2018 based household projections provide the most up to date evidential basis for a housing requirement figure which achieves this and therefore High 2 scenario is supported as the most appropriate option.

North West Leicestershire has a strong market, with high build rates over the last ten years highlighting the level of market demand. The High 2 scenario is therefore entirely achievable in the District over the next 15 years.

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

The preferred distribution for the High 2 Scenario (the scenario supported in question 3), Option 7b includes directing 1,785 homes to the Coalville Urban Area, 1,785 homes to a New Settlement, 765 homes to Key Service Centres (Ashby de la Zouch and Castle Donington), 510 homes to Local Service Centres (Measham, Ibstock and Kegworth) and 255 homes to the Sustainable Villages.

The proposed approach to the distribution of housing growth is not supported. It is critical to the success of the Local Plan, that land availability, deliverability and opportunity to avoid significant negative impacts are considered alongside the overall sustainability of individual settlements. The distribution also needs to reflect the relative sustainability of settlements within a tier of the hierarchy where there is a significant evidenced difference such as that between Ashby de la Zouch and Castle Donington.

The preferred options as currently proposed, significantly underestimate the opportunity for Ashby de la Zouch to contribute to meeting the District's housing needs. Option 7b should be adjusted to reflect the evidence of land availability, suitability and achievability and Ashby de la Zouch's evidenced and long-standing role as a second tier main town / market town which has significant potential to sustainably deliver housing growth in this context.

Land availability, suitability and achievability

The consultation document highlights significant doubts about the ability of the market to deliver a significant scale of growth in the Coalville Urban Area based on recent build rates and an understanding of the market interest there.

Whilst the Strategic Housing Land Availability Assessment highlights there is land available in the Coalville Urban Area, there are no options identified close to the town centre and many of the larger site opportunities require compromising important areas of separation between Whitwick and Coalville or will cause coalescence issues with Ravenstone. Whilst there are a small number of larger site options to the east and south of the town and adjoining the smaller linked settlements of the urban area, these options are limited.

Option 7b needs to be adjusted to reflect the land availability and market position at Coalville as well as the adverse impacts of further significant growth on the character of the villages that make up the Coalville Urban Area. The current figure of 1,785 homes should be reduced significantly and directed to other sustainable settlements. As the next most sustainable town in the District, with the most potential to support development, significant further development should be directed to Ashby de la Zouch as part of this process. This would maintain the key aspects of Option 7b, which led to it being identified as the preferred option, whilst ensuring the Council can maintain a five year supply and meet housing needs.

Option 2b tests a higher scale of growth in the Key Service Centres, directing a total of 2,040 dwellings to Ashby de la Zouch and Castle Donington. Whilst this option was not taken forward as it would provide a lack of flexibility or choice in the market, the Sustainability Appraisal found this option had the least number of significant negative effects of all the High 2 options. Whilst it is not suggested Option 2b is taken forward as it would direct significantly more growth to the Coalville Urban Area than could be delivered in the plan period, this Sustainability Appraisal evidence is an important consideration which could inform an adjustment to Option 7b. It suggests that the Key Service Centres can sustainably support and deliver significantly more growth than is proposed for this level of the hierarchy.

Relative Sustainability of Key Service Centres

Ashby de la Zouch, whilst in the same settlement hierarchy tier, should be considered separately and ahead of Castle Donington in terms of sustainable locations for growth for the reasons set out under question 2. Ashby de la Zouch, as well as being the second most sustainable location in the District, has strategic land available, providing an opportunity to delivery planned sustainable growth that can be accommodated without adversely impacting on infrastructure or settlement identity.

The Strategic Housing Land Availability Assessment 2021 identifies a land availability capacity of 4,112 homes in Ashby de la Zouch compared to 2,709 homes in Castle Donington. Whilst the SHLAA capacity is only indicative of development potential, it does highlight the need to consider the role of Ashby de la Zouch separately to Castle Donington in terms of the role these settlements can realistically have in delivering growth in the District over the plan period.

Land south of Ashby de la Zouch

This representation is made on behalf of Jelson Limited in relation to their land interests at Land adjacent to A42/south of Ashby de la Zouch. The site provides an opportunity to deliver significant employment development at Ashby de la Zouch and lies directly south and adjacent to Land south of Ashby de la Zouch, a site being promoted by Hallam Land Management for up to 1,088 homes, a community hub and primary school extension along with public open space, formal sports provision and a local centre.

There is an opportunity to consider a wider comprehensive mixed use scheme that includes integrating the new homes promoted by Hallam Land Management with our clients employment land to the south of the site. Both promoters are working together to masterplan the two sites as a single comprehensive development, including sustainable transport linkages into the town centre and delivered in phases having regard to the requirements of the local plan.

The consultation document raises concerns about the time it would take to deliver a large scale development like Land south of Ashby de la Zouch when considering Option 2b. Land south of Ashby de la Zouch has been promoted for many years and the constraints and opportunities of this site are well understood. Whilst a masterplanning brief for the wider site could be progressed early to ensure the scheme is properly planned, the delivery of both employment and housing development could be phased to deliver sustainable growth throughout the new plan period. Including this site as an adjustment to Option 7b where there is strong market demand would ensure there are a range of comprehensive strategic developments complemented by smaller scale developments across a range of settlements and locations.

Q10 - Which option for ensuring a continuity of employment land supply do you prefer?

Option 2, to increase the requirement figures by an additional factor to ensure continuity of employment land, is supported.

The evidence supports the provision of additional employment land over the plan period. Without additional allocations there is the potential for an insufficient supply of employment land over the plan period. Option 2 will ensure flexibility and choice is available and importantly ensure an on-going supply of suitable and available employment land throughout the plan period. This will give the Council greater control over site selection and provides the opportunity to plan employment and housing growth comprehensively over the plan period.

Q11 - Which general employment land strategy option do you prefer?

General Employment Land Strategy Option 1 for general employment land allocations to be principally provided at Coalville, Ashby and Castle Donington is supported.

This strategy would recognise the sustainability of the settlements at the top of the hierarchy, helping to secure the long term future of new employment areas that are supported by infrastructure and an accessible and local workforce. There is already a concentration of employment associated with the East Midlands Airport and Gateway Industrial Cluster (EMAGIC) which, due to the imbalance with homes in that area, means this area is a net importer of labour each day. The proposed new settlement will provide an opportunity to address this imbalance if additional employment is instead focused in District's existing most sustainable settlements to ensure a strong relationship and balance between homes and jobs throughout the District.

It is critical to the success of the Local Plan, that land availability, deliverability and opportunity to avoid significant negative impacts are considered alongside the overall sustainability of individual settlements.

Ashby de la Zouch provides both a sustainable location for employment growth and the opportunity to deliver employment land in the plan period, in association housing development, whilst avoiding any significant negative impacts. The evidence of land availability, suitability and achievability support the continuing role for Ashby de la Zouch in delivering new employment land.

The relative sustainability of Ashby de la Zouch compared to Castle Donington, as set out in relation to question 2, should be taken into account in the site selection process. Ashby de la Zouch's evidenced and long-standing role as a second tier main town / market town and the opportunity to sustainably deliver employment growth should inform the next stage of the plan preparation process.

This representation is made on behalf of Jelson Limited in relation to their land interests at Land adjacent to A42/south of Ashby de la Zouch. The site provides an opportunity to deliver significant employment development at Ashby de la Zouch, the most sustainable location outside of the Principal Town.

The site has the potential to deliver up to 29.5 hectares of employment and make a significant contribution to local employment needs as well as strategic B8 employment requirements in the

District, having regard to the Leicester and Leicestershire Housing and Economic Development Needs Assessment and Warehousing and Logistics in Leicester and Leicestershire Study.

Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change Study (April 2021) identifies the A42 transport corridor, incorporating Ashby-de-la-Zouch as an 'Area of Opportunity' on the basis of having good connections with the strategic highway network, being appropriately located relative to the markets to be served, accessible to labour and located close to areas of employment need.

The study sets out a criteria-based approach for identifying and assessing potential new sites for large warehouses (para 11.17). The table below considers each of the criteria for assessing appropriate sites in turn and highlights how well aligned this opportunity at Ashby de la Zouch is with those criteria. The report acknowledges that it is unrealistic to expect all new large scale distribution activity to locate at a directly rail-served strategic logistics site and therefore sets out that an appropriate road only site are those that meet all the other criteria (excluding the modal choice requirements). The table below confirms that this site at Ashby de la Zouch meets all the criteria, as well as being a suitable site in terms of other site constraints such as flood risk and biodiversity impacts which the report highlights as also being important.

Criteria for Assessing Sites Appropriate for Strategic Distribution	Land adjacent to A42/south of Ashby de la Zouch
Good connections with the strategic highway network – close to a junction with the motorway network or long-distance dual carriageway. Motorway/dual carriageway junctions and the approach routes should have sufficient network capacity.	Yes. This site is ideally located at junction 12 of the A42, a junction with existing capacity to support significant development. The A42 is an important part of the Strategic Road Network, a dual carriageway which at junction 11 becomes the M42.
Appropriately located relative to the markets to be served.	Yes. This site is located on junction 12 of the A42/M42 which provides a strategic link between the M1 and M6 providing access to nationwide markets.
Is sufficiently large and flexible in its configuration so that it can accommodate the range of sizes of distribution centre warehouse units now required by the market.	Yes. The site is 29.5 hectares and therefore there is flexibility to accommodate a range of sizes of unit.
Is served from an electricity supply grid with sufficient capacity to permit the charging of large fleets of battery-electric freight vehicles simultaneously, or part of the electricity supply grid which can be upgraded (network reinforcement) relatively easily and at a reasonable cost.	Yes. There are no known issues with electricity supply in this area.

<p>Is accessible to labour, including the ability to be served by sustainable transport, and located close to areas of employment need.</p>	<p>Yes. Located within walking and cycling distance of Ashby de la Zouch Town Centre, therefore very accessible to labour within the town and within those areas served by local bus services which have the potential to be extended to the site.</p>
<p>Is located away from incompatible land-uses.</p>	<p>Yes. Site located between A42 and B5006 to the south of one of the most sustainable settlements in the District where the relationship to residential areas can be effectively managed to avoid any incompatibility issues.</p>

The site, in combination with the proposed housing site to the north, Land south of Ashby de la Zouch, promoted by Hallam Land Management, provides an opportunity to deliver a sustainable, well integrated extension to the town of Ashby de la Zouch, one of the most sustainable locations in the district.

In line with the Council's evidence, there is an opportunity here to plan for development opportunities at as part of a substantial site, with the critical mass and visibility. As the consultation notes, the development of a critical mass and visibility provides an opportunity for development to comprise modern, flexible high-specification space in an attractive environment.

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

The initial Policy Option of 50% of the outstanding road-served requirement to be met in NWL is supported.

There is a good record of delivery in North West Leicestershire and a continuing market for strategic warehousing in the District which this policy approach would support and ensure the Council has more control over location of further strategic B8 development.

This representation is made on behalf of Jelson Limited in relation to their land interests at Land adjacent to A42/south of Ashby de la Zouch. This employment site at Ashby de la Zouch provides the opportunity for both strategic and non-strategic employment, having regard to the Leicester and Leicestershire Housing and Economic Development Needs Assessment and Warehousing and Logistics in Leicester and Leicestershire Study and the recommended criteria for identifying strategic employment sites. At 29.5 hectares, this site could make a significant contribution to strategic employment needs as well as local needs.

The site, in combination with the housing site to the north promoted by Hallam Land Management, provides an opportunity to deliver a well integrated extension of the town of Ashby de la Zouch, one of the most sustainable locations in the district.

Q13 - Which policy option for employment land proposals on unidentified sites do you prefer?

Option 2 to retain the existing policy is supported. The policy currently sets out that where evidence indicates an immediate need or demand for additional employment land (B1, B2 and B8) in the District cannot be met from land allocated, the Council will consider favourably proposals that meet the identified need in appropriate locations subject to the site being accessible by sustainable means, having good access to the strategic highway network and an acceptable impact on the capacity of that network and not being detrimental to the amenities of any nearby residential properties or the wider environment.

This policy approach to employment land ensures flexibility to respond to employment market demands. The alternative approaches set out of requiring that premises should be for a named end user, that alternative sites outside the district should be considered, that only need is considered not demand and that the need/demand must be exceptional; would not provide the flexibility required by the NPPF. These proposed policy approaches are too restrictive and will put the district at a disadvantage in attracting good quality employment provision.

The proposed approach in Option 4 to amend the current policy to include sites with planning permission, as well as those allocated, in the alternative sites test for the need/demand which has been identified appears reasonable if amendments are made to the existing policy.

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

Option 1 for a policy which encourages local employment initiatives in new, large-scale developments is supported. Whilst local employment initiatives are supported, it is not always possible to achieve depending of the skills available locally and this policy approach provides the flexibility to recognise this.

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

This policy approach is supported and reflects the approach taken to development by Jelson Limited including that promoted at Land adjacent to A42/south of Ashby de la Zouch. This site provides an opportunity to promote good walking and cycling routes into the town centre and accessible employment to residents of the town.

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

The proposed policy requires all development to follow a sequential energy hierarchy prioritising fabric first and achieving 31% reduction in regulated CO2 emissions. This policy is not necessary as it repeats the Building Regulations. Planning policy does not need to set standards for energy efficiency, the government is making these requirements through Building Regulations.



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

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

Declaration

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

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

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

Signed

[Redacted signature box]

Date

14/03/22

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

The deadline for responses is the end of Monday 28 February 2022 (updated to 14/03/22)

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

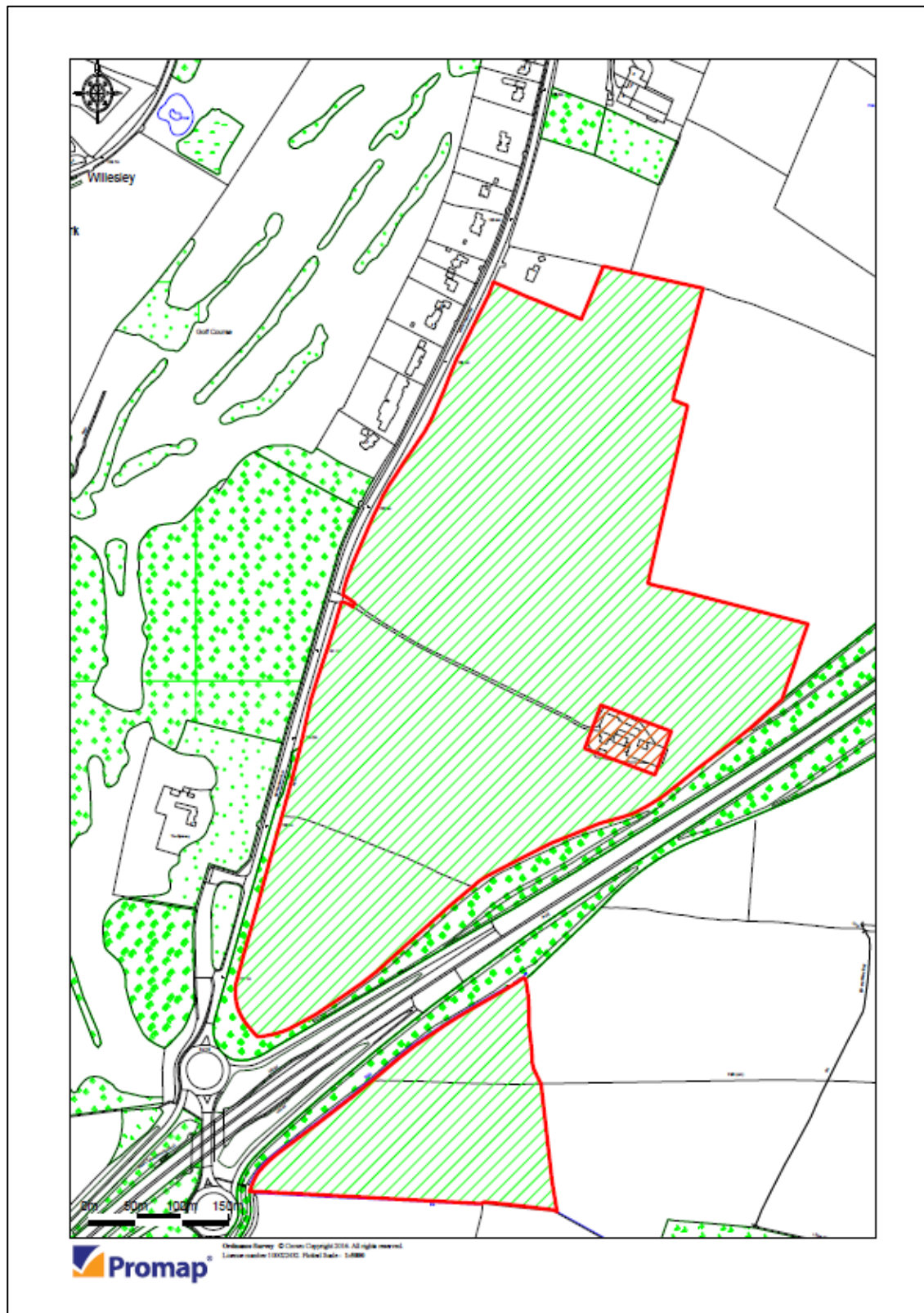
The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004, save for requests of such information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

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

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Appendix 1 – Land adjacent to A42/south of Ashby de la Zouch SHLAA Site Location Plan (A18)



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

East Midlands

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

On behalf of Hallam Land Management.

Date: 14 March 2022 | Pegasus Ref: P22-0513

Author: Clare Clarke





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1. Introduction

- 1.1. This representation is submitted by Pegasus Group on behalf of Hallam Land Management, in response to the Local Plan Review – Development Strategy and Policy Options (Regulation 18) consultation.
- 1.2. This representation is made in relation to our client's land interests at Land south of Ashby de la Zouch.
- 1.3. The response form below sets out our client's comments on the proposed settlement hierarchy, growth scenarios and emerging distribution strategy, as well as the detailed policy proposals.
- 1.4. Our clients have previously engaged in the preparation of the plan including representations to the last Local Plan consultation and submissions the Strategic Housing Land Availability (SHLAA) Call for Sites. This representation includes an update to our client's previous SHLAA submission, site reference A7. Appendix 1 provides an updated red line for site A7 to show the full extent of our client's land interests which are available for residential development.
- 1.5. This land adjoins SHLAA site A18, promoted by Jelson Limited for employment development. Both promoters recognise the wider potential for comprehensive development of these two sites and are working on a joint concept plan showing how the sites could collectively deliver suitable and sustainable development to help meet the Council's future employment and housing needs.
- 1.6. The proposed housing site would deliver a sports hub, local centre and new primary school and the proposed employment site, a mix of local and strategic employment for the District. The sites in combination provide the opportunity for car free linkages between employment and housing growth, within walking distance of the town centre. There would be at least two main access points for a new bus service to penetrate the scheme and be commercially viable. This is a unique opportunity to deliver a strategic scale of development close to services and facilities in one of the District's most sustainable locations.



1.7. DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

January 2022

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent’s Details (if applicable)
Title	Mr	Mrs
First Name	Paul	Clare
Last Name	Burton	Clarke
[Job Title]	Director	Associate Planner
[Organisation]	Hallam Land Management Limited	Pegasus Group
Address Line 1	██████████	██████████
Address Line 2	██████	██████████
Address Line 3		██████
Address Line 4		██████
Postcode	██████	██████
Telephone		██████████
Email address		████████████████████

PART B – Your Representation

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

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

The proposed settlement hierarchy is not supported, it does not reflect the role and function of Ashby de la Zouch relative to other settlements. It is identified as a Key Service Centre alongside Castle Donington, however these two settlements are very different and provide very different opportunities for future growth. The hierarchy should be reviewed and Ashby de la Zouch identified as a Main Town in the second tier of the hierarchy separate to Castle Donington.

Ashby de la Zouch was historically categorised with Coalville, as one of the two main towns in the District. This changed when Coalville was elevated by the Regional Plan, and it is now identified as the Principal Town, comprising seven settlements and an employment area.

Ashby de la Zouch continues to be an important market town in the District, with a full range and choice of services and facilities which serves a wide area. The evidence which underpins the proposed settlement hierarchy, however, fails to fully take into account the level choice and size of services available in Ashby de la Zouch and compares it with the seven linked settlements of the Coalville Urban Area, which distorts the findings. The result of this is that the town of Ashby de la Zouch is categorised with Castle Donington as a Key Service Centre rather than as a Market or Main Town, which would better reflect its role.

All settlements should be reassessed to fully take account of the number of each service available, as well the types of services in order to fully understand the role of individual settlements. The assessment should also acknowledge and take into account the unique position of the Coalville Urban Area which is being assessed as a whole rather than as individual settlements first and then for their role as linked settlements. This will highlight that Ashby de la Zouch is very different to Castle Donington acting as a Main Town or Market Town, with Castle Donington much more closely associated with the Local Service Centres.

The findings of the Settlement Study (2021) already support this, despite hiding the full extent of service provision available in Ashby de la Zouch. In this study Castle Donington scored 20, only one point more than the Local Service Centre Ibstock (19) and three points less than Ashby de la Zouch (23). The three-point difference in the score between Ashby de la Zouch and Castle Donington is same score difference used to make the distinction between the Local Service Centre of Kegworth and the Sustainable Village of Moira. Recategorising Ashby de la Zouch as a Market or Main Town or Castle Donington as a Local Service Centre would therefore be a more consistent approach, based on the existing evidence.

The study methodology hides the full extent of the distinction between Ashby de la Zouch and Castle Donington. Whilst the study takes account of the number of convenience stores available within each settlement, the number and level of choice for the other services and facilities is not taken into account.

The importance of this level of detail is highlighted by the fact that the only distinction in the scores for the top four settlements – Coalville Urban Area (comprising seven settlements), Ashby de la Zouch, Castle Donington and Ibstock – is the number of convenience stores. Without this detail these four

settlements, which are identified as falling into three different tiers of the hierarchy, would all have scored the same.

Ashby de la Zouch not only has more variety, and larger, convenience stores available, including a large Tesco Extra and Aldi (compared to Castle Donington which has a Co-op and Spa), the table below highlights Ashby de la Zouch also has significantly more choice in the other services and facilities too. Ashby de la Zouch has five primary schools, two secondary schools and a greater number and choice of other services including chemists, public houses and places of worship (based on the findings of the Council's Settlement Study 2021) but also dentists, opticians, vets and gyms (established from our own desk top assessment). Ashby de la Zouch is much closer to Coalville in terms of service provision (excluding the linked smaller settlements). Coalville also has five primary schools, eight convenience stores and a choice of most key service and facilities like Ashby de la Zouch reflecting their roles as the main towns.

	Coalville (excluding linked settlements)	Ashby de la Zouch	Castle Donington
Convenience Store	8	6	3
Primary School	5	5	3
Secondary School	4	2	1
GP Surgery	3	1	1
Chemist/Pharmacy	5	4	1
Dentist	8	4	1
Optician	4	4	1
Vet	2	2	1
Public House	8	13	8
Place of Worship	12	7	4
Gym	6	5	2
Library	1	1	1
Post Offices	3	1	1
Community Venue	3	4	5
At least hourly buses	6	3	3
Employment Areas	6	3	5

The table above provides a comparison between the two settlements and clearly highlights that whilst both settlements have a good range of services and facilities, if the number of those services had been factored into the scoring, as it was for convenience stores, the distinction between the two settlements would have been much clearer.

The number of services available and therefore the choice available is a really important indicator of whether a settlement is serving the immediate settlements in its vicinity or drawing in people from a wider catchment. Ashby de la Zouch has a wider retail offer, a greater range of cafes and bars and far more of a destination for people within the wider area as a result.

The distinction is further reflected in the population difference between the two settlements (population of 12,385 in Ashby de la Zouch compared to just 6,350 in Castle Donington in the 2011 census). Castle Donington is a large village, with a Parish Council, offering with a good range of facilities

to residents. Ashby de la Zouch on the other hand is a market town, with a Town Council, offering a destination for people seeking higher order services from beyond its immediate area.

The settlement hierarchy evidence needs to be revisited to ensure the unique position of Ashby de la Zouch in the hierarchy is clear.

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

Yes, in particular, the High 2 scenario is supported. As the consultation document sets out, this growth scenario performs best having regard to all of the factors which need to be considered.

The Planning Practice Guidance sets out that standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. As the consultation document sets out, it does not predict the impact of changing economic circumstances or other factors on demographic behaviour or take account of unmet needs (Ref: 2a-010-20201216). With this in mind there are three key reasons why the High 2 growth scenario is the most appropriate for North West Leicestershire and these are set out below.

Economic Needs

The first relates to economic needs for new homes over and above those required to meeting demographic needs. The Leicester and Leicestershire Housing and Economic Needs Assessment (HEDNA 2017) found that the economy will drive above-trend economic migration to North West Leicestershire. The study recommended an upward adjustment to housing provision to support workforce growth. The Council's Local Housing Needs Assessment (2019) supported this evidence and found an uplift for economic needs would be appropriate.

As a net importer of labour and with significant economic growth continuing in the District, it is essential the housing requirement in the local plan reflects this and the Local Housing Need figure generated by the standard method is adjusted upwards for economic needs as proposed.

Household Projections

The second is the latest 2018-based household projections, published in June 2020, which showed a significant increase in likely household growth for North West Leicestershire over the period to 2043 when compared to the 2014-based projections used to inform the standard method. The latest projections further support the High 2 scenario being used to inform the housing requirement in the local plan.

North West Leicestershire is one of the authorities with the largest increase in household projections, identified as one of the top 10 authorities in the country, indicating that a higher housing requirement above the standard method is appropriate and necessary to meet needs in the area.

Whilst the latest projections are not used in the standard method, they are important in understanding the likely number of households arising in an area. The current national policy directs the increased need arising nationally to the twenty largest cities and urban areas, including Leicester City, instead of those areas where the need arises. This increase for Leicester City will however only increase the level of unmet need for the city area.

Unmet Housing Needs from Leicester

The third reason the High 2 scenario is the most appropriate option to inform the housing requirement in the local plan, is the level of unmet need arising from Leicester City mentioned above. The NPPF sets out that strategic policies should be informed by a local housing need assessment and in addition any needs that cannot be met within neighbouring areas (para 61). Leicester City have declared an unmet need and the consultation document suggests this is in the region of 18,000 homes.

The Leicester and Leicestershire Statement of Common Ground published in March 2021 states that work to inform the apportionment of Leicester's unmet need was due to be complete in Winter 2021/2022. An update to the Charnwood Local Plan Inspectors suggests this now expected in May 2022. This will provide more clarity on the distribution of Leicester's unmet need. Planning for unmet need in the interim is supported particularly in the context of the joint vision in the Leicester and Leicestershire Strategic Growth Plan. The Strategic Growth Plan identifies the north west of the County as a growth location, described as the Leicestershire International Gateway and identified as a focus of strategic levels of development, further supporting the High 2 scenario and the potential for unmet need to be apportioned to North West Leicestershire.

Overall the evidence supports a housing requirement above the standard method Local Housing Need figure without meeting any unmet needs from Leicester and ahead of applying a percentage uplift for flexibility to ensure delivery. The scale of uplift needs to be informed by the economic growth in the area, the latest household projections, and the role of the District in meeting Leicester's unmet need. The 2018 based household projections provide the most up to date evidential basis for a housing requirement figure which achieves this and therefore High 2 scenario is supported as the most appropriate option.

North West Leicestershire has a strong market, with high build rates over the last ten years highlighting the level of market demand. The High 2 scenario is therefore entirely achievable in the District over the next 15 years.

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

The preferred distribution for the High 2 Scenario (the scenario supported in question 3), Option 7b includes directing 1,785 homes to the Coalville Urban Area, 1,785 homes to a New Settlement, 765 homes to Key Service Centres (Ashby de la Zouch and Castle Donington), 510 homes to Local Service Centres (Measham, Ibstock and Kegworth) and 255 homes to the Sustainable Villages.

The proposed approach to the distribution of housing growth is not supported. It is critical to the success of the Local Plan, that land availability, deliverability and opportunity to avoid significant negative impacts are considered alongside the overall sustainability of individual settlements. The distribution also needs to reflect the relative sustainability of settlements within a tier of the hierarchy where there is a significant evidenced difference such as that between Ashby de la Zouch and Castle Donington.

The preferred options as currently proposed, significantly underestimate the opportunity for Ashby de la Zouch to contribute to meeting the District's housing needs. Option 7b should be adjusted to reflect the evidence of land availability, suitability and achievability and Ashby de la Zouch's evidenced and long-standing role as a second tier main town / market town which has significant potential to sustainably deliver housing growth in this context.

Land availability, suitability and achievability

The consultation document highlights significant doubts about the ability of the market to deliver a significant scale of growth in the Coalville Urban Area based on recent build rates and an understanding the market interest there.

Whilst the Strategic Housing Land Availability Assessment highlights there is land available in the Coalville Urban Area, there are no options identified close to the town centre and many of the larger site opportunities require compromising important areas of separation. Whilst there are a small number of larger site options to the east and south of the town and adjoining the smaller linked settlements of the urban area, these options are limited.

Option 7b needs to be adjusted to reflect the land availability and market position at Coalville as well as the adverse impacts of further significant growth on the character of the villages that make up the Coalville Urban Area. The current figure of 1,785 homes should be reduced significantly and directed to other sustainable settlements. As the next most sustainable town in the District, with the most potential to support development, significant further development should be directed to Ashby de la Zouch as part of this process. This would maintain the key aspects of Option 7b, which led to it being identified as the preferred option, whilst ensuring the Council can maintain a five year supply and meet housing needs.

Option 2b tests a higher scale of growth in the Key Service Centres, directing a total of 2,040 dwellings to Ashby de la Zouch and Castle Donington. Whilst this option was not taken forward as it would provide a lack of flexibility or choice in the market, the Sustainability Appraisal found this option had the least number of significant negative effects of all the High 2 options. Whilst it is not suggested Option 2b is taken forward as it would direct significantly more growth to the Coalville Urban Area than could be delivered in the plan period, this Sustainability Appraisal evidence is an important consideration which could inform an adjustment to Option 7b. It suggests that the Key Service Centres can sustainably support and deliver significantly more growth than is proposed for this level of the hierarchy.

Relative Sustainability of Key Service Centres

Ashby de la Zouch, whilst in the same settlement hierarchy tier, should be considered separately and ahead of Castle Donington in terms of sustainable locations for growth for the reasons set out under question 2. Ashby de la Zouch, as well as being the second most sustainable location in the District, has strategic land available, providing an opportunity to delivery planned sustainable growth that can be accommodated without adversely impacting on infrastructure or settlement identity.

The Strategic Housing Land Availability Assessment 2021 identifies a land availability capacity of 4,112 homes in Ashby de la Zouch compared to 2,709 homes in Castle Donington. Whilst the SHLAA capacity is only indicative of development potential, it does highlight the need to consider the role of Ashby de la Zouch separately to Castle Donington in terms of the role these settlements can realistically have in delivering growth in the District over the plan period.

Land south of Ashby de la Zouch

This representation is made on behalf of Hallam Land Management in relation to their land interests at Land south of Ashby de la Zouch. The site provides an opportunity to deliver a well integrated extension of the town of Ashby de la Zouch, the most sustainable location outside of the Principal Town.

The site has the potential to deliver up to 1,088 homes, a community hub and primary school extension along with public open space, formal sports provision and a local centre. Detailed SHLAA submissions have been made for this site and an updated site plan is included at Appendix 1 for consideration as part of the site selection process.

There are three options submitted, including two smaller options for the development of between 700-900 homes, one with an extension to Western Park proposed and the other with a new Sports hub proposed instead, delivering a new, purpose built multi-pitch sports complex for the town. The sports hub would bring real benefits to the town, not only in terms of assisting with the current traffic management issues on match day, by moving the facilities to a location where this is planned for, but also in terms of the long-term future of the club which is currently struggling with sub-standard facilities.

This site provides an opportunity for comprehensive development which is well planned and integrated into the town, providing new housing within walking distance of the town centre and all the services and facilities available there. This is an opportunity that does not exist within the Coalville Urban Area. The site would fit well with the Council's proposed approach to health and well-being with provision of open spaces, sport facilities and walking and cycling routes, as well as good access to health services. There is also the potential for bus provision, including the potential to consider an on-demand and flexible minibus service like the ArrivaClick service available at New Lubbesthorpe and the surrounding area. This site is an opportunity to deliver tangible benefits to existing residents of Ashby, supporting the continued success of this vibrant town.

There is also an opportunity to consider a wider comprehensive mixed use scheme that includes integrating new homes with employment land to the south of the site. The employment site is being promoted by Jelson Limited and has the potential to meet both strategic and local employment needs in the district. Both promoters are working together to masterplan the two sites as a single comprehensive development, including sustainable transport linkages into the town centre and delivered in phases having regard to the requirements of the local plan.

The consultation document raises concerns about the time it would take to deliver a large scale development like Land south of Ashby de la Zouch when considering Option 2b. Land south of Ashby de la Zouch has been promoted for many years and the constraints and opportunities of this site are well understood. Whilst a masterplanning brief for the wider site could be progressed early to ensure the scheme is properly planned, the delivery of both employment and housing development could be phased to deliver sustainable growth throughout the new plan period. Including this site as an adjustment to Option 7b where there is strong market demand would ensure there are a range of comprehensive strategic developments complemented by smaller scale developments across a range of settlements and locations.

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

The proposed policy to seek self-build and custom-build plots on developments of 50 units or more where there is a proven need is not supported. This policy approach will not boost the housing supply and creates practical issues that should be given careful consideration. It is essential that consideration is given to health and safety implications, working hours, length of build programme and therefore associated long-term gaps in the street-scene caused by stalled projects. There is the potential for unsold plots and the timescale for reversion of these plots to the original housebuilder creates practical difficulties in terms of co-ordinating construction activity on the wider site.

The first part of the proposed policy which supports the provision of self-build/custom build housing is a more appropriate approach to this issue. The Plan should support the delivery of self-build housing.

Q7 - Do you agree with the proposed policy for Space Standards? If not why not?

The proposed approach of requiring all new residential developments to meet Nationally Described Space Standards as a minimum is not supported based on the evidence collected to inform the consultation document.

The Planning Practice Guidance sets out that local planning authorities need to gather evidence to determine whether there is a need for additional standards in their area and justify setting policies in their local plans and that local planning authorities should consider the impact of using the standards as part of the Local Plan viability assessment, considering need, viability and timing.

The Council's evidence suggests that the majority of developments exceed the Nationally Described Space Standards. This suggests this policy is not necessary or justified.

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

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

The preferred policy approach, which proposes that all new build residential developments will be required to meet at least part M4(2) standards of the Building Regulations and 5% will be required to meet Part M4(3)(b) will duplicate the proposed national changes to Part M of the Building Regulations and is therefore unnecessary.

Due to the specific nature of Park M4 (3) homes, if introduced this policy requirement should be limited to affordable homes for which the Council has nomination rights.

Q10 - Which option for ensuring a continuity of employment land supply do you prefer?

Option 2, to increase the requirement figures by an additional factor to ensure continuity of employment land, is supported.

The evidence supports the provision of additional employment land over the plan period. Without additional allocations there is the potential for an insufficient supply of employment land over the plan period. Option 2 will ensure flexibility and choice is available and importantly ensure an on-going supply of suitable and available employment land throughout the plan period. This will give the Council greater control over site selection and provides the opportunity to plan employment and housing growth comprehensively over the plan period.

Q11 - Which general employment land strategy option do you prefer?

General Employment Land Strategy Option 1 for general employment land allocations to be principally provided at Coalville, Ashby and Castle Donington is supported.

This strategy would recognise the sustainability of the settlements at the top of the hierarchy, helping to secure the long term future of new employment areas that are supported by infrastructure and an accessible and local workforce. It is also important that new jobs are provided in the most sustainable locations in the District to ensure a strong relationship between homes and jobs.

It is critical to the success of the Local Plan, that land availability, deliverability and opportunity to avoid significant negative impacts are considered alongside the overall sustainability of individual settlements.

Ashby de la Zouch provides both a sustainable location for employment growth and the opportunity to deliver employment land in the plan period, in association housing development, whilst avoiding any significant negative impacts. The evidence of land availability, suitability and achievability support the continuing role for Ashby de la Zouch in delivering new employment land.

The relative sustainability of Ashby de la Zouch compared to Castle Donington, as set out in relation to question 2, should be taken into account in the site selection process. Ashby de la Zouch's evidenced and long-standing role as a second tier main town / market town and the opportunity to sustainably deliver employment growth should inform the next stage of the plan preparation process.

This representation is made on behalf of Hallam Land Management in relation to their land interests at Land south of Ashby de la Zouch. The site, in combination with the employment site to the south promoted by Jelson Limited, provides an opportunity to deliver a well integrated, sustainable extension to the town of Ashby de la Zouch, one of the most sustainable locations in the District.

The proposed employment site at Ashby de la Zouch, promoted by Jelson Limited to the south of the proposed strategic housing site, Land adjacent to A42/south of Ashby de la Zouch, provides the opportunity for both strategic and non-strategic employment, having regard to the Leicester and Leicestershire Housing and Economic Development Needs Assessment and Warehousing and Logistics in Leicester and Leicestershire Study and the recommended criteria for identifying strategic employment sites. At 29.5 hectares, this site could make a significant contribution to local employment needs as well as strategic B8 employment requirements.

In line with the Council's evidence, there is an opportunity here to plan for development opportunities at as part of a substantial site, with the critical mass and visibility. As the consultation notes, the development of a critical mass and visibility provides an opportunity for development to comprise modern, flexible high-specification space in an attractive environment.

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

The initial Policy Option of 50% of the outstanding road-served requirement to be met in NWL is supported.

There is a good record of delivery in North West Leicestershire and a continuing market for strategic warehousing in the District which this policy approach would support and ensure the Council has more control over location of further strategic B8 development.

This representation is made on behalf of Hallam Land Management in relation to their land interests at Land south of Ashby de la Zouch. The site, in combination with the employment site to the south promoted by Jelson Limited, provides an opportunity to deliver a well integrated extension of the town of Ashby de la Zouch, the one of the most sustainable locations in the District.

The employment site at Ashby de la Zouch, promoted by Jelson Limited to the south of the proposed strategic housing site, Land south of Ashby de la Zouch, provides the opportunity for both strategic and non-strategic employment, having regard to the Leicester and Leicestershire Housing and Economic Development Needs Assessment and Warehousing and Logistics in Leicester and Leicestershire Study and the recommended criteria for identifying strategic employment sites. At 29.5 hectares, this site could make a significant contribution to strategic employment needs as well as local needs.

Q13 - Which policy option for employment land proposals on unidentified sites do you prefer?

Option 2 to retain the existing policy is supported. The policy currently sets out that where evidence indicates an immediate need or demand for additional employment land (B1, B2 and B8) in the District cannot be met from land allocated, the Council will consider favourably proposals that meet the identified need in appropriate locations subject to the site being accessible by sustainable means, having good access to the strategic highway network and an acceptable impact on the capacity of that network and not being detrimental to the amenities of any nearby residential properties or the wider environment.

This policy approach to employment land ensures flexibility to respond to employment market demands. The alternative approaches set out of requiring that premises should be for a named end user, that alternative sites outside the District should be considered, that only need is considered not demand and that the need/demand must be exceptional; would not provide the flexibility required by the NPPF. These proposed policy approaches are too restrictive and will put the District at a disadvantage in attracting good quality employment provision.

The proposed approach in Option 4 to amend the current policy to include sites with planning permission, as well as those allocated, in the alternative sites test for the need/demand which has been identified appears reasonable if amendments are made to the existing policy.

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

Option 1 for a policy which encourages local employment initiatives in new, large-scale developments is supported. Whilst local employment initiatives are supported, it is not always possible to achieve depending of the skills available locally and this policy approach provides the flexibility to recognise this.

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

This policy approach is supported and reflects the approach taken to development by Hallam Land Management including that promoted at Land south of Ashby de la Zouch. This site provides an

opportunity to improve the sport facilities available to the wider town as well as provide the new residents with accessible open spaces and good walking and cycling routes into the town centre.

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

Q18 - Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?

The proposed policy on Health Impact Assessments where Health Impact Screening Statements must be undertaken on various development types appears reasonable, but the evidence to support the threshold of 30 dwellings or 1 ha is not clear.

The consultation document suggests this threshold is set to avoid burdening small and medium sized builders, however this threshold has the potential to impacts medium sized housebuilders. A higher threshold should be considered and the opportunity for the Council to require Screening Statements in other unspecified instances should be replaced with clear criteria to create greater certainty for applicants.

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

The proposed policy requires all development to follow a sequential energy hierarchy prioritising fabric first and achieving 31% reduction in regulated CO2 emissions. This policy is not necessary as it repeats the Building Regulations. Planning policy does not need to set standards for energy efficiency, the government is making these requirements through Building Regulations.

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

The proposed policy for water efficiency standards requires all proposals for new residential development to achieve the national water efficiency standard of a maximum of 110 litres of water per person per day. This policy is not necessary as a requirement is set out in the Building Regulations and there is insufficient evidence provided for a locally needed lower requirement.



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

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

Declaration

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

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

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

Signed

[Redacted signature box]

Date

14/03/22

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

The deadline for responses is the end of Monday 28 February 2022 (updated to 14/03/22)

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

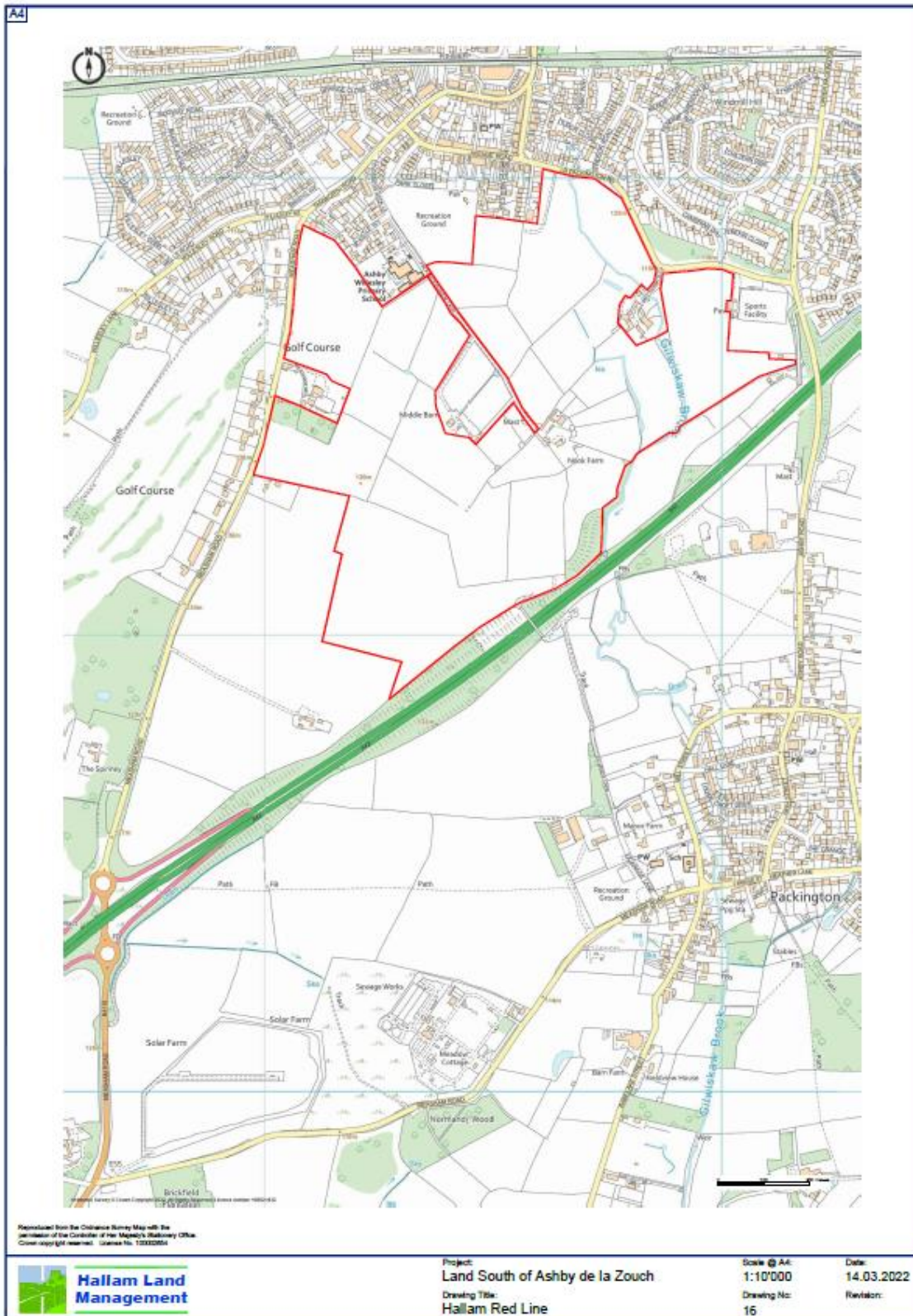
The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. It will be used only for the preparation of local development documents as required by the Planning and Compulsory Purchase Act 2004, save for requests of such information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

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

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

If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.

Appendix 1 – Strategic Housing Land Availability Assessment (SHLAA) Site Update



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

East Midlands

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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	David	
Last Name	Jones	
[Job Title]	Senior Strategic Land Manager	
[Organisation]	Metacre Limited	
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

We broadly agree with the Local Plan Review objectives, but would expand point 2 to include that the delivery of new homes must also meet local needs with sufficient choice in a variety of locations and settlements. New homes must be spatially distributed so that people have the opportunity to stay living locally and remain in their local communities if they wish. It is important that existing social networks and family connections can be maintained. This can only be achieved if sufficient sites are allocated across the authority area and not only concentrated in larger settlements. It is accepted that new homes need to be built in sustainable locations, and it is therefore proposed that a more significant proportion of new housing allocations are provided in Sustainable Villages.

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

Please state which consultation question your response relates...

Q 5

We propose that the option to be taken forward should be based on 9b High 2 growth. We would propose that there should be less reliance on higher tiers, and suggest that Sustainable Villages have capacity to accommodate a greater number of new dwellings, providing greater choice for residents to remain in their local communities, supporting the vitality and viability of local services. There is a risk of over reliance on the Principal Town to accommodate housing growth which would be unbalanced and will result in increased pressure on infrastructure and services. We propose that Sustainable Villages have the capacity to accommodate additional growth as proposed in Option 9b High 2, without any adverse effects, and will further promote the sustainability, vitality and viability of those villages.

We note that this document does not identify the quantum and location of development sites, however the five potential significant negative effects identified in the Sustainability Appraisal Report can be considerably mitigated by allocating suitable and appropriate housing sites in Sustainable Villages thereby distributing growth and utilising existing infrastructure more effectively.

If the council are minded to proceed on an alternative strategy for the distribution of housing growth, we would propose that the council's preferred option 7B high 2 growth is capable of modification to provide for a redistribution of dwellings from the Principal Town to Sustainable Villages that is more equally balanced for the reasons above.

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

Please state which consultation question your response relates...

Q 11

There should be an element of employment land allocated in Sustainable Villages, as this will enable the continued sustainable growth of these settlements, supporting local services and providing jobs and opportunities for local people, in conjunction with the provision of new dwellings. It should be recognised that smaller businesses are often locally owned, and that provision of employment land in larger strategic locations will not serve always this important sector of the market. This is especially relevant for start-up space and small workshop schemes. Employing local people in local businesses is an integral part of community life, especially in sustainable villages. A key aim of sustainable development is to reduce travelling and emissions by providing new employment opportunities close to new and existing housing, allowing the sustainable growth of both. We therefore support Option 3 with specific reference to improved provision in Sustainable Villages.

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

Please state which consultation question your response relates...

Q 14

We support Option 1 and 5, which allows for start-up employment sites to be allocated, with specific reference to Sustainable Villages, but also permitted on exception sites in suitable locations on the periphery of sustainable settlements.

(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

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Date

14/03/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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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.

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

**Representation on behalf of Cuvette Strategic Land and Harworth
Group**

Land south of East Midlands Airport,
North West Leicestershire

March 2022

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CONTENTS

- 1. Introduction**
- 2. Response to Consultation**
 - Responses to Specific Questions**
- 3. Summary and Conclusions**

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1.0 INTRODUCTION

- 1.1 These representations are made by Oxalis Planning Limited and Pegasus Group on behalf of Cuvette Strategic Land and Harworth Group.
- 1.2 We are promoting land south of East Midlands Airport for a New Settlement. In this regard we previously submitted a response via the 'call for sites' consultation and the growth options considered in this consultation include the potential of a New Settlement.
- 1.3 These representations provide our response to the North West Leicestershire Local Plan Review Development Strategy and Policy Options consultation.

2.0 RESPONSE TO CONSULTATION

2.1 Responses to Specific Questions

- 2.1.1 We agree with the proposed Local Plan Review Objectives (**Question 1**). The Local Plan Review provides the Council with the opportunity to consider and address the key challenges, including climate change and biodiversity as well as housing, employment and infrastructure provision, at a strategic level, enabling comprehensive, rather than localised or disjointed, responses.
- 2.1.2 The need to deliver sustainable development, through planning for the future, whilst maintaining flexibility, is a difficult balance to strike. However, the overarching principles established through the Objectives will help the Council in meeting this challenge.
- 2.1.3 In this context, we welcome the emphasis on sustainability which runs through the Objectives and which recognises that sustainable development is not simply about design innovation, but also includes delivering development in the right locations.
- 2.1.4 In this regard, Objective 4 specifically identifies the need to reduce the demand for travel through connectivity. A vital component of this is locating homes near to jobs, enabling people to live close to where they work.
- 2.1.5 In the interests of flexibility, it is important that the Objectives are drawn together with an understanding of the potential for change over the Plan period. The last couple of years have shown, albeit in unprecedented circumstances, how quickly change can come about. This has served to highlight the need for the ability to provide rapid responses to a changing context throughout all forms of Plan making.
- 2.1.6 With regard to **Questions 2 and 3**, we agree with the proposed Settlement Hierarchy and the approach to Local Housing Needs Villages.
- 2.1.7 Whilst the Settlement Hierarchy is appropriate, housing delivery in these existing locations is inextricably linked to the Council's development strategy options for housing, which include an option for a New Settlement. A self-contained, sustainable community delivered through a New Settlement in the District would help to diversify housing supply options and would provide continuity of delivery across the Plan period.
- 2.1.8 We cautiously agree with the broad approach to the amount of housing growth proposed (**Question 4**). We concur with paragraph 4.20 of the consultation document that the two 'high growth' options identified reflect the most likely outcome of future housing requirements through giving the Council some flexibility, at this current time, in adapting to the necessary housing requirement for the District once Leicester's unmet need is established.
- 2.1.9 However, the overriding consideration in undertaking the Local Plan review will clearly be ensuring that the decisions taken forward can be found sound at Examination.

-
- 2.1.10 In this regard, in particular, the High Growth 2 scenario is supported as, currently, with the unknown requirements for Leicester City's unmet need, High Growth 1 does present some element of risk: High Growth 2 presents no such risk and provides a much more robust position.
- 2.1.11 Flexibility to adapt to changing needs and to ensure that potential housing requirement scenarios are covered will be key to the success of the Local Plan. As such, we consider that High Growth 2 presents the greatest degree of flexibility and should be considered as the Council's 'preferred option' in taking the growth scenarios forward as the Local Plan review progresses. Indeed, as recognised at paragraph 4.19 of the consultation document, having regard to all of the relevant factors, the High Growth 2 scenario performs best.
- 2.1.12 As noted in the consultation document, the Planning Practice Guidance sets out the standard methodology for identifying an area's minimum housing requirement. But, importantly, it does not predict any potential impacts of changing economic circumstances or demographic trends; nor does it take account of unmet needs.
- 2.1.13 In this regard, there are three key factors which highlight why High Growth 2 is the most appropriate growth scenario to be brought forward in the Local Plan review, these are: Leicester City's unmet need; household projections; and economic needs. Taking each in turn:

Leicester City's Unmet Need

- As noted above, the extent of Leicester City's unmet need is currently unknown. The Leicester and Leicestershire Statement of Common Ground was published in March 2021 and it stated that work to inform the allocation of Leicester's unmet need was due to be concluded in the winter of 2021-2022. However, the latest update (from Charnwood Borough Council's Local Plan Inspector) suggests that this is now anticipated in May 2022.
- Whilst this work will provide more clarity on the distribution of any unmet need, paragraph 4.11 of the consultation document identifies a potential figure of 18,000 dwellings. It is entirely appropriate to plan for this potential unmet need whilst awaiting the outcome of the ongoing work.
- Furthermore, national policy currently directs the increased need occurring on a national scale to the twenty largest cities and urban areas, which includes Leicester City. This additional requirement will inevitably increase the level of unmet need for the city.

Household Projections

- The 2018 household projections were published in June 2020. They show a significant increase in the potential household growth for the District over the period to 2043, when compared to the 2014-based household projections which inform the standard methodology.

-
- Whilst the latest projections are not used in the standard methodology, they are the most up to date data available and are therefore an important factor in understanding the likely growth for the District. Indeed, North West Leicestershire is one of the top ten authorities in the country with the largest increase in household projections, which indicates that a higher housing requirement is an appropriate strategy to take forward, above the standard method, to ensure that the District meets the needs of the area.

Economic Needs

- The conclusions of the Leicester and Leicestershire Housing and Economic Needs Assessment (HEDNA 2017) identified that the economy will drive above-trend economic migration to North West Leicestershire. In this context, the Study recommended that an upward adjustment on housing provision should be made to support workforce growth.
- The Council's 2019 Local Housing Needs Assessment supported this evidence and found that an uplift for economic needs would be appropriate.
- In order for the Local Plan to be relevant and sustainable across the Plan period, it is essential that housing requirement figure responds to this additional growth through including an appropriately robust figure.

2.1.14 In addition to the above points, paragraph 1.9 of the consultation document states that the Local Plan must have regard to other strategies and documents, including the Leicester and Leicestershire 2050 Strategic Growth Plan.

2.1.15 The Strategic Growth Plan presents a joint vision for growth in the area. It highlights the north west of the County as a key strategic growth location, identifying it as the 'Leicestershire International Gateway'. This strategic ambition further demonstrates why High Growth 2 is the most appropriate growth scenario to take forward; it will help to ensure that the area's ambitions can be achieved and that the housing numbers respond to the requirements of the inevitable unmet need arising from Leicester City.

2.1.16 Notwithstanding, as noted above, flexibility is key to ensuring that the Local Plan will remain relevant for the entire Plan period. The inclusion of a self-contained New Settlement as part of the growth for the District is a sustainable way to secure housing delivery. Whilst we strongly advocate that the High Growth 2 scenario should be brought forward in the Local Plan, this does not mean that a New Settlement should be disregarded if this was not the chosen option. A New Settlement would work within a range of housing growth scenarios, offering continuity of delivery across the Plan period.

2.1.17 In the above context, in response to **Question 5**, we also cautiously agree with the proposed approach to the distribution of housing which is being taken forward.

2.1.18 However, it is vital that the growth options clearly highlight the risks associated with the 'High 1 Scenario' growth option and taking forward Option 3a, where there is a high probability that

the numbers will not be sufficient to meet the housing requirements for North West Leicestershire over the Plan period.

- 2.1.19 'High 2 Scenario', taking forward Option 7b, ensures continuity with the current Local Plan through essentially retaining the adopted approach, but with the addition of a New Settlement which increases the strategy's flexibility.
- 2.1.20 As identified at paragraph 4.55 of the consultation document, the existing strategy has a strong delivery record.
- 2.1.21 Specifically with regard to the location of the New Settlement, the land south of East Midlands Airport presents an opportunity to deliver housing close to jobs.
- 2.1.22 The number of jobs in this area has rapidly increased over recent years and this exponential growth is set to continue as the Airport, East Midlands Distribution Centre and East Midlands Gateway continue to deliver jobs. In addition, the recent confirmation of the Freeport will inevitably further increase the number of jobs. Indeed, it is estimated that the East Midlands Airport Gateway Cluster, bolstered through the Freeport announcement could support an additional 10-15,000 jobs, with the redevelopment proposals of Ratcliffe Power Station anticipated to create an additional 7,000 to 8,000 new jobs.
- 2.1.23 All of the workers for these various sites will need somewhere to live and currently the majority of workers have to commute to the area. Indeed, in 2011 an estimated 80% of workers commuted in. This situation is unlikely to have changed.
- 2.1.24 There is clearly an existing, and growing, imbalance between the number of jobs and houses in this area, which, in order to be properly sustainable, needs to be redressed.
- 2.1.25 As noted above, the Leicester and Leicestershire Strategic Growth Plan identifies the north west of the County as the 'Leicestershire International Gateway'. A proposed New Settlement south of the Airport would be situated at the heart of this identified area of strategic growth.
- 2.1.26 It is clearly the logical and sensible approach to deliver new houses near to these existing and anticipated jobs and at the core of an area of focussed strategic growth. Enabling people to live close to where they work is at the heart of sustainability, providing the inherent social benefits of locational proximity and through reducing journeys to work and offering truly sustainable connectivity.
- 2.1.27 With regard to **Question 11**, we believe that any policy for employment land distribution needs to contain flexibility in order to ensure that it remains sustainable and appropriate throughout the Plan period.
- 2.1.28 Option 4 suggests the allocation of a high quality mixed use business park, proposing that this could be included as part of the delivery of a New Settlement. However, within a New Settlement there is unlikely to be enough land for a critical business park mass and it is far

from certain that a business park should be the approach to delivering employment land within the District. Scale is a critical consideration.

- 2.1.29 Looking to examples elsewhere, the Nottingham Business Park and Blyth Valley Business Park were both initially brought forward to deliver solely employment development. However, as employment needs changed both, in the end, have resorted to delivering housing to obviate insufficient demand for the form of employment space they provided. Market needs change over time.
- 2.1.30 Whilst a New Settlement could deliver some employment, this would essentially be localised employment to serve the inherent needs and demands of the New Settlement itself. In this regard, it should not be prescribed through policy as to what could be delivered in employment terms within a New Settlement, as meeting the emerging needs and demand of the Settlement as it is delivered should be the objective.
- 2.1.31 Health and wellbeing are increasingly understood to be important aspects of Plan making as the design and structure of the built environment can have a significant impact on these factors and, consequently, people's lives.
- 2.1.32 In this regard we support the inclusion of a specific health and wellbeing policy in the Plan (**Question 16**). The consultation document identifies at paragraph 8.2 that the planning process can help to promote health and wellbeing. We concur that the design of places can influence people's ability to follow healthy behaviours and we believe that development which can support and encourage active and healthy lifestyles should be supported.
- 2.1.33 A New Settlement south of East Midlands Airport would help the Council to meet the challenges of promoting health and wellbeing through Plan making by creating a sustainable community which can encourage active travel through the provision of new links and routes and deliver sustainable public transport connections.
- 2.1.34 A New Settlement could incorporate innovative and sustainable design solutions to help to address the impacts of climate change; create an attractive and vibrant public realm; and deliver recreational facilities which are accessible for all.
- 2.1.35 In this context we also agree that it is sensible to include a Health Impact Assessment (HIA) policy (**Question 17**) and that thresholds should be set within for which development's should be required to include a HIA as part of the application submission.
- 2.1.36 However, the proposed policy wording indicates that a screening process will be required in advance of application proposals being brought forward. We do not agree that a HIA Screening Statement should be mandatory for all applications above the threshold (**Question 18**). Whilst screening can be a helpful process, it can also slow down the ability of applicants to progress with an application whilst they await responses to the Screening Statement.
- 2.1.37 It should be at the discretion of the applicant as to whether they seek to 'screen' the HIA requirements or not. In some instances, it could be realistically assumed by an applicant that

the full HIA will be required and therefore screening would be an unnecessary additional process to undertake in the preparation of an application. Clearly, not going through the screening process would be the applicant's risk, and if an applicant is unsure, the screening process can be undertaken.

2.1.38 In this context, we would propose the following amendments to the suggested policy wording:

First Paragraph:

A Health Impact ~~Screening Statement Assessment~~ 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 which require a Health Impact Assessment, ~~where the a screening assessment may be undertaken. The results of the screening assessment will determine whether the full Health Impact Assessment will be required for the specific proposal. Where the screening assessment~~ indicates more significant health impacts, ~~a the~~ more comprehensive, in-depth Health Impact Assessment will be required. This will also be expected to demonstrate how any negative cumulative impacts will be addressed.

Second Paragraph:

A Health Impact Screening Statement ~~must can~~ be undertaken on the following:

- 2.1.39 In response to **Question 19**, we agree with the proposed renewable energy policy approach.
- 2.1.40 Renewable energy will continue to play a significant role in addressing the climate emergency. However, there are obvious economies of scale associated with delivering sustainable renewable energy options and delivering larger scale new development presents an opportunity to consider various renewable energy options. A New Settlement would have sustainability at its core and presents the opportunity for new innovative designs to be utilised on the scheme through a fabric first approach to design.
- 2.1.41 In this context, we also agree with the proposed approach to energy efficiency policy (**Question 20**). It is important to set targets which focusses attention and will help to ensure that the Council's ambitions are met.
- 2.1.42 With regard to embodied carbon (**Question 21**), whilst we agree that it is important to consider and address this in development proposals, any proposed Policy should ensure that it is not too restrictive and does not prevent important development from being brought forward.
- 2.1.43 For example, in delivering large scale new development, infrastructure improvements and investment will inevitably be required. With current construction methods and materials, it could be extremely difficult to offset this embodied carbon in, for example, a housing scheme. Whilst it's important for new development to address embodied carbon as far as possible, consideration must be given in any policy wording to the above constraints.

2.1.44 We agree that large scale new developments should be held to high standards of construction methods and design and therefore we agree with the proposed policy approach for climate change assessments of developments (**Question 23**).

2.1.45 In the above overall context regarding the Council's approach to climate change and in response to **Question 24**, we broadly support the proposed policy for reducing carbon emissions. The draft policy wording appears to include flexibility to recognise the difficulties for smaller developments in addressing climate issues. The more stringent requirements are therefore levelled at the larger development where economies of scale make this more achievable. However, for the policy to be successful, the above points in response to questions 19, 20, 21 and 23 must be borne in mind as the Local Plan review progresses.

3.0 SUMMARY AND CONCLUSIONS

- 3.1 These representations are made by Oxalis Planning Limited and Pegasus Group on behalf of Cuvette Strategic Land and Harworth Group.
- 3.2 We are promoting land south of East Midlands Airport for a new settlement. In this regard we previously submitted a response via the 'call for sites' consultation.
- 3.3 The growth options considered in this consultation include the potential of a New Settlement on land south of East Midlands Airport.
- 3.4 We agree with the Council's Local Plan review and we welcome the Council's proactive approach to ensuring sufficient housing delivery.
- 3.5 Whilst there are two Growth Options being brought forward, we believe that High Growth 2 presents a greater degree of flexibility and therefore should be considered as the Council's 'preferred approach' to housing numbers.
- 3.6 The consultation document recognises that, having regard to all of the relevant factors, the High Growth 2 scenario performs best. Whilst the Planning Practice Guidance sets out the standard methodology for identifying an area's minimum housing requirement, the method is recognised as being deficient insofar as it does not predict the potential impact of changing economic circumstances; demographic trends; or unmet needs arising from elsewhere.
- 3.7 As such, an assessment of these three key factors identifies that the higher growth figure should be taken forward to ensure that the Local Plan remains relevant throughout the Plan period and contains flexibility to adapt to changing circumstances.
- 3.8 The inclusion of a New Settlement south of East Midlands Airport is a sensible and logical approach to delivering some of the requisite new housing for the District and this is the case for a range of housing delivery scenarios.
- 3.9 Currently, there is a significant imbalance in the supply of jobs and housing in this location and with recent economic investment announcements, this disparity will only increase. The situation needs to be addressed in a sustainable manner.
- 3.10 A self-contained, sustainable community delivered through a New Settlement would help to address this existing problem. It would enable people to choose to live close to where they work, thus reducing the need to commute into the area for work, and it is situated at the heart of an area identified for strategic growth in the Leicester and Leicestershire Strategic Growth Plan, a recognised consideration in the consultation document for the preparation of the Local Plan.
- 3.11 The site south of the Airport is well located with regard to existing active travel links, which, as part of the delivery of any new community, would be enhanced and extended to further encourage active travel, helping to promote health and wellbeing.

-
- 3.12 Innovative and sustainable design solutions can be imbedded within the design principles of a New Settlement, which could take the 'fabric first' approach to help address the impacts of climate change whilst delivering an attractive and vibrant public realm.

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: NWLDC Local Plan Review Comments
Date: 14 March 2022 16:57:03

Planning objection-

To Whom It May Concern,

I am writing to object most strongly at the proposed development of 4700 new homes and additional development of land for industrial use around the village of Diseworth Derbyshire.

The proposed development is obscene to say the very least; it reinforces the idea held by many that indiscriminate building on UK greenbelt is out of control. It is hard to drive through our beautiful local area now without seeing, once quaint local villages, without bright orange characterless development's sprawling onto the local countryside!

The land around Diseworth is a vital local resource for its residents and provides a significant buffer from noise and pollution from the airport, major road networks and surrounding industries. The proposed development would result in the end of rural life for all its residents and also impact other local villages. The noise and light pollution would be significant as would the increase in traffic on our already busy local roads. 10,000 + additional people all now competing for the same resources such as Schools and Doctors. It is already incredibly difficult to get a GP appointment at our local surgery.

Diseworth also suffers substantially from localised flooding as the Diseworth brook receives a significant volume of run off from the airport and industrial estates. The current system of water management doesn't work at the best of times and many residents suffer the heartbreaking effects first hand. I can't imagine how many hundreds of acres of impermeable surfaces will help the situation for both Diseworth, Long Whatton and other villages down stream.

The environmental damage is what bothers me the most. Nearly 800 acres of beautiful British countryside and natural habitat wiped clear and irreparably replaced with brick, concrete and tarmac. It is hard to take seriously governments and local authorities telling us we need to work hard to protect the environment when this carpet bombing approach to development goes on almost completely unregulated and unopposed. May I suggest planners and developers focus their efforts on the redevelopment of brown field sites and other already urbanised areas. Loughborough for example, around the train station is a great example of clever planning that has provided a great many homes and regenerated an area where infrastructure, local facilities and amenities already exist.

There are no excuses! It is time to stop and protect our beautiful countryside.

Yours Sincerely

Rob Morris

Sent from my iPhone

14 March 2022



Planning Policy Team
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LE67 3FJ

Lynette Swinburne DipTP MRTPI

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savills.com

Dear Sir or Madam

**Development Strategy Options and Policy Options (Regulation 18) Consultation,
January 2022-March 2022
Land around Thringstone and Whitwick**

Savills UK Ltd is instructed by our client, the Trustees of the Grace Dieu & Longcliffe Estates, to submit representations in relation to the current Regulation 18 consultation on the emerging Local Plan.

These representations relate to land within our client's ownership around the settlements of Thringstone and Whitwick.

Land proposed for development

A plan is enclosed which indicates the extent of the Estate's ownership in the local area. Two sites have been identified which may have potential to accommodate growth as part of the emerging Local Plan development strategy:

- Site 1: Land east of Grace Dieu Road, Thringstone
- Site 2: Land between Swannymote Road and Oaks Road, Thringstone

Site location plans are enclosed with this submission.

The sites are characterised by agricultural uses although are in close proximity to existing residential development.

Site 1 is approximately 1 ha in size and includes allotments and woodland on part of the land. The allotments which would be retained and present an opportunity to create a sustainable new scheme around these local facilities.

It is noted that in relation to Site 1, this could accommodate approximately 20 dwellings. As part of any potential allocation, the existing allotments would be retained, with the potential for some expansion to meet the needs of new residents. In addition, woodland on the site would also be retained and enhanced, to reflect the character of the local area.

Site 2 is approximately 8.5 ha in size and is in use for agriculture.

In relation to Site 2, this is anticipated to accommodate approximately 150-200 dwellings if developed in its entirety. However, given the large landholding, it would be possible for a different area (smaller or larger) to come forward to meet the specific needs of the Council.

Offices and associates throughout the Americas, Europe, Asia Pacific, Africa and the Middle East..

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Registered office: 33 Margaret Street, London, W1G 0JD



Heritage Designations

There are no listed buildings within either site and they are not located within a Conservation Area.

Local Plan Designations

The sites are located in close proximity/adjacent to the Limits to Development of Thringstone and Whitwick. Both sites are therefore in the Countryside and fall within the following wider, large scale designations in the adopted Local Plan:

- National Forest
- Charnwood Forest

Flood Risk

The sites are located in an area designated as Flood Zone 1, and therefore, have a low probability of flooding.

Planning History

Planning history was determined by undertaking a desktop search of the North West Leicestershire Council online facility. No relevant planning history was identified on either of the sites.

National Planning Policy Context

The National Planning Policy Framework (NPPF), which was updated in 2021, establishes that the purpose of the planning system is to contribute to the achievement of sustainable development. The three dimensions to sustainable development, as set out in the NPPF, require the planning system to perform an economic, social and environmental role. For plan making, Paragraph 11 of the NPPF, requires that Local Planning Authorities positively seek opportunities to meet the development needs of their area.

In respect of small and medium sized sites paragraph 69 of NPPF recognises that these can make an important contribution to meeting the housing requirement of an area as they are often built out relatively quickly.

Delivery of Housing

The National Planning Policy Framework (NPPF) 2021 at paragraph 68 requires planning authorities examine the suitability, availability and economic viability of sites when undertaking housing and economic land availability assessment. Further detail about how these assessments should be undertaken is provided within National Planning Policy Guidance (NPPG).

Therefore, an assessment of the sites against the tests within the NPPG¹, is provided below, confirming that all sites are suitable, available and achievable for development purposes.

Suitable

The sites are located adjacent to the existing settlement of Thringstone and Whitwick, which is classified in the adopted and emerging Local Plans, as a Principal Town, at the top of the hierarchy and therefore, where new development should be directed under all of the emerging scenarios.

The principle of development on the two sites as part of a Principal Town, would therefore be sustainable and in accordance with the hierarchy for growth.

¹ Paragraph: 019 Reference ID: 3-019-20140306; Paragraph: 020 Reference ID: 3-020-20140306; and Paragraph: 021 Reference ID: 3-021-20140306

Smaller scale sites such as those put forward can make a real contribution to housing growth in the shorter term as they have fewer infrastructure needs to address before development can come forward.

Available

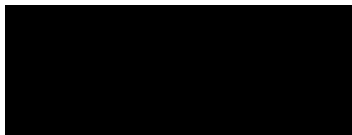
The land is available for development with both sites within a single ownership.

Achievable

At this early stage, no detailed technical work has been undertaken in relation to the site. However, there are no known constraints that would prevent the sites from coming forward for development within the early stages of the plan period.

Please do not hesitate to contact me should you require any further information.

Yours sincerely



**Lynette Swinburne BSc(Hons) Dip TP MRTPI
Associate Director
Planning**

Encs:



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

Consultation Response Form

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

Part A – Personal details

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

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Ms
First Name		Lynette
Last Name		Swinburne
[Job Title]		Associate Director
[Organisation]	Trustees of the Grace Dieu and Longcliffe Estate	Savills UK Ltd
Address Line 1	C/O Agent	Stuart House
Address Line 2		St John's Street
Address Line 3		Peterborough
Address Line 4		
Postcode	C/O Agent	PE1 5DD
Telephone	C/O Agent	[REDACTED]
Email address	C/O Agent	[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...

Q26

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

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

Please refer to covering letter.

(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

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.

Land east of Grace Dieu Road, Thringstone



Land between Swannymote Road and Oaks Road, Thringstone





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

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Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
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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		David
Last Name		Bainbridge
[Job Title]		Planning Director
[Organisation]	Taylor Wimpey UK Limited and Bloor Homes Limited	Savills
Address Line 1	C/o Savills	██████████
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

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

Please see letter from Savills.

(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

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

Date

14 March 2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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By email only to: planningpolicy@nwleicestershire.gov.uk

Dear Ian

**North West Leicestershire Local Plan Review
Development Strategy and Policy Options Consultation, January 2022
Response on Behalf of Taylor Wimpey UK Limited and Bloor Homes Limited**

I write on behalf of my clients Taylor Wimpey UK Limited (Taylor Wimpey) and Bloor Homes Limited (Bloor Homes) in response to the above consultation.

Introduction

As you are aware Taylor Wimpey and Bloor Homes are among the largest and most successful home builders in the UK and have a successful track record of place-making in Leicestershire.

Taylor Wimpey and Bloor Homes are working together to deliver development at Land at Money Hill, Ashby de la Zouch.

These representations follow the format of the main consultation document with answers provided to the consultation questions where relevant. A response form accompanies this submission.

Background

These representations have been prepared solely with development land at Money Hill in mind¹. We have enclosed a copy of location plan of this land. The gross site area is approximately 88.55 hectares.

Land at Money Hill, Ashby de la Zouch (the Site) is a committed site for development being in part allocated under policies H1b, H3a and Ec2(1).

The site is within the identified limits of development at Ashby de la Zouch, the boundary of which runs approximately along the A511 road to the north and north east of the site. This will be a further phase of development following the delivery of the approved 605 dwellings scheme (reference: 15/00512/OUTM).

Within the Ashby de la Zouch Neighbourhood Plan 2011-2031, Policy H1 Sustainable Housing Growth identifies development of 2,050 dwellings on the land north of Ashby de la Zouch at Money Hill. Figure 5 Money Hill in the Neighbourhood Plan reproduces the policies map within the local plan.

The 2021 Housing Trajectory for North West Leicestershire District identifies Money Hill, Ashby de la Zouch with an overall capacity of 2,050 dwellings. As of 31 March 2021 the net completions recorded at this site

¹ Our clients are also submitting representations in relation to their other landholdings in the District, which are intended to be complimentary to these comments.



was 121 dwellings. The trajectory identifies delivery of 415 dwellings in the five year supply period of 2021 to 2025/26, an overall supply of 1,241 in the period 2011 to 2031 and 891 dwellings beyond 2031.

We support the continued identification of this site to deliver new homes at Ashby de la Zouch. We understand that the site continues to be a commitment and therefore in planning policy terms is not under review as part of the emerging Local Plan. We support the retention of this committed development site and would welcome discussions with you and relevant colleagues in respect of the planning for further delivery of development at the site. Taylor Wimpey and Bloor Homes are reviewing the possibility of preparing a planning application for the site.

The LDS 2022-2024 states that the Substantive Review will address the future development needs of the District, most likely up to 2039, including site allocations as well as specific policies and criteria against which planning applications for development can be assessed. It will need to have regard to the outcome from the Strategic Growth Plan for Leicester and Leicestershire as well as the National Planning Policy Framework (NPPF) and other national policy requirements, including new household projections.

The LDS in effect schedules in 3 no. consultations during 2022 which could be described as forming parts of Regulation 18 of The Town and Country Planning (Local Planning) (England) Regulations 2012. Consultation on the Regulation 19 version is scheduled for June/July 2023, with submission for examination in October 2023 and examination and adoption in 2024. We welcome this ambition and hope the Council can sufficiently resource the plan-making process to make this timeline happen. We would ask for confirmation that during the plan-making process, committed sites such as Money Hill, Ashby de la Zouch, will continue to be supported for delivery through the development management process.

We are aware that the River Mease which passes through part of the District is designated as a Special Area of Conservation (SAC) at EU level and that the Council is required to undertake a Habitats Regulations Assessment of any development plan whose policies or proposals could have a significant adverse effect upon the integrity of the SAC. The site is already a committed site for development which has been the subject of consultation and examination but nonetheless should the Council decide to undertake further assessment we would ask to be involved in this process. The various stakeholders should work proactively to pursue solutions to address the SAC constraints.

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

We agree with the draft objectives overall but consider it is appropriate to define the period of time for delivery because currently only the District target of carbon neutrality by 2050 states a period of time and this is beyond the proposed period for the local plan.

Taylor Wimpey and Bloor Homes fully support responding to emerging climate change with proactive measures but policies must be sufficiently flexible and fit for purpose.

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

We agree with settlement hierarchy insofar as it identifies Ashby de la Zouch as a Key Service Centre. This is a sound conclusion following the Interim Sustainability Appraisal Report of the Spatial Options and in view of the sustainability of Ashby de la Zouch.

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

We do not consider it appropriate to provide a response to Question. 3.

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

We do not consider it appropriate to provide a response to Question. 4.

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

The consultation document identifies that land for development has to be deliverable and of course be developable. Land at Money Hill, Ashby de la Zouch is already committed for development with delivery due to commence later this year. The future phase of development by Taylor Wimpey and Bloor Homes is being masterplanned based upon assessment of technical, environmental and design constraints. Subject to resolving issues associated with the River Mease SAC we expect to be able to submit a planning application in the near future following pre-application discussions which will further confirm the deliverability of development within the proceeding five year period e.g. 2022/23 to 2027/28.

In view of the existing commitment at Ashby de la Zouch we only comment that the ability of existing site commitments to deliver an increased amount of residential should be considered. This can come through a variety of circumstances for example increased density within the same gross site area and/or expansion of the gross site area for example where land once identified for employment development is to be instead delivered for residential development.

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

We agree with elements of the hybrid approach as contained within the proposed policy. For example, we agree that it is not appropriate to set a target for delivery of a number of self-build and custom housebuilding plots due to the absence of evidence and we agree that the Council should support self-build and custom housebuilding proposed on sites capable of being considered suitable for housing. It may be appropriate to state which local plan policies will be referred to in assessing whether sites are suitable for housing.

In respect of inclusion of self-build and custom housebuilding as part of residential development within the District we are concerned that a threshold of 50 or more dwellings is too low and might lead to an abundance of such plots without evidence on need. We note that Charnwood Borough's local plan proposes a threshold of 250 dwellings and more. We do not consider there is a consistent entry level because circumstances change based on evidence but would request consideration of a higher entry point.

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

The Planning Practice Guidance states that local planning authorities have the option to set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access and water, and an optional nationally described space standard, but evidence is needed to justify this. In the absence of such evidence we consider it is not appropriate to seek NDSS².

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

We do not agree with the proposed policy wording because we do not consider there is evidence of need that all dwellings should be to at least M4(2) (accessible and adaptable) standards of the Building Regulations.

² See for example the Harborough Local Plan 2011 to 2031, Inspector's Report 8 April 2019, Paragraph 49 – a requirement to comply with NDSS in the draft Local Plan was deleted due to lack of evidence.

Compliance with M4(2) is optional and currently Building Regulations only requires this where there is a planning condition requiring compliance with the optional requirements. The requirements have implications for the design of new homes, both internal and external and this should only be a planning policy requirement where there is evidence of need. In the absence of such evidence we consider it is not appropriate to seek M4(2).

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

We do not agree with the proposed policy wording. Section 3A is the approach to the dwelling and is optional under Building Regulations only required where there is a planning condition requiring compliance with this optional requirement. 3A is the approach route between the dwelling and the point, or points, at which a wheelchair user or other disabled occupant or visitor, would expect to get in and out of a car. This needs evidence of need which is not in place to underpin such a policy, especially for market housing where occupancy is typically subject to the market and not controlled by the local authority.

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

On balance we consider that sufficient employment land based on evidence of need plus buffer say c.10% should be identified in the emerging local plan, which seems to equate to option 2.

The strategy for employment land should factor in uncertainty within the employment sector, which itself can be broken down in sub-sectors, and the potential for land already identified for employment to be more appropriately planned for other uses.

We note that the majority of recent/forthcoming employment development is in a relatively limited number of locations in the District for example offices at Ashby de la Zouch, Park Lane and EM Point at Castle Donington.

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

At Ashby de la Zouch there is both office and industrial employment land and floorspace which in part reflects the status of Ashby within the existing settlement hierarchy and also within the proposed settlement hierarchy. It is difficult to be too prescriptive on strategy for new employment land but in the context of our preference for sufficient employment land based on evidence of need plus buffer, it seems appropriate to identify a range of land including at locations beyond Coalville, Ashby and Castle Donington.

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

We do not consider it appropriate to provide a response to question 12.

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

We note the comment that Policy Ec2 in the adopted Local Plan is concerned with new employment sites. Part 1 of the policy allocates up to 16ha of land at Money Hill, Ashby de la Zouch for employment. This is part of a wider allocation for housing, part of which has outline planning permission.

It is considered appropriate to look again at the employment allocation at Money Hill, Ashby de la Zouch to see whether this is still needed and/or meets the market requirements for such land. Given the uncertainty faced by businesses it is not considered appropriate to amend this policy to something which is more restrictive because some employment land, for example at Money Hill, Ashby de la Zouch, should be considered for alternative development for example residential development and hence it would be preferable to prepare a draft policy to guide consideration of this scenario.

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

We do not consider it appropriate to provide a response to question 14.

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

We consider it is appropriate to look at options for local employment initiatives arising from new development. This could cover construction phase and operational phase of development.

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

We support the objectives of the potential policy in terms of health and well-being but there is a challenge to devise a set of measurable targets and delivery of such improvements is a wider responsibility, not just for new development. The National Design Guide and Building for a Healthy Life includes some useful advice in this regard.

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

We do not see the evidence to support the development thresholds for a health impact screening statement for example 30 dwellings or more or 1 hectare or more. We consider that a threshold that is too low will just add burden to development without good justification.

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?

We do not agree with this approach which seems akin to a catch-all without a criteria to steer this.

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

The policy on renewable energy includes a proposal for all new developments to incorporate on-site electricity and heat production from solar, wind and other renewable technologies so as to maximise renewable energy production.

We consider this is not the most appropriate strategy to take because this would require both electricity and heat production which is challenging on some sites given the patchy level of supply and it does not set-out a standard based on an objective of seeking net zero carbon whereas it is rather one-sided focusing on a desire to maximise renewable energy production.

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

Targets for energy efficiency should take into account the national position on Building Regulations and the emerging Future Homes Standard. There is no evidence or justification to adopt a different approach.

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

It is an important consideration as to how such an approach would be regulated for example where is the detail of the standard set-out, how might this be updated going forward, how will the Council resource assessment of the LCA and will this be factored into viability of appraisal of planning policies?

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

It is appropriate to consider building design including orientation when it comes to overheating but this can be part of a wider development management style of policy.

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

We are not convinced a change is needed to policy to set-out specific targets under assessment criteria.

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

The target goes beyond the proposed plan period and there is no evidence of testing of development viability for such targets or what the phased approach might be. We note that a viability study has been commissioned that will undertake testing of the various policy options outlined in the consultation and look forward to seeing this. The costs of introducing proposed policy requirements must be included within the Plan viability assessment and viability assessment of strategic sites. This should include the cost of network upgrades to support technologies. Where a viability assessment is submitted to accompany a planning application, this should be based upon and refer back to the viability assessment that informed the plan, with evidence of what has changed since then.

Until Future Homes Standard and the Standard Assessment Procedure software finalised (the Government is due to consult 2023) the industry will be unable to confirm building specification and carbon reduction over Building Regulations 2013. Currently the Future Homes Standard is intended to become legislation in 2025. Therefore the proposed local plan policy should be flexible to allow developers to utilise the most appropriate technology available at that time. The Government's approach "remains technology-neutral and designers will retain the flexibility they need to use the materials and technologies that suit the circumstances of a site and their business". (MHCLG Summary Response to the FHS (2019 Consultation Changes to Part L and F).

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

We do not object to the proposals under this potential policy.

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

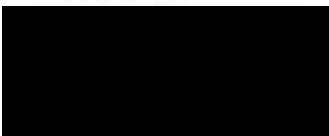
We welcome sight of the consultation and opportunity to comment and are available to discuss our response in more detail.

Conclusion

We would be grateful to receive acknowledgment of receipt of this submission and to be kept informed of the future stages of the emerging local plan for North West Leicestershire District including relevant aspects of the evidence base.

We would welcome discussions with you and relevant colleagues in respect of the planning for further delivery of development at Land at Money Hill, Ashby de la Zouch.

Yours sincerely

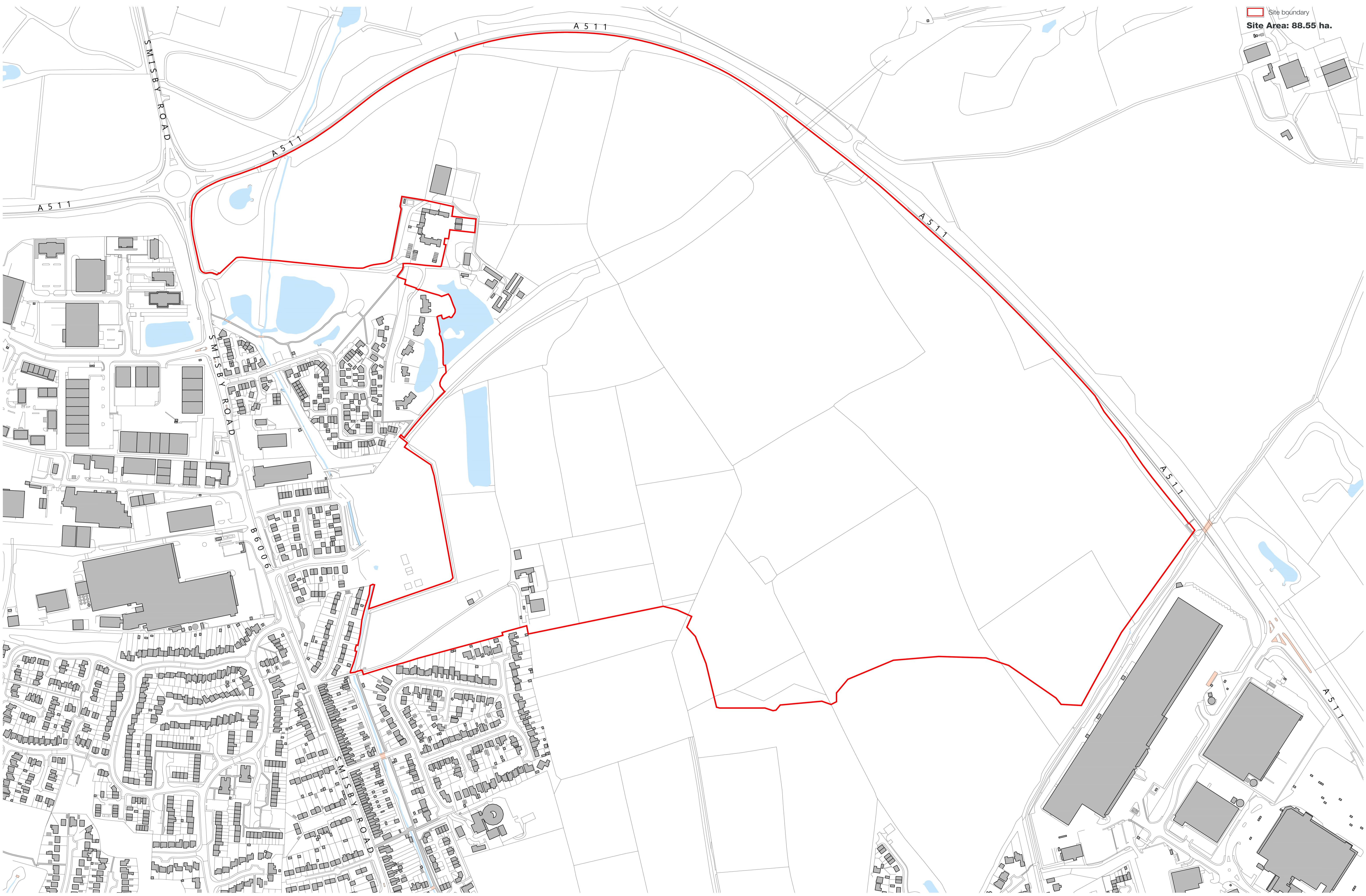


David Bainbridge MRTPI
Planning Director

cc. Taylor Wimpey UK Limited and Bloor Homes Limited

encl. Location plan, response form

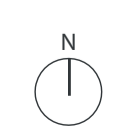
Site boundary
Site Area: 88.55 ha.



Land at Money Hill, Ashby de la Zouch, Leicestershire

on behalf of Taylor Wimpey and Bloor Homes

Drawing no.	01	drawing	Redline Plan
Revision	-	scale	1:2500
Drawn by	ZP	checked by	CM
Date	15/02/2022	job no.	499145



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C:\Users\zaid.prasad\Box\UK\UrbanDesignProjects\TaylorWimpey\499145_LandatMoneyHill.AshbydeZouch\8\Drawings\NDD\499145_01_LandatMoneyHill_DrawingSheets15/02/22
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North West Leicestershire Local Plan Review Development Strategy and Policy Options Consultation

**Representation on behalf of Charles Coaker and the Curzon Coaker
Trust**

Land to the west of Kegworth,
North West Leicestershire

March 2022

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2. Response to Consultation

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- **Question 26 – Additional Comments**

3. Summary and Conclusions

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1.0 INTRODUCTION

- 1.1 These representations are made by Oxalis Planning Limited on behalf of Charles Coaker and the Curzon Coaker Trust.
- 1.2 They relate to land on the western edge of Kegworth, which has the potential to be developed for employment purposes.
- 1.3 The land has not previously been put forward through the 'call for sites' process due to uncertainty with regard to HS2. However, following discussions with HS2 which have resulted in an agreement regarding how we could approach delivery on the site, we are now in a position to submit this proposition.
- 1.4 These representations provide our response to the North West Leicestershire Local Plan Review Development Strategy and Policy Options consultation.

2.0 RESPONSE TO CONSULTATION

2.1 Responses to Specific Questions

- 2.1.1 We agree with the proposed Local Plan Review Objectives (**Question 1**). The Local Plan Review provides the Council with the opportunity to consider and address the key challenges, including climate change and biodiversity as well as housing, employment and infrastructure provision, at a strategic level, enabling comprehensive, rather than localised or disjointed, responses.
- 2.1.2 The need to deliver sustainable development, through planning for the future, whilst maintaining flexibility, is a difficult balance to strike. However, the overarching principles established through the Objectives will help the Council in meeting this challenge.
- 2.1.3 In this context, we welcome the emphasis on sustainability which runs through the Objectives and which recognises that sustainable development is not simply about design innovation, but also includes delivering development in the right locations.
- 2.1.4 In the interests of flexibility, it is important that the Objectives are drawn together with an understanding of the potential for change over the Plan period. The last couple of years have shown, albeit in unprecedented circumstances, how quickly change can come about. This has served to highlight the need for the ability to provide rapid responses to a changing context throughout all forms of Plan making.
- 2.1.5 In this regard, land on the western edge of Kegworth responds positively to the identified Objectives, as it would provide employment space close to existing communities whilst also delivering on the strategic locational requirements of the market (as set out in our representations below).
- 2.1.6 With regard to **Questions 10 and 11**, whilst we agree with the Council's approach to seeking to allocate employment land, we consider that the scope of potential employment locations for consideration is too specific and rigid.
- 2.1.7 In order for the allocations to be successful and sustainable, they need to be on land of the right type and in the right location.
- 2.1.8 In this respect, sites for new employment development should not be restricted by existing areas, or areas at the 'top of the settlement hierarchy', but must be in the most viable areas to ensure their success.
- 2.1.9 Strategic connections to the wider area are of paramount importance to many occupiers. In this regard, it is vitally important that the primary aspect considered for employment site allocations is their location.
- 2.1.10 New employment opportunities should be in locations that can accommodate the needs of the development and sectors. Whilst there is merit in focussing some growth around existing locations, new employment sites should not be limited to this.

-
- 2.1.11 Employment sites with direct links to the strategic road network (the M1, A50, A42 and A453) will be most attractive to the market. Therefore, this broad area of search should be considered through the Local Plan review.
- 2.1.12 Currently, the proposed employment land strategy options have been drawn up using 'Table 8: Local Plan distribution of employment land', within paragraph 6.14 of the consultation document. This table, and consequently the suggested employment policy options, are restrictive insofar as they concentrate on very specific locations when reviewing existing employment locations and anticipating future need.
- 2.1.13 For example, the 'Castle Donington area' is extremely limited and contains only Castle Donington, Diseworth and Lockington. In reality, over recent years, the area around Castle Donington has benefitted from concentrated investment, not just within the town itself, but more broadly around East Midlands Airport, East Midlands Gateway and north of the A50 where there is a consented development scheme at Netherfields Lane, adjacent to Aldi's recently completed distribution hub.
- 2.1.14 Similarly, Kegworth is identified (amongst other settlements) as 'Elsewhere' in the Table 8. Kegworth is at a strategic locational point, with its proximity to Junction 24 of the M1 being an appealing location for companies requiring strategic distribution links.
- 2.1.15 Rather than being identified as 'Elsewhere' in the District, we believe that Kegworth's strategically advantageous position, alongside the surrounding area, should be recognised as employment policies are prepared. Instead, Kegworth should be bracketed within the strategic area of search centred on Junction 24 of the M1.
- 2.1.16 Accordingly, there should not be a focus on growth at defined settlement areas but broader consideration of the wider, strategic opportunities which make North West Leicestershire, and particularly the area around Junction 24 of the M1, so appealing for warehousing, logistics and distribution uses.
- 2.1.17 An approach which takes a broader view is further supported by the emerging wider strategic context for the area, following the announcement of the Freeport and the East Midlands Airport and Gateway Industrial Cluster (known as 'EMAGIC') investment area.
- 2.1.18 The identification of the UK's only inland Freeport within this area of North West Leicestershire is significant. The opportunities afforded by the recognition of the strategic importance of the area should not be overlooked.
- 2.1.19 Further investment, on the back of the Freeport announcement highlighting the attractiveness of the area should be expected. Paragraph 6.24 of the consultation document recognises that there has been considerable demand for new-build strategic warehousing in North West Leicestershire and that the *"level of provision in NWL alone has exceeded what was predicted for the whole of Leicester and Leicestershire up to 2031 in the Strategic Distribution Study (2017) which signals the particular market strength of this sector in the district"*. This clearly

demonstrates that academic studies of past trends do not anticipate the market and future needs.

- 2.1.20 Whilst reviews of past trends can be used as a starting point, the success of East Midlands Gateway, Mercia Park and Bardon, which were all market led schemes, demonstrate unequivocally that the market will lead itself and will determine the nature and location of sites that are required to meet specific needs.
- 2.1.21 The Local Plan should seek to identify a range of sites to respond to identified need, but also to meet needs which may not be anticipated by a review of past trends. It is likely, for example, that the increased demand for logistics and warehouse space, which has been accelerated by the pandemic, will remain.
- 2.1.22 As such, the Plan needs to contain flexibility to enable it to appropriately respond to market demand and unforeseen changes. The policy preparation must carefully consider which trends are set to continue in the long term and then consider this as the minimum provision required, enabling the Councils' strategic response, through the Local Plan review, to be fit for purpose.
- 2.1.23 In this regard, the consultation document identifies that there is a shortfall of non-rail served sites to 2041. Land to the west of Kegworth could respond to this shortfall through helping to address this deficit.
- 2.1.24 In this overall context, in response to **Question 13** (policy options for employment land proposals on unidentified sites), we consider that Policy Options 2 and 4 are the most appropriate options to consider taking forward in the Local Plan.
- 2.1.25 Option 2 would clearly provide continuity in land supply through policy approach. Policy Ec2 has responded well to the strong demand for employment sites within the District and provides the Council with some flexibility in terms of bringing sites forward which may not have been identified at this early Local Plan review preparation stage.
- 2.1.26 Option 4 would provide some consistency with the existing policy situation, but would update it to provide more clarity and certainty for applicants bringing sites forward in understanding that they would also be required to assess proposals benefitting from planning permission, but which are not yet delivered.

2.2 **Question 26 – Additional Comments**

- 2.2.1 Land to the south of the A6, west of Kegworth has planning permission for housing and public open space. This permission has been started on site and is therefore secure. However, further implementation is blighted by HS2 safeguarding. If this restriction continues, then a part of this development site could be developed for employment purposes alongside a potential HS2 route.
- 2.2.2 Other land to the north of the A6 could form part of a comprehensive employment development in the context of the Freeport and 'EMAGIC' and access to the surrounding road network.

3.0 SUMMARY AND CONCLUSIONS

- 3.1 These representations are made by Oxalis Planning Limited on behalf of Charles Coaker and the Curzon Coaker Trust.
- 3.2 They relate to land on the western edge of Kegworth, which has the potential to be developed for employment purposes.
- 3.3 The land has not previously been put forward through the 'call for sites' process due to uncertainty with regard to HS2. However, following discussions with HS2 which have resulted in an agreement regarding how we could approach delivery on the site, we are now in a position to submit this proposition.
- 3.4 The land west of Kegworth is ideally located to aid the Council in addressing an identified shortfall in non-rail served employment land.
- 3.5 The Council's proposed policies are currently being prepared on a narrow identification of employment locations, centred on individual settlements. In order for the Local Plan to contain the requisite flexibility and the opportunity to respond to change, then the locational areas considered for employment provision should be broadened.
- 3.6 In this regard, Kegworth should be considered within the strategic area of search centred on Junction 24 of the M1.
- 3.7 The identification of the Freeport and 'EMAGIC' opportunities are significant and highlight the attractiveness of the area around Junction 24 of the M1 to the warehousing, logistics and distribution market. One of the primary considerations for this employment market is accessibility to the strategic road network and the markets they serve.
- 3.8 In this regard, much of the successful development in North West Leicestershire in recent years has been driven by the market. This position should be carefully considered and reflected in any proposed policy being brought forward through the Local Plan review.



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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Ben
Last Name		Williams
[Job Title]		Senior Planner
[Organisation]	Clowes Developments (UK) Ltd, Redrow Homes Ltd & Wilson Enterprises Ltd (jointly and severally)	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 clients Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd (hereafter referred to as the 'land-owners') (jointly and severally) 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 which includes a Vision Document setting out how the proposals could come forward.

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.

Track Record of Delivery

Clowes Developments (UK) Ltd is an East Midlands based property developer and investor. Alongside Miller Homes, Clowes jointly secured permission for 895 new homes to the east of the relief road in Castle Donington, adjacent to the site. Clowes are also bringing forward further development at its Castle Donington employment site (East Midlands Distribution Centre) which is immediately to the north of the Park Lane site.

Redrow Homes Ltd is an award-winning national housebuilder that has been operating across the UK for over 40 years. In addition to having its East Midlands office in Castle Donington, Redrow has recent experience of delivering high quality homes within the town. Redrow is currently building over 200 new homes at its Foxbridge Manor development to the east of the relief road (south of Park Lane).

Wilson Enterprises Ltd is an East Midlands based company that specialises in the promotion of strategic development land across the UK. WEL is actively promoting a range of strategic sites, both on a standalone basis and as part of a consortium. WEL's sister company, Davidsons Developments Ltd, is the highly-regarded Midlands based housebuilder who has built a reputation as a place-maker of quality on sites across the East Midlands.

Castle Donington

Castle Donington is an historic town with a distinctive local character with amenities and employment opportunities that provide a great opportunity for delivering new high-quality housing in a sustainable location.

The town has a good range of services and facilities to support housing development. Retail, supermarkets, restaurants, pharmacies, medical centres and hotels are primarily located along the historic Market Street/Borough Street. St Edward's Church and Castle Donington Methodist Church are also situated just off the main road, forming and a destination town centre for local residents.

Residents of Castle Donington benefit from a significant number and range of employment opportunities including the Segro East Midlands Gateway Logistics Park, East Midlands Distribution Centre, Willow Farm Business Park, Trent Lane Industrial Estate and East Midlands Airport.

The employment opportunities in the area are set to grow exponentially in the coming decades with the introduction of the East Midlands Freeport. The East Midlands Development Corporation (EMDC) has been set up by five Councils (including NWLDC) to drive development at the three sites within the East Midlands Freeport. These include the East Midlands Airport, Ratcliffe-on-Sour Power Station, and Toton & Chetwynd East Midlands Hub. The EMDC plans to create up to 84,000 jobs, more than 10,000 new homes by 2045, and create more than £4.8 million in added value to the Midlands economy. All of these sites are within 10 miles of Castle Donington. Castle Donington is a truly sustainable location that would benefit from, and be able to support, a significant growth in population.

The Site

The Site comprises of two parcels of land: Parcel A is located to the north of Park Lane, extending to xx ha (123.97 acres), and Parcel B is located to the south of Park Lane, totalling xx ha (75.66 acres). It is currently used for agriculture and is made up of numerous fields sub-divided by hedges and trees.

The eastern boundary of the site is defined by the recently upgraded Western Relief Road, forming a north-south access route directly to the East Midlands Distribution Centre that is situated adjacent to the northern boundary of the Site.

To the west of the Site, the elegant Donington Hall sets within its extensive parkland situated at the western end of Park Lane, which bisects the site and provides direct access to the town centre and existing residential areas within Castle Donington to the east.

The Site is predominantly open with views northward across the River Trent Valley. Hedgerows run predominantly in a north/south orientation, some containing significant trees, particularly lining Park Lane. A number of existing woodland areas are located in the southern parcel with a more significant area of woodland in the far south of the Site, including Studbrook Hollow and Dalby's Covert woodlands.

The 'Development Strategy Options and Policy Options' Document

The North West Leicestershire Local Plan was adopted in November 2017 and covers the period up to 2031. The plan sets the spatial strategy for the District, allocates land for development and sets out planning policies to guide development. Policy S1 required the Council to undertake a review of the Local Plan by the end of January 2018 or within 3 months of the adoption of the plan. The Council decided to progress the plan review in two stages. The first stage, termed the 'Partial Review', comprised an amendment to Policy S1. It was adopted in 2021 and extended the requirement to submit a full review of the Local Plan (termed the 'Substantive Review') by 21 November 2022. The Park Lane site is designated within the plan as 'Countryside' (outside the limits to development) and is subject to Policy S3.

North West Leicestershire District Council is now undertaking a Regulation 18 consultation on the Substantive Review. The consultation covers 'Development Strategy' and 'Policy Options'. Section 3 of the document looks at the settlement hierarchy.

It proposes to retain the existing hierarchy which places the Coalville Urban Area at the top as the 'Principal Town', Ashby-de-la Zouch and Castle Donington as 'Key Service Centres', Ibstock, Kegworth and Measham as 'Local Service Centres', then 'Sustainable Villages' and 'Local Housing Needs Villages'.

Section 4 of the document presents four growth options for dealing with its housing growth strategy. The Council is taking two housing growth options forward: High 1 Scenario (512 dwellings each year, with a residual requirement of around 1,000 dwellings) and High 2 Scenario (730 dwellings each year, with a residual requirement of about 5,100 dwellings).

The consultation document then assesses a number of potential spatial distribution options. It concludes that it will take two options forward as the preferred spatial distribution for the Substantive Review. The option for the High 1 scenario (3a) allocates 500 dwellings at the 'Principal Town', 300 dwellings at Key Service Centres, and 200 dwellings at Local Service Centres. The option for the High 2 scenario (7b) allocates 1,785 dwellings at the 'Principal Town', 765 dwellings at Key Service Centres, 510 dwellings at Local Service Centres and 255 dwellings

at Sustainable Villages.

The developers are promoting the Park Lane site as a residential-led development which could accommodate around 1,200 dwellings to address the residual requirements identified in both preferred housing growth options. The developers have responded formally to the consultation document in respect of the housing growth options and distribution strategy.

Previous SHELAA Assessments

This site was assessed in the 2021 SHELAA (reference CD10 Land north and south of Park Lane, Castle Donington). At the time of that assessment, the site was considered to be 'potentially suitable' as it did not "adjoin the Limits to Development and is poorly related to the settlement [Castle Donington]". It went on to say the site is "some distance from the main built-up area of Castle Donington, although the relief road, when built, will bring the built up area closer to the site". The site was considered 'potentially available' as it was being promoted by an agent of behalf of a client who owns the site but there were no housebuilders involved at that stage. Finally, the site was considered 'potentially achievable' as there were "no known physical or economic constraints".

The site area was stated as 95 hectares, with 47.5 hectares of land available for housing development. Taking a housing density of 30 dwellings per hectare, the estimated capacity was stated as 1,425 dwellings, with a timeframe for development of 11- 20 years. The site has also been promoted for employment uses and is given reference number EMP27.

The assessment concludes the site is 'potentially suitable' for residential uses, and considered 'developable' with a timeframe of 11-20 years. To be considered "deliverable", the NPPF states that sites for housing should meet three tests (suitable, available and achievable).

- **Suitable:** The site can be considered suitable if it would provide an appropriate location for development when considered against its constraints. The site was only considered 'potentially suitable' in the 2021 SHELAA assessment as there would need to be a "change in the boundary of the Limits to Development" and "there would also need to be a change in the development strategy to enable this site to be considered suitable". Since then, the land between this site and Castle Donington has been developed with new housing along with a relief road that runs adjacent to our client's site. The accompanying Vision Document demonstrates there are no overriding physical, environmental or technical constraints to development. We therefore consider the site is now 'suitable'.
- **Available:** The site must be 'available' now. The site is being promoted by a consortium of developers which own the freehold of all of the land including its access to the highway. There is absolute certainty here that there are no legal or ownership impediments to development. The site is therefore considered to be 'available'.
- **Achievable:** It should be 'achievable' with a realistic prospect that housing will be delivered on the site within five years. The land-owners have instructed a number of consultants to begin initial assessments of any technical, environmental or economic constraints. This has led to the development of a Masterplan Framework and a suite of technical assessments. The masterplan for the site shows potential areas for residential and employment development, along with significant areas of open space / landscaping and access to the wider highway network. This provides a useful indication of the potential layout and site capacity. The land-owners have jointly instructed highways experts to consider initial considerations of the transport implications as one of the most common constraints to development of large-scale sites is typically lack of access to existing highways infrastructure. Highways advice has concluded that the adjacent relief road was built with significant spare capacity (33%). Direct access onto the relief road at the Park Lane roundabout from the site will ensure that external vehicular demand from the site has a direct routeing to the local principal roads without unduly impacting on the local road network. This will allay any concerns about the impact of the proposals from a highways' perspective on the local community and highway network. Additionally, the location between multiple urban centres is likely to result in rapid dispersion of traffic on the wider road

network.

- **Summary:** The SHELAA assessment concludes that the site is 'developable' with a timeframe of 11-20 years. To be considered "deliverable", the NPPF states that sites for housing should meet three tests (suitable, available and achievable). The land-owners have control of the site and have instructed an expert team to begin initial assessments of any physical or economic constraints. The accompanying Vision Document and technical supplementary reports demonstrate there are no 'showstoppers' to development and this site could be brought forward quickly. It is clear that the site is suitable, available and achievable and is truly therefore 'deliverable' in terms of its definition in the NPPF. The site's ownership and lack of technical constraints mean that delivery could comfortably commence within the next 5 years, with multiple outlets enabling a fast pace of delivery.

'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". This site should be allocated and would address 6,719sqm of this shortfall.

This site offers the potential to locate further employment development on site in a settlement where there is significant demand for Class B2 and non-strategic B8 units. This is an additional benefit of this site being selected as an allocation in the substantive review.

Summary

It is clear that the site is suitable, available and achievable and is truly therefore 'deliverable' in terms of its definition in the NPPF. The land-owners have control of the site and have instructed an expert team to begin initial assessments of any physical or economic constraints. The accompanying Vision Document and technical supplementary reports demonstrate there are no 'showstoppers' to development and this site could be brought forward quickly. It is clear that the site is suitable, available and achievable and is truly therefore 'deliverable' in terms of its definition in the NPPF.

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?

The Land-Owners' Response

The proposed settlement hierarchy identifies Castle Donington as a 'Key Service Centre' along with Ashby-de-la-Zouch. Paragraph 3.5 of the consultation document states that the methodology for determining the relative sustainability of settlements looks at services and facilities as well as accessibility by public transport. Paragraph 3.6 states the following factors are assessed:

- Access to convenience stores for food shopping;
- Access to education facilities, both primary and secondary;
- Access to employment locations;
- Public transport access to higher order services outside of the settlement; and
- Range of accessible community services and facilities (libraries, GPs, pharmacies, post offices, community venues, pubs, places of worship, and recreation facilities).

It is agreed that the Coalville Urban Area is the most sustainable location within the District. However, we do not agree that Ashby-de-le-Zouch and Castle Donington should be within the same category of the hierarchy.

Employment opportunities in Castle Donington and the surrounding area are set to grow exponentially in the coming decades with the introduction of the East Midlands Freeport. The East Midlands Development Corporation (EMDC) will drive development at three sites within the East Midlands Freeport (East Midlands Airport, Ratcliffe-on-Soar Power Station, and Toton & Chetwynd East Midlands Hub), all of which are within 10 miles of Castle Donington. The EMDC plans to create up to 84,000 jobs, more than 10,000 new homes by 2045, and create more than £4.8 million in added value to the Midlands economy. The strategic importance of Castle Donington will continue to grow during the plan period and we consider this should be reflected within the settlement hierarchy as development should be focused in this location.

It is therefore proposed that Castle Donington, and the surrounding area, is given its own category (underneath 'Principal Town' and above a 'Key Service Centre'). This elevated position would reflect its status as a focus for growth. This could be termed as a 'Key Strategic Growth Location'.

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...

Q4

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.

The Land-Owners' Response

We agree with NWLDC's decision to discount the 'low scenario' and 'medium scenario' options. Neither of these options take into account: the market build rates (619 dwellings per annum between 2011-21; and 770 dwellings per annum since 2016/17), the likely requirement coming from Leicester City Council's unmet need or the figures from the Strategic Growth Plan (SGP) for Leicester and Leicestershire.

The NPPF is clear that "in addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for". The PPG is also clear that planning for higher housing needs will be appropriate in certain circumstances which include where: (i) growth strategies for the area are likely to be deliverable; (ii) strategic infrastructure improvements that are likely to drive an increase in the homes needed locally; or (iii) an authority has agreed to take on unmet need from neighbouring authorities.

All three of these circumstances are relevant to NWL District and Castle Donington in particular.

NWLDC is pursuing two scenarios: High 1 scenario which proposes 512 dwellings per annum (taken from the Leicester and Leicestershire Strategic Growth Plan (SGP)); and 'High 2 scenario' which proposes 730 dwellings per annum (based on the 2018 household projections with an allowance for vacancy rates in dwellings).

NWLDC states that the High 1 scenario provides a 'good' buffer for accommodating unmet need from Leicester City, although it concedes that this remains a risk as the exact figure is still not agreed. There are eight local planning authorities in the Leicester and Leicestershire Housing Market Area that are responsible for plan-making. The SGP assumes that neither Leicester City Council nor Oadby & Wigston Borough Council will be able to accommodate their needs beyond 2031. It is anticipated that Leicester City's unmet alone will be 18,000 dwellings. This will need to be distributed across six authorities. Taking an even split, that is at least 3,000 dwellings per authority. In all likelihood, North West Leicestershire will be expected to accommodate more than 3,000 homes from the unmet need due to the recent and planned significant employment growth in the District.

Additionally, the High 1 scenario also does not reflect the demographic trends and build rates (referred to above). It also does not reflect the anticipated impact of the East Midlands Freeport (which we expand upon in our commentary on High 2 scenario below). All of this is acknowledged by the Council. We therefore conclude that High 1 scenario is not an appropriate housing target for the District.

High 2 scenario is the second housing growth option that the Council is taking forward for consultation. This is considered to be the best performing option as "*it provides a very significant degree of flexibility to help address issues of unmet need*". The Council goes on by stating that the District is a "*net importer of labour as measured using the Office for National Statistics job density rate which results in in-commuting to the District. This trend is almost certain to continue into the future*".

The land-owners support the Council's aspirations to plan positively and increase housing targets for the Substantive Review. However, we would encourage the Council to plan more positively due to the progress of

the East Midlands Freeport and Development Corporation.

Employment opportunities in Castle Donington and the surrounding area are set to grow exponentially in the coming decades with its introduction, with up to 84,000 jobs to be created and more than 10,000 new homes, and Castle Donington is within 10 miles of the three sites where development will be focused. This growth should be met within the District of North West Leicestershire to reduce the need for long distance commuting (as stated above, there are currently more people entering the District for employment purposes than) leaving, which in turn will leave to truly sustainable 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...

Q5

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.

The Land-Owners' Response

The Council has identified a number of spatial distribution options and applied these against High 1 scenario and High 2 scenario. This is resulted in 16 options which have been subject to a Sustainability Appraisal. It has been confirmed that the dwelling numbers in the tables are indicative at this stage for the purposes of testing the options.

Table 6 sets out the options being taken forward by the Council for both growth scenarios. Both scenarios require additional land to be allocated to address the residual requirement. High 1 scenario has a residual requirement of 1,000 dwellings. High 2 scenario has a residual requirement of 5,100 dwellings.

For the High 1 scenario, Option 3a has been chosen as the 'preferred option'. This would allocate 500 dwellings in the Coalville Urban Area, 300 dwellings in Castle Donington or Ashby-de-la-Zouch, and 200 dwellings across the 'Local Service Centres'.

For the High 2 scenario, Option 7b has been chosen as the 'preferred option'. This would allocate 1,785 dwellings in the Coalville Urban Area, 1,785 within a new settlement, 765 dwellings in Castle Donington or Ashby-de-la-Zouch, 510 across the 'Local Service Centres' and 255 dwellings across the 'Sustainable Villages'.

We state above that High 1 scenario is not an appropriate housing target for the District. Notwithstanding that, if the Council pursue this option, then Castle Donington is the most appropriate location for the residual requirement of 1,000 dwellings (as explained below).

The consultation document states that the identification of land for a further 5,100 dwellings would "*inevitably require the allocation of some significant sites in terms of size, potentially including a New Settlement as allowed for in Options 4b, 5b, 6b, 7b, 9b and 8*" (paragraph 4.37). It goes on to say that "*large scale development such as a new settlement has the potential to deliver significant benefits in terms of new homes but also new infrastructure. However, such large schemes take a significant amount of time to bring to fruition*" (paragraph 4.38), and that "*research published by Lichfields (2020) found that large schemes can take 5 or more years to start, with sites of 2,000 or more dwellings taking on average 8.4 years from validation of the first planning application to the first dwelling being completed*".

Paragraph 4.42 appears to specifically reference the land-owners' site. It states that: "*The scale of growth is such that it is almost inevitable that some large-scale sites would be required. For example, looking at the Council's recently published Strategic Housing and Economic Land Availability Assessment 2021 (SHELAA) to accommodate growth in the Key Service Centres would be likely to require **identifying an area of 1,400 dwellings west of Castle Donington** or 800 dwellings at Packington Nook Ashby de la Zouch. As already noted, it takes time for large scale sites such as these to begin to deliver. Again, any slippage in delivery would impact upon the 5- year housing land supply, and so represents a risk to ensuring that the plan does not become out-of-date*".

For these reasons, the Council has decided not to take this option (2a) forward.

For the reasons set out below, and expanded upon in the Vision Document which accompanies these representations, the site at Park Lane is demonstrably able to commence prompt and rapid delivery of housing without the constraints which normally delay such schemes. Key in this is the promoters' unencumbered freehold ownership of the entire site, and the ability for immediate highways access to be provided from existing adopted roads.

As the Council will no doubt be aware, paragraph 73 of the NPPF 2021 states: "*The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way*". Clearly the NPPF envisages that large sites can play a positive and meaningful contribution to the supply of new housing and encourages local planning authorities to address concerns regarding delivery (see for example paragraph 69(d) and paragraph 73).

Neither of the preferred options that the Council wish to take forward would accommodate significant delivery in Key Service Centres (including Castle Donington). This approach has been taken without assessing potential housing sites properly in terms of their suitability, availability and achievability

We would strongly recommend that the strategy for distribution should be confirmed **after** potential housing sites have been assessed. Ahead of the consultation on potential site allocations in spring 2022, we would appreciate the opportunity to speak with Officers regarding the suitability, availability and achievability of the land-owners site at Park Lane, Castle Donington.

The most recent SHELAA assessment (2021) concluded the site is 'potentially suitable' for residential uses, and considered 'developable' with a timeframe of 11-20 years. To be considered "deliverable", the NPPF states that sites for housing should meet three tests (suitable, available and achievable).

- **Suitable:** The site can be considered suitable if it would provide an appropriate location for development when considered against its constraints. The site was only considered 'potentially suitable' in the 2021 SHELAA assessment as there would need to be a "change in the boundary of the Limits to Development" and "there would also need to be a change in the development strategy to enable this site to be considered suitable". Since then, the land between this site and Castle Donington has been developed with new housing along with a relief road that runs adjacent to our client's site. The accompanying Vision Document demonstrates there are no overriding physical, environmental or technical constraints to development. We therefore consider the site is now 'suitable'.
- **Available:** The site must be 'available' now. The site is being promoted by a consortium of developers which jointly owns the freehold of all of the land including its access to the highway. There is absolute certainty here that there are no legal or ownership impediments to development. The site is therefore considered to be 'available'.
- **Achievable:** It should be 'achievable' with a realistic prospect that housing will be delivered on the site within five years. The land-owners have instructed a number of consultants to begin initial assessments of any technical, environmental or economic constraints. This has led to the development of a Masterplan Framework and a suite of technical assessments. The masterplan for the site shows potential areas for residential and employment development, along with significant areas of open space / landscaping and access to the wider highway network. This provides a useful indication of the potential layout and site capacity. The land-owners have jointly instructed highways experts to consider initial considerations of the transport implications as one of the most common constraints to development of large-scale sites is typically lack of access to existing highways infrastructure. Highways advice has concluded that the adjacent relief road was built with significant spare capacity (33%). Direct access onto the relief road at the Park Lane roundabout from the site will ensure that external vehicular demand from the site has a direct routeing to the local principal roads without unduly

impacting on the local road network. This will allay any concerns about the impact of the proposals from a highways' perspective on the local community and highway network. Additionally, the location between multiple urban centres is likely to result in rapid dispersion of traffic on the wider road network.

The SHELAA assessment concludes that the site is 'developable' with a timeframe of 11-20 years. To be considered "deliverable", the NPPF states that sites for housing should meet three tests (suitable, available and achievable). The land-owners have control of the site and have instructed an expert team to begin initial assessments of any physical or economic constraints. The accompanying Vision Document and technical supplementary reports demonstrate there are no 'showstoppers' to development and this site could be brought forward quickly. It is clear that the site is suitable, available and achievable and is truly therefore 'deliverable' in terms of its definition in the NPPF. The site's ownership and lack of technical constraints mean that delivery could comfortably commence within the next 5 years, with multiple outlets enabling a fast pace of 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...

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?

The Land-Owners' 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.

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 tests in national planning policy or guidance (unlike housing) to trigger the release of additional 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 specific 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 this 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.

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?

The Land-Owners 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 an expanded version of General Employment Land Strategy Option 1 to focus more employment development in and around Castle Donington.

The employment opportunities in Castle Donington are set to grow exponentially in the coming decades with the introduction of the East Midlands Freeport. The East Midlands Development Corporation (EMDC) has been set up by five Councils (including NWLDC) to drive development at the three sites within the East Midlands Freeport. These include the East Midlands Airport, Ratcliffe-on-Sour Power Station, and Toton & Chetwynd East Midlands Hub. The EMDC plans to create up to 84,000 jobs, more than 10,000 new homes by 2045, and create more than £4.8 million in added value to the Midlands economy. All of these sites are within 10 miles of Castle Donington.

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?

The Land-Owners' 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

14 March 2022

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

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

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

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14 March 2022

Delivered by email to planning.policy@nwleicestershire.gov.uk

Ian Nelson
Planning Policy and Land Charges Team Manager
North West Leicestershire District Council
Council Offices
Whitwick Road
Coalville
Leicestershire
LE67 3FJ

Dear Mr Nelson

NORTH WEST LEICESTERSHIRE LOCAL PLAN | SUBSTANTIVE REVIEW | CALL FOR SITES

We write on behalf of our clients Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd (hereafter referred to as the 'land-owners') (jointly and severally) 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*').

We have completed a separate Consultation Response Form on behalf of our clients in respect of the consultation. This has been submitted to the Council. The consultation document confirms that the next stage of the Substantive Review will be a 'consultation on potential site allocations' in spring 2022.

The land-owners acquired the land north and south of Park Lane, Castle Donington in 2021. Collectively, they own the freehold of the land, including the access onto the highway. Clowes, Wilson Enterprises and Redrow wish to promote land for residential-led development for allocation within the Substantive Review of the North West Leicestershire Local Plan. The proposals also include land for potential employment, a local centre and a primary school.

The purpose of this letter, and the supplementary information, is to formally re-submit this site for consideration as a potential housing allocation in the emerging Local Plan Substantive Review and, in doing so, provide useful updates and additional information.

This covering letter is supported by a Vision Document setting out how the proposals could come forward.

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*

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development as possible" (Paragraph: 010 Reference ID: 3-010-20190722). This process should not be restricted to a formal consultation period.

Accordingly, we wish to submit our client's site for renewed consideration as a potential allocation within the Substantive Review.

Track Record of Delivery

Clowes Developments (UK) Ltd is an East Midlands based property developer and investor. Alongside Miller Homes, Clowes jointly secured permission for 895 new homes to the east of the relief road in Castle Donington, adjacent to the site. Clowes are also bringing forward further development at its Castle Donington employment site (East Midlands Distribution Centre) which is immediately to the north of the Park Lane site.

Redrow Homes Ltd is an award-winning national housebuilder that has been operating across the UK for over 40 years. In addition to having its East Midlands office in Castle Donington, Redrow has recent experience of delivering high quality homes within the town. Redrow is currently building over 200 new homes at its Foxbridge Manor development to the east of the relief road (south of Park Lane).

Wilson Enterprises Ltd is an East Midlands based company that specialises in the promotion of strategic development land across the UK. WEL is actively promoting a range of strategic sites, both on a standalone basis and as part of a consortium. WEL's sister company, Davidsons Developments Ltd, is a highly-regarded Midlands based housebuilder who has built a reputation as a place-maker of quality on sites across the East Midlands.

Castle Donington

Castle Donington is an historic town with a distinctive local character with amenities and employment opportunities that provide a great opportunity for delivering new high-quality housing in a sustainable location.

The town has a good range of services and facilities to support housing development. Retail, supermarkets, restaurants, pharmacies, medical centres, and hotels are primarily located along the historic Market Street / Borough Street. St Edward's Church and Castle Donington Methodist Church are also situated just off the main road, forming and a destination town centre for local residents.

Residents of Castle Donington benefit from a significant number and range of nearby employment opportunities including the Segro East Midlands Gateway Logistics Park, East Midlands Distribution Centre, Willow Farm Business Park, Trent Lane Industrial Estate and East Midlands Airport.

The employment opportunities in the area are set to grow exponentially in the coming decades with the introduction of the East Midlands Freeport. The East Midlands Development Corporation (EMDC) has been set up by five councils (including NWLDC) to drive development at the three sites within the East Midlands Freeport. These include the East Midlands Airport, Ratcliffe-on-Sour Power Station, and Toton & Chetwynd East Midlands Hub. The EMDC plans to create up to 84,000 jobs, more than 10,000 new homes by 2045, and create more than £4.8 million in added value to the Midlands economy. All of these sites are within 10 miles of Castle Donington. Castle Donington is a truly sustainable location that would benefit from, and be able to support, a significant growth in population.

The Site

The Site comprises of two parcels of land: Parcel A is located to the north of Park Lane, extending to 50.7 ha (125 acres), and Parcel B is located to the south of Park Lane, totalling 30.6 ha (76 acres). It is currently used for agriculture and is made up of numerous fields sub-divided by hedges and trees.

The eastern boundary of the site is defined by the recently upgraded Western Relief Road, forming a north-south access route directly to the East Midlands Distribution Centre that is situated adjacent to the northern boundary of the Site.

To the west of the Site, the elegant Donington Hall sets within its extensive parkland situated at the western end of Park Lane, which bisects the site and provides direct access to the town centre and existing residential areas within Castle Donington to the east.

The Site is predominantly open with views northward across the River Trent Valley. Hedgerows run predominantly in a north / south orientation, some containing significant trees, particularly lining Park Lane. A number of existing woodland areas are located in the southern parcel with a more significant area of woodland in the far south of the Site, including Studbrook Hollow and Dalby's Covert woodlands.

The 'Development Strategy Options and Policy Options' Document

The North West Leicestershire Local Plan was adopted in November 2017 and covers the period up to 2031. The plan sets the spatial strategy for the District, allocates land for development and sets out planning policies to guide development. Policy S1 required the council to undertake a review of the Local Plan by the end of January 2018 or within 3 months of the adoption of the plan. The Council decided to progress the plan review in two stages. The first stage, termed the 'Partial Review', comprised an amendment to Policy S1. It was adopted in 2021 and extended the requirement to submit a full review of the Local Plan (termed the 'Substantive Review') by 21 November 2022. The Park Lane site is designated within the plan as 'Countryside' (outside the limits to development) and is subject to Policy S3.

North West Leicestershire District Council is now undertaking a Regulation 18 consultation on the Substantive Review. The consultation covers 'Development Strategy' and 'Policy Options'. Section 3 of the document looks at the settlement hierarchy.

It proposes to retain the existing hierarchy which places the Coalville Urban Area at the top as the 'Principal Town', Ashby-de-la-Zouch and Castle Donington as 'Key Service Centres', Ibstock, Kegworth and Measham as 'Local Service Centres', then 'Sustainable Villages' and 'Local Housing Needs Villages'.

Section 4 of the document presents four growth options for dealing with its housing growth strategy. The Council is taking two housing growth options forward: High 1 Scenario (512 dwellings each year, with a residual requirement of around 1,000 dwellings) and High 2 Scenario (730 dwellings each year, with a residual requirement of about 5,100 dwellings).

The consultation document then assesses a number of potential spatial distribution options. It concludes that it will take two options forward as the preferred spatial distribution for the Substantive Review. The option for the High 1 scenario (3a) allocates 500 dwellings at the 'Principal Town', 300 dwellings at Key Service Centres, and 200 dwellings at Local Service Centres. The option for the High 2 scenario (7b) allocates 1,785 dwellings at the 'Principal Town', 765 dwellings at Key Service Centres, 510 dwellings at Local Service Centres and 255 dwellings at Sustainable Villages.

The developers are promoting the Park Lane site as a residential-led development which could accommodate around 1,200 dwellings to address the residual requirements identified in both preferred housing growth options. The developers have responded formally to the consultation document in respect of the housing growth options and distribution strategy.

Previous SHELAA Assessments

This site was assessed in the 2021 SHELAA (reference CD10 Land north and south of Park Lane, Castle Donington). At the time of that assessment, the site was considered to be 'potentially suitable' as it did not *"adjoin the Limits to Development and is poorly related to the settlement [Castle Donington]"*. It went on to say the site is *"some distance from the main built-up area of Castle Donington, although the relief road, when built, will bring the built-up area closer to the site"*. The site was considered 'potentially available' as it was being promoted by an agent of behalf of a client who owns the site but there were no housebuilders involved at that stage. Finally, the site was considered 'potentially achievable' as there were *"no known physical or economic constraints"*.

The site area was stated as 95 hectares, with 47.5 hectares of land available for housing development. Taking a housing density of 30 dwellings per hectare, the estimated capacity was stated as 1,425 dwellings, with a timeframe for development of 11- 20 years. The site has also been promoted for employment uses and is given reference number EMP27.

The assessment concludes the site is 'potentially suitable' for residential uses and considered 'developable' with a timeframe of 11-20 years. To be considered "deliverable", the NPPF states that sites for housing should meet three tests (suitable, available and achievable).

- **Suitable:** The site can be considered suitable if it would provide an appropriate location for development when considered against its constraints. The site was only considered 'potentially suitable' in the 2021 SHELAA assessment as there would need to be a *"change in the boundary of the Limits to Development"* and *"there would also need to be a change in the development strategy to enable this site to be considered suitable"*. Since then, the land between this site and Castle Donington has been developed with new housing along with a relief road that runs adjacent to our client's site. The accompanying Vision Document demonstrates there are no overriding physical, environmental or technical constraints to development. We therefore consider the site is now 'suitable'.
- **Available:** The site must be 'available' now. The site is being promoted by a consortium of developers which jointly owns the freehold of all of the land including its access to the highway. There is absolute certainty here that there are no legal or ownership impediments to development. The site is therefore considered to be 'available'.
- **Achievable:** It should be 'achievable' with a realistic prospect that housing will be delivered on the site within five years. The land-owners have instructed a number of consultants to begin initial assessments of any technical, environmental or economic constraints. This has led to the development of a Masterplan Framework and a suite of technical assessments. The masterplan for the site shows potential areas for residential and employment development, along with significant areas of open space / landscaping and access to the wider highway network. This provides a useful indication of the potential layout and site capacity. The land-owners have jointly instructed highways experts to consider initial considerations of the transport implications as one of the most common constraints to development of large-scale sites is typically lack of access to existing highways infrastructure. Highways advice has concluded that the adjacent

relief road was built with significant spare capacity (33%). Direct access onto the relief road at the Park Lane roundabout from the site will ensure that external vehicular demand from the site has a direct routing to the local principal roads without unduly impacting on the local road network. This will allay any concerns about the impact of the proposals from a highways' perspective on the local community and highway network. Additionally, the location between multiple urban centres is likely to result in rapid dispersion of traffic on the wider road network.

- **Summary:** The SHELAA assessment concludes that the site is 'developable' with a timeframe of 11-20 years. To be considered "deliverable", the NPPF states that sites for housing should meet three tests (suitable, available and achievable). The land-owners have control of the site and have instructed an expert team to begin initial assessments of any physical or economic constraints. The accompanying Vision Document and technical supplementary reports demonstrate there are no 'showstoppers' to development and this site could be brought forward quickly. It is clear that the site is suitable, available and achievable and is truly therefore 'deliverable' in terms of its definition in the NPPF. The site's ownership and lack of technical constraints mean that delivery could comfortably commence within the next 5 years, with multiple outlets enabling a fast pace of delivery.

'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**"*. This site should be allocated and would address 6,719sqm of this shortfall.

This site offers the potential to locate further employment development on site in a settlement where there is significant demand for Class B2 and non-strategic B8 units. This is an additional benefit of this site being selected as an allocation in the substantive review.

Summary

It is clear that the site is suitable, available and achievable and is truly therefore 'deliverable' in terms of its definition in the NPPF. The land-owners have control of the site and have instructed an expert team to begin initial assessments of any physical or economic constraints. The accompanying Vision Document and technical supplementary reports demonstrate there are no 'showstoppers' to development and this site could be brought forward quickly. It is clear that the site is suitable, available and achievable and is truly therefore 'deliverable' in terms of its definition in the NPPF.

Ahead of the consultation on potential site allocations in spring 2022, we would appreciate the opportunity to speak with Officers regarding the suitability, availability and achievability of our client's

site and its potential to make a significant contribution to the council's residential (and employment) requirement over the plan period for the Substantive Review.

We look forward to discussing this site in further detail with officers. Should you require any further information or clarification, please do not hesitate to contact myself using the contact details below or David Murray-Cox (david.murray-cox@turley.co.uk).

Yours sincerely

Ben Williams
Senior Planner



Enc. Vision Document for Park Lane, Castle Donington

A Vision for

Park Lane

Castle Donington



March 2022



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1. Introduction

This document presents the vision for a residential-led development for Park Lane, located in North West Leicestershire district. The vision is to create a new community which aims to deliver new high quality housing along with facilities including a primary school and local centre and employment, to meet North West Leicestershire District Council's housing needs and to support economic growth.

Redrow Homes Ltd, Clowes Developments (UK) Ltd and Wilson Enterprises Ltd (landowners) are delighted to introduce their proposals for a residential-led mixed-use development at Park Lane, Castle Donington. The landowners acquired the site in 2021. Collectively they own the freehold of the land, including the access onto the highway. This Vision Document has been prepared to accompany representations to the Regulation 18 consultation on the Substantive Review of the North West Leicestershire Local Plan.

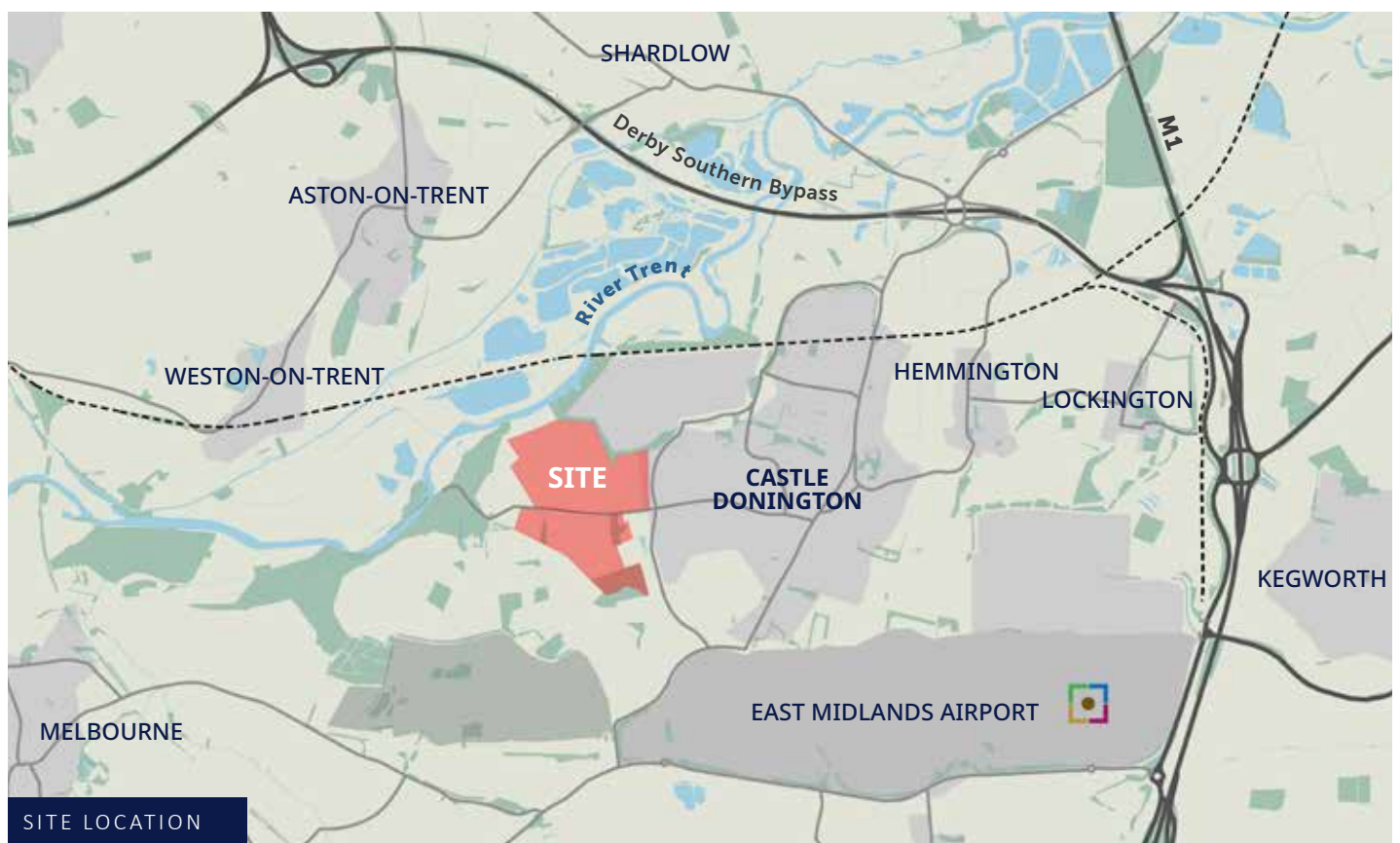
It sets out our vision for a sustainable extension to Castle Donington. The proximity of the site to existing and further planned local employment opportunities, proximity to the town centre and all its attendant services and facilities, and its

road and pathway connections, makes the site an accessible and sustainable location for development. The proposals will create a landscape led, sustainable community, which will contribute to meeting housing need within the District.

The developers have commissioned urban designers and an experienced technical team to assess the site and undertake an initial masterplan framework exercise for the potential development of the site. The proposals presented in this Vision Document have been informed by these assessments. Although this exercise remains on-going, the early technical conclusions demonstrate that this site is deliverable.

Further technical justification is set out within this Vision Document which demonstrates the site is deliverable in the short to medium term.

This Vision Document demonstrates that the site's ownership and lack of technical constraints mean that delivery could comfortably commence within the next five years, with multiple outlets enabling a fast pace of delivery.



SITE LOCATION

2. Confidence in Delivery

Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd acquired the land to the north and south of Park Lane, to the west of Castle Donington, in early 2021. Collectively, they own the freehold of the land, including the access onto the highway. They have formed a 'consortium' and wish to promote the site for residential-led development for allocation within the Substantive Review of the North West Leicestershire Local Plan.

THE DEVELOPERS



REDROW HOMES LTD

- Redrow is an award winning national housebuilder that has been operating across the UK for over 40 years.
- In addition to having its East Midlands office in Castle Donington, Redrow has recent experience of delivering high quality homes within the town. Redrow is currently building over 200 new homes at its Foxbridge Manor development to the east of the relief road (south of Park Lane).

CLOWES DEVELOPMENTS (UK) LTD

- Clowes is an East Midlands based property developer and investor.
- Alongside Miller Homes, Clowes jointly secured permission for 895 new homes to the east of the relief road in Castle Donington.
- Clowes are also bringing forward further development at its Castle Donington employment site (East Midlands Distribution Centre).

WILSON ENTERPRISES LTD

- Wilson Enterprises Ltd (WEL) is an East Midlands based company that specialises in the promotion of strategic development land across the UK. WEL is actively promoting a range of strategic sites, both on a standalone basis and as part of a consortium.
- WEL's sister company Davidsons Developments Ltd is the highly-regarded Midlands based housebuilder who has built a reputation as a placemaker of quality on sites across the East Midlands.

3. The Vision

Park Lane is a sustainable location for development. Our vision for Park Lane is to create an attractive new neighbourhood which integrates well with the surrounding countryside landscape.

HIGH QUALITY HOMES FOR ALL



The development has the potential to deliver around 1,200 new high quality homes with a variety of sizes and tenures. These homes aim to be sustainable, energy efficient and adaptable to the changing needs of future residents and to help meet future housing target.

A COMMUNITY HEART



A new Local Centre forms the neighbourhood's focal destination which will be located to the east of the new neighbourhood to allow easy walking and cycling access for new and existing residents of Castle Donington. The co-location of uses including shops, a supermarket and a school help foster a sense of community.

CREATE NEW LANDSCAPE ASSETS



A new Country Park of more than 24 hectares (59 acres) would be provided in a highly accessible location that is well-integrated within the existing landscape and the wider countryside. It would offer significant new areas of amenity, leisure and ecology for residents to enjoy.

Existing trees and hedgerows are to be protected and enhanced creating a network of green corridors and links, encouraging walking and cycling as part of daily journeys which promotes healthy and active lifestyles.

EDUCATION PROVISION



The development will deliver a new Primary School that is co-located with other uses for convenience and easy access. The school is ideally situated adjacent to a green corridor and open space, allowing active travel options for parents and children for everyday journeys.

HIGH QUALITY AND DISTINCTIVE DESIGN



Areas of distinct design will be identified to reflect different parts of the site and respond to their surrounding context. These areas will draw inspiration from the landscape, historic urban form and characteristics of surrounding villages thereby creating a sense of place and being in keeping with the local vernacular.





4. Planning Context

Castle Donington is located within North West Leicestershire District in Leicestershire. The site is located to the west of Castle Donington in two parcels on the north and south side of Park Lane, which runs westward out from the centre of the town.

The North West Leicestershire Local Plan was adopted in November 2017 and covers the period up to 2031. The plan sets the spatial strategy for the district, allocates land for development and sets out planning policies to guide development. Policy S1 required the council to undertake a review of the Local Plan by the end of January 2018 or within 3 months of the adoption of the plan. The council decided to progress the plan review in two stages. The first stage, termed the 'Partial Review', comprised an amendment to Policy S1. It was adopted in 2021 and extended the requirement to submit a full review of the Local Plan (termed the 'Substantive Review') by 21 November 2022. The Park Lane site is designated within the plan as 'Countryside' (outside the limits to development) and is subject to Policy S3.

North West Leicestershire District Council is now undertaking a Regulation 18 consultation on the Substantive Review. The consultation covers 'Development Strategy' and 'Policy Options'. Section 3 of the

document looks at the settlement hierarchy. It proposes to retain the existing hierarchy which places the Coalville Urban Area at the top as the 'Principal Town', Ashby-de-la-Zouch and Castle Donington as 'Key Service Centres', Ibstock, Kegworth and Measham as 'Local Service Centres', then 'Sustainable Villages' and 'Local Housing Needs Villages'.

Section 4 of the document presents four growth options for dealing with its housing growth strategy. The council is taking two housing growth options forward: High 1 Scenario (512 dwellings each year, with a residual requirement of around 1,000 dwellings) and High 2 Scenario (730 dwellings each year, with a residual requirement of about 5,100 dwellings). The consultation document then assesses a number of potential spatial distribution options. It concludes that it will take two options forward as the preferred spatial distribution for the Substantive Review. The option for the High 1 scenario (3a) allocates 500 dwellings at the 'Principal Town', 300 dwellings at Key Service Centres, and 200

dwellings at Local Service Centres. The option for the High 2 scenario (7b) allocates 1,785 dwellings at the 'Principal Town', 765 dwellings at Key Service Centres, 510 dwellings at Local Service Centres and 255 dwellings at Sustainable Villages.

The developers are promoting the Park Lane site as a residential-led development which could accommodate around 1,200 dwellings to address the residual requirements identified in both preferred housing growth options. The developers have responded formally to the consultation document in respect of the housing growth options and distribution strategy.

Local Plan Review Timetable	2020	2021	2022
Consultation on draft plan (Regulation 18) - Summer 2020	■		
Pre-submission consultation (regulation 19) - Spring 2021		■	
Submission - Autumn 2021		■	
Examination - Winter 2021/22		■	
Adoption - Autumn 2022			■



IMAGES FROM CASTLE DONINGTON

5. Why Castle Donington?

Castle Donington is an historic town with a distinctive local character along with amenities and employment opportunities that provide a great opportunity for delivering new high quality housing in a sustainable location

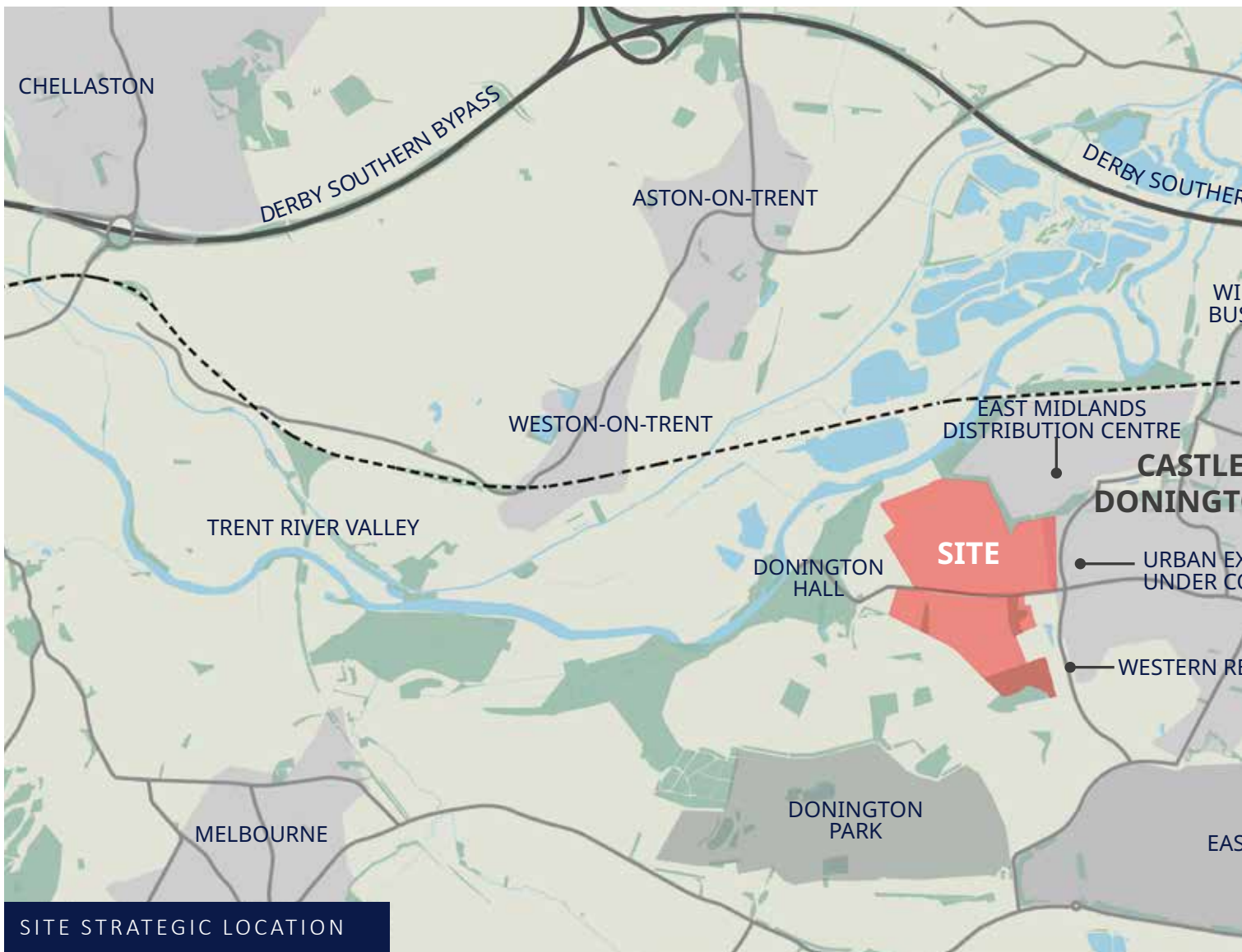
Castle Donington is an attractive market town that sits within the rural landscape of the River Trent. The town has a distinctive local character with many historic buildings some dating back to 17th century, also examples of Georgian and Regency period buildings can still be seen in the historic heart of the town.

New residents would benefit from:

- A good range of shops, supermarkets, restaurants, pharmacies, medical centres and hotels primarily located along the historic Market Street/ Borough Street forming a destination town centre.
- Castle Donington has two primary schools, The Orchard Community Primary School to the north west and

St Edward's C of E Primary School to the south east of the town centre. Castle Donington College offers education for students aged from 11 to 16 years of age.

- Close proximity to an extensive area of open countryside and a National Forest providing opportunities for leisure activities and creating an attractive environment;

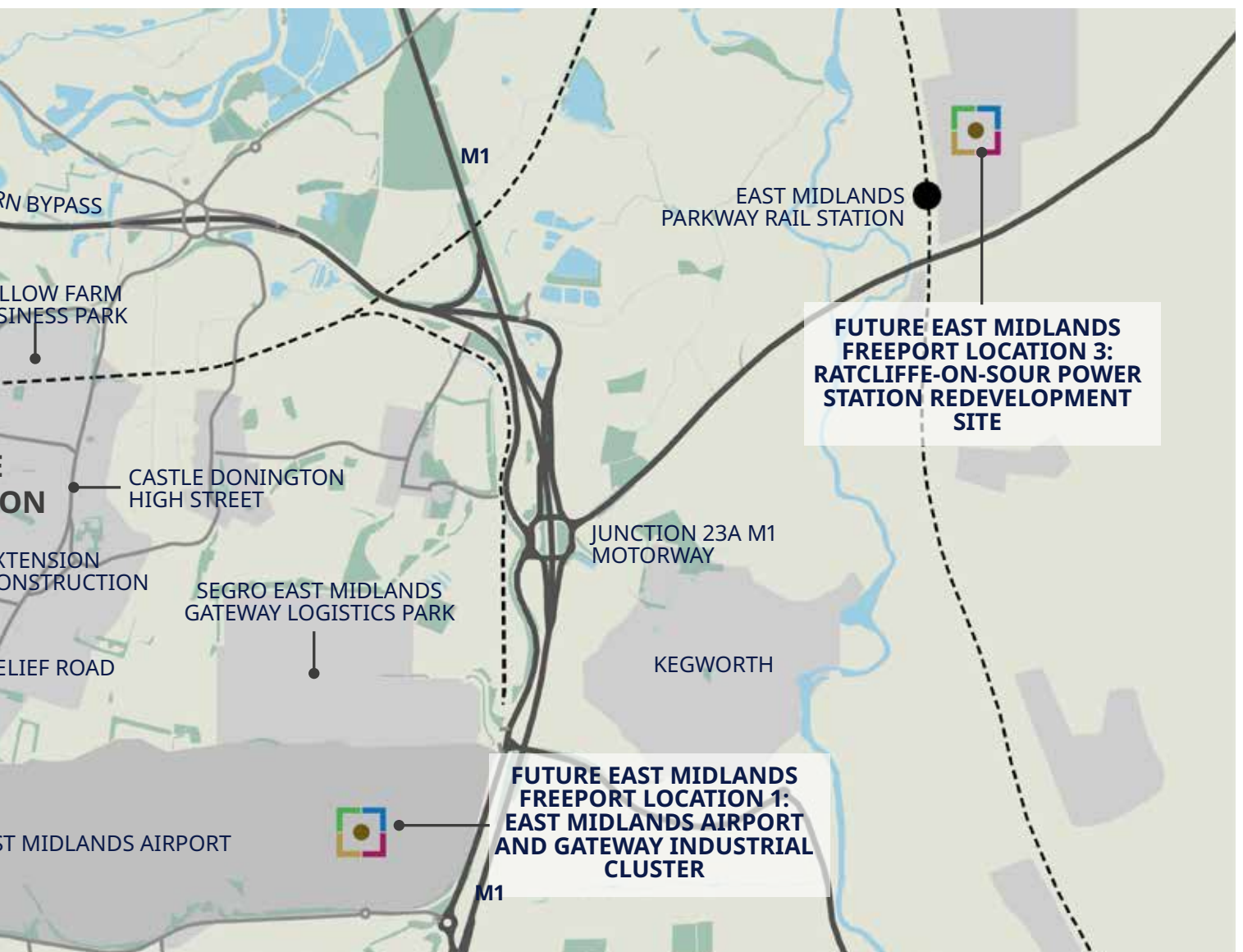


- Access to existing public bus and rail services available within Castle Donington;
- Opportunities for new cycle and pedestrian links and new bus services connecting to local amenities;
- Easy access to the Western Relief Road which provides excellent road access to four major cities - Birmingham, Derby, Leicester and Nottingham using the motorway network (M1 north/south and M42 south-west/north-east).
- Access to multiple expanding employment hubs in the locality. The

East Midlands Distribution Centre and Willow Farm Business Park are situated to the north of the town, creating job opportunities for existing and future residents.

- SEGRO East Midlands Gateway Logistics Park is located to the south east of Castle Donington. This consists of 700 acres of logistics accommodation with direct access to J24 of the M1.
- The employment opportunities in the area are set to grow exponentially in the coming decades with the introduction of the East Midlands Freeport. The East Midlands Development Corporation (EMDC) has

been set up by five councils (including NWLDC) to drive development at the three sites within the East Midlands Freeport. These include the East Midlands Airport, Ratcliffe-on-Sour Power Station, and Toton & Chetwynd East Midlands Hub. The EMDC plans to create up to 84,000 jobs, more than 10,000 new homes by 2045, and create more than £4.8 million in added value to the Midlands economy. All of these sites are within 10 miles of Castle Donington. Castle Donington is a truly sustainable location that would benefit from, and be able to support, a significant growth in population.



6. Why This Site

The wider strategic location is close to many potential employment opportunities set within attractive landscape which makes Castle Donington a desirable place to live, work and play.

LAND OWNERSHIP AND TRACK RECORD OF DELIVERY

- The site is owned and wholly controlled by the three land-owners who are able to bring forward proposals for development immediately.
- The consortium is made up of developers that have a stellar record of delivering residential and employment development, particularly within the East Midlands and most recently within Castle Donington itself. There is absolute certainty here that there are no legal or ownership impediments to development.
- Housing could be delivered on the site within the next five years. We would anticipate that up to 150 residential units could be delivered on this per annum with at least three house builders on site.

SITE LOCATION

- The site is located immediately adjacent to the built-up area of Castle Donington. It is sited in an obvious location for expanding the settlement to provide new, high-quality housing to complement the existing employment opportunities in the area.
- An integrated network of Public Rights of Way connects the site to Castle Donington and nearby employment areas which enable walking and cycling for work and daily journeys. Direct bus services connect Castle Donington to Derby, Nottingham, East Midlands Airport and neighbouring towns and villages, unlocking further opportunities for jobs and providing access to amenities.

- The site benefits from unobstructed access to the Castle Donington Relief Road (CDRR) which has come forward to support westward expansion of Castle Donington and has significant spare capacity to allow for the predicted trip generation of the site. This means there is no requirement to build new, or significantly enhance, highways infrastructure.
- The site lies adjacent to the East Midlands Distribution Centre so the site will benefit from a vehicular and pedestrian connection into an existing employment area. These routes could be designed to accommodate a bus route and a cycleway.

NO TECHNICAL CONSTRAINTS TO DEVELOPMENT

- The land-owners have instructed a number of consultants to begin initial assessments of any physical technical, environmental or economic constraints. This has informed the development of the Masterplan for the site. Further details are set out in this document.
- This Vision Document demonstrates there are no overriding physical, environmental or technical constraints to development.

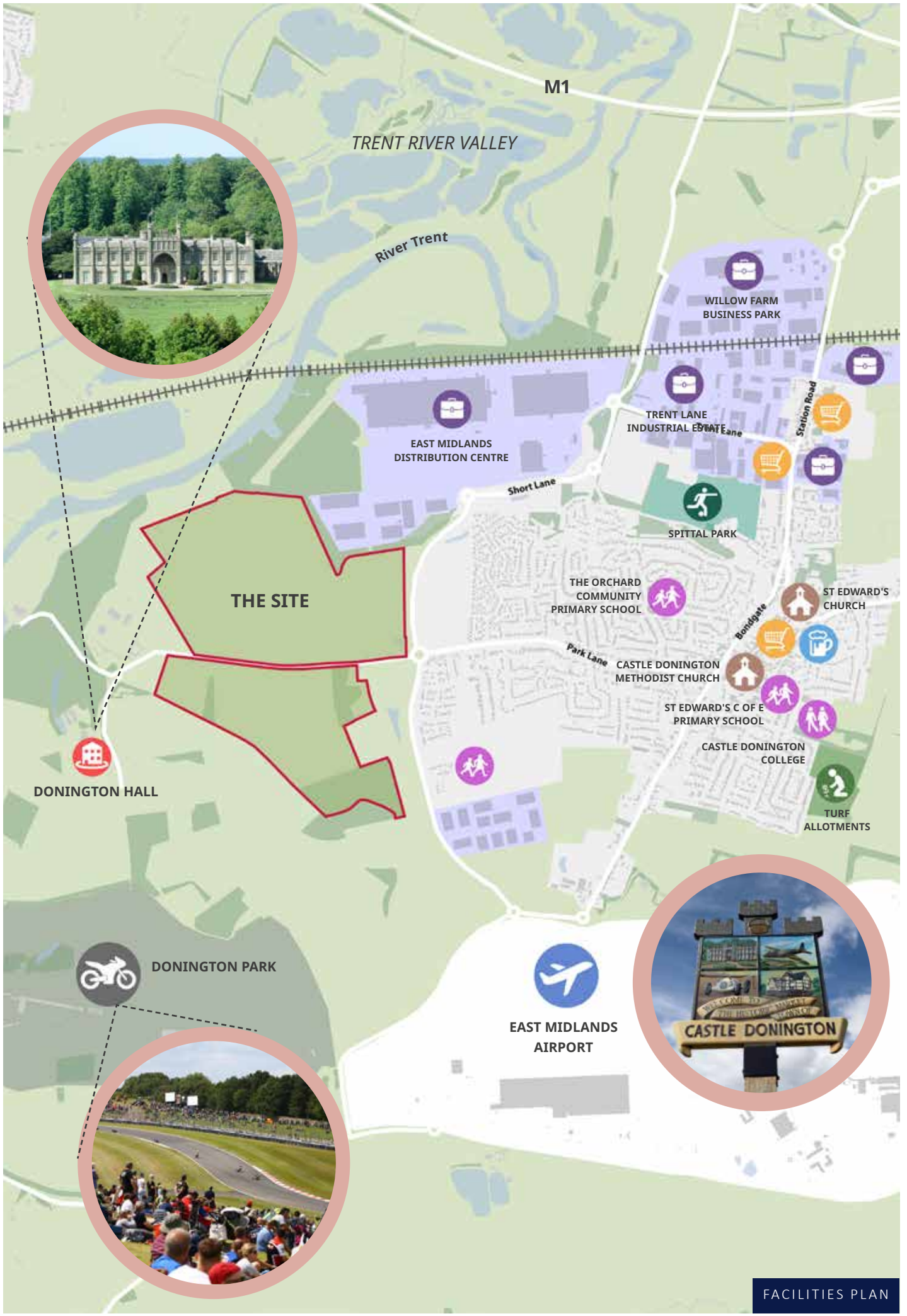
BENEFITS OF THE PROPOSALS

- The development will deliver around 1200 high quality homes of all sizes and tenures that are sustainably located within close proximity to local facilities and public open spaces.
- New homes will meet high sustainable construction and energy standards.
- The proposals would deliver must needed affordable housing.

- A new Country Park of more than 24 hectares (59 acres) would be provided in a highly accessible location that is well-integrated within the existing landscape and the wider countryside. It would offer significant new areas of amenity, leisure and ecology for residents to enjoy.
- Existing trees and hedgerows would be protected and enhanced creating a network of green corridors and links, encouraging walking and cycling as part of daily journeys which promotes healthy and active lifestyles.
- The proposals would deliver beautifully designed public spaces and a mixed-use Local Centre offering the opportunity for people to gather, meet and socialise, and are an essential component in creating a sense of belonging and building community spirit.
- The proposals would include the provision of a new primary school at a central, safe and attractive location that benefits all existing and new residents.

- The site could accommodate additional areas for employment uses to help address the identified need across the district.
- There is potential to structure the proposed site layout with green corridors and connected green spaces which break up the mass of the development in views from the north, and allow the majority of new homes to enjoy views of either amenity space, existing woodland, or the Trent Valley

This site offers the most sustainable location for accommodating a significant number of additional housing in a highly sustainable location within the district.



TRENT RIVER VALLEY

M1

River Trent

WILLOW FARM BUSINESS PARK

EAST MIDLANDS DISTRIBUTION CENTRE

TRENT LANE INDUSTRIAL ESTATE

SPITTAL PARK

THE SITE

THE ORCHARD COMMUNITY PRIMARY SCHOOL

ST EDWARD'S CHURCH

CASTLE DONINGTON METHODIST CHURCH

ST EDWARD'S C OF E PRIMARY SCHOOL

CASTLE DONINGTON COLLEGE

TURF ALLOTMENTS



DONINGTON HALL



DONINGTON PARK



EAST MIDLANDS AIRPORT



7. Understanding the Site

The proposed masterplan aims to create a new neighbourhood of Castle Donington that responds to the site's context.

THE SITE CONTEXT

The eastern boundary of the site is defined by the recently completed Western Relief Road. The relief road is immediately adjacent to new areas of housing, incorporating a new primary school, and an employment site which extends the existing urban area of Castle Donington to the west. The relief road provides access to the East Midlands Distribution Centre that is situated adjacent to the northern boundary of the Site.

The elegant Donington Hall which is set within extensive parkland is situated at the western end of Park Lane. To the east, Park Lane provides direct access to the town centre and existing residential areas of Castle Donington.

Donington Park race track is located immediately to the south of the grounds to Donington Hall.

The site is predominantly open with views northward across the River Trent Valley. Adjacent to the East Midlands Development Centre the gradient increases into a V shaped valley whose sides have a gradient of 1 in 6. The industrial units sit low in the view from the site.





AERIAL PHOTO

LANDSCAPE & VISUAL APPRAISAL SUMMARY

A series of Landscape and Visual baseline desktop studies were undertaken including the following:

LANDSCAPE CHARACTER AND SENSITIVITY STUDIES

- **National Level:** National Character Area (NCA) 69 - Trent Valley Washlands and NCA 70 - Melbourne Parklands.
- **Regional Level:** East Midlands Landscape Character Assessment 2010;
- **County Level:** Leicestershire and Rutland Historic Landscape Characterisation 2011;
- **District Level:** North West Leicestershire Landscape Character Assessment.

LANDSCAPE-RELATED DESIGNATIONS AND PROTECTED FEATURES

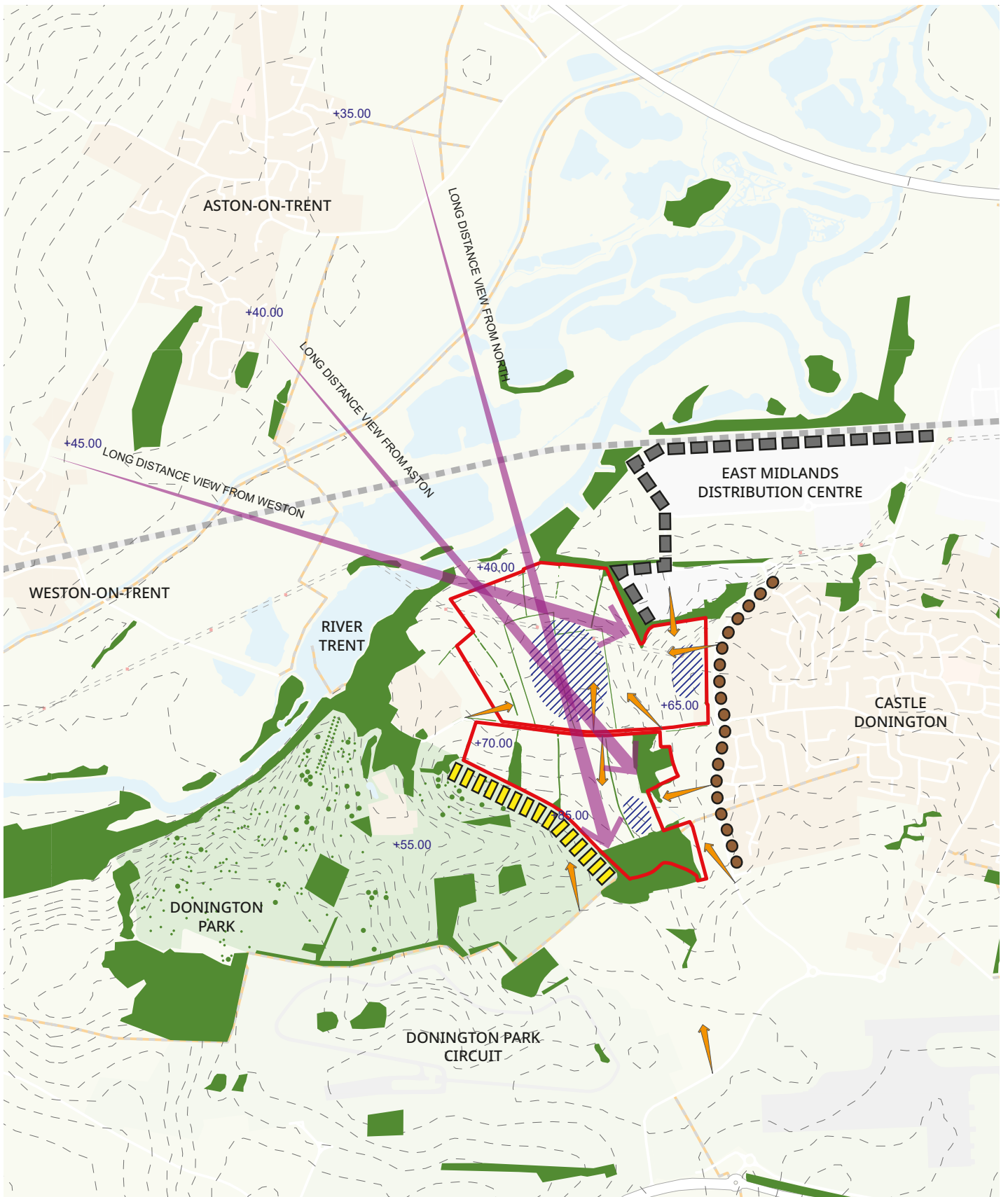
There are no international, national or local landscape-related designations covering the site, nor any protected features. There are, however, a number of designations and features relevant to the setting of the site which were identified and mapped.











INPUTS TO THE MASTERPLAN

From these desktop studies and field survey work carried out, several points emerged regarding landscape features, landscape character and visual amenity which will be used to feed into the opportunities and constraints for development of the site. These are set out below.

- The southern part of the site is relatively well enclosed visually by a combination of topography, woodland, trees and hedgerows, although leaf fall during winter months would open up views into the site considerably and views from the north would remain due to its sloping nature;
- The northern part of the site is much more openly visible from all directions;
- The key features which contribute to screening of the site include built form within the industrial area to the north east and the residential edge to the east, and the topographic ridge east of Donington Hall, along with the larger woodland blocks at Dalby's Covert and around Kings Mills;
- Views towards the site from north of the river are available from within the river corridor and parts of the villages of Aston-on-Trent and Weston-on-Trent, and these views would be more open during winter months when the leaves have fallen from the trees;

- The people who would be likely to experience changes in views as a result of development on the site (known as visual receptor groups) would include residents on the edge of Castle Donington, residents and motorists on Park Lane, walkers on the PROW to the south of the site/within the site, motorists on the relief road, workers in the distribution centre and residents and walkers to the north of the river.
- Both parts of the site are in agricultural use, however, the southern part of the site is characterised by woodland and pasture land, whereas the northern part of the site is characterised by arable land and its setting against the urban edge and river corridor;
- The pylons on the northern part of the site are a detractive influence on landscape character;
- The woodlands, hedgerows, tree groups and avenue of mature trees along Park Lane on the site make an important contribution to local landscape character;
- The PROW in the southern part of the site is likely to be valued by local people as it links to a network of pathways extending from the urban edge; and
- The Stud Brook, although largely hidden by vegetation during summer months would make a positive contribution to landscape character in winter months.



- | | | | |
|---|--|---|--|
|  | Site boundary |  | Settlement visual edge (containing views from northwest) |
|  | Long distance views |  | Topographic ridge (containing views from northwest) |
|  | Short distance views (indicative local views) |  | Woodland and notable trees |
|  | Zones of visual prominence |  | Contours (shown every 5m) |
|  | Industrial visual edge (containing views from northwest) |  | Spot heights |

SITE CONSTRAINTS & OPPORTUNITIES

The landowners have commissioned a team of expert consultants across various disciplines to undertake initial assessments of the site to consider if the site is appropriate for development. The results of these initial assessments are summarised here and have informed the concept diagrams and masterplan

OVERVIEW

The Site comprises of two parcels of land: Parcel A is located to the north of Park Lane, 50.7 ha (125 acres) in size, and Parcel B is located to the south of Park Lane, totalling 30.6ha (76 acres). It is currently used for agriculture and is made up of numerous fields sub-divided by hedgerows and trees. Hedgerows run predominantly in a north/south orientation, some containing significant trees, particularly those lining Park Lane. A number of existing woodland areas are located in the southern parcel with a more significant area of woodland in the far south of the Site, including Studbrook Hollow and Dalby's Covert woodlands.

ACCESS & MOVEMENT

There is potential to create two vehicular connections off Park Lane which tie the southern and northern parcels together and link to the Castle Donington Relief Road (CDRR) which has come forward to support westward expansion of Castle Donington and has significant spare capacity to allow for the predicted trip generation of the site.

A further vehicular/pedestrian connection could be realised in the north, linking the site to the East Midlands Distribution Centre. These routes could be designed to accommodate a bus route and a cycleway.

PEDESTRIAN/CYCLE

The site is connected to the public right of way (PROW L 87) network of Castle Donington and Melbourne via the existing PROW which runs through the south of the site. This route should be retained and considered integral to connecting the site to the wider pedestrian movement network. A crossing point is indicated on the new relief road.

Connectivity could be improved by introducing additional pedestrian and cycle links improving connections between proposed development, Castle Donington and the surrounding countryside

EDUCATION

Castle Donington currently benefits from two primary schools and a secondary school. A new primary school is proposed to be delivered as part of the Castle Donington West development, located immediately adjacent to the site.

It is assumed that a development of approx. 1,200 homes would require a primary school and local centre. Their locations need to be carefully considered.

TOPOGRAPHY

The topography slopes from a high point of 85 metres AOD adjacent to the southern boundary, down to 45 metres AOD at the southern boundary. Over the majority of the site the slope is gradual at between 1 in 20 to 1 in 35.

A pronounced ridge runs along this slope through the centre of the site. Either side of the ridge are two valleys, the steepest of which lies to the east. Where possible the proposed development should work with the contours. There is an opportunity to work with the contours of the site to create a unique character, and integrate the proposed development into its setting.

KEY VIEWS

The central and southern part of the site is visible in long range views from the villages of Aston and Weston. Local views of the site exist from Park Lane and along the Relief Road. The Landscape and Visual Impact Assessment and design development of the masterplan should consider the visibility of proposed development in local and long range views.

There is potential to structure the proposed site layout with green corridors and connected green spaces which break up the mass of the development in views from the north, and allow the majority of new homes to enjoy views of either amenity space, existing woodland, or the Trent Valley.

ECOLOGY

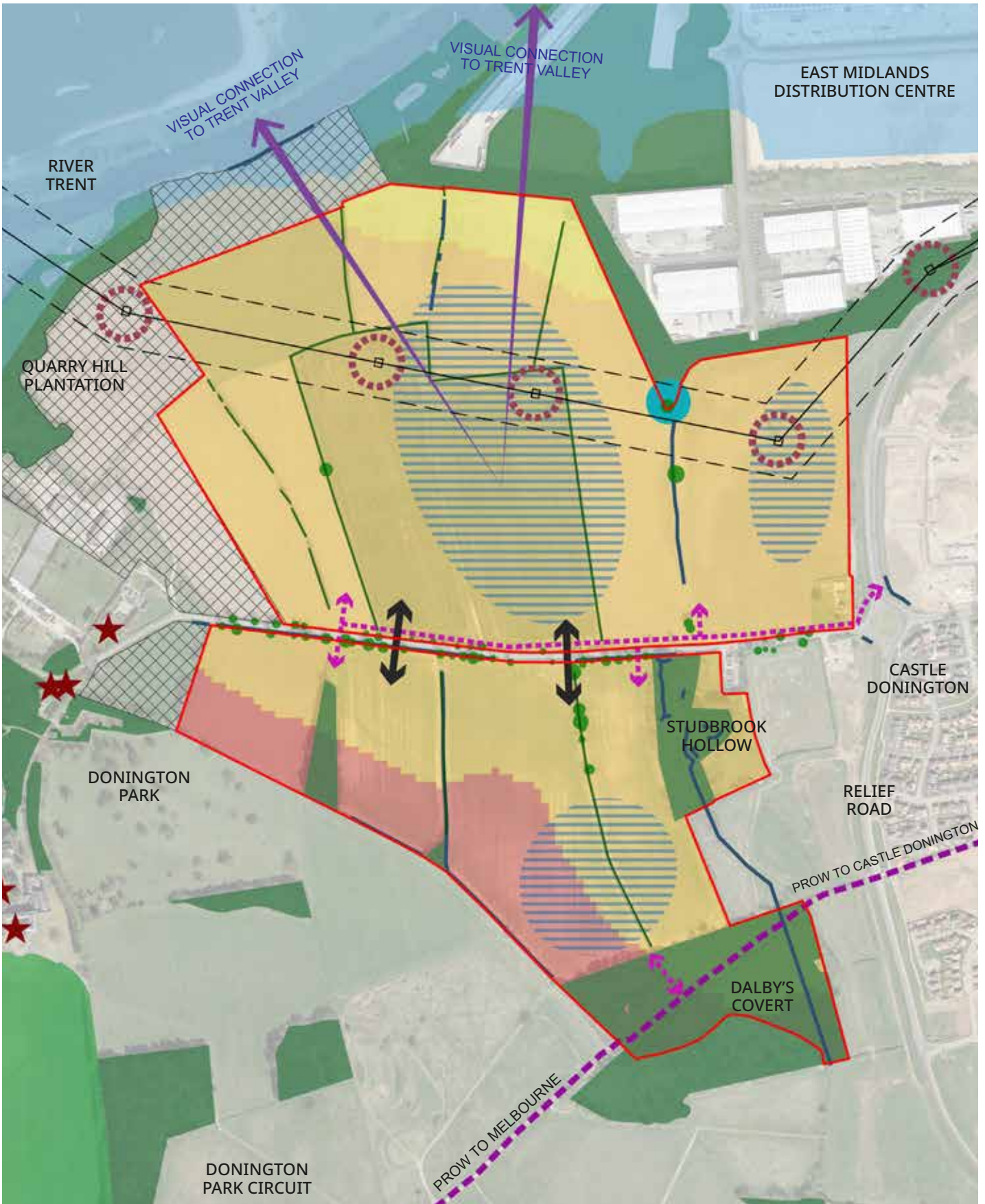
Our initial analysis of published data has not identified any known significant constraints. The site is not located within any sensitive landscape or nature designations. However, Donington Park SSSI, 39 hectares of broadleaved, mixed and yew woodland, is approximately 1 km to the west. The majority of this site is therefore considered to be within the SSSI impact zone. This would need to be taken account of in the appraisal of the site but is not considered to be a meaningful constraint to development.

FLOOD RISK & SURFACE WATER DRAINAGE

The entire site is situated within Flood Zone 1 and therefore at very low risk of flooding from rivers or the sea. The risk of surface water flooding is deemed 'very low', although immediately to the north of the site there are areas of risk due to low points in the topography. A sustainable drainage system with a controlled run off will ensure that drainage is appropriately managed.

ARCHAEOLOGY

Although areas of the site were found to have high potential for archaeological remains of Prehistoric, Roman, and Medieval date, no evidence was found for remains of such high archaeological interest exist that their nature, level and extent would undermine the deliverability of the scheme.



- | | | | |
|---------------------------------------|--------------------------|----------------------------|---|
| Site Boundary
- 81.28Ha / 200.85Ac | Trees & Hedgerows | Power Line with 50m Buffer | Long Distance Views out of the Site Across the Trent Valley |
| Flood Zone 2 | Noise Level (dB) - 50-55 | Public Rights of Way | Potential Pedestrian & Cycle Connections to Existing Routes |
| Flood Zone 3 | Noise Level (dB) - 55-63 | Listed Buildings | Potential Vehicular Connection to Existing Highways |
| Existing Watercourse / Drains | Noise Level (dB) - >63 | Parkland | |
| Drainage Outfall | SSSI | Zones of Visual Prominence | |
| Existing Woodland | Retained Land | Visual Distractor | |

LAND CLASSIFICATION

An agricultural land quality survey has been undertaken of 81.1 ha of land off Park Lane, Castle Donington. The site has three main soil types: reddish loamy soils, sandy soils and slowly permeable soils. The site is mainly grade 2 agricultural quality, with smaller areas of grade 1 and subgrade 3a and 3b land. The quality of the land is primarily limited by droughtiness and wetness.

NOISE

An assessment has been undertaken to identify the key noise sources associated with the proposal, (the East Midlands Airport and Donington Race Track) which have the potential to impact upon the closest existing and proposed residential dwellings. The assessment has been informed by a baseline sound survey completed over a full weekday and weekend period in order to quantify the existing background noise environment at the site. 3D noise modelling was performed to map the dominant noise sources affecting the site and has informed the possible future developments and the mitigation that they would require to meet the stated planning policies and standards.

UTILITIES

Power cables and three pylons run the width of the northern part of the site. The development will need to consider any restrictions relating to lines and pylons as set out by the National Grid.

HERITAGE & CONSERVATION

No known designated or non-designated heritage assets were identified within the boundaries of the site. Assessment showed that the site currently makes a positive contribution to the setting of 26 listed buildings, 3 scheduled monuments,

3 conservation areas and 2 candidate non-designated heritage assets.

Only one designated heritage asset, the Grade II* listed building, Donington Hall, showed a high sensitivity to the scheme, although there is no intervisibility between it and the site. Associated assets, including the hall's informal parkland which abuts the southwest of the site and 14 listed buildings within and around it, showed a moderate to low sensitivity to the site's development. Park Lane forms an informal approach to the hall and associated assets, and the site forms a large part of their wider rural setting, notably the Grade II listed Home Farm to the immediate west of the site.

Assessment shows the site makes a positive but distant contribution to the setting of three designated heritage assets within the historic village of Castle Donington. Due to its location on the rising slopes of the Trent Valley the site's open rural character forms a positive element of the wider setting of designated assets on the opposing side of the valley.

The masterplan should be designed to avoid, minimise and mitigate negative impacts upon the potential archaeological resources and the setting of heritage assets.

Large areas of open space were given over to lower lying ground in the north of the site where the potential for archaeological remains of interest to survive is likely highest. Retention of the open area, alongside planting to the northern fringe of developed areas, would also assist in preserving the setting of those heritage assets to the north of the river.

Generous green space to the north and south of Park Lane would enable the lane to retain much of its informal character as an approach to heritage assets associated

with the Donington Hall Estate alongside others to the west of the site. Generous buffers of open green space along the south of the development, extensive planting and the retention of semi-natural rural features would assist in minimising the broader impact of the scheme upon the wider setting of all heritage assets.

Further work needs to be undertaken which will be taken into account but will not preclude development of the site.

LANDSCAPE

The existing hedgerows, tree groups and remnant woodlands provide an attractive landscape character as well as enclosing much of the site's perimeter boundary. Park Lane bisects the site and has many attractive mature trees which form an avenue between the two parts of the site. The masterplan should look to retain and enhance the setting of the existing woodland blocks and retain the quality tree stock where possible.

The strong landscape setting provides the opportunity for a landscape led masterplan, with existing trees and woodland structuring the new development. The existing woodland blocks both within the site boundary and beyond form a mature landscape framework with opportunities for connections via new green corridors.

VIEWS TO WOODLAND



PARK LANE - MATURE LANDSCAPE



STUDBROOK HOLLOW - HABITATS SUPPORTING WILDLIFE



LONG VISTAS TO THE TRENT VALLEY



8. Design Concepts

The landscape-led masterplan needs to respond to the unique landscape assets, topography and location of the site to maximise its potential to deliver a high quality, aspirational neighbourhood that is exemplar to Castle Donington and to create a distinctive sense of place and memorable character for the site.



RESPONDING TO THE LANDSCAPE

- The majority of the open space located to the north of the pylons, including sports pitches and sports pavilion set within a strong landscape structure of mature trees and hedgerows.
- North/south orientated green corridors running through the development. Following the alignment of retained hedgerows and areas of steep gradients, linking from the River Trent to the north through to the open high ground to the south. These corridors could incorporate surface water conveyance swales.
- Buffer planting along the southern and western edges with more substantial areas of publicly accessible, woodland to the south.
- Surface water attenuation basins located at the lowest point of the site.



MOVEMENT AND COMMUNITY HUB

- Vehicular access gained from the Western Relief Road roundabout along Park Lane.
- A circulation loop which forms two cross road junctions with Park Lane to enable a bus service to deviate through the development.
- The block structure facilitates further future access points either vehicular or pedestrian only onto and across the Relief Road into Castle Donington.
- Co-location of small retail units, a primary school and potentially a community facility, in the east of the development.
- A permeable structure ensures the scheme is walkable, with attractive pedestrian/cycle routes through the green corridors.



COMMUNITY FOCUSED NEIGHBOURHOOD

- The proposed **Local Centre** will form a community hub containing a mix of amenities and facilities.
- The **primary school** will be located at the geographical heart of the development to ensure safe and easy access for children and parents.
- Various **gateway** 'entrance' points will be identified along Park Lane. The principal gateway being at the Western Relief Road roundabout and two at cross road junctions along Park Lane to create a sense of arrival. These will be characterised with special architectural design, features and treatment to the facade.

DEFINING THE DISTINCTIVE CHARACTER

- **Entrance Gateway:** Robust building materials, inclusion of linear green buffers to provide protection from the adjacent busy road corridors, include taller buildings of 3 storey or more to create landmarks and accentuate arrival.
- **Urban Core:** Predominantly buildings of a vernacular character, incidental open spaces, continuous, formal frontages, and buildings heights between 2-3 storeys.
- **Parkland Edge:** Lower density and building heights, use of natural building materials, generous set backs with building orientation to minimise noise impact from Donington Park.
- **Park view:** Medium density housing in a limited colour palette with opportunities to respond and optimise views across the landscape.

9. The Masterplan

Informed by technical assessment of the site, the masterplan opposite aims to illustrate how a development of 1,200 dwellings, a school and local centre can be achieved which responds to the design concepts

The design principles have been brought together into a masterplan, shown opposite, which delivers a development of 1,200 new homes at an overall density of 36 dph.

- 1 A local centre incorporating small retail units a community facility as well as residential accommodation.
- 2 New primary school provision, within easy walking distance of all homes.
- 3 Natural open space utilising land to the north of the pylons.
- 4 Access points, gained from the Western Relief Road roundabout and the East Midlands Distribution Centre.
- 5 The principle circulation street runs around the development forming two cross road junctions with Park Lane.
- 6 A green pedestrian and cycle network, integrated throughout the built area.
- 7 A landscaped buffer, retaining the existing woodland and adding further tree planting to the southern and western edges.
- 8 Allotments, to encourage growth of local produce.
- 9 Attenuation, to ensure run-off at greenfield rates and creation of new semi natural wetland habitats.
- 10 Children's play, including equipped play areas.
- 11 Steep topography, integrated into the open space provision.
- 12 Existing pedestrian crossing point, over the Western Relief Road located on the Public Right of Way.





- | | | | |
|---------------------------------------|-----------------------------------|---------------------|--------------------|
| Site Boundary
- 81.28Ha / 200.85Ac | Open Space | Pedestrian Link | Existing Planting |
| Residential | Attenuation | Proposed Footpath | Existing Hedgerows |
| Residential / Potential Employment | Allotments | Public Right of Way | Proposed Planting |
| Local Centre | Primary Vehicular Movement Routes | | |
| Education | Children's Play | | |

CONCEPT MASTERPLAN

LAND USES

The development aims to create a well-located and sustainable neighbourhood that delivers around 1,200 high quality homes. A mix of dwelling types will help to create an active place to meet the needs of its residents and create an inclusive and well balanced community.

The new community will consist of a range of uses, including a new primary school, a mixed use Local Centre, the potential for an employment area, a number of multi-functional open spaces and children's play areas. The play areas will be easily accessible via an integrated network of pedestrian and cycle friendly green streets.

The second table sets out the open space standards as recommended by the adopted North West Leicestershire Local Plan. The masterplan was designed to ensure that the open spaces provided meet those standards where they are prescribed. The Local Plan states that other types of open space will be assessed on a site by site basis.

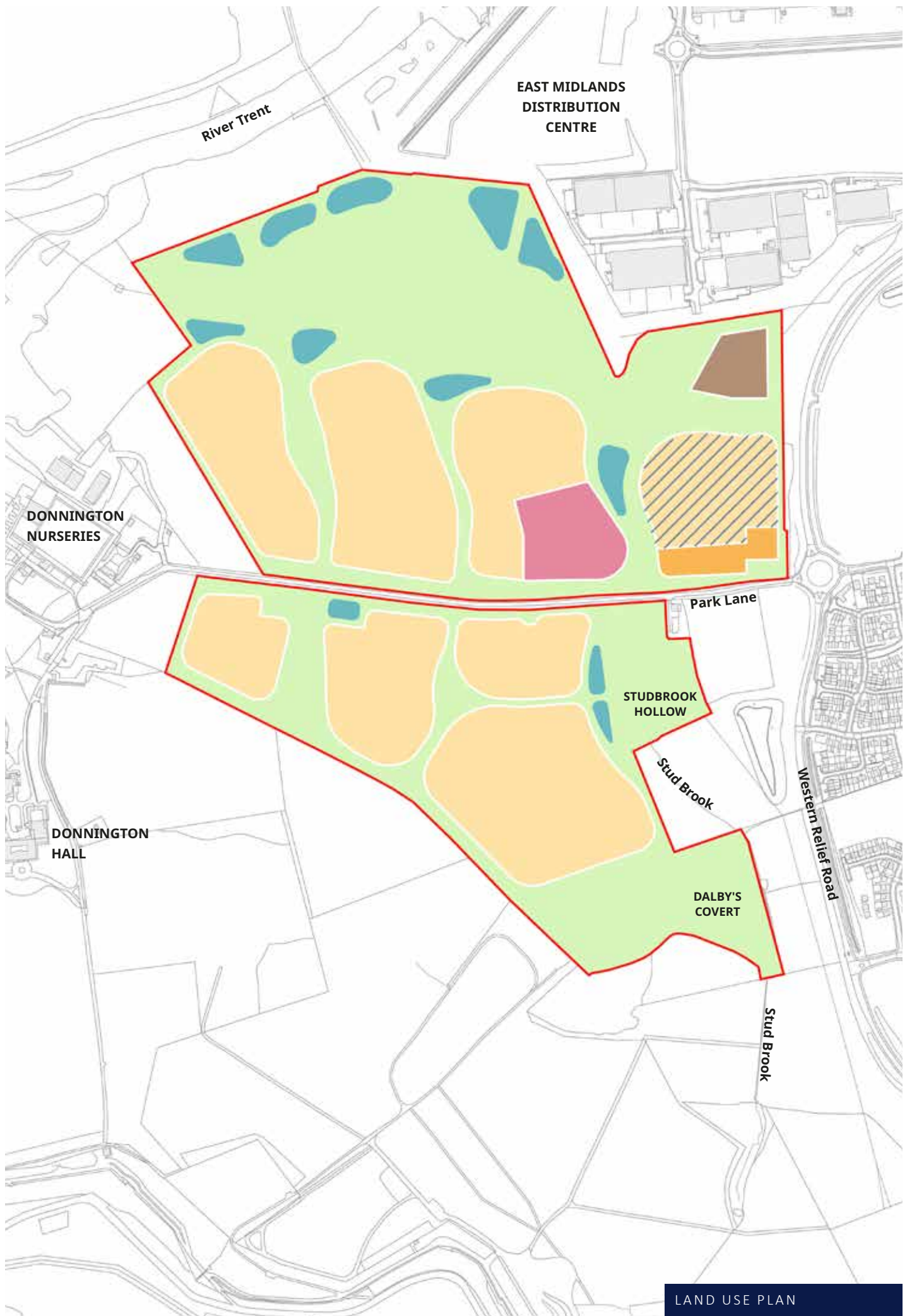
The masterplan provides over 100 acres of public amenity space which exceeds the requirement for a development of 1,200 dwellings. This will allow the development to meet the needs of Biodiversity Net Gain across the site and provide a generous provision of open space for the enjoyment of the new residents to help improve health and wellbeing through high quality accessible open space.

The proposed land uses are set out on the plan opposite and the tables below.

Site Boundary	81.28	200.85		
AREA	Ha	Ac	Density	Units
Residential	29.72	73.44	36	1,070
Resi (Potential Employment)	3.39	8.38	36	122
Local Centre	0.90	2.21		20
Education	2.10	5.19		
Open Space	40.69	100.55		
Attenuation	3.48	8.61		
Allotments	1.00	2.48		
TOTAL	81.28	200.86		1,212

Dwellings at 2.4 people per household	Units 1,200	Population 2830
Open Space Typology	Ha per 1,000 pop.	Ha required
Informal		
Parks & Gardens	0.8	2.26
Amenity Green Space	0.6	1.70
Natural and Semi Natural	1.8	5.09
Allotments	0	0
Formal Outdoor		
Playing Pitches	1.2	3.40
All Outdoor Sports	1.6	4.53
Equipped Play Area	0.25	0.71
Other Outdoor Provision	0.3	0.85
TOTAL		18.54





ACCESS & MOVEMENT

The development will integrate with the wider community of Castle Donington to allow access to jobs and the facilities which people can conveniently walk and cycle to. The masterplan allows for the provision of a primary school and local centre within the site so reducing the need for vehicular trips.

The development will support the ability of the wider community at Castle Donington to meet a greater proportion of its own needs. This marks a shift from a transport mode-based approach, on which historically the private car has perhaps been unduly prioritised, to a place-based approach which prioritises people and activities.

A comprehensive strategy is envisaged which will minimise the need to travel by car and to maximise the options for the future residents to integrate sustainable travel into their day-to-day lifestyle.

The access strategy corresponds to the main desire lines between the site and wider community. It is envisaged that there will be two primary vehicle accesses. The site will access onto Park Lane with direct access to Castle Donington Relief Road and onwards connection to the town centre. The partial upgrading of a section of the existing Park Lane would respect the setting and views to the Grade II* Listed Donnington Hall.

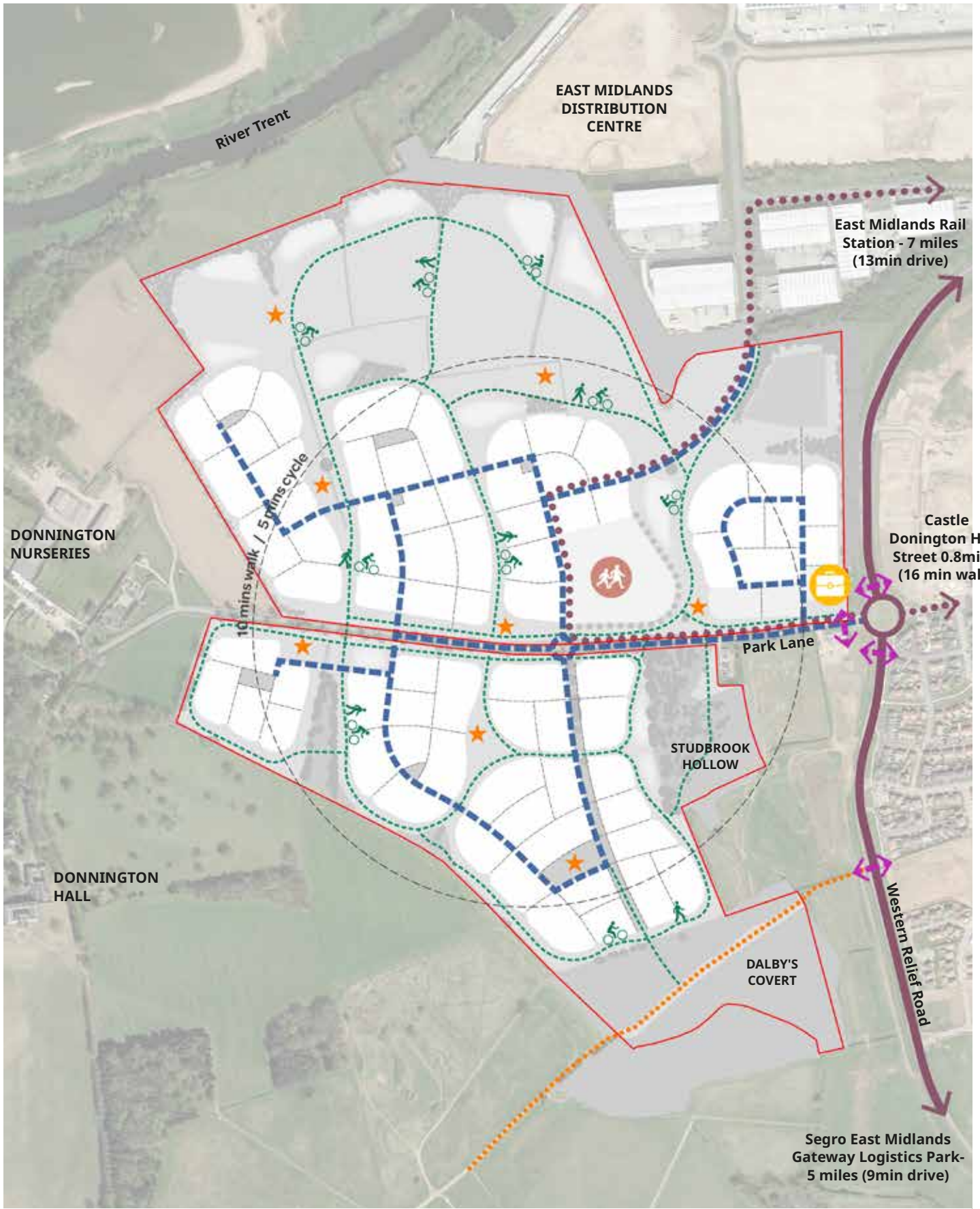
The site will access onto West Meadow Rise forming a direct link into the East Midlands Distribution Site to allow efficient routing of a public transport service through both sites.

Direct access onto the Castle Donington Relief Road at the Park Lane roundabout will ensure that external vehicular demand from the site has a direct routing to the local principal roads without unduly impacting on the local road network; this will minimise impact on the local community as well as providing good connectivity to the wider road network. Moreover, the location between multiple urban centres will result in rapid dispersion of traffic on the wider road network.

Public rights of way will be maintained and integrated into a comprehensive network of active travel routes within the site. This network of active travel routes takes on board recent guidance in LTN 1/20, best practice and contemporary design guidance. It responds to the five core design principles that the network should be coherent, direct, safe, comfortable and attractive. The emerging masterplan therefore reflects a high degree of segregation and the alignments have been designed to avoid adverse gradients greater than 5% including the West Meadow Rise link.

The scale of development allows for the delivery of a permeable and connected new neighbourhood within the community to ensure a high level of local mobility and accessibility for all people.





- - - Primary Vehicular Movement Routes
- ↔ Pedestrian Crossing
- - - Proposed Footpath
- - - Public Right of Way
- Existing Bus Route - Skylink Derby, Skylink Nottingham, my15
- - - Proposed Bus Route - via Diversion or New Service
- ★ Children's Play
- ⊙ Primary School
- ⊙ Local Centre

LANDSCAPE STRATEGY

The overarching landscape vision for the Land at Park Lane Castle Donington is underpinned by a landscape led approach where the inherited green infrastructure assets are used to craft a new special place with a distinctive character and a strong community focus.

The principal objectives of the landscape framework are summarised under the following three themes:

EMBRACE

Embrace the inherited mature landscape and provide a unique, established setting for open spaces and new homes, creating the opportunity for the landscape to define, shape and inform the character of the emerging masterplan.

Elements to Embrace:

- Mature landscape setting created by the existing woodlands of Dalby's Covert, Studbrook Hollow, Captain's Gorse and adjoining woodland blocks.
- Views towards the mature wooded landscape.
- Park Lane mature tree avenue.
- Long distance views across the Trent valley.
- Wildlife supporting habitats such as woodland blocks, existing trees, hedgerow and Stud Brook watercourse.

CONNECT

Connect the fractured mosaic and create a connected green infrastructure network that plugs into the wider network. Establish a clear hierarchy of green spaces and linkages that form a connected multifunctional landscape framework for the proposed development and the surrounding neighbourhoods.

Key Connections and linkages:

- Four green corridors consisting of 'Captain's Link', 'Green Link', 'Studbrook Link', and 'Trent Link'.
- Infill and connect the existing tree avenue along Park Lane.
- Establish wooded buffers running along the site perimeter where required. The buffers will form secondary ecological and biodiverse connections along the sites peripheries.
- The Woodland will also provide visual and landscape mitigation to adjoining sensitive receptors of Donington Hall, Donington Park and Home Farm

CREATE

Create a series of public open spaces and strategic pedestrian connections which offer the future community opportunities to connect with nature whilst supporting social and active lifestyles. Provide a variety of public open spaces with opportunities for walking, exercise, picnicking, gathering, playing and recreation on residents' door steps.

Creating Home

- Attractive landscape setting for new homes, local centre and school (commercial area to be accommodated if required).
- The lifestyle experience of 'Woodland Living' to the south and 'Parkland Living' to the north.
- A variety of parkland spaces with distinct characters, varied user experiences and recreational opportunities for all ages.
- 3km recreational loop connecting all public open spaces and tying into the existing pedestrian movement network, connecting the site to countryside and town.






CONCEPT PLAN CONNECT



CONCEPT PLAN EMBRACE



CONCEPT PLAN CREATE



River Trent

Landscape Concept Masterplan

The layout and structure of the Landscape Concept Masterplan has been strongly shaped by the landscape, and physical features located within and adjacent to the site. The development parcels sit within a green infrastructure network which links and integrates the existing landscape assets with new public amenity and recreation spaces.

The green infrastructure network forms a clear hierarchy of greenspaces linking both north-south and east-west through the development. Landscape and visual sensitivities are addressed, and ecological and biodiversity enhancements are considered across the site.

1. Formal Parkland
2. Informal recreation space
3. Biodiverse meadow and wetland park
4. Equipped play area
5. Green corridor
6. Landscaped buffer - visual mitigation to Donington Hall and Park
7. Landscaped buffer - visual mitigation to Home Farm
8. Landscaped SuDS ponds
9. Allotments
10. Existing woodland
11. Woodland planting
12. Formal recreation route, shared pedestrian cycle loop, 3km long
13. Informal pedestrian paths
14. Existing Public Right of Way

Home Farm

Park Lane

7

Donington Hall

Donington Park

East Midlands
Distribution Centre

Short Lane

3

12

2

11

10

8

9

1

5

5

Residential
Parcels

Education

Local Centre

4

Castle
Donington

13

10

10

6

14

10

Consented
Development

Relief Road

10. Deliverability & Phasing

The site is being promoted by a consortium of developers who jointly own the freehold of all of the land within the red line boundary and have complete control over the site and its access to the highway network.

DEVILERABILITY

The most common constraints to development of large-scale sites are often (1) complexities around land ownership and control and (2) access to existing highways infrastructure with spare capacity.

LAND OWNERSHIP AND TRACK RECORD OF DELIVERY

The site is owned and wholly controlled by the three land-owners who are able to bring forward proposals for development immediately. In addition, the consortium is made up of developers that have a stellar record of delivering residential and employment development, particularly within the East Midlands and most recently within Castle Donington itself. There is absolute certainty here that there are no legal or ownership impediments to development.

The consortium is fully committed to this site and have demonstrated this commitment by commissioning a team of expert consultants across various disciplines to undertake initial assessments

of the site. This Vision Document and the supplementary technical reports demonstrate there are no physical or environmental constraints to development, and the masterplan shows that a high quality, landscape-led scheme can be brought forward on this site that can deliver a significant proportion of NWDLC's residual housing requirement and at the same time providing significant areas of open space / landscaping which will be of benefit to the future residents and existing residents of Castle Donington.

HIGHWAYS INFRASTRUCTURE

The site also has direct access to the existing highways infrastructure. The new western relief road was built with significant spare capacity (33%) meaning that development of this site can be brought forward without having to build new, or significantly enhance, highways infrastructure. Moreover, the relief road at the Park Lane roundabout from the site will ensure that external vehicular demand from the site has a direct routeing to the local principal roads without unduly impacting on the local road network. This will allay

any concerns about the impact of the proposals from a highways perspective on the local community and highway network. Additionally, the location between multiple urban centres is likely to result in rapid dispersion of traffic on the wider road network.

PHASING

Should NWLDC support this site for residential-led development, housing could be delivered on the site within the next five years. We would anticipate that up to 150 residential units could be delivered on this per annum with at least three house builders on site. In terms of the NPPF, we conclude that the site is truly deliverable in that it is 'available', 'achievable' and 'suitable' for development.

Housing could be delivered on the site within the next five years. We would anticipate that up to 150 residential units could be delivered per annum with at least three house builders on site. See table below.

Timings	Housing delivey per annum	Total of homes delivered
Year 2027 - 2028	150 units	150 units
Year 2028 - 2029	150 units	300 units
Year 2029 - 2030	150 units	450 units
Year 2030 - 2031	150 units	600 units
Year 2031 - 2032	150 units	750 units
Year 2032 - 2033	150 units	900 units
Year 2033 - 2034	150 units	1050 units
Year 2034 - 2035	150 units	1200 units



11. Summary

THE PROPOSED MASTERPLAN WILL DELIVER:



NEW, DIVERSE AND AFFORDABLE HOMES

The development will deliver around 1200 high quality homes of all sizes and tenures that are sustainably located within close proximity to local facilities and public open spaces. New homes will meet high sustainable construction and energy standards.



A HEART FOR THE COMMUNITY

Beautifully designed public spaces and a mixed use Local Centre offer the opportunity for people to gather, meet and socialise, and are an essential component in creating a sense of belonging and building community spirit.



ACCESSIBLE GREEN SPACE

The masterplan proposal respects, protects and enhances existing landscape assets, providing a connected network of public open space, providing multi-functional open spaces to be enjoyed by all.



HIGH QUALITY AND DISTINCTIVE DESIGN

Making new homes more sustainable, resilient to climate change and efficient will help reduce costs and support the health and wellbeing of their users and positively contribute to reducing our carbon footprint



A NEW PRIMARY SCHOOL

Provision of a new primary school at a central, safe and attractive location that benefits all existing and new residents.





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	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Peter
Last Name		Leaver
[Job Title]		Director
[Organisation]	IM Properties	JLL
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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...

Q 10

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

Prior to responding directly on which policy option we would prefer to ensure a continuation of employment land supply, we would like to comment on the balance between employment land need and supply. The balance, as at 31.3.2021, is set out in Table 7. For ease of reference, this is provided below.

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	Total Requirement [A+B+C]	70,685	11.28	285,284	71.57
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	Total Supply [E+F+G]	68,750	20.4	119,540	38.39
	Residual requirement(+)/surplus(-) (2021-39) [H-D]	1,935	-9.12	165,744	33.18

There is an anomaly in this table with the figure given for the land area for the Residual Requirement for industrial/smaller warehousing. This figure – 33.18 ha – has been derived by deducting the Total Supply from the Total Requirement. The arithmetic is correct. However, it leads to a land area (33.18 ha) that is not sufficient to accommodate the required floorspace (165,744 sqm). This would require a plot ratio of c. 50%. However, this is inconsistent with the plot ratio Stantec have assumed in generating the initial requirement (187,000 sqm on 47 ha – i.e. 40%), which is fairly standard, in its Employment Land Report.

If a 40% plot ratio was assumed, then the Residual Requirement for industrial/smaller warehousing of 165,744 sqm would require 41.4 ha. As Stantec have developed a model based on the derivation of floorspace, prior to the derivation of necessary land, it is clear that the floorspace figure should derive the land requirement.

This has probably arisen because of a mathematical quirk. The net permissions provide 73,910 sqm on 28.22 ha. This represents a low density of 26%. This has had the effect of inflating the Total Supply and, therefore, reducing the Residual Requirement.

As such, the Residual Requirement for industrial/smaller warehousing should be 41.4 ha. In addition, this is 41.4 ha of developable land. The overall level of allocated land, which is generally quoted in gross

terms, will need to be greater to account for this. We generally find that the developable area is 75% of gross site area, although much depends on the particular site circumstances. In addition, the requirement for BNG is leading to greater gross land areas being required to yield the same level of floorspace.

If an 75% developable area/gross land area is assumed, and Stantec's assumption of 40% development plot ratio, is employed, then the overall site coverage on gross land areas would be 30%. This is better than that attained by the current permissions (26%), but is a reasonably safe basis to plan for. A 30% plot coverage of 165,744 sqm would require allocated land of c. **55 ha**.

The Development Strategy Options identify a risk that the supply of available employment land will tail off considerably in the later years of the plan review period. As such, the policy options look at ways of ensuring a continuity of supply.

We support this general approach. Many LPAs look to allocate only the bare minimum to meet identified need. This can, and has led, to both a quantitative and qualitative shortage of sites if demand levels are greater than predicted. Allocating an insufficient amount of land can also lead to the LPA having to respond to and consider speculative development proposals in locations which may be in less suitable or desirable locations. A proactive rather than reactive approach to allocating land is considered to provide more certainty for all.

We favour **Option 2** – i.e. increasing the requirement by an additional factor. This option would provide the greatest flexibility and certainty. In addition, by allocating additional sites, it would help to ensure a greater geographical spread and depth of employment land at the key employment nodes of the District and foster competition between them.

We favour Option 2 over Option 1 (i.e. identification of reserve sites) as it would help to ensure a greater range and depth of sites which are likely to be immediately deliverable. This will increase the choice of sites available.

(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

Peter Leaver

Date

14.3.2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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Title		Mr
First Name		Peter
Last Name		Leaver
[Job Title]		Director
[Organisation]	IM Properties	JLL
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Address Line 2		██████████
Address Line 3		
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Postcode		██████
Telephone		██████████
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PART B – Your Representation

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Please state which consultation question your response relates...

Q 11

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

We favour Option 2. This would look to allocate employment land at Coalville, Ashby and Castle Donington (Option 1) and also at Measham/Appleby Magna as a 'new', expanding employment location.

The advantages of this Option are spelt out well in Paragraphs 6.21 and 6.22 of the Development Strategy Options & Policy Options. This Option will provide a reasonable choice of sites but limit them to ensure a critical mass and visibility.

The addition of Measham/Appleby Magna will hold particular advantages over Option 1. Firstly, the Development Strategy Options & Policy Options identify particularly benefits for Measham 'where there are known pockets of deprivation'. Secondly, it notes that the strategy could involve

".....establishing Junction 11 A42 as a 'new', expanding employment location, capitalising on the profile of Mercia Park with the potential to share infrastructure."

Mercia Park has been a huge success. It has attracted two international companies – DSV and JLR. DSV have taken 575,000 sq ft in three buildings. Five units totalling 3 million sq ft have been pre-let to JLR. These are currently under construction, with Unipart due to occupy 2 million sq ft next year having won the contract from JLR to manage their aftermarket parts global division.

Only 1.64 hectares (4 acres) of development land remains at Mercia Park. This is the subject of a Reserved Matters application, submitted in January, for a single unit on 51,000 sq ft. IM Properties, the developers of Mercia Park, plan to build this speculatively once Reserved Matters is secured.

Mercia Park has been a success for a number of reasons. These are: -

- It is located at a motorway junction (Junction 11, M42), resulting in excellent access to the strategic highway network.
- It is in range to serve the strong East and West Midlands markets, particularly the manufacturing sector.
- It enjoys a good catchment for labour, with significant planned housing growth within a 30 minutes drivetime catchment.
- It is accessible to rail freight facilities at East Midlands Gateway, Birch Coppice and Hams Hall.
- It has a sufficient scale and can accommodate large floor plate buildings.
- It is located away from any adjoining incompatible uses, such as housing.

IM Properties are promoting an extension to Mercia Park through the Local Plan Review. This site (SHELAA Ref. No. EMP82) is located directly to the north-east of Junction 11 and provides a further 28 hectares (69 acres) of employment development land. This site enjoys all the advantages of Mercia Park and can build on the infrastructure provided to enable the development of Mercia Park. This includes: -

- Highway improvements to Junction 11, M42.
- Investment in public transport, including a new bus service connecting Mercia Park to surrounding settlements.
- Utility connections, including a new foul sewer to Tamworth Sewage Treatment Works, discharging wastewater outside the River Mease SAC.
- The provision of amenity uses which are currently the subject of an occupier and marketing demand exercise, which may ultimately provide uses such as a café, creche, gym, and/or convenience store.

- An existing Employment and Skills Partnership, supported by a wide range of organisations, which will support employees and deliver training initiatives.

This additional land can accommodate the need for both general employment for industry/smaller warehousing and for strategic warehousing (i.e units over 100,000 sq ft). Its capacity for development has been both illustrated and demonstrated by the response made by JLL to the Call for Sites exercise in October 2020 and subsequent more recent technical-based submissions. These submissions have included: -

- Transport appraisal.
- Ecology technical note.
- Heritage technical note.
- Tree survey.
- Drainage strategy.
- Constraints and opportunities plan.
- Initial Master Plan.

These demonstrate that the site has no major constraints that cannot be overcome. The Master Plan, which builds in mitigation strategies in terms of access (for all modes), on-site drainage, Biodiversity Net Gain and landscaping, shows that the site has capacity for just over 1 million sq ft (93,000 sq m) with a wide potential choice of building sizes. These range from 25,000 sq ft to 400,000 sq ft, with this versatility being attractive to local SMES as well as footloose international companies.

Option 2 plays best to the strengths of the District. Specifically, it enables a capitalisation of the success of Mercia Park, where additional development land is available.

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

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PART B – Your Representation

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Please state which consultation question your response relates...

Q 12

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

We support the approach of the Council in seeking to make provision for this important sector. However, the quantum suggested for road-based strategic warehousing – between 106,000 sq m and 150,000 sq m for the plan period to 2039 – will be wholly inadequate to meet the need and demand of this sector for North West Leicestershire over this period.

The initial Policy Option looks to absorb 50% of the County's need of road-based strategic warehousing, once the latest supply of sites is taken into account. This seems on the face of it to be a reasonably generous proportion, although past take up in North West Leicestershire has accounted for a greater percentage of take up in the County over recent years (see below for more details). The principal issue is that the overall quantum of road-based strategic warehousing for the County for the next 20 years has been fundamentally underestimated.

The future requirement for both road-based and rail-served strategic warehousing has been assessed by the study referred to in Paragraph 6.26 of the Development Strategy Options & Policy Options. This study - entitled Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change - was jointly commissioned by the Local Planning Authorities of Leicestershire and published in April 2021. It is the successor study to the Strategic Distribution Study (published in 2017) and assesses the sector's needs over the period from 2020 to 2041. The previous study had an end date of 2031.

We have reviewed the study in detail and considered its implications on North West Leicestershire. This assessment is covered in a separate technical note, which is appended to this response (**Enclosure No. 1**).

Our principal findings are as follows: -

- The need for strategic distribution floor space has been fundamentally underestimated by the study (as it was by the previous study). This is due to a flawed methodology and a failure to anticipate the effect of Covid-19 and other drivers to the market.
- To illustrate this point, the study covers a period of 21 years (from 2020 to 2041). Completed developments since 2020 and under construction (and on course to be completed by 2024) account for 50% of the overall predicted requirement for the County (for both rail and road-based floor space). Essentially, 50% of the total requirement for the County has been or will be completed within the first 4 years (or 20%) of the overall study period.
- The proportion of rail-based need is set at 43%. This reflects primarily the land supply – principally existing developments at East Midlands Distribution Centre and East Midlands Gateway and the proposed development of Hinkley NRFI. If the overall requirement increases (as it plainly should), then the additional land will probably need to be road-based.
- North West Leicestershire has accommodated 65% of all completions in the County (both rail and road based) in the period from 2012/13 to 2019/20 and 60% of all completions since and under construction. This reflects its exceptional strategic transport links, as acknowledged by the study.
- North West Leicestershire has or will accommodate about 750,000 sq m of road-based floor space in the 11 year period from 2012/13 to 2023/24. This averages out to about 70,000 sq m per year.
- The future forward supply of road-based land for the County is heavily skewed to Harborough, accounting for 723,000 sq m out of the total County's supply of 1,073,000 sq m (all concentrated at Magna Park). Only 150,000 sq m (15% of supply) is located in North West Leicestershire, with 93,000 sq m of this already built and let (Interlink 225, Zorro and Unit 2 Mount Park Phase 2). This just leaves the Lounge site with permission for 62,000 sq m.

- The allowance for additional supply of 106,000 sq m to 150,000 sq m, as proposed by North West Leicestershire, breaks down to just **1.5 years to 2.1 years** of supply based on take up rates over the last 11 years. This is clearly insufficient to accommodate growth based on past and recent take up.

The study does make clear that the outputs from the land use forecasting exercises are not viewed as a maximum level of development or cap (paragraph 9.34 of the study). In addition, it emphasises the importance of the market being offered a geographical spread of commercially attractive sites.

Nevertheless, it is our strongly held view that the study's principal findings on need should be reassessed in the light of the latest market information on demand and supply. This should be undertaken prior to the allocation of land.

As with the previous study, the new study identifies Key Areas of Opportunity. Six are identified, of which three are located in North West Leicestershire. Two of these are road-based, as follows: -

- A04 – M1 – Castle Donington to Bardon
- A05 – A42 – Castle Donington to Appleby Magna

The study also provides criteria for road-based sites. These refer to: -

- Good connections to strategic highway network.
- Appropriately located relative to the markets it serves.
- Sufficiently large and flexible in its configuration to accommodate a range of sizes of warehouses.
- Sufficient electricity supply.
- Accessible to labour with an ability to be served by sustainable transport and located close to areas of employment need.
- Located away from incompatible land uses.

In addition, the study advocates that land meeting these criteria should be identified and allocated in a sequential order, as follows: -

- Extension of existing strategic distribution sites.
- Satellite sites to rail-served sites, where rail-served sites cannot be extended.
- New strategic distribution sites on previously developed land.
- New strategic distribution sites on green field land.

It is important to note that the first priority includes explicitly both rail-served and road-based sites.

IM Properties are promoting an extension to the successful Mercia Park, which is home to JLR and DSV (SHELA Ref No EMP82). This extension could provide up to 1 million sq ft (93,000 sq m) on a site of 28 hectares (69 acres). It can accommodate a range of size of buildings, including a warehouse of up to 400,000 sq ft. More details of the capacity and deliverability of this site is provided in our response to Question 11.

Mercia Park clearly meets all the qualitative criteria for strategic warehousing, as recommended by the 2021 study and set out above. In addition, the proposed extension is sequentially preferable as it is building on an existing strategic distribution site, the shared benefits of which are set out in our

response to Question 11.

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	Peter Leaver	Date	14.3.2022
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Please send completed forms to planning.policy@nwleicestershire.gov.uk or
Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.

**Development Strategic Options and Policy Options
Enclosure to Response by JLL to Question 12
Technical Note on Strategic Distribution for North West Leicestershire**

Introduction

1. The successor study to the County wide Strategic Distribution Study of 2014 (and refreshed in 2016 and 2017) was published in April 2021. It is entitled Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change. It was produced by GL Hearn and MDS Transmodal on behalf of Leicester and Leicestershire Authorities.
2. The 2014 Study looked forward to 2031. The new study (the Study) covers the period from 2020 to 2041. The principal elements of interest to the evolving North West Leicestershire Development Plan are: -
 - Need.
 - Split between rail and road.
 - Supply of road-based sites.
 - Locations for development.
3. These are considered in turn below.

Need

4. The need for strategic warehousing (classified as units greater than 100,000 sq ft) is considered by a variety of different means. These are summarised in Table 49 of the Study. This is provided below:

Table 49: Summary of modelled scenarios

Model	2020-2041 Needs 000s sqm	Comments
High replacement, central traffic growth	2,466	Reflects accepted traffic growth and new technology needs in stock replacement, with margin.
Low replacement, central traffic growth	2,061	Reflects accepted traffic growth and assumes longevity in stock, with margin, with margin.
High replacement, sensitivity test traffic growth	2,571	Increases traffic growth and assumes new technology requires stock replacement, with margin.
Low replacement, sensitivity test traffic growth	2,166	Increases traffic growth and assumes longevity in stock, with margin.
Completions trend	2,702	Reflects large warehouse floorspace delivery over the 2012-19 period, projected forwards.
VOA trend	1,941	Models growth only districts 2011-18 projected forwards, all warehouse and industrial stock including losses
Labour demand	-50	Assumes baseline model for all sectors
Labour demand sensitivity	163	Assumes baseline model for warehouse and related sectors for growth only districts

Source: GLH

5. The Study recommends the scenario for “high replacement sensitivity test traffic growth” to be used. This projects a need of 2,571,000 sq m for the County and breaks down to 122,500 sq m per year.
6. This projection is made up of three specific elements. The first two are “replacement build” and “growth build”. The former represents the continual need to build new large-scale warehousing to replace existing capacity which will become life expired. The latter represents the need for additional floor space to handle freight traffic growth and reflects the long-term growth in demand for goods in the wider economy. The third element is a “margin for flexibility”. This is a contingency factor and is equivalent to five years of completions.
7. The three elements are summarised below in Table 1:

Table 1 – Elements of Preferred Scenario – High Replacement Sensitivity Test Traffic Growth

Elements	Floor Space Projected (2020-2041) sq m
Replacement build	1,620,000
Growth build	308,000
Margin for flexibility	643,000
Total	2,571,000

8. As a general comment, the amount of growth build does not ring true with the current market. Certainly, it does not seem to have anticipated the acceleration in e-commerce since the beginning of lockdown in March 2020. This is considered in further detail below.
9. This is acknowledged under the heading of Key Risks and Assumptions. Covid-19 is identified as a key risk. Paragraphs 10.28 and 10.29 provide commentary and are cut and pasted below.

10.28 **COVID-19:** This may lead to a short to medium term recession, particularly after the end of furlough support, that reduces the overall volume of goods required in the UK particularly for comparison goods and reduces floorspace needs. However, it could equally lead to greater rates of stock holding to mitigate for potential supply chain shortages, therefore increasing large warehouse requirements.

10.29 COVID-19 has certainly increased e-commerce trends. However, this is more likely to put pressure on last mile facilities rather than large NDCs, since e-commerce affects the distribution model and point of delivery rather than total goods sold (i.e. shift from shop to delivery).

10. The comment about demand pressure being on last mile facilities, rather than large NDCs, does not seem to have been borne out by evidence of take up in the County over the last 2 years. Again, this is considered in greater detail below.
11. The higher replacement sensitivity test traffic growth scenario forecast (2,571,000 sq m) is relatively close to the completions trend forecast (2,702,000 sq m). The authors of the Study consider this provides a broad sense check that the other forecasting models (based on replacement and growth build) are reliable.
12. Table 45 of the Study provides a summary of the completions trend forecast, broken down by Local Planning Authority. This is provided below.

Table 45: Forecast Completions 2020 to 2041

	Total 2012/13-19/20		Annual		2019/20-35/36		2019/20-40/41	
	SQM	Ha	SQM	Ha	SQM	Ha	SQM	Ha
Blaby	102,050	27	14,579	4	233,257	62	306,150	81
N.W Leicestershire	86,305	116	83,758	17	1,340,127	264	1,758,916	347
Hinckley & Bosworth	83,770	28	11,967	4	191,474	65	251,310	85
Harborough	28,621	63	18,374	9	293,991	144	385,863	189
Total	900,746	234	128,678	33	2,058,849	534	2,702,239	701

Source: Authority Monitoring Data / GL Hearn

13. This table contains a couple of basic errors: -
 - The total completions for North West Leicestershire for 2012/2013 to 2019/2020 should read 586,305 sq m and not 86,305 sq m.
 - The total completions for Harborough for 2012/2013 to 2019/2020 should read 128,621 sq m and not 28,621 sq m.
14. A clear initial observation is the dominance of North West Leicestershire in terms of the proportion of the County's take up. Its contribution equates to 65% of all completions which took place in the County over the period from 2012/2013 to 2019/2020. It is projected to contribute the same percentage for the period 2019/2020 to 2040/2041, equating to 1,758,916 sq m.
15. The completions data was provided by each local planning authority. This data is not broken down in the Study. However, fortunately, the data for North West Leicestershire is provided by the Stantec November 2020 study, North West Leicestershire: The Need for Employment Land. This study is the principal evidence base on employment land for the evolving Local Plan. A schedule of completions is provided in Appendix B of this study. The schedule of completions for Strategic Warehousing is cut and pasted overleaf:

COMPLETIONS 2012/13-2019/20

STRATEGIC WAREHOUSING

Site	Settlement	Sq m	Year completed
GAINS			
EMDC	Donington	84,000	2012/13
Interlink, Bardon	Bardon	12,077	2015/16
DHL at East Midlands Airport	Castle Donington	83,445	2016/17
Beveridge Lane, Ellistown	Ellistown	169,800	2016/17
Beveridge Lane/South Street	Bardon	20,900	2016/17
EMDC	Castle Donington	10,707	2016/17
Beveridge Lane	Ellistown	29,218	2016/17
Ashby Business Park	Ashby	21,936	2017/18
Sawley Crossroads	Sawley	56,701	2019/20
Land At Cargo East, North Of Beverley Road, East Midlands Airport	Castle Donington	46,071	2019/20
Plot 1, EMDC	Castle Donington	51,450	2019/20
Total gains		586,305	
No losses are recorded for strategic warehousing			

16. This schedule does not include a number of large transactions. This may be because they were not completed by 31 March 2020. We have identified the principal transactions and developments completed since March 2020 or currently under construction and likely to be completed by March 2024. These are summarised below in Table 2:

Table 2 – Additional development completed since March 2020 or currently under construction in North West Leicestershire

Development	Operator	Floor Space (sq m)
East Midlands Gateway	Kuehne & Nagel	18,166
East Midlands Gateway	Shop Direct	51,306
East Midlands Gateway	XPO (for Nestle)	59,177
East Midlands Gateway	Amazon	48,030
East Midlands Gateway	Games Workshop	16,499
East Midlands Gateway	DHL	62,243
East Midlands Gateway	Amazon	13,935
East Midlands Gateway	Arvato	20,466
East Midlands Gateway	Ceva (for Amazon)	59,456
East Midlands Gateway	DHL	17,837
Mercia Park	DSV	53,257
Mercia Park	JLR	271,733
East Midlands Distribution Centre (EMDC)	Plot 3B – Speculative	24,893
East Midlands Distribution Centre (EMDC)	Plot 5B – Speculative	13,291
Total		730,289

17. This is a substantial level of completed (or to be completed) floor space over the four years period from 2020. It will increase the level of completed take up in North West Leicestershire from 586,305 sq m over the period from 2012/2013 to 2019/2020 to 1,316,594 sq m over the period from 2012/2013 to 2023/2024. It would push the annual completions from 83,758 sq m per year in North West Leicestershire over the period from 2012/2013 to 2019/2020 to 119,690 sq m per year over the period from 2012/2013 to 2023/2024. This, in turn, will increase the projection for North West Leicestershire for the study period (2020-2041) to 2,513,490 sq m. This is significantly greater than the current projection for North West Leicestershire of 1,758,916 sq m.
18. Similar exercises could be carried out for the other local planning authorities in the County, although we do not have the data for completions for these authorities. However, we are aware of significant development at Magna Park (Harborough), Phase 2 at Mountpark (Hinckley and Bosworth), Nailstone Colliery (Aldi) (Hinckley and Bosworth) and Hinckley Park (Hinckley and Bosworth) that has either been completed since March 2020 or is under construction and will be completed by March 2024.
19. This further development is in the order of 500,000 sq m. Added to the levels of completions in North West Leicestershire since 2020 (i.e 730,000 sq m) gives a total of completed and potentially completed big box development in the County over the four years period from March 2020 to March 2024 of circa 1.25 million sq m. This represents **46%** of the predicted completions (2,702,000 sq m) and **49%** of the favoured prediction based on the replacement build model for the whole Study period (2020 to 2041) (2,571,000 sq m).
20. Essentially, the first four years of the Study period (2020-2024) will see almost 50% of the predicted need developed. The first 20% of the period will witness half of the overall projected requirement being built. This implies strongly that the overall recommended quantity of floor space for the 20 years period to 2041 has been fundamentally underestimated. In essence, the Study has failed to predict the rapid growth of this market over recent years and made an insufficient allowance for new floorspace on a purely quantitative basis.

Split between Rail and Road

21. The proportion of future provision that would be rail based was tested over a number of scenarios: -
 - 6% - completed provision in the County as at April 2020 (EMDC).
 - 26% - national rail freight demand forecast undertaken by Network Rail in 2018.
 - 60% - based on the proportion of warehouses in East Midlands that are greater than 25,000 sq m and the assumption that it is larger warehouses which will be attracted to SRFIs.

- 43% - a midpoint between 26% and 60%.
22. 43% was chosen principally as this scenario would best balance need and supply. 43% of total need (based on the higher replacement model, but not including the margin of flexibility – i.e 1,928,000 sq m) equates to 829,000 sq m.
 23. The supply of rail-based sites in the County is restricted to East Midlands Gateway and EMDC – both are located in North West Leicestershire. The supply of land remaining at East Midlands Gateway is restricted to the last six remaining plots at the time the Study was written. This potentially delivers 236,000 sq m. It is to be noted that only one plot now remains – Plot 5, which can accommodate potentially 65,000 sq m.
 24. According to the Study, the supply at EMDC covers EMDC 525 (a unit of 49,000 sq m speculatively built by Panattoni and now let to Buy it Direct) and Plot 3 (capable of delivering 53,000 sq m). These two plots provide 102,000 sq m.
 25. Together, the remaining plots at East Midlands Gateway and EMDC total 338,000 sq m. Against a need of 829,000 sq m (i.e 43% of total need), there is a shortfall of 491,000 sq m. This equates to a shortfall of development land of 196 hectares at a plot ratio of 25% (assumed by the study for SRFIs).
 26. The Study considers this shortfall could be fulfilled by the proposed development by Tritax Symmetry of Hinckley NRFI at Junction 2, M69. This proposes 650,000 sq m on a site of 185 hectares (developable area) and 336 hectares (gross site area). It is also considered that this development will also fulfil largely the additional need created by the need for a margin of flexibility.
 27. No other SRFI proposals in Leicestershire are identified and we are not aware of any (although the Lounge site could be rail served). The Study does refer to consented and proposed sites elsewhere in the East Midlands. These are:
 - DIRFT III – 731,000 sq m on 345 hectares (consented and partly developed).
 - Northampton Gateway – 560,000 sq m on 219 hectares (consented).
 - East Midlands Intermodal Park – 485,000 sq m on 255 hectares (proposed).
 - Rail Central – 700,000 sq m on 294 hectares (proposed).
 28. There is some uncertainty about the last two sites, particularly Rail Central.
 29. The Study acknowledges that the future supply of rail-based sites is fairly fixed. This means that any significant increase in the overall need, for the reasons referred to above, will probably need to be road based.

Supply of Road Based Sites

30. The need for road-based sites over the Study period (2020-2041) is 1,099,000 sq m (based on the high replacement model). This assumes that 43% of total development is rail served. A further 366,000 sq m is added to provide a margin of flexibility, giving a total need for road-based sites of 1,485,000 sq m.
31. A supply of road-based sites, as at April 2020, is identified in Table 43 of the Study. This is cut and pasted below.

Table 43: Site Supply Road Only– Vacant Units and Plots with B8 Consents (exc pre-lets)

Local Authority and Site	000s sqm
Hinckley and Bosworth	
Unit 1 Mountpark Phase II	62
Blaby	
Land West of St Johns Enderby	99
Charnwood	
Rothley Lodge, Loughborough Road, Rothley	11
Artform International, Loughborough (built, available)	14
Harborough	
Tornado 186 Magna Park (built, available)	16
Magna Park South (Glebe Farm)*	279
Magna Park North (Mere Lane)**	320
M1 Access, Lutterworth (built, available)	11
X Dock 377, Magna Park (built, available)	35
Quantum, Magna Park (built, available)	38
Hurricane Warehouse (4400) Magna Park (built, available)	24
Leicester	
D&B Leicester Distribution Park	9
North West Leicestershire	
225 at Interlink, Beveridge Lane, Bardon (built, available)	21
Zorro, Coalfield Way, Ashby-De-La-Zouch (built, available)	22
Former Coal Lounge Disposal Point (built, available)	62
Unit 2, Mountpark Phase II (built, available)	50
Total	1,073
Permissions with pre-lets, excluded from supply	552

Source: Planning applications, developer estimates, CoStar availability April 2020

* Up to 8 plots

** Up to 7 plots

Figures may not sum due to rounding

32. This totals 1,073,000 sq m. This leaves a shortfall of only 393,000 sq m over the whole Study period (i.e to 2041). Moreover, based on a straight-line projection of need, there is not a shortfall (or need for additional sites) until well after 2031.

33. A breakdown of the supply by local authority is provided below in Table 3:

Table 3 – Breakdown of Supply of Road Based Sites by Local Planning Authority

Local Planning Authority	Floor Space Area (sq m)	Percentage of Total Supply
Hinckley and Bosworth	62,000	6%
Blaby	99,000	9%
Charwood	25,000	2%
Harborough	723,000	67%
Leicester	9,000	1%
North West Leicestershire	155,000	14%
Total	1,073,000	100%

34. This illustrates that the supply of road-based sites in the County is heavily skewed by supply in Harborough. The north and south extensions to Magna Park contribute almost 600,000 sq m.
35. The supply in North West Leicestershire counts for just under 15% of the total supply for the County. This is totally at odds to completion trends for North West Leicestershire in the period from 2012/2013 to 2019/2020. Over this period, North West Leicestershire contributed 65% of all completions in the County. In addition, since 2020, completions or sites under construction in North West Leicestershire are contributing 60% of all completions in the County in the period to 2024.
36. It is evident that much of the supply in Table 43 (available as at 1 April 2020) is no longer available. For example, significant development has already taken place or is being undertaken at the northern and southern extensions of Magna Park. About 120,000 sq m has already been built and let at the southern extension and ground works have started on the remainder. A further three units, totalling around 90,000 sq m, are under construction in the northern extension, with 18,500 already pre-let. Groundworks for the remaining four units at Magna Park North have already commenced. This illustrates the increase in pace in development referred to earlier under the heading of Need.
37. Four units/plots are listed as available in North West Leicestershire. However, three of these (Interlink 225, Zorro and Mountpark) are all let. The only remaining site is the Lounge site at Ashby. This is being marketed by GLP for build to suit units of up to 736,000 sq ft (68,370 sq m), although we understand consideration is being given to speculative development.

38. At the time of writing the Study, the Lounge site was the only road-based site with consent in North West Leicestershire. Subsequently, Newlands has received planning permission for 65,726 sq m (of which 33,675 sq m is for strategic B8) at Netherfield Lane, Sawley (near Castle Donington).
39. Other consented strategic B8 land in North West Leicestershire is rail based and also located in Castle Donington. This is summarised below in Table 4.

Table 4 – Rail Based Land in North West Leicestershire

Site	Plot Capacity	Comments
Plot 5, East Midlands Gateway	65,000 sq m	Last remaining plot at East Midlands Gateway. Being marketed on a design and build basis.
Plot 3B, EMDC	24,893 sq m	Being speculatively built. Contractors on site.
Plot 5B, EMDC	13,291 sq m	Being speculatively built. Contractors on site.
EMDC 342	31,842 sq m	Preliminary ground works. Being marketed as being available for fit out by Q2 2023.

40. The North West Leicestershire Local Plan Review Development Strategy and Policy Options considers that the additional need for a road based strategic warehousing for the whole County will be between 212,093 sq m and 301,293 sq m once account is made of the Newlands planning permission at Sawley (33,675 sq m) and the Aldi planning permission in Hinckley and Bosworth (89,200 sq m). It proposes to accommodate 50% of this outstanding requirement, equating to between 106,000 sq m and 150,000 sq m.
41. To put this into context, 440,148 sq m of completions of road based strategic warehouse were registered for North West Leicestershire for the period 2012/2013 to 2019/2020. This equates to 62,117 sq m per annum. The road-based completions for North West Leicestershire for the succeeding four years period (2020/2021 to 2023/2024) will total 324,990 sq m. This equates to 81,248 sq m per annum. The total road-based completions for North West Leicestershire over the period from 2012/2013 to 2023/2024 will be around 765,000 sq m. This equates to approximately 70,000 sq m per annum.
42. The allowance for additional supply of 106,000 sq m to 150,000 sq m, as proposed by North West Leicestershire, breaks down to just **1.5 years to 2.1 years** of supply based on take up rates over the last 11 years. This is clearly insufficient to accommodate growth based on past and recent take up.

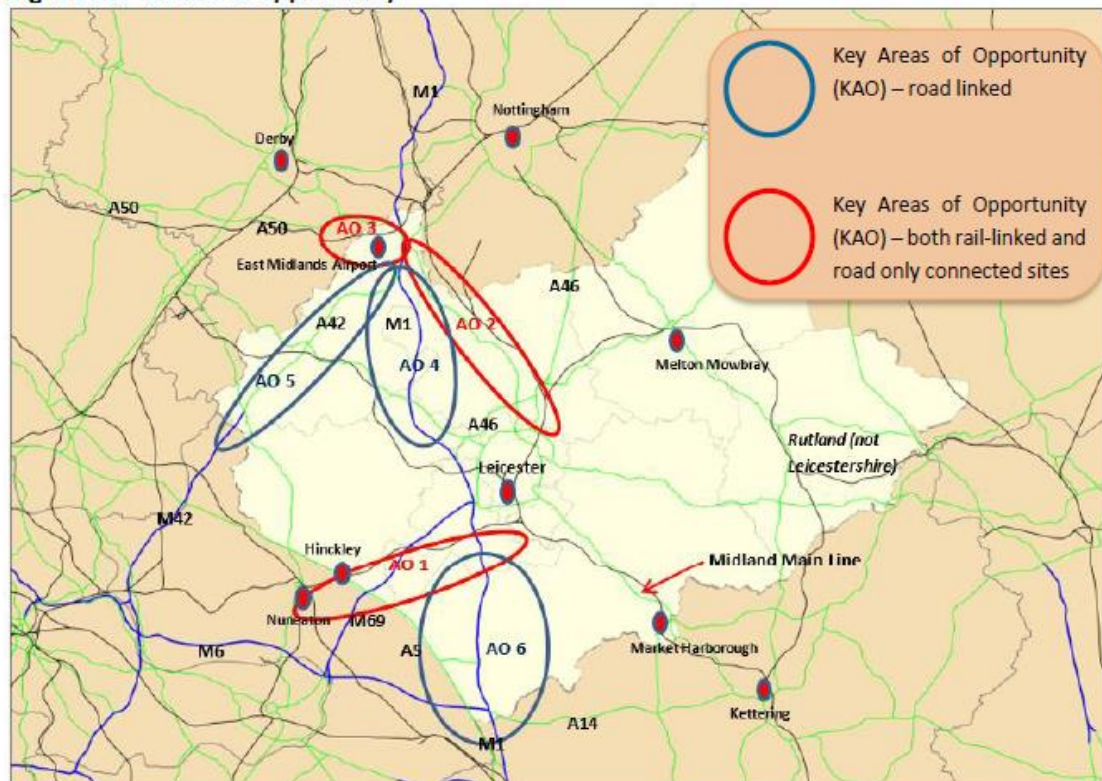
Locations for Development

43. At the end of Section 9 of the Study, which addresses the issue of supply, it recognises that 60% of the supply is located around Magna Park in Harborough. In paragraph 9.33, it advises that it will be prudent to bring forward further sites elsewhere in the County. Paragraph 9.34 states further that:

9.34 In order to maintain and enhance the competitive position currently enjoyed by the region/sub-region, it is considered vitally important that the market in future is offered a geographical spread of commercially attractive sites available to satisfy individual operator locational requirements. Sites should therefore be brought forward at various locations across Leicestershire at any one time. Related to this conclusion, it is also important that the outputs from the land-use forecasting exercises are not viewed as a maximum level of development or cap.

44. The last point is obviously important given our conclusions on supply as a factor of likely take up.
45. Like the previous study, the 2021 Study identifies Key Areas of Opportunity. Figure 15 illustrates these and is provided below:

Figure 15: Areas of Opportunity



NB: Boundaries of key areas are not definitive and are shown for indicative purposes only

46. North West Leicestershire contains three of the six Areas of Opportunity. One of these is rail based (AO3), which takes in East Midlands Gateway and EMDC at Castle Donington. It also takes in the road-based Newlands site at Netherfield Lane, Sawley.
47. The other two are road based. AO4 takes in the M1 and covers the existing established node at Bardon (Junction 22 of the M1). AO5 takes in the A42 and covers Ashby (Lounge site) and Appleby Magna (Mercia Park).
48. Paragraph 11.10 notes that the majority of North West Leicestershire is within one or other Area of Opportunity. This is due to its “multi-directional accessibility”. Nevertheless, it is cautioned that “the actual potential is much more limited, however, once basic constraints are added”.
49. Under the sub-heading of Phasing and Deliverability, paragraph 11.11 reiterates the importance that the market is offered a geographical spread of commercially attractive sites as differing occupiers have differing needs. For these reasons, it emphasises that future provision should not be concentrated or focussed on one particular Area of Opportunity. In addition, it states that,

“New land should initially be allocated in those Areas of Opportunity where there is an identified under supply of strategic sites, ahead of those Areas of Opportunity which are currently well provided for”.
50. In this respect, AO5 is not particularly well provided for. It contains just one available site or building – the Lounge site at Ashby.
51. Paragraph 11.17 of the study recommends a criteria-based approach be adopted by local planning authorities when allocating land for strategic warehousing. This is similar to the previous study. The principal criteria for road-based sites refer to: -
 - Good connections to strategic highway network.
 - Appropriately located relative to the markets it serves.
 - Sufficiently large and flexible in its configuration to accommodate a range of sizes of warehouses.
 - Sufficient electricity supply.
 - Accessible to labour with an ability to be served by sustainable transport and located close to areas of employment need.
 - Located away from incompatible land uses.

52. Paragraph 11.19 advocates that new land meeting these criteria should be identified and allocated in a **sequential** order. This order is: -
- Extension of existing strategic distribution sites.
 - Satellite sites to rail served sites, where rail served sites cannot be extended.
 - New strategic distribution sites on previously developed land.
 - New strategic distribution sites on greenfield land.
53. The first priority takes in both rail-served and road only connected sites. This point is made explicitly. For road-based sites, site extensions should only be permitted where there is adequate road capacity serving the site and at adjacent motorway network, or can be created.

PJL
JLL
17 February 2022



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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Peter
Last Name		Leaver
[Job Title]		Director
[Organisation]	IM Properties	JLL
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 13

In our response to Question 10, we have preferred Option 2, i.e increasing the requirement figure by an additional factor to ensure a continuation of supply of general employment land. However, we still see a role for an Ec2(2) type policy, particularly for the strategic warehousing sector. We comment on this sector in our response to Question 12 (strategic warehousing: need and supply).

The principal justification for such a policy is spelt out well in the explanatory text in Section 7 of the Development Strategy Options & Policy Options. Essentially, it is a mechanism to provide **flexibility** to the plan to deal with circumstances that have not been or cannot be predicted by the plan.

Two such circumstances are identified by the explanatory text. These include: -

- Accommodation of needs, whether quantitative or qualitative, **not anticipated by the plan**.
- Enabling a rapid response to **changes in economic conditions** (e.g a specific requirement from an operator or other specific shifts in patterns of demand).

These two circumstances relate to need and demand respectively and are exceptional. Both are important elements in ensuring the plan has sufficient flexibility.

Another important aspect is supply. It may be the case that the need or demand is not exceptional but there is a lack or shortage of suitable and available land to accommodate such needs or demands. Qualitative factors will be as important as the quantity of supply, with consideration to be given to both geography and sector.

From this basis, a number of requirements for an Ec2(2) type policy can be identified. To provide sufficient flexibility, the policy should include the following elements: -

- Relate to both need and demand.
- Both do not need to be demonstrated. One or other is sufficient.
- The need or demand should be exceptional.
- Exceptional need or demand should not be absolute but relate to the quantity and quality of relevant supply.
- The relevance of supply will depend on the nature of the proposals.

From these initial findings, we would prefer best a policy based on **Option 6**. However, we would disagree that this would necessarily be more specific or restrictive than the current test – immediate need or demand. Immediate need or demand may be a component, but not necessarily be the only exceptional case.

For example, in our response to Question 12 we have identified a considerable shortfall with the proposed quantum of land for road-based strategic warehousing. The proposed quantum of land equates to only two years' take up and is wholly insufficient to accommodate the growth of this sector over the plan period. If this is not rectified, then this would be a factor that could represent exceptional need or demand (as set out above – i.e. circumstances not anticipated by the plan or as a response to changing economic conditions).

The quantification of supply is an important counter to the qualification of need or demand. To be meaningful, the assessment of supply should relate to the proposals being promoted as exceptional.

For example, a proposal for general employment land (i.e industry and warehousing below 100,000 sq ft) should be considered only in the context of local land supply - i.e consented or allocated sites in North West Leicestershire. In addition, consideration should be given to the quantity and quality of land in that particular part of the District.

The assessment for supply for strategic warehousing would be different. This is because operators may be more footloose and the catchment area may be greater. In such cases, the availability of consented or allocated land outside the District could be a factor.

Further, the dimension of time is important. Not all consented or allocated land can be delivered within the timeframe of operator's requirements. Any assessment of supply should consider the suitability and availability of sites to meet the exceptional need proposed.

If such criteria were built into a version of Option 6 of Policy Ec2(2), then we would consider this would best meet the principal guidance set out by NPPF and referred to by paragraph 7.4 of the Development Strategy Options & Preferred Options. This looks to ensure sufficient land of the **right type** is available in the **right places** and at the **right time** to support growth, innovation and improve productivity.

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

Yes

No

Declaration

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

Signed

Peter Leaver

Date

14.3.2022

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

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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...

Q 14

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

IM Properties appreciate the need for start-up and grow-on premises in the District. It also understands that such developments, if freestanding, are often not viable.

As such, a policy enabling their provision as part of a wider development would be the most effective. However, it is important that any requirement is proportionate to the overall development and does not compromise overall viability of the scheme.

In addition, the mix and quantum of start-up and grow-on premises should respond to market demand and supply. If there is found to be no demand, through market testing, then its development would serve no end. A flexible approach is most likely to ensure developer engagement.

IM Properties consider that Option 3 would probably be the most flexible approach. This allows either a proportion of the development to be start-up and grow-on units or a financial contribution paid to support the provision of start up space in sustainable locations across the District.

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

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PART B – Your Representation

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Please state which consultation question your response relates...

Q 15

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

IM Properties already adheres to Option 1 – i.e. encouraging local employment initiatives in new, large scale developments. This has been a requirement of the successful Mercia Park development at Jn 11, M42 at Appleby Magna and has led to the establishment of the Mercia Park Employment and Skills Partnership, comprising public sector bodies, educational institutions, private training companies, National Careers Service, and a number of other businesses within the Local Impact Area within which Mercia Park sits.

Alongside the investment and continuing work underway to inform a sustainable transport solution to the site, the Employment and Skills Partnership scheme has the potential to support a pipeline of labour from various locations in the District and beyond.

The provision of this infrastructure and the established ESP will provide a foundation for the extension of Mercia Park. As such, IM Properties would be happy to support such an approach.

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

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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...

Q 19

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

Question 19 refers to Renewables and Low Carbon.

IMP supports NWLDC's preferred Option 2, which sets out solar and wind energy targets in line with the Zero Carbon Roadmap.

The proposed policy wording in relation to renewable energy requires new developments to *"incorporate proposals for on site electricity and heat production from solar, wind and other renewable technologies so as to maximise renewable energy production"*.

IMP would however resist explicit targets to produce renewable energy via any specific technology, any future policy should allow developers flexibility to utilise the energy infrastructure which is most appropriate to the site and its operations.

It should also be noted that in order to achieve the Councils commitment to net zero, this will require much more than renewable technologies.

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

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Signed	Peter Leaver	Date	14.3.2022
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PART B – Your Representation

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Please state which consultation question your response relates...

Q 20

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

Question 20 refers specifically to Energy Efficiency. It's noted that the Council prefers Option 3, which sets out an energy efficiency target higher than 31% reduction in carbon emissions compared to the current standard for an average home built to Building Regulations 2013 Part L requirements.

It appears that there may be some confusion or lack of clarity with the approach. The 31% improvement is specifically for new homes (Future Homes Standard) whilst the equivalent for non-domestic buildings is the Future Buildings Standard and sets different targets for different building types. For Logistics (Use Class B8) this is circa 27% improvement on current 2013 Regulations. Whilst IMP support the Council's ambition to improve energy efficiency, the draft policy should clarify the different targets for different types of development.

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

Yes

No

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PART B – Your Representation

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Please state which consultation question your response relates...

Q 21

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

Question 21 relates to carbon reduction and specifically sets out a potential requirement for applicants to undertake a Lifecycle Carbon Assessment (LCA) to support planning applications for major development.

IMP understand and appreciate the importance of ensuring developers are conscious of their carbon output. Indeed, we have recently launched our Sustainable Futures agenda, within which undertaking an LCA for each development will be part of our standard approach for carbon neutral construction. We therefore support Option 3.

However, it is important that any future policy wording allows flexibility to acknowledge that at outline design stage, there will only be limited material data and information available to draw upon which will significantly reduce the effectiveness of the LCA exercise. It would be more efficient to allow the use of benchmark data for an outline application stage with an LCA required for detailed planning submissions.

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

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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...

Q 22

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

Question 22 refers to overheating and sets out preferred Option 3, which suggests a policy requiring major developments to address overheating through an industry recognised assessment, and minor developments to use a simple checklist to demonstrate that the risk of overheating has been considered.

IMP support the Council's approach to this, however, the sentiments of this policy is now required by building regulations, so IMP would question whether a policy to address overheating is entirely necessary within the Local Plan.

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PART B – Your Representation

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Please state which consultation question your response relates...

Q 23

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

Question 23 relates to the requirement for applicants to submit an industry recognised assessment to demonstrate that development is addressing climate change – e.g. HQM for residential schemes and BREEAM for non-residential.

IMP currently undertake BREEAM reporting to support emerging developments, and therefore support Option 3.

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?

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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...

Q 24

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

Question 24 relates to suggested policy wording to cover energy efficiency, reducing carbon, overheating and how new development can demonstrate it is addressing climate change.

IMP support the sentiments of the proposed policy. However, we suggest that the wording is revisited and clarify a number of detailed points: -

- The draft Policy set out requires all development to achieve net zero carbon, however it's not clear as to the definition and timescales associated.
- Part 2 – As noted in our response to Question 20, we understand that the 31% reduction on Part L specifically relates to the future homes standard. Non-domestic buildings are assessed under different regulations which set different targets for different building types. Use Class B8 buildings are required to target a 27% improvement on Part L, and this should be clarified within the proposed policy wording.
- Carbon offset fund – The Council should make clear what charge would be levied on any residual carbon emissions which cannot be offset through onsite initiatives. It should also be noted that developers may already be off setting their emissions through a recognised 3rd party certified scheme, and that may not always mean they are offset within the Local Authority boundary. The policy should make allowances for this situation. Furthermore, if the council are intending to develop a carbon offset fund then they should make a clear commitment to ensure that their fund meets the requirements of high-quality carbon offset projects to enable such offsets to be counted toward a net zero carbon target. Recent guidance from the UK GBC should be used to develop the carbon offset fund - <https://www.ukgbc.org/ukgbc-work/renewable-energy-procurement-carbon-offsetting-guidance-for-net-zero-carbon-buildings/>

On a broader point, NWLDC should note that supporting net zero development is about more than just renewable energy generation. There are a number of other factors that contribute to reduction in carbon, for example, locating new employment land close to strategic highways; supporting the use of electric vehicles; and promoting large scale tree planting in new development to reduce carbon emissions. Great weight should be given to the benefit of those developments which adopt a broad range of approaches to reduce their carbon output in the decision-making process.

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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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	Peter Leaver	Date	14.3.2022
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Please send completed forms to planning.policy@nwleicestershire.gov.uk or
Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

If at any point in time you wish to be removed from the database, or to have your details changed, please contact the Planning Policy team on 01530 454 676 or planning.policy@nwleicestershire.gov.uk.



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

Consultation Response Form

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Peter
Last Name		Leaver
[Job Title]		Director
[Organisation]	IM Properties	JLL
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 25

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

Question 24 relates to Water Efficiency Standards. It suggests that “all proposals for new non-domestic buildings will be required to be designed to achieve the maximum available credits under BREEAM Wat 01...”.

In our professional experience, securing all water credits requires the adoption of potentially restrictive approaches such as grey water recycling, which may affect the feasibility of development. We would suggest that this Policy wording be amended to achieving BREEAM excellent water credits which does require the extensive use of water efficiency measures and rainwater harvesting.

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

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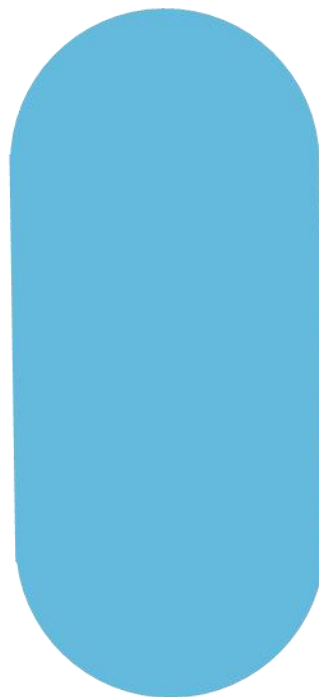
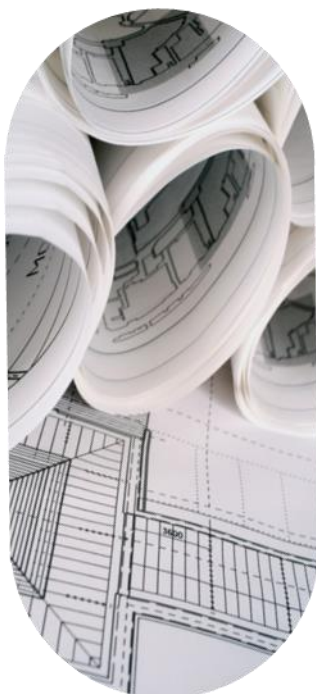
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**REPRESENTATION ON THE NORTH WEST LEICESTERSHIRE
LOCAL PLAN 2020-2039 (FEBRUARY 2022)**

LAND OFF STEPHENSON WAY, COALVILLE

On Behalf of William Davis



1. INTRODUCTION

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

2. BACKGROUND AND CONTEXT

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

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

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

seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

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

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

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

2.9 Paragraph 60 of the NPPF says that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed.

2.10 Paragraph 61 of the NPPF says that to determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach and paragraph 62 confirms that within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.

2.11 Paragraph 66 of the NPPF says that strategic policy-making authorities should establish a housing requirement figure for their whole area, which shows the extent to which their identified housing need (and any needs that cannot be met within neighbouring areas) can be met over the plan

period. Within this overall requirement, strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations.

- 2.12 Paragraph 68 of the NPPF says that strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.
- 2.13 Paragraph 69 of the NPPF recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Paragraph 72 of the NPPF goes on to say that the supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities. Working with the support of their communities, and with other authorities if appropriate, strategic policy-making authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way.
- 2.14 Paragraph 74 says that strategic policies should include a trajectory illustrating the expected rate of housing delivery over the plan period and that local planning authorities should identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years' worth of housing against their housing requirement set out in adopted strategic policies.
- 2.15 Paragraph 78 recognises that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs.

2.16

Paragraph 79 of the NPPF says that to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. The national policy context for plan making is clear in that:

1. the plan must set out an overall strategy for the pattern of development that makes sufficient provision for housing to meet the needs of North West Leicester as well as any needs that cannot be met within neighbouring areas;
2. Sufficient sites to deliver the strategic priorities of the area must be planned for and allocated;
3. a sufficient amount and variety of land can come forward where it is needed;
4. policies should be set within a vision that looks at least 30 years ahead where larger scale developments, such as significant extensions to existing towns and villages, form part of the strategy for the area;
5. the plan should be positive, aspirational and be responsive to changes in local circumstances;
6. strategic policies should also set out a housing requirement for designated neighbourhood areas which reflects the overall strategy for the pattern and scale of development and any relevant allocations;
7. In rural areas housing developments that enhances or maintains the vitality of rural communities should be supported; and
8. suitable locations for villages to grow and thrive should be identified, especially where this will support local services, including extensions to villages where this can help to meet identified needs in a sustainable way.

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

3.1 The Local Plan Review notes the Leicester and Leicestershire Strategic Growth Plan includes an agreed vision and a strategy for the city and county up to 2050 to be delivered through individual authorities' local plans. The SGP is particularly relevant given Leicester City's unmet need and the implications for Local Plans currently being prepared in the county. We understand the local authorities are actively seeking to resolve housing distribution to manage unmet need.

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

2 – Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type.

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

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

3.3 The Local Plan Review proposes a Settlement Classification (paragraph 3.11) based upon the findings of the North West Leicestershire District Council Settlement Study 2021. The methodology includes an assessment of services and facilities available within a settlement, but also considered accessibility to services and facilities elsewhere by public transport as such provision can contribute towards the sustainability of a settlement. This is considered a sensible approach in the context of the settlement pattern within North West Leicestershire.

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- 3.4 The Settlement Classification has Coalville Urban Area at the top of the hierarchy, comprising of Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone and Whitwick as well as the Bardon employment area
- 3.5 We agree with the approach taken to arrive at the settlement hierarchy but have not had sight of the evidence that defines the Coalville Urban Area. Nevertheless, it is clear that Coalville is the principal town and most sustainable settlement in North West Leicestershire having regard to the range of services and facilities available and as a consequence should be a focus for growth.
- 3.6 The local plan goes on to identify four options for the housing requirement:
- 368 dwellings per annum (this is the result from the standard method) – referred to as Low scenario;
 - 448 dwellings per annum (this is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA)) – referred to as Medium scenario;
 - 512 dwellings per annum (this is the figure from the Leicester and Leicestershire Strategic Growth Plan) – referred to as High 1 scenario; and
 - 730 dwellings per annum (this is based on the 2018 household projections with an allowance for vacancy rates in dwellings) – referred to as High 2 scenario.
- 3.7 These options have been assessed against demographic trends, build rates (market signals), unmet need and deliverability. The Council accept at paragraph 4.14 of the draft local plan, and the evidence clearly agrees, that any housing requirement included as part of the Local Plan will have to be higher than the standard method.
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- 3.8 Scenarios High 1 and High 2 are concluded to represent potentially suitable options until such time as the issue of the redistribution of unmet housing need from Leicester City has been agreed. The bullet points within paragraph 4.19 of the draft local plan recognise that the High 2 scenario “performs the best” and provides a very significant degree of flexibility to help address issues of unmet need.
- 3.9 The latest Authority Monitoring Report (December 2021) sets out housing completions since 2011 with the most recent 5 years (2016-21) averaging 770 dwellings per year and peaking in 2017/18 at 978 dwellings. It might be noted in the context of the Government’s objective of significantly boosting the supply of homes (paragraph 60 NPPF) that this evidence points to a higher housing requirement than any of the options identified.
- 3.10 Several Council’s in Leicester and Leicestershire, including North West Leicestershire, have accepted there is an unmet need from Leicester City of approximately 18,000 dwellings (2020-36). The Framework is clear in its expectation that these homes should be accommodated somewhere in Leicestershire.
- 3.11 The Leicester and Leicestershire authorities continue to work together to agree how this will be distributed. At the time of writing the most up to date framework for strategic planning in the housing market area is set out in the Strategic Growth Plan (SGP) for Leicester and Leicestershire. The SGP appears to have been based on unmet need from Leicester City for somewhere between 6,000 and 8,000 homes to 2036 and arrived at a housing requirement for North West Leicestershire for 512 dwellings each year between 2031-50. Clearly the unmet need is now known to be significantly higher.
- 3.12 The context for housing requirements in North West Leicestershire point to the Low scenario not being a sensible approach. Limiting delivery would conflict with the SGP and will not allow for any flexibility in meeting unmet housing need from Leicester. Such an approach, directly conflicting with the recent joint work across Leicestershire, would result in a plan which has not been positively prepared and would almost certainly
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- lead to challenges in respect of accommodating unmet need. Such an approach would also restrict future growth within the District, effectively acting as a moratorium.
- 3.13 The Medium scenario for 448 dwellings per annum is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA). This study was published 5 years ago and has its foundations under the pre-standard method approach utilising aged demographic data. The SGP was informed by the 2017 HEDNA and arrived at a higher figure for North West Leicestershire. Adopting a lower figure than the SGP would conflict with the HMA agreement, a backwards step and inappropriate in the context of increased unmet need.
- 3.14 High 1 scenario aligns with the Leicester and Leicestershire SGP to 2039, albeit the SGP envisaged growth across the longer period to 2050. As set out in respect of the Medium scenario, the Leicester City unmet need is now identified to be circa 18,000 homes rather than the 8,000 homes that underpinned the SGP. Pursuing High 1 would provide no relief to the additional 10,000 homes that now need to be found.
- 3.15 As set out in paragraph 4.19 of the draft local plan, High 1 is considered to *“provide a good buffer for accommodating unmet need from Leicester City, although it is not clear at this time whether it would be sufficient and so it would still represent a risk.”* Further, it is acknowledged that 512 dwellings per annum is below demographic trends and significantly below historic build rates for the District.
- 3.16 The Council’s own evidence points to consistently high delivery of homes and there is a danger that the standard method seriously underplays the demand for homes and the role the District plays in the housing market area. There are clear arguments to support a housing target higher even than the High 2 category which is below recent delivery.
- 3.17 On this basis, the High 2 scenario is considered to *perform the best* and provide a very significant degree of flexibility to address unmet need.
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There are clearly arguments to support a higher growth scenario in the District. However, the preference for the High 2 scenario is considered appropriate given the scenario's considered.

3.18 The draft local plan sets out 9 options for the spatial distribution of development:

- Option 1: As per adopted Local Plan
- Option 2: Principal Town and Key Service Centres
- Option 3: Principal Town and Key Service Centres and Local Service Centres
- Option 4: Principal Town and New settlement
- Option 5: Principal Town, New settlement and Key Service Centres
- Option 6: Principal Town, New settlement and Key Service Centres and Local Service Centres
- Option 7: Principal Town, New settlement and Key Service Centres and Local Service Centres and Sustainable Villages
- Option 8: New settlement
- Option 9: Principal Town, New settlement and Key Service Centres and Local Service Centres, Sustainable Villages and Small Villages

3.19 The Council have identified a clear preference for the High 2 growth scenario and on the basis that only options 2b, 3b, 4b, 5b, 6b, 7b, 8 and 9b are capable of accommodating that level of growth we only comment on these options.

High 2 scenario (residual requirement = 5,100 dwellings)

Option 2b	Principal Town (3,060 dwellings) and Key Service Centres (2,040 dwellings)
Option 3b	Principal Town (2,550 dwellings), Key Service Centres (1,530 dwellings) and LSC (1,020 dwellings)
Option 4b	Principal Town (2,040 dwellings) and New Settlement (3,060 dwellings)
Option 5b	Principal Town (2,295 dwellings), New Settlement (2,295 dwellings) and KSC (510 dwellings)
Option 6b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (1,020 dwellings) and LSC (510 dwellings)
Option 7b	Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), KSC (765 dwellings), LSC (510 dwellings) and Sustainable Villages (255 dwellings)
Option 8	New Settlement (5,100 dwellings)
Option 9b	Principal Town (1,020 dwellings), New Settlement (1,785 dwellings), KSC (459 dwellings), LSC (255 dwellings), Sustainable Villages (1,377 dwellings) and Small Villages (204 dwellings)

3.20 We appreciate that the Plan identifies Options 3a and 7b as the preferred options, with 3a relating to the High 1 scenario and 7b the High 2 scenario. As acknowledged within the Plan, and set out in paragraph 3.21, the High 2 scenario performs best and therefore Option 3a is not considered suitable.

3.21 Option 7b represent a continuation of the strategy in the adopted Local Plan which has a demonstrable strong delivery record albeit that the option includes a new settlement and the existing strategy does not. The

SA identifies potential significant positive effects (SA4 - good quality homes to meet local needs and SA6 - enhance the vitality and viability of existing town and village centres). However, The SA also makes clear that the inclusion of a New Settlement causes potential significant negative effects for SA13 (conserve and enhance the quality of the District's landscape and townscape character) and SA14 (ensure land is used efficiently and effectively).

3.22 The Council will be aware of the guidance at paragraph 69 of the Framework which recognises that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built-out relatively quickly. Such sites are often found at villages in the sustainable settlement tier and restricting such development through the inclusion of a new settlement is directly opposed to that approach. In our view, an option which distributes through the hierarchy, with appropriate scale development at Coalville and sustainable settlements, without a new settlement should be considered and assessed. It is quite normal for development strategy options to be rationalised into a hybrid option which seeks to deliver the positive impacts and minimise or manage the negative impacts from individual options. This is explored below.

3.23 A new settlement may provide a sensible solution for growth within Leicestershire in the future. However, it is not likely to deliver substantial numbers within a plan period to 2039. The Framework recognises this position and says that larger developments, including new settlements, require a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery. We agree with this and in our view a new settlement could be considered against a longer timeframe such as 2050 set out in the SGP or for the next Local Plan.

3.24 Only options 7b and 9b distribute growth to Sustainable Villages. However, both options include a New Settlement at 1,785 homes. By contrast options 2b and 3b do not include a new settlement and distribute only to the principal town and key service centres (2b) and principal town,

key service centre and local service centres (3b). In this respect, 2b and 3b provide for much greater growth in the higher order settlements. The inclusion of a new settlement in both options which distribute to sustainable settlements results in less opportunity for growth in those villages.

- 3.25 In our view, a hybrid strategy is required for the reasons sets out above and should be tested through SA. A distribution under such a hybrid option could be:

Principal Town (1,785 dwellings), Key Service Centres (1,330 dwellings), Local Service Centres (1,020 dwellings) and Sustainable Villages (965 dwellings)

4. REPRESENTATIONS IN RESPECT OF LAND OFF STEPHENSON WAY, COALVILLE

- 4.1 The Coalville Urban Area is the Principle Town within North West Leicestershire and is the most sustainable settlement in terms of access to services and facilities.

- 4.2 William Davis are have an interest in circa 56 hectares of land to the north east of Stephenson Way, Coalville. The land immediately adjoins the existing built form of Coalville in the south and south west, currently defined by the A511 where residential development is being promoted.

- 4.3 The wider land parcel extends to the urban area of Hermitage Road, Whitwick in the west and is dissected, loosely north to south, by Green Lane with residential development at Green Lane, Whitwick to the north. The Rugby Ground lies to the east and open land under separate ownership lies between the north and eastern boundaries and Hall Lane and Tiverton Avenue beyond.

- 4.4 The land is designated as an Area of Separation (AoS) for Coalville and Whitwick under Policy En5 of the North West Leicestershire Local Plan (2011-2031). As is customary for AoS, the policy says that 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.

- 4.5 Whilst we note that the Local Plan Review has yet to determine any role for AoS alongside the spatial distribution of growth the Council has produced an Area of Separation Study 2019. The land is within 'Area A' where the Study concludes, broadly, that an AoS is considered to be appropriate. In doing so, the study recognises that "development to the south-west of Area A along the A511, including Units 5 and 8 would be physically and visually isolated from Whitwick" (paragraph 5.1d) and in this sense development in this part of the AoS would have less limited impact on the identity of Whitwick as part of the urban area. The study goes on to note that "development in this location would breach the strong containing line of the A511 corridor and lack integration with the settlement of Coalville" (Paragraph 5.1d).
- 4.6 In our view, we consider these two points; i. The question of breaching the A511; and ii. Integration with Coalville, to be divorced from the role the land plays as an area of separation and the justification for any designation in the new local plan.
- 4.7 Any decision to breach the A511 requires a balanced judgement to be taken having regard to the scale of growth that is required at Coalville to meet housing needs in the context of competing options. In short, the greater the housing requirement the greater the pressure to consider development on the north east side of the A511. Indeed, the greater the housing requirement the greater the pressure to consider development in areas of separation. In fact, any new development in this area would still sit entirely within the wider urban area given the physical geography of the Coalville urban area and the relationship with Whitwick.
- 4.8 The question of integration is, ostensibly, one of urban design and place-making. It is entirely plausible that an appropriate masterplanning exercise could focus on the need for integration and, indeed, any policy that accompanied an allocation on the land at Stephenson Way could

require such matters to be a primary objective of the design process with appropriate infrastructure required to support integration between the existing and new communities. Notwithstanding this premise, the site is of sufficient size to accommodate a development that is capable of serving the day to day needs of some residents and to have functional separation to Coalville.

- 4.9 The matters discussed at 4.6-4.8 are not specifically provided for by the Study's eight Value Criteria (see pages 6 and 7 of the Study) and do not particularly provide a landscape or settlement-identity led case for an Area of Separation designation. We also note, that the Study recognises that new woodland has been planted as part of the National Forest which will help to reduce the visual impact of existing built development to the edge of the AoS, including the reduction of views from Hermitage Road.
- 4.10 Our client has started work to understand where development might be appropriate taking account of settlement identity and the need to maintain separation. The land is capable of delivering a significant number of houses and supporting infrastructure whilst preserving the separation with Whitwick. We would stress that our client remains open minded on the arrangements for an allocation and any master planning of the site and would welcome an opportunity to explore that with the Council.
- 4.11 Turning to site specifics, the land is entirely within Flood Zone 1, land at the lowest risk of fluvial flooding, and is not at risk from canals, reservoirs or large waterbodies. There are no heritage assets within or adjoining the site. Access can be taken from Stephenson Way and designed in accordance with the Leicestershire Highway Design Guide.
- 4.12 The North West Leicestershire Strategic Housing and Economic Land Availability Assessment (SHELAA) 2021 assessed the site as potentially suitable (reflecting the need to take account of separation), available and potentially achievable and is considered capable of providing an element of housing delivery within a 5 year period.
- 4.13 On behalf of our client we respectfully ask that consideration be given to

an allocation on the land at Stephenson's Way. Any policy would be able to take account of the matters explored and discussed above with a landscape led approach taken to ensure development does not prejudice the identity of Whitwick whilst also ensuring the objective for integration sits at the heart of the place making strategy. The total amount of development would depend on the outcome of that process.

4.14 We agree with the Council that the Coalville Urban Area remains the most sustainable location for significant growth in North West Leicestershire. In the absence of any coordinated strategic planning framework for new settlements across a longer plan period we believe that this will remain the case for not only this Local Plan Review but also subsequent spatial strategies.

4.15 Should the Council not consider it necessary to allocate Stephenson Way for housing to meet housing need in the immediate plan period it may be prudent to consider identifying the land as a reserve allocation of Broad Location for Growth. Under either scenario, the site could be released in the event that:

- the Council were unable to, or at risk of being unable to, demonstrate a 5 year housing land supply;
- a local plan policy related to unmet need or increased housing need were triggered; or
- sites were needed for an accelerated local plan review.

4.16 The land off Stephenson Way is capable of providing a number of configurations to achieve the number of homes and type of development required for Coalville and is also large enough to consider planning for any infrastructure requirements (such as a new school). William Davis are willing and able to take a flexible approach to the development and would welcome dialogue with the District Council.

5. CONCLUSION

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- 5.1 We agree with the settlement hierarchy in principle with the Coalville Urban Area being identified as the most sustainable settlement and the Principle Town in the District.
- 5.2 We agree that the housing requirements proposed in the Low and Medium scenarios are not appropriate. The Council's own evidence shows that the High 1 scenario is below demographic trends and recent build rates for the District. There is clear evidence to support a growth scenario above the Standard Method and, taking into account the circumstances including increasing unmet need from Leicester City, the evidence suggests that High 2 is the most appropriate option. We endorse that finding.
- 5.3 We do not consider the Council's preferred option should be based upon the delivery of a new settlement, which is unlikely to deliver sufficient growth within the plan period. With the best two performing options including a new settlement we consider it necessary to test a hybrid which distributes the 1,785 new settlement homes to other tiers in the hierarchy including sustainable settlements to allow for a greater focus on delivery from small and medium sites in accordance with paragraph 69 of the Framework.
- 5.4 Our proposed hybrid development strategy aligns with the benefits of option 7b whilst removing the negative impacts from the new settlement and suggests the following distribution:
- Principal Town (1,785 dwellings), Key Service Centres (1,330 dwellings), Local Service Centres (1,020 dwellings) and Sustainable Villages (965 dwellings).
- 5.5 Coalville is well placed to receive growth as part of a hybrid development strategy or through the inclusion of reserve allocations or broad areas for growth.
- 5.6 The Land off Stephenson Way would focus development adjacent to Coalville and can deliver significant development in a sustainable
-

location. The land north of the proposed development, and central within the AoS, can allow for further screening of views and additional woodland planting. In addition, there is the potential to raise levels within this area to remove any visibility of the development from Whitwick and therefore ensure the AoS is retained, managed and improved.

- 5.7 There are no physical or technical constraints which would prevent development from taking place at the land off Stephenson Way. The land is suitable, available and achievable and William Davis own the land and are committed to its promotion. As a consequence, our client is capable and willing to deliver homes, including in the short term.
- 5.8 William Davis are willing to explore how the Land off Stephenson Way can support infrastructure delivery including the potential delivery of a Primary School and to take a flexible approach to the number of homes required to provide a sensible and meaningful contribution to the eventual housing requirement.
- 5.9 The site can positively contribute towards a five year supply and as a result we respectfully request that Land off Stephenson Way is identified as a housing allocation in the Local Plan Review. If the Council were not seeking to allocate the site, we would recommend either the identification of the site as a reserve allocation to be brought forward if the Council are unable to demonstrate a 5 year housing land supply or the identification of the site as a Broad Area for Growth to be delivered towards the end of the plan period or through a subsequent local plan.

Planning Policy Team
Northwest Leicestershire District Council
Council Offices
Whitwick Road
Coalville
Leicestershire
LE67 3FJ

Churchill House, Parkside
Christchurch Road, Ringwood
Hampshire BH24 3SG
Telephone 01425 462372
Fax 01425 462101

14th March 2022

Dear Sirs,

**CHURCHILL RETIREMENT LIVING & McCARTHY STONE
RESPONSE TO THE NORTH-WEST LEICESTERSHIRE COUNCIL LOCAL PLAN
REVIEW – DEVELOPMENT STRATEGY & POLICY OPTIONS CONSULTATION.**

Thank you for the opportunity to comment on the consultation papers for the aforementioned document. McCarthy Stone Retirement Lifestyles Ltd and Churchill Retirement Living are two independents, competing developers of retirement housing for sale to the elderly. Please find below our comments on the Issues and Options consultation, which specifically address the need for specialist housing for the elderly.

National Policy Context

Government's policy, as set out in the revised NPPF, is to boost significantly, the supply of housing. Paragraph 60 reads:

“To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay.”

The revised NPPF looks at delivering a sufficient supply of homes, Paragraph 62 identifies within this context, the size, and type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies including older people.

In June 2019 the PPG was updated to include a section on Housing for Older and Disabled People, recognising the need to provide housing for older people. Paragraph 001¹ states:

*“The need to provide housing for older people is **critical**. People are living longer lives and the proportion of older people in the population is increasing. In mid-2016 there were 1.6 million people aged 85 and over; **by mid-2041 this is projected to double to 3.2 million**. Offering older people a better choice of accommodation to suit their changing needs can help **them live independently for longer, feel more connected to their communities and help reduce costs to the social care and health systems**. Therefore, an understanding of how the ageing population affects housing needs is **something to be considered from the early stages of plan-making through to decision-taking**” (emphasis added)*

¹Planning Practice Guidance, Paragraph: 001 Reference ID: 63-001-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

Paragraph 003² recognises that

“the health and lifestyles of older people will differ greatly, as will their housing needs, which can range from accessible and adaptable general needs housing to specialist housing with high levels of care and support.”

Thus a range of provision needs to be planned for. Paragraph 006³ sets out

“plan-making authorities should set clear policies to address the housing needs of groups with particular needs such as older and disabled people. These policies can set out how the plan-making authority will consider proposals for the different types of housing that these groups are likely to require.”

Therefore, recognising that housing for older people has its own requirements and cannot be successfully considered against criteria for general family housing.

Need for Older Persons' Housing

It is well documented that the UK faces an ageing population. Life expectancy is greater than it used to be and as set out above by 2032 the number of people in the UK aged over 80 is set to increase from 3.2 million to five million (ONS mid 2018 population estimates).

The Homes for Later Living Report notes the need to deliver **30,000 retirement and extra care houses a year** in the UK to keep pace with demand (September 2019).

The age profile of Northwest Leicestershire can be drawn from the 2018 population projections from the Office for National Statistics. This advises that there were 20,367 persons aged 65 and over in 2018, accounting for 19.9% of the total population of THE District. This age range is projected to increase by 13,547 individuals, or 66.5%, to 33,914 between 2018 and 2043. The population aged 65 and over is expected to increase to account for 24.7% of the total population of the District by 2043.

In 2018 there were 4,766 persons aged 80 and over, individuals who are more likely to be frail and in need of long-term assistance. The number of people in this age range is forecasted to increase by 5,614 individuals, or 117.8%, to 10,380 between 2018 and 2043. The population aged 80 and over is anticipated to represent a higher proportion of Northwest Leicestershire's residents, accounting for 4.2% of the total population in 2018 and increasing to 7.6% by 2043.

It is therefore clear there will be a significant increase in older persons' over the Plan Period and the provision of suitable housing and care to meet the needs of this demographic should be a priority of the emerging Local Plan.

Benefits of Older Persons' Housing

Older peoples housing produces a large number of significant benefits which can help to reduce the demands exerted on Health and Social Services and other care facilities – not only in terms of the fact that many of the residents remain in better health, both physically and mentally, but also doctors, physiotherapists, community nurses, hairdressers and

² Planning Practice Guidance, Paragraph: 001 Reference ID: 63-003-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

³ Planning Practice Guidance, Paragraph: 001 Reference ID: 63-006-20190626. Available here: <https://www.gov.uk/guidance/housing-for-older-and-disabled-people>

other essential practitioners can all attend to visit several occupiers at once. This leads to a far more efficient and effective use of public resources.

Economic

The report '*Healthier and Happier' An analysis of the fiscal and wellbeing benefits of building more homes for later living*' by WPI Strategy for Homes for Later Living explored the significant savings that Government and individuals could expect to make if more older people in the UK could access this type of housing. The analysis showed that:

- 'Each person living in a home for later living enjoys a reduced risk of health challenges, contributing to fiscal savings to the NHS and social care services of approximately £3,500 per year.
- Building 30,000 more retirement housing dwellings every year for the next 10 years would generate fiscal savings across the NHS and social services of £2.1bn per year.
- On a selection of national well-being criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing to housing specially designed for later living.'

Each person living in a home for later living enjoys a reduced risk of health challenges, contributing fiscal savings to the NHS and social care services of approximately £3,500 per year (*Homes for Later Living September 2019*). More detail on these financial savings is set out within the report.

A recent report entitled *Silver Saviours for the High Street: How new retirement properties create more local economic value and more local jobs than any other type of residential housing* (February 2021) found that retirement properties create more local economic value and more local jobs than any other type of residential development. For an average 45 unit retirement scheme, the residents generate £550,000 of spending a year, £347,000 of which is spent on the high street, directly contributing to keeping local shops open.

As recognised by the PPG, Retirement housing releases under-occupied family housing and plays a very important role in recycling of housing stock in general. There is a 'knock-on' effect in terms of the whole housing chain enabling more effective use of existing housing. In the absence of choice, older people will stay put in properties that are often unsuitable for them until such a time as they need expensive residential care. A further Report "*Chain Reaction" The positive impact of specialist retirement housing on the generational divide and first-time buyers (Aug 2020)*" reveals that about two in every three retirement properties built, releases a home suitable for a first-time buyer. A typical Homes for Later Living development which consists of 40 apartments therefore results in at least 27 first time buyer properties being released onto the market.

Social

Retirement housing gives rise to many social benefits:

- Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Older homes are typically in a poorer state of repair, are often colder, damper, have more risk of fire and fall hazards. They lack in adaptations such as handrails, wider internal doors, stair lifts and walk in showers. Without these simple features everyday tasks can become harder and harder

- Retirement housing helps to reduce anxieties and worries experienced by many older people living in housing which does not best suit their needs by providing safety, security and reducing management and maintenance concerns.
- The Housing for Later Living Report (2019) shows that on a selection of wellbeing criteria such as happiness and life satisfaction, an average person aged 80 feels as good as someone 10 years younger after moving from mainstream housing into housing specifically designed for later living.

Environmental

The proposal provides a number of key environmental benefits by:

- Making more efficient use of land thereby reducing the need to use limited land resources for housing.
- Providing housing in close proximity to services and shops which can be easily accessed on foot thereby reducing the need for travel by means which consume energy and create emissions.
- Providing shared facilities for a large number of residents in a single building which makes more efficient use of material and energy resources.
- The proposal includes renewable technology through the use of solar panels to assist in the reduction of CO₂ emissions.
- All areas of the building will be lit using low energy lighting and where applicable utilise daylight and movement sensor controls.

Recommendations

Given all these factors and the guidance of the PPG, we consider that the best approach towards meeting the diverse housing needs of older people is **for the Local Plan to give the earliest consideration towards how best to meet these needs and to include a standalone policy in this respect.** Such policies should encourage the delivery of specialist forms of accommodation for older people and not be criteria led. Developers should not be required to demonstrate need given the many benefits that such developments bring and if a quantum is specified this should be regarded as a target and not a ceiling. Given also that such developments “*help reduce costs to the social care and health systems*” (PPG refers), requirements to assess impact on healthcare services and/or make contributions should be avoided.

While we appreciate that no one planning approach will be appropriate for all areas, an example policy is provided that, we hope, will provide a useful reference for the Council:

“The Council will encourage the provision of specialist housing for older people across all tenures in sustainable locations.

The Council aims to ensure that older people are able to secure and sustain independence in a home appropriate to their circumstances by providing appropriate housing choice, particularly retirement housing and Extra Care Housing/Housing with Care. The Council will, through the identification of sites, allowing for windfall developments, and / or granting of planning consents in sustainable locations, provide for the development of retirement accommodation, residential care homes, close care, Extra Care and assisted care housing and Continuing Care Retirement Communities.”

We would respectfully remind the Council of the increased emphasis on Local Plan viability testing in Paragraph 58 of the NPPF and that the PPG states that *“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan”* (Paragraph: 002 Reference ID: 10-002-20190509).

The evidence underpinning the Council's planning obligations and building requirements should therefore be robust

We would also like to respectfully remind the Council that the viability of specialist older persons' housing is more finely balanced than 'general needs' housing and the respondents are strongly of the view that these housing typologies should be robustly assessed in the forthcoming Local Plan Viability Assessment. This would accord with the typology approach detailed in Paragraph: 004 (Reference ID: 10-004-20190509) of the PPG which states that. *“A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period. If this is not done, the delivery of much needed specialised housing for older people may be significantly delayed with protracted arguments about failure to meet affordable housing policy requirements which are wholly inappropriate when considering such housing*

Thank you for the opportunity for comment.

Yours faithfully



Ziyad Thomas
BSc (Hons), MSc, MRTPI
Associate Director

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

Local Plan Review. Consultation Response

Name Gillian and Clive Simkiss.....

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 Mr and Mrs Simkiss

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Objections to EMP 90- Land south of East Midlands Airport and south west of 23a M1
Date: 14 March 2022 18:08:13

To whom it may concern

It saddens me to have to write this. I want to log my objections to the development of the industrial zone plans right up to Disewrith boundaries.

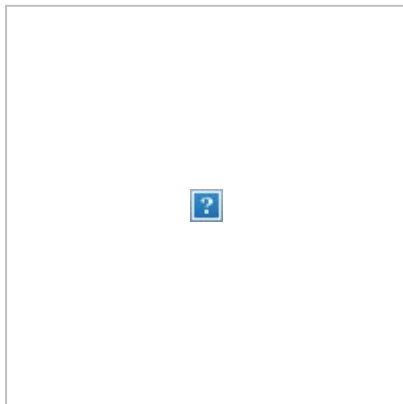
This will cause Extra 10,000 vehicles to our congested local roads. The village roads will have so much more traffic on them.

There will be a loss of countryside walks and clean air I grew up around these fields and they have great biodiversity of plants and wildlife which will all be lost if this development goes ahead. The village and surrounding areas will suffer noise and light pollution and environmental degradation

We can not afford to loss more of this land to industrialisation of our countryside, this will change the village and there will be a loss of rural village life

Regards
Sarah

--



Sarah Barnett



From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: NWLDC local plan review Comments
Date: 14 March 2022 18:10:13

To whom it may concern,

I wish to air my views on the current housing proposals for our village.

Such proposals would have a devastating impact on our village both environmentally and ecologically. This area homes water vole and the great crested newt to name a few.

We are surrounded by beautiful countryside which is home to lots of wildlife and rare species and this would be impacted greatly.

Cloud wood a important protected area of ancient woodland is adjacent to this proposed development and the impact and devastation will be huge on this region.

Our village is surrounded by beautiful landscapes and established trees and hedgerows which would be obliterated.

I wish to safeguard our village community. Our residents don't want to live in a large town. Our village is unique and full of character and nature and natural village heritage which makes it our home and a special place to bring up our families.

The additional noise, pollution, traffic and potential crime that a place of this size will bring is devastating effects to our community and is extremely worrying and not wanted by our residents.

Please preserve our green belt and natural environment that makes this region unique. There are other places less intrusive to build on rather than the doorstep of the Diseworth residents.

The large sheds/warehouses would also bring down our village. Please respect the wishes of the residents and build these in the Amazon vicinity away from our village. We already have to contend with the Airport which is enough. Please respect this and do not take away our beautiful village.

Regards,
Karen Oliff

[REDACTED]

[REDACTED]

Sent from my iPhone

By email

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

Dear Ian

North West Leicestershire District Council - Local Plan Review - Development Strategy and Policy Options (January 2022) – Blaby District Council Response

Blaby District Council welcomes the opportunity to comment on the emerging new Local Plan for North West Leicestershire District Council. We recognise the challenges faced in preparing a new Local Plan in the current climate.

Blaby District Council (BDC) supports North-West Leicestershire District Council (NWLDC) in updating the Strategic objectives of the Local Plan. In particular, BDC support the strategic objectives that seek to:

- Improve health and wellbeing
- delivery of new homes - including those to help meet the unmet needs of Leicester City
- Providing for a range of employment opportunities including those that help to meet the strategic warehousing and logistics needs across Leicester and Leicestershire and contributing to the unmet employment needs arising from Leicester City, and
- Mitigating and adapting to climate change

Specifically, Blaby District Council would like to make the following responses:

1. **An extension to the end date of the Local Plan to 2039 - BDC Response**

BDC supports NWLDC extending the plan period to 2039. This allows a 15-year time horizon and is consistent with other Local planning Authorities Local Plan reviews.

2. **A review the settlement hierarchy in North-West Leicestershire - BDC Response**

BDC supports the proposed settlement hierarchy but respectfully requests that NWLDC thoroughly assesses the transport implications of development in the areas proposed for growth, in particular, the transport implications of growth arising from development close to motorway junctions on the M1.

3. Development Strategy options for housing - BDC Response

BDC welcomes NWLDC's approach to considering a broad range of housing requirement options for the district. BDC support options that allow NWLDC to meet their own needs whilst also meeting a portion of the unmet housing need arising from Leicester City, in this respect, BDC support NWLDC's choice of the high growth scenarios as the preferred options until such time as the redistribution of unmet housing need from Leicester City has been agreed. BDC will continue to work with NWLDC and other parties to agree a distribution of unmet need through a Statement of Common Ground (SoCG).

4. Where should new housing be located?- BDC Response

Blaby District Council welcomes NWLDC's approach to considering a range of strategic locations to meet the housing requirements for the district. BDC support NWLDC's choice of options to be taken forward which allow for the delivery of high growth scenarios.

Growth of existing and provision of New Settlements is supported to meet the challenging growth targets for North-west Leicestershire District and the wider needs of Leicester and Leicestershire.

BDC strongly encourage NWLDC to fully assess the transport implications of the emerging growth strategy including the cumulative implications of growth on the Local and Strategic Road Network. Should any growth be located close to the junctions of the M1, impacts further afield (including at junction 21 of the M1) need to be fully addressed.

5. Housing – BDC Response

Blaby District Council welcomes NWLDC's proposed approach to securing Self-build and custom housebuilding.

6. Internal Space Standards - BDC Response

Blaby District Council welcomes and supports NWLDC's proposed approach to securing minimum internal space standards.

7. Accessible and adaptable housing - BDC Response

BDC welcomes and supports NWLDC's proposed approach to securing minimum standards for accessible and adaptable dwellings wheelchair adaptable and accessible dwellings.

8. Development strategy options for employment - BDC Response

BDC welcomes NWLDC's approach to considering the need for employment land to meet the needs of NWLDC and assessing the potential to contribute towards meeting the unmet employment land needs of Leicester City.

BDC support NWLDC's evidence-based approach to identifying the need for additional employment land. BDC also welcome recognition of the updated Housing and Employment Needs Assessment (HENA) that is being prepared on behalf of all Leicester and Leicestershire Authorities.

BDC support all options that allow for continuity of employment land provision throughout the plan period. BDC request that the transport implications of large-scale employment growth are fully assessed in order to understand implications for the strategic and local road network. In particular, the implications of growth on the M1 should be considered. Deliverable mitigation measures to address any adverse impacts should be identified.

9. Strategy Options for general employment land - BDC Response

BDC welcomes NWLDC's approach to considering a broad range of employment site location options for delivering the employment needs of the district.

10. Strategic Warehousing - BDC Response

BDC welcome NWLDCs approach to helping to meet the strategic logistics needs identified in the 'Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change (April 2021)' study. BDC welcome the preliminary approach that seeks to deliver some 50% of the road based strategic warehousing.

BDC request that NWLDC keep an open mind in relation to 'rail based' strategic warehousing given the potential uncertainties regarding the Hinckley National Rail Freight Interchange (in Blaby District) which is subject to the Development Consent Order procedure and is not currently committed development. BDC will continue to work with NWLDC and other partners to agree and approach to future delivery of road and rail based strategic warehousing, including the preparation of Statements of Common Ground where necessary.

11. Employment - BDC Response

BDC welcome NWLDCs approach to helping to meet local employment needs through exploring policies that seek to deliver land for local employment and work opportunities. BDC do not have any preference for the detailed options promoted for delivering local employment.

12. Health & wellbeing – BDC Response

BDC welcome NWLDCs approach to promoting healthy communities. BDC agrees that developing healthy communities is a key function of the planning process. BDC support the option of including an overarching general health and well-being policy.

BDC welcome and support NWLDC's preferred approach of seeking a Health Impact Assessment for planning proposals above a specified threshold and use of Health Impact Screening Statements to determine whether a full HIA is required. A threshold of 30 dwellings or 1 hectare seems a reasonable and proportionate threshold for seeking HIA.

BDC will continue to work with Leicestershire County Council Public Health Team and NWLDC to further develop effective policies and procedures for delivering healthy communities.

13. Renewables and low-carbon – BDC Response

BDC broadly welcomes NWLDC's Local Plan policy approach to addressing climate change.

BDC supports NWLDC's preferred options that seek to: pursue challenging but realistic targets for the generation of renewable energy; optimise energy efficiency and carbon reduction; seek 'Lifetime Carbon Assessments' on major developments; require major developments to address overheating; require applicants to carry out recognised industry assessments to assess whether new residential and commercial development is satisfactorily addressing climate change; deliver carbon off-setting; and promote water efficiency.

Please contact me if you have any questions about the responses.

Yours sincerely,



Vicky Chapman
Development Strategy

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

Local Plan Review. Consultation Response

Name Richard and Laurie Baker

Address [REDACTED]

Dear Sirs,

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

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. Pollution will significantly increase due to higher volumes of traffic both through the local villages, and congestion build-up along the A543. Pollution will also be an issue from the proposed industrial areas (EMP90), both light, noise and air pollution from warehousing or other industrial unit usage, which will inevitably include 24 hour use for a large proportion if not the majority. If any such development occurs, even on a smaller scale than proposed, these factors must be considered and due diligence given to protecting existing residents from these factors to the highest level possible.

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, the local roads do not have capacity to allow for the extra traffic these plans will generate – both whilst building work is underway, and when houses and industrial units are completed and in use. There are currently bottle-necks of traffic on the A453 past the EM Airport, and the airport is not currently close to even 50% full of its capacity following the start of the pandemic. All the proposed works will do is create heavy traffic which this road (as well as smaller B-roads) is unable to cope with, creating raised carbon monoxide levels and other pollutants for Diseworth and surrounding residents.

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. Diseworth's natural heritage is open [designated] countryside and farmland.

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

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

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

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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 modified J24 of the M1. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

15. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale and 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 solid black rectangular box used to redact the signature of the sender.

The Template Letter:-

Local Plan Review. Consultation Response

Name Tracie 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.

The Template Letter:-

Local Plan Review. Consultation Response

Name Gloria Lowe.....

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].
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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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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: Local Plan Review. Consultation Response
Date: 14 March 2022 23:48:26

Mrs J. Orrill
[REDACTED]

Dear Sirs,

I would like to voice my concern regarding the potential development of land around Isley Walton (316 hectares) and the close proximity of its boundary to the village of Diseworth. (SHELLA 2021.IW1)

I'm also very concerned about the potential of further industrial development of the land south of the A453 which also borders Diseworth to the North and East. (SHELLA.2021.EMP90)

Based on the following, as in the NWLDC Local Plan (2017 amended 2021) that set out 15 primary objectives.

The Isley Walton (IW1) and Diseworth/Long Whatton

Industrial proposals fail to meet several of the objectives.

1. Objective 1. Health and well-being. Both proposals fail on this
2. Objective 3. High quality housing stock and reflection of local context. Both proposals fail on this. Neither will reflect local context. Also, IW1 will be overcrowded and cramped.
3. Objective 4. Reduce the need to travel. IW1 will fail on this as the need to travel and use of cars will increase.
4. Objective 9. Effective flood prevention. Both proposals fail on this. Water management has been mismanaged for many years to the West of Diseworth. IW1 will cause more difficulties. The creation of 100 hectares of concrete on EMP90 with a downslope towards Diseworth is a disaster in the making.
5. Objective 10. Preserve and enhance the district's natural and rural heritage. It is self evident that both proposals fail on this. The Diseworth natural heritage is open as designated countryside and farmland.
6. Objective 11. Protect and enhance the natural environment. Both proposals fail miserably on these issues. The proposal to construct 4,700 houses and 100 hectares of concrete on historical open countryside and farmland, how on earth can this aim be achieved.
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 on this. Both of them will cause pollution and congestion and will never 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. I feel this is unacceptable.
9. Noise. Page 18 of the Local Plan (Pollution) states that new developments should not be affected by noise. IW1 fails miserably. It is in close proximity to the Donington circuit and the EMA take off and landing flight paths. It is noisy, both can sometimes be heard in Long Whatton If the wind blows a certain way! EMP90 will generate unacceptable noise in Diseworth and both will produce an immeasurable amount of additional traffic fumes and noise pollution.
10. Traffic. IW1 will generate in the region of an additional 10,000 residential vehicles as well as large volumes of service traffic. Our local roads are already struggling with existing levels of traffic. Even more so when the M1/A42 corridors are congested. Loughborough will be one of the closest towns to the site and Diseworth and Long Whatton already suffer from commuting through traffic, the rat run is already bad and can only become worse with this new proposal.
11. Non Compliance. EMP90 does not comply with Planning Policy Ec2. There's is no evidence that the site satisfies an " . Access to the site is not compliant with existing Highways Authority regulation. Further, the site does not meet the requirement of not being.

Diseworth is only separated by 75 metres.

12. The Settlement Hierachy 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. Furthermore effective 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. Not sure how these figures are arrived at, but I can't see why nearly half of that projection should be built in one location at IW1.

The problems of congestion, pollution, need to travel will all have an adverse effect on communities and on climate change.

14. Over Development. Diseworth and all the surrounding areas have already been subjected to significant development over recent years. The rail/freight interchange has generated a huge increase in HGV traffic, adding to that already caused by the development of the DHL and UPS air freight hubs at EMA. Also the fact it is Europe's last unregulated airport, we suffer increasing levels of noise and pollution from aircraft.

Add the creation of the A42, Moto services then junction 23A on the M1. Then

the creation of the modified J24 of the M1 and all the extended infrastructure put in there is a big blot on what was once a pleasant landscape. Surely there reaches a limit to the decimation of our countryside and our rights to try and preserve our heritage for existing and future generations.

15. Summary. Both these schemes are in the wrong place and ill conceived on an unprecedented scale that offers no benefit to the local environment. Promoted by an alliance of opportunistic landowner/owners and exploitative developer/s

who seem to have no knowledge, interest, or concern for the locality or the feelings of the impact on local communities or wildlife.

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 NWLDC would have to compromise, ignore or remove its own guidance and primary planning objections. This would not be a principled or a sustainable position and it would render any future Local Plan valueless. Changing the rules to suit is not an acceptable practice.

Jane Orrill

Sent from my iPad



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

Consultation Response Form

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

Part A – Personal details

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

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Ms	Mr
First Name	Sally	Mark
Last Name	Smith	Rose
[Job Title]	Planning Director	Director
[Organisation]	Bloor Homes Limited (c/o Define Planning and Design Ltd)	Define Planning and Design Ltd (on behalf of Bloor Homes Limited)
Address Line 1	[REDACTED]	Define Planning and Design Ltd
Address Line 2	[REDACTED]	[REDACTED]
Address Line 3	[REDACTED]	[REDACTED]
Address Line 4	[REDACTED]	[REDACTED]
Postcode	[REDACTED]	[REDACTED]
Telephone	c/o Agent	[REDACTED]
Email address	c/o Agent	[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...

Q1: Plan Objectives

QUESTION 1: DO YOU AGREE WITH THESE LOCAL PLAN REVIEW OBJECTIVES? IF NOT, WHY NOT?

Bloor Homes Ltd (BHL) welcomes the preparation of the North West Leicestershire Local Plan Review (LPR), and supports the intention by North West Leicestershire District Council (NWLDC) to positively plan for sustainable development and growth in the District in the upcoming plan period.

In that regard, BHL welcomes the reference in proposed objective 2 to ensuring the delivery of new homes to meet local housing needs, which reflects the requirement of paragraph 11b of the National Planning Policy Framework (NPPF) for strategic policies to “*as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas.*” Indeed, Section 4 of the Regulation 18 consultation document sets out the potential approaches that could be taken to meeting the District’s own needs, as well as providing a contribution towards the unmet needs arising from neighbouring Leicester City Council (LCC); an approach that is very much welcomed by BHL.

Whilst the scope of objective 2 is welcomed, however, it is suggested that the wording be extended so as to fully reflect the requirements of the NPPF and the scope of the emerging plan. It is suggested that the wording be updated as follows: “*Ensuring the delivery of new homes, including affordable housing, which meets local housing needs in terms of **quantum**, size, tenure and type; whilst also making an appropriate contribution towards the unmet housing needs that are arising from Leicester City Council.*”

In addition to that, BHL welcomes the reference made in proposed objective 6 to enhancing the vitality and viability of the District’s town and local centres, which reflects the requirement of NPPF paragraph 86 for planning policies to “*support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation.*”

Moreover, BHL also welcomes the reference in proposed objective 5 to supporting the district’s economy and rural economy. However, this objective should be extended to refer to supporting “*the rural economy, as well as the services and facilities available in rural areas*”, given the importance that those services and facilities play in the day-to-day life of the District’s rural population. Critically, and as is highlighted in BHL’s response to Question 5, that should also be reflected in the plan’s spatial strategy for development; through the focusing of development to sustainable rural villages, including local service centres such as Measham. Indeed, paragraph 79 of the NPPF states that “*to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities*” and that planning policies should, therefore, “*identify opportunities for villages to grow and thrive, especially where this will support local services.*”

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

Please state which consultation question your response relates...

Q2: Settlement Hierarchy

QUESTION 2 – DO YOU AGREE WITH THE PROPOSED SETTLEMENT HIERARCHY? IF NOT, WHY NOT?

BHL supports the inclusion of Measham within the 'local service centre' category at tier 3 of the proposed settlement hierarchy, which reflects the very good range of services and facilities that are available in the village.

Indeed, as is set out within NWLDC's Settlement Study 2021, that includes two convenience stores, a number of smaller shops, a post office, a GP surgery, a pharmacy, two primary schools, a village hall, a library, a youth club, and numerous places of worship. In addition, Measham benefits from a good recreational offer, including a leisure centre with several pitches, numerous play spaces (one of which includes a skate park), allotments and other public open spaces, as well as numerous bars, pubs, restaurants, cafes and takeaways. Moreover, the settlement has a good employment offer from which existing and new residents can benefit; particularly within the Westminster Industrial Estate, the Forterra complex, and the Measham Lodge Business Park.

In addition to that, Measham is well connected to nearby settlements, meaning that its residents are able to benefit from the services and facilities that are available therein. In particular, a number of bus services (7, 19, 19B, 19C) run along Ashby Road / High Street / Tamworth Road. Those routes provide services to nearby 'sustainable villages' and 'local housing need villages', as well as Burton upon Trent, Swadlincote, Ashby-de-la-Zouch and Atherstone.

Therefore, given the good range of services and facilities available within Measham, and its connectivity to nearby settlements and the services and facilities therein, the settlement hierarchy is quite correct in recognising the settlement's sustainability by designating Measham as a 'local service centre.' With that said, however, the settlement hierarchy and resultant spatial strategy should also take into account other factors beyond the sustainability of each settlement, including the housing need within each settlement. Report 2 of the Council's Housing Needs Assessment highlighted that, on the basis of a 19-year plan period and an (at the time) assumed overall housing need of 480 dwellings per annum (dpa), Measham would have a housing need of 488 dwellings. However, if that figure was updated to reflect the need for a 20-year plan period (see BHL's response to Question 4) and the housing requirement of 730dpa that BHL considers appropriate (see also BHL's response to Question 4), the housing need in Measham would be 781 houses in the plan period.

That too, as well as the settlement's sustainability, supports NWLDC's decision to include Measham as a 'local service centre.' It is critical, however, that the settlement hierarchy is reflected in the spatial strategy by ensuring that a sufficient amount of development is focussed towards such settlements so as to meet those housing needs. That is discussed further in BHL's response to Question 5.

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

Please state which consultation question your response relates...

Q4: Amount of housing growth

[Response to Question 4 on following page due to formatting problem].

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.

As set out in their response to Question 1, Bloor Homes Ltd (BHL) welcomes the preparation of the North West Leicestershire Local Plan Review (LPR), and supports the intention by North West Leicestershire District Council (NWLDC) to positively plan for sustainable development and growth in the District in the upcoming plan period. In that regard, BHL very much welcomes NWLDC's proposed approach of seeking to meet its own housing needs in full, whilst also providing a contribution towards the unmet housing needs arising from Leicester City Council (LCC). It does, however, wish to provide the following comments in relation to the exact development strategy that is taken forward by NWLDC in the emerging Local Plan.

Plan Period

In the first instance, it is noted that NWLDC is currently proposing a plan period between 2020 and 2039. Whilst it is recognised that, if the emerging plan is adopted in mid-2024 as is expected, this would meet the requirement as per NPPF paragraph 22 for plans to “*look ahead over a minimum 15-year period from adoption, to anticipate and respond to long-term requirements and opportunities*” that would allow very little room for slippage in the preparation of the plan. That is particularly significant given the complexity of the plan (particularly in relation to the need to take account of the unmet housing needs arising from LCC), which may well result in the plan's adoption slipping beyond that date into 2025; which would only require a delay of 6 months. Therefore, to allow for some flexibility in the preparation of the plan, **it is suggested that the plan period taken forward by NWLDC should be 2020 to 2040.** That should, however, be kept under review as the plan progresses and should be updated to reflect any slippage in the timetable for the plan's preparation; so as to ensure that a period of 15 years post-adoption is allowed for.

In addition to that, NPPF paragraph 22 notes that “*where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.*” Therefore, if NWLDC continues to pursue the potential of a new settlement, which forms an element of Spatial Strategy Option 7b, it clearly must take that consideration into account. Even if that is not reflected through the extension of the plan period to cover 30 years, NWLDC must give significant consideration to the likely timescales and rates of delivery that would be expected from a new settlement both 15 years and 30 years on from the adoption of the plan. That is highlighted in BHL's response to Question 5 below.

Policy Context

Notwithstanding the above, BHL wish to make the following comments in relation to the scale of development that should be accommodated within NWLDC in the plan period. That should be considered in the national and regional context, which clearly sets the basis for pursuing the High 2 level of growth.

The NPPF is underpinned by a presumption in favour of sustainable development that requires Local Plans to positively plan for and meet the development needs of their area as well as any needs that cannot be met within neighbouring areas (para. 11). Ensuring that there is a continual supply of both market and affordable housing is a critical policy imperative for the Government and it remains a central tenet of the NPPF. That is because insufficient housing provision has resulted in a nationwide “housing crisis” that needs to be remedied as a matter of urgency in order to address its acute socio-economic consequences (escalating house prices, rocketing rents, declining home ownership, increased housing benefit burden, reduced labour mobility, etc).

The NPPF, therefore, emphasises the Government's objective of “*significantly boosting the supply of homes*” (para. 60) and requires strategic plan making authorities to establish a housing requirement figure for their whole area which shows the extent to which their identified housing need, and any needs that cannot be met in neighbouring areas, can be met over the plan period. It is, therefore, essential that

the market and affordable housing needs arising in the plan area over the period to 2040 are identified and fully provided for in the emerging Local Plan, alongside an appropriate contribution towards the unmet needs arising within the Leicester and Leicestershire Housing Market Area (LLHMA). Critically, the plan must make provision for the unmet need arising from LCC; which has not been addressed elsewhere in any meaningful way since it was first identified in 2017.

North West Leicestershire's Housing Need

NPPF paragraph 61 states that *"to determine the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance."* The standard method-derived local housing need (LHN) for NWLDC in the 2022 period is 366 dwellings per annum (dpa), which broadly reflects the standard method housing need figure highlighted in the Regulation 18 consultation document (359dpa).

The Government's Planning Practice Guidance (PPG) highlights, however, that the standard method for assessing LHN provides *"a minimum starting point in determining the number of homes needed in an area"* and that this figure may be exceeded *"where increases in housing need are likely to exceed past trends"* (PPG Ref. ID: 2a-010-20201216). That matter was considered in the Council's Housing and Economic Development Needs Assessment (HEDNA) which quite correctly found that the District's objectively assessed housing need (OAHN) should be subject to an uplift above the standard method-derived LHN to reflect trend-based demographic projections, economic dynamics and growth, commuting and market signals.

However, the actual OAHN will have increased further since that HEDNA was carried out in 2017 as a result of the District's changing economic circumstances. For example, the Government's recent granting of a 'freeport' status to the East Midlands Airport (EMA) will inevitably drive a further demand for housing to ensure that the quantum of housing delivered is aligned with the number of workers required to meet the jobs arising from the EMA as its operations expand. Therefore, NWLDC should revisit its HEDNA in order to consider the additional uplift that is required to the District's OAHN to reflect those changing circumstances.

The OAHN figure that is arrived at through that process should be considered to be the appropriate housing need figure for the District, given that it reflects the level of housing that will need to be delivered to meet the District's housing needs and appropriately respond to its socio-economic context and relevant economic projections. Any provision above that figure would constitute a contribution towards the unmet needs arising from LCC, therefore; which is discussed below.

Unmet need arising from Leicester City Council

NPPF paragraph 61 highlights that, in addition to that OAHN figure, overall housing requirements should take account of *"any needs that cannot be met within neighbouring areas."* As NWLDC have correctly recognised in their Regulation 18 consultation document, that is relevant to the emerging Local Plan given the long-established unmet housing needs that are arising elsewhere in the Housing Market Area (HMA), most notably from LCC.

That is a strategic issue that has been extensively discussed between the LLHMA authorities in recent years, but with little if any positive outcome or action. Indeed, the 2018 Strategic Growth Plan (SGP) that was prepared between the authorities looked at the housing needs arising from each of the LLHMA authorities in the period to 2031. Its claim that those housing needs would be met was, however, based on unrealistic assumptions in relation to existing and emerging commitments (most notably windfall sites). Notwithstanding that, the SGP highlighted that a substantial unmet housing need was to arise in the post-2031 period, and that this would need to be re-distributed accordingly. That has, however, not yet been the subject of any agreed re-distribution strategy, and has therefore not been dealt with since the SGP's publication.

Moreover, the extent to Leicester's unmet need has worsened since that point. Indeed, whilst the draft Leicester Local Plan (as published in September 2020) suggested that the City's unmet housing need

was just 7,742 dwellings in the 2019-2036 period, the Government have since updated its PPG in relation to LHN calculations to require a 40% uplift above Leicester's base LHN. Given the finite development capacity within LCC's jurisdiction (in light of the preceding position that it already could not meet its own housing needs before that uplift was introduced), that will clearly have a significant impact on the level of unmet need arising from the city. Indeed, on the basis of the housing capacity of 21,362 dwellings in the city (as per the September 2020 plan), and the current 2022 housing need of 2,042dpa (equating to 40,840 dwellings across the 2019-2036 period), LCC would now have an unmet need of 19,478 dwellings over the 2019-2036 period, and presumably a substantial unmet need in the remainder of the proposed plan period for NWLDC.

As NWLDC are aware, that evolving context has resulted in the LLHMA authorities revisiting the findings of the SGP, which will be informed by an updated HEDNA. Whilst those documents have not yet been published, the exercise will inevitably find a substantial unmet need arising from LCC. That must be taken into account in the emerging local plans of neighbouring authorities, including NWLDC. In order to reflect that considerable unmet need, and to address the lack of action to date, it is critical that those authorities make substantial contributions towards the unmet housing need within their emerging plans. That is reflected in BHL's support for the High 2 growth scenario, as set out below.

Scale of growth

In light of the above context, there is a clear need for significant development within NWLDC both to fully meet the needs arising from the District itself, whilst also contributing appropriately to the unmet needs of LCC. The Regulation 18 consultation document is, therefore, quite correct in concluding that the Low and Medium scenarios are a wholly inappropriate basis on which to continue planning for future provision. Indeed, the Low growth scenario would fail to meet NWLDC's own housing needs, whilst the Medium growth scenario would only match the now out-dated OAHN that was derived from the 2017 HEDNA. As such, that growth option would also fail to meet NWLDC's own housing needs and would provide no additional housing to respond to LCC's unmet needs. Both scenarios are clearly inappropriate and would be found to be unsound.

Whilst the High 1 scenario (512dpa) could provide some contribution towards the unmet housing, that would only be the case if the revised HEDNA found that NWLDC's OAHN fell below 512dpa; which may not be the case. Even if that is not the case, however, any contribution made towards the unmet needs of LCC would be minimal. That is recognised in the Regulation 18 consultation document, which highlights that it is not clear at the current time whether the High 1 growth scenario would provide a sufficient contribution towards LCC's unmet housing needs and, therefore, that this represents a key planning risk to the plan. That growth option is, therefore, also not an appropriate basis upon which to bring forward the emerging Plan.

As such, the High 2 growth scenario represents the only appropriate growth scenario that is put forward. Indeed, that is reflected in the Regulation 18 consultation document, which clearly sets out that the High 2 scenario performs most favourably against demographic trends, build rates, unmet need and deliverable growth strategy criteria and would provide a "*significant degree of flexibility to help address issues of unmet need.*" In that context, BHL strongly supports that the emerging Local Plan be taken forward using the High 2 growth scenario that would pursue the delivery of 730dpa; which would ensure that the needs of NWLDC are met in their entirety and that an appropriate contribution is made towards the unmet needs arising from LCC.

As set out above, however, this should be extended to cover the 2020-2040 plan period, which would result in **an overall housing requirement of 14,600 dwellings between 2020 and 2040**. Once completions and commitments have been taken into account, that would result in a **residual housing requirement of 5,816 dwellings**.

Residual Housing Supply

As such, NWLDC should identify sufficient residential development sites to meet that residual housing requirement, whilst also providing a buffer above that requirement for flexibility, and to ensure that much-

needed housing comes forward in a timely manner. Indeed, such an approach was advocated in a March 2016 report by the Local Plans Expert Group, which recommends that an additional 20% uplift is incorporated into a Council's housing supply above its base requirement to allow for flexibility in the authority's land supply.

On the basis of a residual requirement of 5,816 dwellings, **that would require the emerging Local Plan to identify a further supply of 6,980 dwellings** to provide sufficient certainty that NWLDC is able to deliver the quantum of housing required to meet its own housing needs and provide an appropriate contribution towards LCC's unmet needs. That is particularly pertinent given that NWLDC may seek to pursue the delivery of an entirely new settlement as part of its spatial strategy; the implications of which are discussed in BHL's response to Question 5.

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

Please state which consultation question your response relates...

Q5: Distribution of Growth

[Response to Question 5 on following page due to formatting problem].

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.

Overall Housing Requirement and Residual Housing Supply

As set out in BHL's response to Question 4, BHL strongly supports the High 2 housing requirement (at 730dpa), given that it is the only appropriate option for growth that would fully meet NWLDC's housing needs whilst also providing a suitable contribution towards the unmet needs arising from LCC. With that said, BHL's response to Question 5 also highlighted that the plan period utilised by NWLDC should be extended to 2020-2040, and that the overall housing requirement should be 14,600 dwellings as a result.

In light of the purported completed / committed supply of 8,784 dwellings, therefore, BHL's response to Question 4 highlights there will be a residual requirement of **5,816 dwellings** within the 2020-2040 plan period, rather than 5,100 dwellings, but that a 20% buffer should be provided above that residual requirement for flexibility. **That would require the emerging Local Plan to identify a further supply of 6,980 dwellings.** In the first instance, therefore, the spatial options that are set out in the Regulation 18 document should be updated to reflect that requirement.

Assessed Spatial Strategy Options

With that said, and overlooking that the residual housing supply being discussed differs from that suggested by BHL above, the following comments are made in relation to the spatial strategy options that have been assessed to date.

Firstly, reflecting that BHL only supports the High 2 growth scenario, and that a High 1 growth scenario would not provide an appropriate contribution towards LCC's unmet housing needs, BHL does not strictly *support* any spatial option relating to that level of growth.

It is BHL's clear position that the High 2 growth scenario is the only appropriate growth scenario presented, and that this should be taken forward by NWLDC. Within that, BHL considers that the scope of Spatial Option 7b is a largely acceptable framework for a spatial strategy, insofar as that the option seeks to appropriately spread development across the tiers of the spatial strategy. Indeed, that is a far more appropriate spatial strategy than other strategies that seek to maximise development within the principal town and / or a new settlement and / or the key service centres, whilst failing to bring forward any additional development at local service centres. Indeed, the approach of providing development to an appropriate level across each tier of the settlement hierarchy will meet the housing need arising within those settlements in a sustainable manner, and will also ensure the vitality and viability of key services and facilities upon which existing residents depend.

In addition to being a suitable and sustainable strategy for growth, spatial strategy Option 7b also represents a spatial strategy framework that is likely to ensure the delivery of housing in the locations where it is required, in a timely manner. As is recognised in the Regulation 18 consultation document, that is not the case for other spatial options, particularly when placing considerable reliance on key service centres (particularly Coalville) and a new settlement. Indeed, in relation to Option 7b, the Regulation 18 document states that the strategy largely reflects that which has been pursued in the adopted Local Plan (with the exception of the delivery of a new settlement) which "*has a demonstrably strong delivery record*" (paragraph 4.55).

Thus, Option 7b is considered to be a good basis upon which to develop the spatial strategy for the District in the 2020-2040 plan period. The final strategy should, however, consider other matters such as the actual capacity of settlements in light of, for example, existing development commitments, identified needs within specific settlements, and the likely timescales for the delivery of a new settlement; as discussed below.

Accounting for Existing Commitments

In developing the spatial strategy for the District, NWLDC must take into account of where growth is already committed within the District to ensure that the spatial strategy is deliverable in practice.

That is a particularly important consideration given that existing commitments within North West Leicestershire are largely focused on the principal town of Coalville, and the key service centres of Ashby de la Zouch and Castle Donington. That is reflected in the housing trajectory attached to the Council's 2021 Five Year Housing Land Supply Position, which highlights an estimated pre-2031 supply of 4,016 dwellings and a post-2031 supply of 1,814 dwellings in the Coalville Urban area, 2,597 dwellings of pre-2031 supply and 809 dwellings of post-2031 supply in Ashby de la Zouch, and 1,227 dwellings of pre-2031 supply in Castle Donington. Clearly, therefore, NWLDC is anticipating consistent and substantial housing delivery in the pre-2031 and post-2031 periods in those settlements even before any additional allocations are made through the emerging Local Plan.

NWLDC should, therefore, consider the cumulative position to ensure that those settlements have the capacity to accommodate the planned growth in the plan period. When considering that, NWLDC should also take into account any technical and environmental constraints that would limit the scale of development that those settlements could accommodate. BHL note that taking those matters into account is of paramount importance given that failing to take that into account would threaten the deliverability (and thus soundness) of the spatial strategy and, therefore, the plan as a whole, and would likely result in an inability to maintain a five-year supply of housing throughout the plan period.

New Settlements

Moreover, and whilst BHL do not have any in-principle objections to the delivery of a new settlement as part of the spatial strategy, NWLDC must also take a realistic view in relation to the delivery of such a new settlement. That is particularly significant given the scale of the settlement that is being discussed, with NWLDC's Regulation 18 consultation document referring to the delivery of some 4,700 dwellings within a combined site at East Midlands Airport.

Principally, NWLDC should take into account that delivering a wholly new settlement requires significant infrastructure in relation to highways, public transport, utilities, services and facilities that would need to be in place prior to the delivery of the settlement's first dwellings. The delivery of such significant elements of infrastructure will, even without delays, result in considerable lead-in times once planning permission has been granted. Even then, however, the delivery of that infrastructure could itself be subject to delays given the size and complexity of any new settlement.

To reflect the clear complexity of delivering development of this scale, and to ensure that NWLDC meets its overall housing requirement in full, it is important that NWLDC sets out realistic timescales for the delivery of such a site; and indeed that is a requirement of NPPF paragraph 74. The Regulation 18 consultation document sensibly refers to the Lichfields '*Planning Matters: What Factors Affect the Build-Out Rates of Large-Scale Housing Sites*' document in that regard, which it states has informed the assessment of each spatial strategy option.

However, the findings of that report do not appear to have been applied in a sensible manner. As the Regulation 18 plan identifies, sites of 2,000+ dwellings (of which this site falls considerably above that value) take on average 8.4 years from the validation of the first planning application to the first dwelling being completed. As set out above, that would be an optimistic assumption given the scale of the new settlement being discussed and the complexity of delivering significant development in an entirely new location of growth. With that said, however, the 8.4-year assumption provides a reasonable starting point from which to model the delivery of any such site.

Assuming that the plan is adopted as expected in mid-2024, and that the first application is submitted immediately upon the plan's adoption (which are both best-case scenarios), that would suggest that first deliveries would begin in early 2033, which would allow for 7 years of delivery in the plan period. The Planning Matters document also sets out an average build-out rate of 160dpa for sites of this size. As

such, that would suggest that around 1,120 dwellings would be delivered in the plan period; which is some 650 dwellings short of the number of dwellings that are included within Spatial Option 7b.

It is BHL's view, therefore, that Spatial Option 7b should be amended to refer to a capacity of 1,120 dwellings from a new settlement.

Developing a Deliverable Spatial Strategy

In light of the above points, whilst Spatial Option 7b represents a good basis upon which to develop a spatial strategy, it is suggested that the quantum of housing that is accommodated within the Principal Town of Coalville and the Key Service Centres must reflect their true capacity in the plan period, and that the supply expected from a new settlement be updated to reflect its capacity of c. 1,100 dwellings in the plan period.

To offset that, it is suggested that the final spatial strategy focuses an increased level of development at the Local Service Centres, notably Measham, where less development is already committed and a need has been identified. That would provide NWLDC with the confidence that its spatial strategy for development was deliverable, and that a five-year supply of housing could be maintained as required by NPPF paragraph 74. Moreover, in addition to the deliverability of such a strategy, increasing the level of housing delivered within the principal town, key service centres, local service centres and sustainable villages would more accurately reflect the housing need arising in those settlements and reflect their inherent sustainability to accommodate development.

To achieve that more sustainable and deliverable spatial strategy, NWLDC should maximise the potential of the plentiful supply of suitable, available and achievable sites within local service centres. That includes Land at Bosworth Road, Measham, the merits of which are set out below.

Measham

As is set out in BHL's response to Questions 2, in meeting that residual housing target of 6,980 dwellings, NWLDC must distribute development accordingly so as to achieve a sustainable pattern of development as required by NPPF paragraph 11a. In doing so, it should seek to focus development on sustainable settlements, as informed by the proposed settlement hierarchy. That includes focusing an appropriate level of development to local service centres such as Measham, which are inherently sustainable locations for development by virtue of their excellent range of services and facilities, connectivity to higher order settlements, and the inherent demand for housing within such settlements. The suitability of Measham to accommodate development is highlighted in further detail in BHL's response to Question 2, which highlights that Measham is an entirely appropriate location for growth.

Land at Bosworth Road, Measham

In that light, the development potential of 'Land at Bosworth Road, Measham' (as denoted in the Site Location Plan that has been submitted alongside these representations) is noted. Indeed, the site is located in an inherently sustainable location for growth at the eastern extent of Measham, within walking distance of the high street and a number of key services and facilities as discussed above; including the two primary schools and open space / park area that are located in particular proximity of the site to its west.

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

Vehicular access is expected to be provided from Bosworth Road and Leicester Road and is considered to be achievable in highways terms, with those site accesses able to achieve appropriate visibility splays. The location of vehicular access points in those locations will take advantage of the site's very good access to the wider strategic network, including the A42. Pedestrian and cyclist access can be achieved to Bosworth Road, Leicester Road and Gallows Lane. Given that the site is located less than a ten-minute walk from the nearest bus stop on High Street, that will allow new residents to benefit from a very good level of accessibility to the day-to-day services and facilities that are available both within

Measham itself and the nearby settlements that those bus services connect to. As such, the site's location and layout will promote multi-modal journeys via sustainable methods of travel.

The site falls gently from its highest point at the northern boundary to its southern boundary with Bosworth Road, and is not constrained by its topography. A Flood Risk and Surface Water Drainage Technical Note has been prepared in relation to the site, and confirms that the site is entirely located in flood zone 1 and that there are only small areas of low to medium surface water flood risk that, in any case, can be managed effectively as part of the sustainable surface water drainage strategy that has been prepared for the site's development. The site's development will also preserve the open ditch course system within the site to allow for the LLFA to maintain those features. It is also anticipated that foul connections will be achievable. Therefore, topography and drainage is not a constraint to the site's development.

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

Similarly, heritage impact is not considered to be a constraint to development, as there are no known heritage assets within or immediately adjacent to the site. Moreover, the Council's Landscape Sensitivity Study (July 2019) found that the site and its surrounds are of low-medium landscape sensitivity and low visual sensitivity to residential development. As such, it is not considered that there will be a significant adverse landscape and visual impact.

The Concept Masterplan (DE_493 CON 001) that has been submitted alongside these representations sets out the emerging scheme for the site's development and its capacity to accommodate the delivery of between 220 to 235 dwellings (at 35 – 37 dwellings per hectare), with associated open space, drainage and supporting infrastructure.

In light of the above, it is clear that the site is an entirely suitable site for residential development. Given that the site is under the control of BHL, the site is also available, achievable and deliverable, and can therefore make a valuable contribution (potentially up to 235 dwellings) towards meeting the needs both of the District and those unmet needs arising from LCC. The site should, therefore, be included as a proposed residential allocation within the Regulation 19 Local Plan.

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

Please state which consultation question your response relates...

Q6: Self / Custom Build Houses

QUESTION 6 – DO YOU AGREE WITH THE PROPOSED SELF AND CUSTOM HOUSEBUILDING POLICY? IF NOT, WHY NOT?

Whilst BHL note NWLDC's intention to bring forward a hybrid policy in relation to custom and self-build housebuilding (CSBH) that seeks to put in place a number of mechanisms to deliver CSB housing within the District, it would appear that the proposed approach of seeking CSB plots on housing sites of 50+ dwellings would be inappropriate. Indeed, BHL has concerns both in relation to the actual demand for CSB plots, and the practical implications of delivering such plots within a market housing scheme.

With regard to the demand for CSB housing, NWLDC refer to the 78 entries that have been added to the Council's CSB register between April 2016 and January 2022, and thus seek to deliver a sufficient number of CSB plots to reflect the number of entries on the register. However, such registers are not means tested, meaning an individual's registration seldom equates to a genuine desire and ability to develop a CSB plot. Rather, such registers often only require an individual's name and address, and do not seek to ascertain whether an individual or group has the financial resources to deliver such a plot should the opportunity arise. The reality is, therefore, that the actual demand for CSB housing would fall well below that. Further evidence is therefore required to ascertain the true demand for CSB plots within the District in order to inform the emerging policy.

Moreover, registrations on CSB registers often relate to a desire for CSB in a specific location, rather than within estate-like market housing developments. Irrespective of the above point, therefore, that alone calls into question whether seeking CSB plots on market housing sites of 50+ dwellings would be appropriate to meet any demand arising, regardless of its scale.

Furthermore, delivering CSB housing within market housing schemes can be practically challenging. For example, the delivery of CSB houses is often dependent on the ability of sites to provide independent construction access and infrastructure, and deal with difficult health and safety issues. Moreover, CSB housing has the potential to undermine the realisation of consistent design principles across a scheme, and can also negatively impact on delivery timescales.

Those practical challenges have been recognised by NWLDC within the Regulation 18 document itself (paragraph 5.11), which sets out that the Council's Local Plan Committee agreed "*not to require the provision of self-build and custom housebuilding plots as part of general market developments, due to the practical issues with the application of such an approach and due to the lack of consistent support from Inspectors at examinations of Local Plans.*" It was, therefore, decided by the Local Plan Committee to consider other mechanisms for CSB delivery.

Given that, as set out above, the true demand for CSB plots is likely to fall well below the figure derived from the Council's CSB register, that any demand seldom relates to the delivery of CSB plots on market schemes, and that CSB delivery on such schemes is subject to practical difficulties, it is suggested that the proposed requirement for CSB housing on market schemes of 50+ dwellings is removed; given that this is not an appropriate mechanism. Rather, the proposed approach of supporting CSB delivery where that is proposed by applicants is a more appropriate approach towards this policy and, in addition to that, it would be prudent for NWLDC to seek to identify / allocate specific sites for CSB delivery.

Please state which consultation question your response relates...

Q7: Space standards

QUESTION 7 – DO YOU AGREE WITH THE PROPOSED POLICY ON SPACE STANDARDS? IF NOT, WHY NOT?

In response to NWLDC's proposed policy of requiring all new residential developments to achieve gross internal floor areas that, as a minimum, meet the Nationally Described Space Standards (NDSS), BHL note the Government's guidance that the NDSS are "*optional new technical standards*" that should only be required "*if they address a clearly evidenced need, and where their impact on viability has been considered*" (Written Ministerial Statement dated 25th March 2015.)

As such, and as is recognised by the Council, for NWLDC to justify their adoption of such standards, up-to-date and appropriate evidence is required that demonstrates an actual need for dwellings that comply with the NDSS, in order for the proposed policy to meet the tests of NPPF paragraph 35b. Moreover, should that evidence justify the imposition of an NDSS requirement, it must also be considered in a comprehensive viability assessment that considers the cumulative impact of all policy requirements that are set out in the plan. That viability assessment should take into consideration that adhering to the NDSS will inevitably have an impact on development densities, which in turn will influence the viability of schemes. NWLDC have quite correctly recognised that the outcome of this comprehensive viability assessment should inform the approach that is taken forward in the Regulation 19 version of the plan.

As an aside to that, NWLDC should also take into account the impact that any NDSS requirement will have on housing affordability, given that the additional cost of extra floorspace associated with the NDSS will inevitably be passed on to buyers.

Therefore, NWLDC should consider each of those matters in the round when formulating its approach to internal space standards / NDSS requirements ahead of publishing the Regulation 19 of its emerging local plan. That may require a degree of balance between each of those considerations so as to ensure that evidenced needs are met without rendering development schemes unviable, or resulting in an increase in the cost of housing. One option may be, therefore, that NDSS requirements are applied only to specific dwelling sizes / tenures, reflecting the findings of the needs assessment that is required to inform the policy.

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

Please state which consultation question your response relates...

Q8: Accessible Housing

QUESTION 8 – DO YOU AGREE WITH THE PROPOSED POLICY ON ACCESSIBLE AND ADAPTABLE HOUSING? IF NOT, WHY NOT?

Whilst it is noted that the proposed policy approach of requiring all new dwellings to meet at least M4(2) standards of the Building Regulations, and for 5% of all new affordable dwellings to meet Part M4(3) is informed by a Local Housing Needs Assessment (LHNA), it is noted by BHL that the LHNA was carried out on the basis of an assumed provision of 480dpa. However, as is set out in BHL's response to Question 4, NWLDC should plan for a housing requirement of 730dpa over an extended plan period of 2020 – 2040 (rather than 2020-2039 as currently suggested).

As such, the LHNA should be revisited on that basis to consider whether the provision of all dwellings at Part M4(2) standard and 5% of affordable dwellings at M4(3) standard would be appropriate. Indeed, whilst it would be reasonable to suggest that the additional demand in the plan period would increase directly in line with the increase in housing delivery, it is noted that the existing shortfall of accessible / adaptable housing comprises a significant amount of the overall shortfall that is expected by the end of the plan period. That figure, however, is a base figure that will not increase alongside the increased level of housing delivery that should be pursued. It may well be the case, therefore, that those needs could be met whilst requiring a reduced proportion (in terms of a percentage) of Part M4(2) and Part M4(3) housing.

Notwithstanding the outcome of that revisited LHNA, which will justify a revised evidence-based need for accessible and adaptable housing, any requirement should be taken into account in a Viability Assessment that seeks to ensure that *“the total cumulative cost of all relevant policies will not undermine the deliverability of the plan”* (PPG Ref. 10-002-20190509), in order to ensure that the policy requirement is *“deliverable”* in accordance with NPPF paragraph 16b. If it is the case that this Viability Assessment finds that the proposed level of provision would render development schemes unviable, then the level of provision should be capped at a level that would allow for viable schemes.

With the above said, the flexibility that is suggested within the policy is welcomed. Indeed, it is entirely appropriate to allow for exceptions from these requirements *“where it can be robustly demonstrated that it will not be possible to provide safe, step-free access.”* It is also suggested that flexibility is allowed in relation to scheme viability, for example by extending the above policy wording to read *“exceptions to these requirements will only be considered where it can be robustly demonstrated that it will not be possible to provide safe, step-free access, **or where provision of accessible and adaptable housing would render the site unviable.**”*

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

Please state which consultation question your response relates...

**Q9: Wheelchair
Adaptable Housing**

QUESTION 9 – SHOULD PART M4(3)(A) WHEELCHAIR ADAPTABLE DWELLINGS ALSO APPLY TO MARKET HOUSING? IF NOT, WHY NOT?

It is entirely appropriate to apply a requirement for Part M4(3)a housing only to affordable housing, rather than market housing. Indeed, the Council's LHNA identifies that wheelchair users comprise a higher proportion of social tenants compared to owner-occupiers. Thus, reflecting that by providing wheelchair adaptable dwellings in the form of affordable housing only is a sensible approach.

With that said, BHL's response to Question 8 highlights that, when taking into account the need to adopt a 730dpa housing requirement, the requirement for M4(3) housing within the affordable housing offer may reduce in any event.

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

Please state which consultation question your response relates...

Q16: Health and Wellbeing

QUESTION 16 – DO YOU AGREE WITH THE PROPOSED HEALTH AND WELLBEING POLICY? IF NOT, WHY NOT?

NWLDC's choice to include a specific health and wellbeing policy is supported, which reflects that the NPPF recognises that a key element of the social objective of the planning system is to “*support strong, vibrant and healthy communities*” (NPPF paragraph 8). In that regard, the scope of the proposed policy is largely supported by BHL.

With that said, however, it is suggested that the Council updates requirement c to state that “*proposals for development schemes **that meet the criteria set out in Policy XX Health Impact Assessment (HIA)** include a Health Impact Assessment [...].*” That minor alteration would more clearly reflect that HIAs are not expected for all development schemes.

Moreover, in relation to requirement b, which requires development proposals to “*assess their impact upon existing services and facilities, relating to health, social wellbeing, cultural and recreation*”, it would appear that a more appropriate and conventional approach would be for this to be considered by statutory consultees. For example, it would be more appropriate for healthcare providers to consider the impact of a proposed development on services, and then to request financial contributions where appropriate. That should be considered at the outset of the plan through an Infrastructure Delivery Plan, and the likely contributions required for development schemes should then be taken into account within a Viability Assessment that considers the cumulative impact of the plan's policy requirements.

It is suggested, therefore, that requirement b of the emerging policy be updated to read “The Council will require: **statutory consultees** to consider their impact upon existing services and facilities, relating to health, social wellbeing, cultural and recreation **through the emerging Infrastructure Delivery Plan, and for applicants to make the necessary provision to mitigate that impact, be that through on-site provision or financial contributions.**”

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

Please state which consultation question your response relates...

Q17: Health Impact Assessment

QUESTION 17 – DO YOU AGREE WITH THE PROPOSED HEALTH IMPACT ASSESSMENT POLICY? IF NOT, WHY NOT?

As set out in BHL's response to Question 16, the Council's approach of seeking a HIA only for certain developments (i.e. residential developments of 30+ dwellings) is a sensible approach.

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

Please state which consultation question your response relates...

Q19: Renewable Energy

QUESTION 19 – DO YOU AGREE WITH THE PROPOSED RENEWABLE ENERGY POLICY? IF NOT, WHY NOT?

Whilst the scope of the proposed renewable energy policy is acceptable, insofar as setting out NWLDC's support for renewable energy production facilities, the requirement for all new developments to "*incorporate proposals for on-site electricity and heat power from solar, wind and other renewable technologies so as to maximise renewable energy production*" is not suitable; particularly for small and medium-sized developments. As such, it is suggested that requirement 5 of the policy instead "*encourages applicants to consider opportunities for on-site electricity and heat production from solar, wind and other renewable technologies so as to maximise renewable energy production.*"

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

Please state which consultation question your response relates...

Q20: Energy Efficiency

QUESTION 20 – DO YOU AGREE WITH THE PREFERRED POLICY APPROACH FOR ENERGY EFFICIENCY? IF NOT, WHY NOT?

Paragraph 9.26 of the Regulation 18 consultation document states that Option 3, which would require a 31% reduction in carbon emissions compared to the 2013 Edition of the 2020 Building Regulations (Part L) (or any future equivalent legislation), is considered to be the favoured policy option. In reaching that conclusion, it references AECOM's Renewable and Low Carbon Energy Study finding that *"NWLDC should [...] look to set the highest level of building performance standards for new buildings that can reasonably be implemented and should do so as soon as possible."*

Whilst it would appear that the approach of seeking a 31% reduction in carbon emissions over the current Building Regulations is an attempt to replicate the 31% carbon dioxide reduction that is to come into force in June 2022 through an uplift to the current Building Regulations, NWLDC are seeking also to maintain that 31% reduction uplift to *"any future equivalent legislation"* that supersedes the current Building Regulations. On that basis, it would appear that NWLDC would also seek a 31% uplift on the carbon emissions standards that will be set by the Future Homes Standards (FHS) once implemented, which themselves will set ambitious targets for carbon emissions.

Seeking an uplift above any adopted standards, however, will have significant viability implications, and delivering developments that meet those heightened standards will also be a considerable challenge; thus calling into question the deliverability of sites. That is the basis of the Government's intention to set nationwide energy standards, currently through iterations to the adopted Building Regulations and in the future through the FHS. Indeed, the Government's January 2021 response to the FHS consultation sets out that *"we must ensure that all parts of industry are ready to meet the Future Homes Standard from 2025, which will be challenging to deliver in practice."* A key element of that will be to ensure that the economies of scale are in place to provide the technology required to support the ambitious reductions at a viable price.

To seek to set standards that go above and beyond all Government standards on efficiency would, therefore, oppose the Government's desire to standardise energy efficiency targets in a manner that is clear and deliverable. Indeed, consistently seeking an uplift above the standards that have been set by the Government (and themselves have been viability tested to ensure that they are deliverable) would put the viability and deliverability of schemes at risk throughout the plan period. Moreover, even if such standards do not render schemes unviable, the cost of the technology required, which will be more significant if the economies of scale are not in place, will be passed on to the end-user; which should be taken into account by NWLDC. The distinction in the AECOM report that NWLDC should only seek to maximise energy efficiency standards where they can **"reasonably be implemented"** is of relevance in that regard.

That is not to say, however, that NWLDC should not seek to implement ambitious energy efficiency targets. Instead, a different approach should be taken by utilising flexible policy wording that will ensure that the standards within the policy are not quickly outdated. For example, the proposed policy should require developments to *"achieve an energy efficiency in line with the latest standards set by the Government, whether that be Building Regulations or the Future Homes Standard (including any transitional arrangements)."*

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

Please state which consultation question your response relates...

Q21: Lifestyle Carbon Assessment

QUESTION 21 – DO YOU AGREE WITH THE PREFERRED POLICY APPROACH FOR LIFECYCLE CARBON ASSESSMENT? IF NOT, WHY NOT?

Paragraph 9.35 sets out that NWLDC will seek a Lifecycle Carbon Assessment (LCA) for residential sites of 30 dwellings or more that are not developed by small to medium sizes housebuilders. The submission of an LCA is not, however, a requirement that is set out in the NPPF, and is therefore a complicated additional burden that goes beyond the requirements of national policy. That is also the case for the proposed approach of seeking an assessment of overheating (see BHL's response to Question 22), and the requirement for a wider climate change assessment (BHL's response to Question 23).

A more reasonable request, therefore, would be for applicants to submit an overarching Sustainability Statement that sets out the proposed scheme's compliance with relevant policy requirements and gives an overview of the scheme's sustainability credentials.

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

Please state which consultation question your response relates...

Q22: Overheating

QUESTION 22 – DO YOU AGREE WITH THE PREFERRED POLICY APPROACH FOR OVERHEATING? IF NOT, WHY NOT?

Whilst BHL recognise that taking a proactive approach towards overheating can significantly impact upon the energy efficiency of a development, that is not a matter that should be dealt with through planning policy; and instead should be dealt with through the Government's Building Regulations. Therefore, the requirement for applicants to submit an industry recognised assessment that considers overheating is not appropriate.

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

Please state which consultation question your response relates...

**Q23: Climate Change
Assessment**

QUESTION 23 – DO YOU AGREE WITH THE PREFERRED POLICY APPROACH FOR THE CLIMATE CHANGE ASSESSMENT OF DEVELOPMENT? IF NOT, WHY NOT?

Paragraph 9.54 of the Regulation 18 document identifies Option 3, which would require major residential applications to be accompanied by a Home Quality Mark (HQM) assessment, as NWLDC's favoured option. The submission of an HQM assessment is not, however, a requirement set out in the NPPF, and is therefore a complicated additional burden that goes beyond the requirements of national policy.

A more reasonable request, therefore, would be for applicants to submit an overarching Sustainability Statement that sets out the proposed scheme's compliance with relevant policy requirements and gives an overview of the scheme's sustainability credentials.

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

Please state which consultation question your response relates...

Q24: Reducing Carbon Emissions

QUESTION 24 – DO YOU AGREE WITH THE PROPOSED POLICY FOR REDUCING CARBON EMISSIONS? IF NOT, WHY NOT?

BHL's response to Questions 19 to 23 highlight their thoughts on the specific aspects that make up the proposed 'Reducing Carbon Emissions' policy. Given that the proposed policy combines those subjects within a single policy, those responses remain relevant to Question 24 also. Overall, it is BHL's view that, whilst the scope of the policy is largely acceptable and reflects NWLDC's ambition to deliver sustainable development schemes, there are some elements of the policy that must be altered to ensure that the plan as a whole (and its allocations) will be deliverable, and to ensure that the sustainability credentials of schemes can be assessed without introducing additional burdens to applicants.

In light of those responses, BHL is of the view that NWLDC should not seek an additional 31% reduction in regulated CO2 emissions over and above the current Building Regulations, or future equivalent legislation. That is because, as is highlighted in response to Question 19, such an approach would be contrary to the Government's intentions to create a consistent standard for energy efficiency. Moreover, it would also call into question the viability and deliverability of schemes as a result of the significant cost that would be associated with delivering a scheme that performs significantly more efficiently than what is required by the Government's own standards. As such, it is suggested that requirement 2 of the proposed policy should be re-worded so as to require developments to "*achieve an energy efficiency in line with the latest standards set by the Government, whether that be Building Regulations or the Future Homes Standard (including any transitional arrangements).*"

With that said, BHL welcomes the flexibility built into the policy to allow for schemes to maximise renewable energy generation as much as possible where schemes are unable to meet the requirements of the policy due to issues relating to technical feasibility or economic viability. However, the suggestion that applicants should make a financial contribution towards the Council's carbon offset fund in circumstances where on-site delivery is not economically viable appears counter-intuitive.

BHL also notes that the policy requires applicants at major residential sites to submit a Lifecycle Carbon Assessment (LCA) and a Homes Quality Mark (HQM) assessment to demonstrate their compliance with the requirements of the policy. However, undertaking such assessments is not a requirement that is set out in national policy, and therefore is considered to be an additional burden for developers. As such, the policy should not require applicants to submit such assessments, and instead should require applicants to submit an overarching Sustainability Statement that sets out the proposed scheme's compliance with relevant policy requirements and gives an overview of the scheme's sustainability credentials. That would both assist applicants in seeking to demonstrate the sustainability credentials of schemes, and would also allow for officers to determine applications more easily.

Moreover, the requirement for applicants to demonstrate how development proposals have considered overheating risk (which is suggested as being incorporated into an 'industry standard assessment' earlier on in the plan), is not appropriate. Indeed, BHL's response to Question 25 sets out that this is not a matter that should be dealt with through planning policy; and rather should be dealt with by the Government's Building Regulations.

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

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

Yes

No

Declaration

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

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

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

Signed

M. Rose

Date

14/03/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT


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.

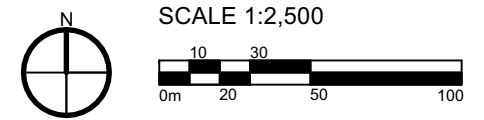
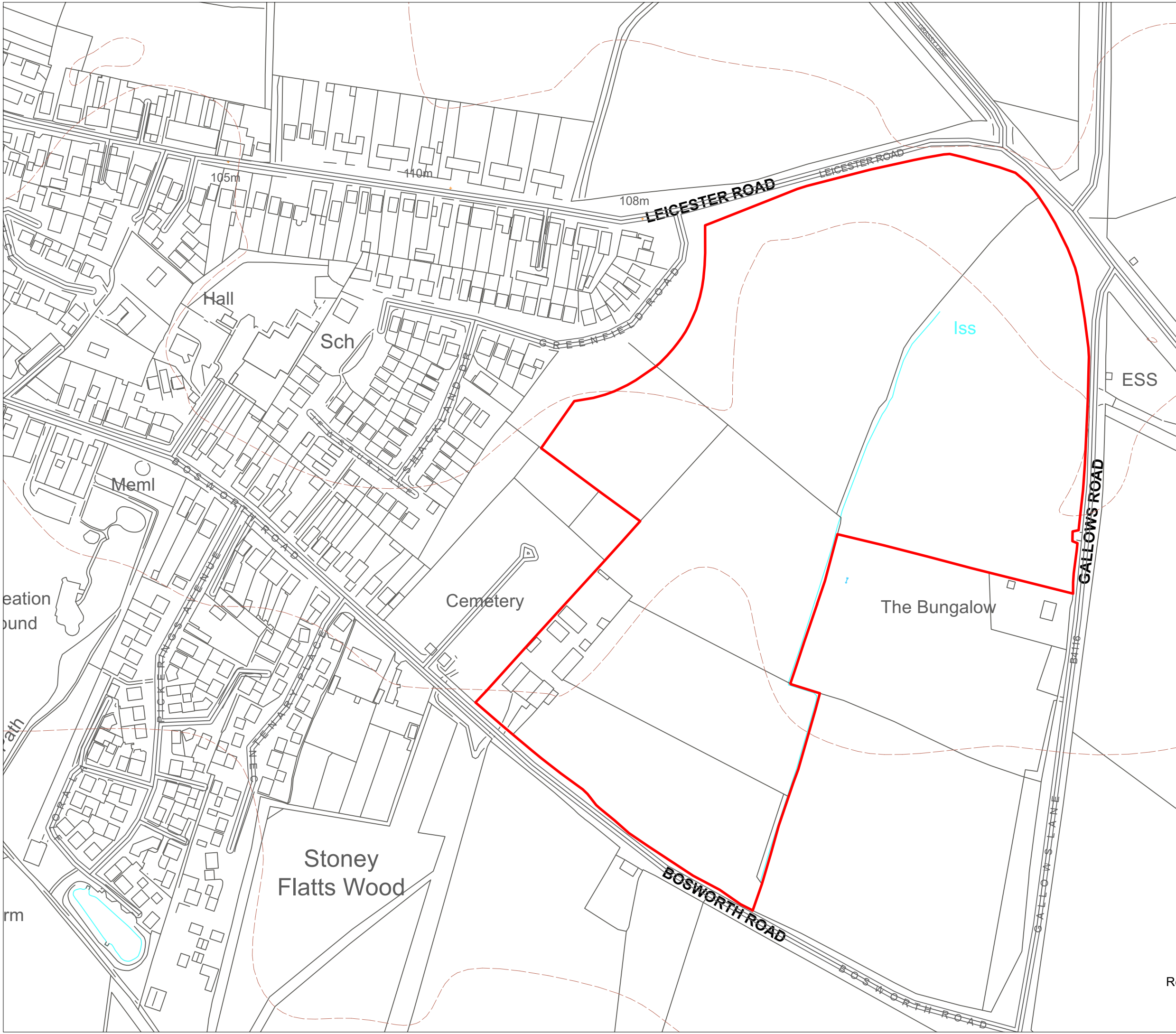
You should not include any personal information in your comments that you would not wish to be made publically available.

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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.

LEGEND

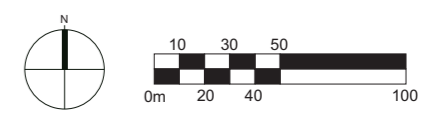
 Site boundary



Rev	Description	Date
		Rev
	DE_493 CFS 001	Drg No
	Bloor Homes Ltd	Client
	Land at Bosworth Road, Measham	Project
	Call for Sites - Land at Bosworth Road, Measham - Site Location Plan	Title
	1:2,500 @ A3	Scale

LEGEND

- Site Boundary (11.73 Ha)
- Residential (6.25 Ha)
- Primary Road
- Secondary Road
- Indicative Tertiary Road / Driveway
- Green Infrastructure / Open Space
- Blue Infrastructure Space
- Indicative Attenuation Area
- Indicative Swale Corridor
- Existing Drain / Ditch
- Existing Vegetation
- Existing Hedgerow
- New Hedgerow on Historic Boundary
- Proposed Woodland / Trees
- Indicative Street Trees
- Indicative Feature Trees
- Existing Public Right of Way
- Indicative Proposed Footpath Links
- Landscape Feature Space
- Focal Space / Play Area
- Residential Allocation
- 0.28 Ha Expansion Space
(Potential Residential, Community Orchard or Cemetery)



	Rev
DE_493 CON 001	Drg No
Bloor Homes Ltd	Client
Land at Bosworth Road, Measham	Project
Concept Masterplan	Title
1:3,000 @ A3	Scale



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...

Questions Answered:

- Q1 Do you agree with these Local Plan Review Objectives? If not, why not?
- Q2 Do you agree with the proposed settlement hierarchy? If not, why not?
- 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.
- 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
- Q6 Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?
- Q7 Do you agree with the proposed policy on Space Standards? If not, why not?
- Q8 Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?
- Q9 Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?
- Q16 Do you agree with the proposed health and wellbeing policy? If not, why not?
- Q17 Do you agree with the proposed Health Impact Assessment policy? If not, why not?
- Q18 Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?
- Q19 Do you agree with the proposed renewable energy policy? If not, why not?
- Q20 Do you agree with the preferred policy approach for energy efficiency? If not, why not?
- Q21 Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?
- Q22 Do you agree with the preferred policy approach for overheating? If not, why not?
- Q23 Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?
- Q24 Do you agree with the proposed policy for reducing carbon emissions? If not, why not?
- Q25 Do you agree with the proposed policy for water efficiency standards? If not, why not?

Please refer to our separate cover letter for our responses to these questions.

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

Caroline Featherston

Date

11/03/2022

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

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

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

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

31910/A3/P2d/CF/EP/KV/bc
11th March 2022

Dear Sir/Madam,

North West Leicestershire District Council – North West Leicestershire Local Plan Review: Development Strategy Options and Policy Options – Land at Ingles Hill, Ashby De La Zouch

Introduction

Barton Willmore write on behalf of Owl Homes, who are working with the landowners in respect of their interest at Land at Ingles Hill, Ashby De La Zouch ('the Site') in connection with the above public consultation on the Regulation 18 Development Strategy and Policy Options Local Plan Review consultation.

This representation relates specifically to the Site and should be read in conjunction with the details outlined below. We accompany our letter with the following documents which show the Site's suitability, availability and deliverability as a residential allocation:

1. Site Location Plan – Appendix 1
2. Vision Document – Appendix 2
3. Concept Masterplan – Appendix 3
4. Consultation Response Form – Appendix 4

This consultation is the 'substantive review' of the North West Leicestershire Local Plan, now referred to simply as 'the Local Plan Review'. The Local Plan was adopted in November 2017 and a 'partial review' concerning amendments to Policy S1 only has already been undertaken and found sound, subject to modifications, by the examining Inspector in February 2021. The North West Leicestershire Local Plan (as amended by the Partial Review) was adopted in March 2021.

Throughout this time, the 'substantive' review has been progressing, and amongst other work, a 'Call for Sites' has been undertaken, inviting submissions for potential housing and employment sites to be considered for inclusion in the Local Plan Review. The last Call for Sites closed in October 2020. The Site was submitted for consideration through the Call for Sites as part of the Local Plan Review in June 2020.

We provide detailed responses in respect of the relevant questions below:

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

We agree with the objectives of the Local Plan Review.

We consider it imperative that the Local Plan Review not just supports, but ensures the delivery of new homes, including affordable houses, to meet local housing needs. Paragraph 61 of the National Planning Policy Framework (NPPF) 2021 sets out that when determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) (Paragraph 62).

This is particularly important given the District is required to address some of the unmet housing need from Leicester City Council. Paragraph 11(b) of the NPPF states that strategic policies should, as a minimum, provide for objectively assessed need for housing and other uses, as well as any needs that cannot be met within neighbouring areas. These figures are starting points, and actual need may be higher. We agree that such development should be of a high quality, sustainable, and respond well to local character to create safe places to live, work and travel.

We agree that new infrastructure should be delivered across the District, and that employment opportunities should be provided to support the District's economy. New housing is required to facilitate employment, therefore the two should be considered holistically. Town and Local Centres play important roles in serving communities, and we agree that their vitality and viability should be enhanced.

We agree that new developments should be prepared to adapt to climate change; conserve heritage and heritage assets; conserve the natural environment; ensure efficient use of resources; maintain access to services and facilities; and ensure development is supported by physical and social infrastructure.

Taking these points into account, we offer the following suggested additions to the Objectives.

Objective 2 could refer to meeting neighbouring needs, as North West Leicestershire will be required to address some unmet need from Leicester City. It could also address the nationwide need to significantly boost the supply of housing (Paragraph 60 of the NPPF), the delivery of which is considered in the recently published Government Research Briefing Paper: Tackling the under-supply of housing in England¹.

Objective 3 could address the sustainability of new housing in terms of locating developments next to existing services and facilities, which would benefit both the community and the sustained provision of local amenities. This links to possible amendments to Objective 7, which could address

¹ <https://commonslibrary.parliament.uk/research-briefings/cbp-7671/>

new housing, employment and services being located in sustainable locations to reduce the need to travel. This would support the objective of reducing carbon emissions and adapting to climate change through changed behaviours.

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

Ashby de la Zouch and Castle Donnington are both classified as 'Key Service Villages': the second tier of settlement in the hierarchy after Coalville: the 'Principal Town'.

We support the hierarchy and consider that it reflects the sustainability criteria of the settlements, however, we consider that it should be noted that Ashby de la Zouch has higher sustainability credentials than Castle Donnington. This is outlined in the 2021 Settlement Study Appendix B². The study finds Ashby de la Zouch to be a more sustainable settlement in terms of its offer of local amenities. We would suggest this is noted in the explanatory text.

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

Not applicable.

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

We agree that the 'Low Scenario' (359 dwellings) and 'Medium Scenario' (448 dwellings) should not be considered reasonable approaches to housing growth within the District. Neither of these scenarios perform well against the factors influencing housing need and would not sufficiently address the needs of North West Leicestershire or the unmet need the District would need to accommodate from Leicester City.

We agree that 'High 1 Scenario' (512 dwellings) would be a more balanced approach than the Low and Medium Scenarios, as it would provide a buffer for addressing Leicester City's unmet need. However, it is still below demographic trends, at 38% below the Principal Demographic Projection, and build rates are more than allowed for under this scenario. The Strategic Growth Plan that this figure is based upon is also now over three years old, having been published in December 2018.

We consider that 'High 2 Scenario' (730 dwellings) would be the most appropriate approach to addressing the amount of housing growth within the District. We agree that this approach, out of all those tested, provides the greatest level of flexibility to address unmet need, which we consider is particularly important as the amount of unmet need to be accommodated in the District is not yet known.

As such, out of the options tested we support High 2 Scenario. Notwithstanding that, the Council should seek to plan for as much housing as possible and we reserve the right to comment further at a later date and as the technical evidence is updated (noting that the recent census data is due to be released in the near future).

2

https://www.nwleics.gov.uk/files/documents/settlement_study_2021_appendix_b/Settlement%20Study%2021%20Appendix%20B.pdf

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

The NPPF is underpinned by the presumption in favour of sustainable development, and Paragraph 11 states that plans and decisions should apply this presumption. Paragraph 11(a) states that for plan making, all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. Paragraph 8 sets out that the planning system should aim to ensure that sufficient land of the right type is available in the right places and at the right time to support growth. The needs of present and future generations should be met by ensuring a sufficient number and range of homes are provided.

To promote sustainable development in rural areas, Paragraph 79 of the NPPF states that housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

The Council's settlement hierarchy places Ashby de la Zouch as a 'Key Service Centre' which is the second highest tier behind the Coalville Urban Area (noting the difficulties surrounding the Coalville Housing Market noted in the consultation). These higher order settlements are served by public transport which enables connectivity to higher tier settlements such as Ashby de la Zouch, Loughborough, Leicester and Burton upon Trent.

The Council's Settlement Study provides a comparative assessment of the relative sustainability of settlements within the District³. The Study finds that Ashby de la Zouch is the second most sustainable settlement within the District after Coalville, based on an assessment of the local services including services and facilities, education and employment sites, and connectivity.

We therefore support the Council's approach which focuses on options 3a and 7b, given they seek to locate housing in the most sustainable locations. The Site at Ingles Hill is well placed to sit within this spatial strategy and provide much needed housing. We agree that an approach based around a new settlement is not the way forward, and note the Inspector's recommendations in the Uttlesford Local Plan⁴, that there should not be an over reliance on these given the inherent risks and lead-in times.

In addition, Paragraph 69 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. This is supported by research conducted by Lichfields in their paper 'Start to Finish' (February 2020)⁵ which shows that smaller sites have the fastest average completion rates (Figure 4 of that report) and the highest proportionate build out rates (Figure 7 of that report).

Having a number of sites of various sizes, including smaller sizes, would reduce risk in terms of deliverability than focusing larger sites only. It would also help to frontload delivery as these sites can be brought forwards quickly.

As such, for the reasons outlined above, we consider Option 7b would be the most appropriate proposed approach to the distribution of housing growth at this time. This approach seeks to locate development in the most sustainable locations and would deliver housing in a range of settlements within the hierarchy, allow greater certainty over the deliverability of housing within the District, and

³ https://www.nwleics.gov.uk/files/documents/settlement_study_2021/Settlement%20Study%202021.pdf

⁴ <https://uttlesford.moderngov.co.uk/documents/s17756/Appendix%201%20-%20Inspectors%20Letter.pdf>

⁵ <https://lichfields.uk/content/insights/start-to-finish>

support villages and their communities in thriving and growing, in accordance with the NPPF. As set out above, we consider that a range of sizes is also important, and this should be taken into account.

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

The PPG states that Councils need to take into account self-build and custom housebuilding registers when preparing planning policies, and that they are also likely to be material considerations in determining planning applications for self and custom builds⁶.

As there is evidence of demand for self-build and custom housebuilding, we agree that it would be appropriate to include a relevant policy.

Notwithstanding this, we consider that such a policy should either seek to provide such housing on specific allocations or within large-scale developments where it can be successfully incorporated. Smaller sites should not be required to provide an element of such housing given the issues surrounding practicality. We note that there is a relatively low demand and, as such, we consider this approach would meet the need. Further, any viability evidence should suitably test any requirements to ensure that the Plan is deliverable.

As such, we object to the policy as currently proposed and consider it is not justified, effective or consistent with national policy as required by Paragraph 35 of the NPPF.

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

Paragraph 130(f) of the NPPF 2021 states that planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. Footnote 49 states that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standards, where the need for an internal space standard can be justified.

The PPG states that evidence regarding need, viability and timing is needed to include the Space Standards in policy. The Development Strategy and Policy Options document states that the 'majority' of developments exceed the NDSS with those not meeting the standard being in some of the smaller settlements.

We agree with the proposed policy on space standards in principle. However, as outlined within the Consultation Document, and in accordance with the PPG, we consider the impact on viability would need to be carefully assessed, particularly in the smallest settlements and most constrained development sites.

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

Please see our answer to Question 7. Further to this, we consider that planning policy should not seek to replicate Building Regulations, where possible, to avoid a duplication of assessment and requirements.

⁶ Paragraph: 014 Reference ID: 57-014-20210508

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

As above, Paragraph 130(f) and Footnote 49 of the NPPF encourage the creation of accessible places. Currently, Policy H6 requires developments of 50 or more dwellings to provide a proportion which are suitable for occupation or easily accessible in accordance with Part M4(2) of the Buildings Regulations. This proposed policy would extend the requirement to all new residential dwellings.

The PPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability, they should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied⁷.

In principle, we would agree with the proposed policy. However, as noted in the PPG, the policy should take account of site constraints including flooding and topography, as well as viability, so as not to hinder the development of housing within the District if the standards are not achievable on all new dwellings. Any thresholds set out in policy should take the above into account.

Part M of Building Regulations makes a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

The PPG states that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling⁸.

Again, in principle, we consider that Part M4(3)(a) wheelchair adaptable dwellings could be applied to market housing. However, the policy should clearly state what proportion of dwellings should comply with these factors and account for site specific constraints, vulnerabilities, and viability issues.

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

Not applicable.

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

Not applicable.

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

Not applicable.

⁷ Paragraph: 008 Reference ID: 56-008-20160519

⁸ Paragraph: 009 Reference ID: 56-009-20150327

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

We agree that it is important to improve the health and wellbeing of our communities and agree with the principle of the proposed policy. Any requirements of the policy should also be tested to ensure viability and deliverability is not undermined.

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

Please see the answer to Question 18.

Q18 Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?

The health and wellbeing of communities is a fundamental principle of planning. Chapter 8 of the NPPF is dedicated to promoting healthy and safe communities and there is additional guidance contained within the PPG. Policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction; are safe and accessible; and enable and support healthy lifestyles.

The Consultation outlines that the District faces health and well-being challenges within its communities. Whilst we consider that this is an important objective for the District and its residents, we consider that for smaller scale and less strategic developments, these matters can be addressed through existing national policy requirements.

We also consider that such a policy could be overly onerous on smaller scale developments and such initiatives would have the greatest impact on strategic scale developments. As outlined in the consultation document, requiring Health Impact Assessments or Health Impact Screening Statements could place significant strain on LPA resources, when the benefits and outcomes for smaller scale developments could be relatively limited.

As such, we would suggest that Health Impact requirements are focussed on large (100+) sites.

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

The only part of this policy that would be applicable to our response is criteria 5, which requires all new developments to incorporate proposals for on-site electricity and heat production from renewable sources.

We agree with the principle of such a requirement. However, flexibility should be built into any requirements to take account of site-specific issues. For example, it is unlikely that wind production will be feasible on smaller sites. Any requirements should also be included in viability testing.

Parameters for the requirements and the preparation of a Supplementary Planning Document as suggested would assist applicants in preparing developments and understanding the Council's requirements in advance of submitting applications. We therefore support this approach and reserve the right to comment further in the future.

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

Please see our answer to Question 24.

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

Please see our answer to Question 24.

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

Please see our answer to Question 24.

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

Please see our answer to Question 24.

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

We agree with the introduction of a policy for addressing carbon emissions. We consider that the policy should retain the clause regarding technical feasibility and economic viability to ensure each scheme and any constraints can be assessed individually.

As outlined in our response to Question 19, we consider the preparation of a Supplementary Planning Document would assist applicants in preparing developments and understanding the Council's requirements. Any requirements should also be tested to ensure that viability and deliverability is not adversely impacted.

Finally, we consider that planning policies should not seek to replicate Building Regulations.

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

Any policy should be tested in terms of viability and deliverability. Any requirements should also be suitably evidenced and justified.

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

No additional questions.

Conclusions

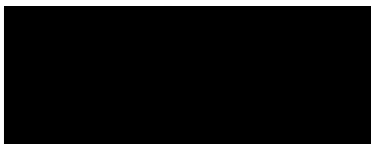
We support the review of the North West Leicestershire Local Plan and the Council's pro-active approach to providing for housing, including wider housing needs. We consider that a range of sites in the most sustainable locations should be provided. Sites that are smaller should also be included to ensure deliverability and to facilitate early growth.

The site at Land at Ingles Hill, Ashby de la Zouch would represent a sustainable development in a location that provides excellent services for its residents through the provision of amenities including primary and secondary schools, bus services, shops, a library, leisure centre and medical services.

We hope that the submitted Site Location Plan (Appendix 1), Vision Document (Appendix 2) and Concept Masterplan (Appendix 3) assist with your assessment of the Site at this initial stage. We look forward to commenting further on the next steps of the Local Plan Review and on future consultation for site allocations and amendments to Limits to Development around settlements.

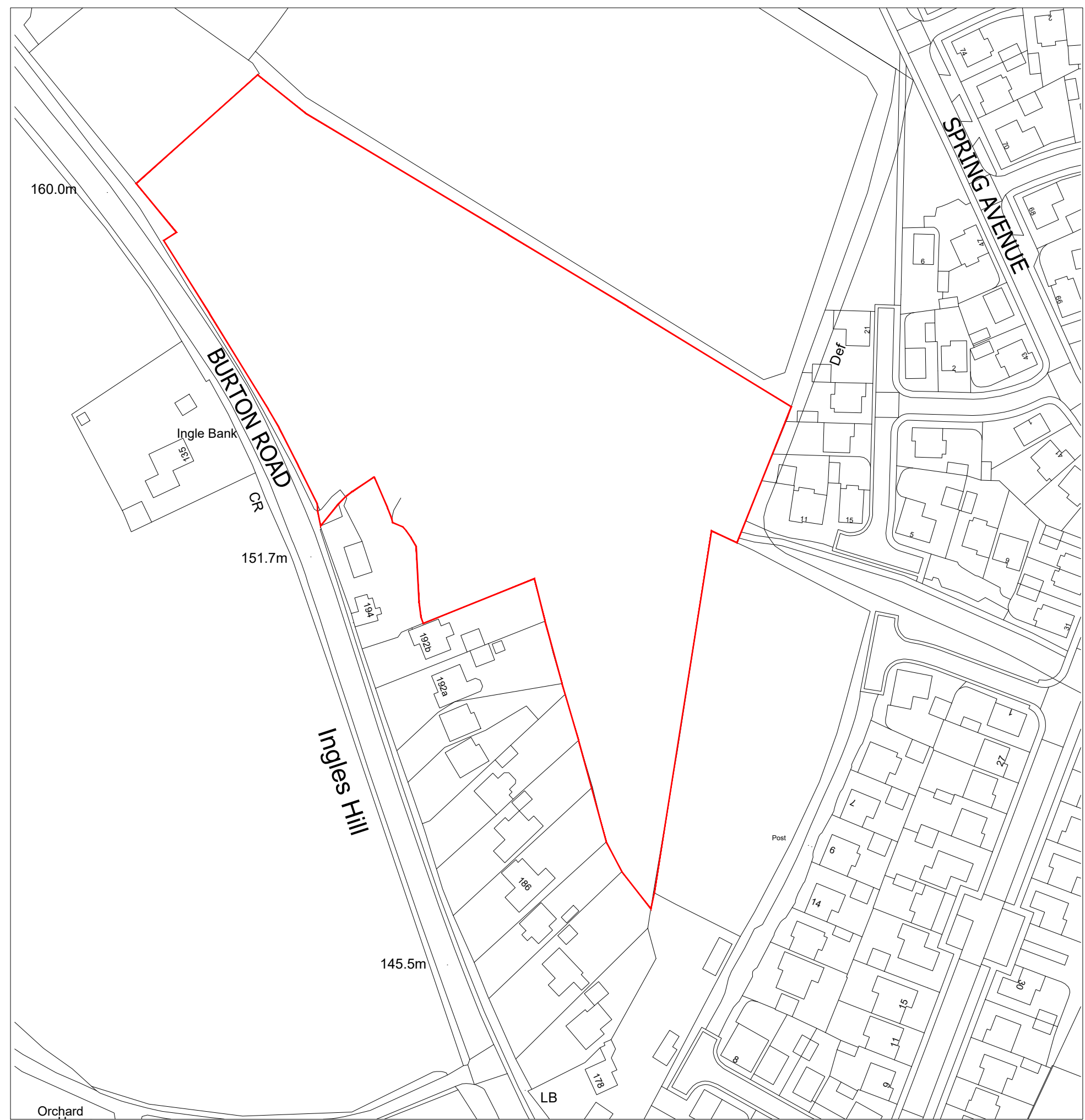
We trust that you will take these comments as helpful in progressing the Plan. Should you require any further information, please do not hesitate to contact me as per the details of this letter.

Yours faithfully,



KATHRYN VENTHAM
Partner

— Site Boundary



Project
**Ingles Hill,
 Ashby-De-La-Zouch**
 Drawing Title
Site Boundary Plan

Date	Scale	Drawn by	Check by
01.06.20	1:1,250 @ A3	SM	LH
Project No	Drawing No	Revision	
31910	BM-M-01	-	



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LAND AT INGLES HILL ASHBY-DE-LA-ZOUCH

Vision Document
March 2022

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1. The Vision

// An attractive and well-connected residential development of high quality homes, set within a strong landscape setting, with an area of attractive public open space as part of the development. //



Creation of high quality homes for all

The development will create new high quality homes within the town of Ashby-de-la-Zouch, sensitive to the local setting and context whilst expanding the residential community.



A development which is well connected and enhances local connectivity

The development is in a highly sustainable location within walking distance of a wide range of facilities and services in Ashby-de-la-Zouch. It also links into and enhances an existing Public Right of Way (PRoW) running across the site to improve local pedestrian connectivity.



A development which sits within the local landscape and responds to the local character

The planting surrounding the site will be maintained and enhanced where required to add to the character of the development and inform new public open space. New public open space will be created on the site, benefiting both the new and existing communities.

2. Introduction

This Vision Document has been prepared by Barton Willmore on behalf of Owl Homes. Owl Homes is working with landowners to support proposals for residential development at Land at Ingles Hill, Ashby-de-la-Zouch, Leicestershire.

The purpose of this document is to support the promotion of the site to accommodate residential development and associated public open space. The key aims and objectives of the document are to:

- Present a vision and design framework to guide and shape the proposals
- Review the site in the context of current Planning Policy
- Present an initial understanding of the site and the local context
- Present the emerging concept masterplan, supported by an explanation of the key design principles that have informed it.



Site Location Plan

Site Location

The site is at Ingles Hill, Ashby-de-la-Zouch.

Ashby-de-la-Zouch is a town within North West Leicestershire District, Leicestershire, situated 8 miles south east of Burton upon Trent, 11 miles south of Derby and 15 miles north west of Leicester.

The site is located on the north-western edge of Ashby-de-la-Zouch and is accessed from Burton Road which runs along the site's western boundary. Burton Road provides excellent connectivity running between Ashby-de-la-Zouch to the south east and the A511 to the north. The A511 provides a direct route to Burton-upon-Trent and Leicester as well as direct connections onto the A42, M1 and onwards into the wider strategic road network.

The Site

The site measures 1.9ha and is currently in agricultural use. It is bounded as follows:

Northern Boundary: A patch of woodland lies directly to the north with new housing development beyond.

Eastern Boundary: A large new housing development lies directly to the east of the site.

Southern Boundary: Existing properties fronting onto Burton Road lie to the south of the site.

Western Boundary: The western boundary of the site is marked by Burton Road with isolated dwellings and agricultural fields beyond.



DERBY

A511

A514

A6

A38

A50

A514

A50

A50

A38

MELBOURNE

A514

TICKNALL

BURTON-UPON-TRENT

A42

SWADLINCOTE

THE SITE

A511

ASHBY-DE-LA-ZOUCH

A444

A511

A444

A42

COALVILLE

MEASHAM

A447

Wider site location plan

3. Planning Context

Local Planning Policy

The Development Plan in relation to this site comprises:

- North West Leicestershire District Council Local Plan (2017).

North West Leicestershire District Council Local Plan was adopted in November 2017 and sets out the vision and strategy for development within the District up until 2031. It allocates sites including those to meet employment and housing needs. It identifies a requirement of 9,620 dwellings and 66ha of employment land over the plan period and states that an early review will be required due to a mismatch in the type of employment land provision (Policy S1).

The adopted Local Plan includes strategic and development management policies including: Policy S1 (Future Housing and Economic Development Needs); Policy S2 (settlement hierarchy); Policy S3 (Countryside); Policy D1 (Design of New Development); Policy D2 (Amenity); Policy H4 (Affordable Housing); Policy H6 (House Types and Mix); Policy IF3 (Open Space, Sport and Recreation Facilities); Policy IF7 (Parking Provision and New Development); and Policy EN3 (National Forest).

The Site lies outside of, but adjacent to, the Limits to Development for Ashby de la Zouch. The adopted Proposals Map identifies that the Site is located in the Countryside and the National Forest. Policy S2 (Settlement Hierarchy) identifies Ashby de la Zouch as a 'Key Service Centre'. Key Service Centres are the second tier of the settlement hierarchy. They are identified as playing an important role providing services and facilities to the surrounding areas. The Local Plan envisages that a 'significant amount of development' will take place within Key Service Centres.

Emerging Policy

The Local Plan Review is being undertaken in two parts: the Partial Review; and the Substantive Review.

A first stage consultation for the Partial Review ran from February to April 2018 and the Emerging Options consultation followed, between November 2018 and January 2019.

Partial Review

The Partial Review concerned amendments to Policy S1 only, relating to housing and employment requirements. The examining Inspector found the Partial Review sound, subject to modifications, in February 2021 and the North West Leicestershire Local Plan (as amended by the Partial Review) was adopted in March 2021.

Substantive Review

The Substantive Review, now referred to simply as 'the Local Plan Review' is wider ranging and has been progressing throughout this time. The latest Call for Sites closed in October 2020.

This review is taking into account changes that have occurred since adoption such as the revised National Planning Policy Framework (NPPF) publication in 2021; changes to the Use Classes Order in September 2020; addressing Leicester City Council's unmet need for housing and employment land; the publication of the Planning for the Future White Paper; and the standard method calculation for housing need, in addition to the implications of extending the plan period to 2039.

The current timetable for the Local Plan Review is as follows:

- Development Strategy Options and Policy Options – January/February 2022 – current stage
- Consult on potential site allocations – Spring 2022
- Consult on draft policies – Autumn 2022
- Agree publication version (Regulation 19) – June 2023
- Consult on Publication Local Plan (Regulation 19) – June/July 2023

- Submission – October 2023
- Examination – January 2024
- Adoption – Mid 2024

This Development Strategy and Policy Options consultation is a Regulation 18 stage public consultation. The consultation is structured into 8 broad topics with some divided into individual policy areas. Some sections include preferred policy options or specific policy wording and each section includes consultation questions.

This consultation does not cover all matters to be included in the Local Plan Review. Future consultations will include sites proposed for allocation and amendments to Limits to Development around settlements.

Evidence Base

The Council are producing evidence for the Local Plan Review. The Evidence Base includes a Sustainability Appraisal, Settlement Study, Strategic Housing and Economic Land Availability Assessment (SHELAA) 2021 and documents and studies relating to employment land, retail uses, renewable and low carbon energy, housing need and landscape.

The Site was submitted for consideration through the Call for Sites as part of the Local Plan Review in June 2020.

Supplementary Planning Guidance/Document

Good Design SPD (2017)

This Document sets out the Council's approach to the design of development proposals, building on the Policies of the adopted Local Plan. The guidance has informed the layout and design of the indicative layout included within this Vision Document.

Affordable Housing SPD (2021)

This Document was adopted in December 2021 with the purpose of supporting the delivery of Affordable Housing in the District. It provides further detail about the application of the Affordable Housing Policies in the Local Plan.

Neighbourhood Plan

The Ashby-de-la-Zouch Neighbourhood Plan was made in November 2018. The Site is included within the Neighbourhood Plan area.

The Site is located outside of but adjacent to the Limits to Development identified within the Neighbourhood Plan.

The Neighbourhood Plan includes key policies on affordable housing and housing mix that are noted.

Other Material Considerations

National Planning Policy Framework (NPPF) (2021)

The NPPF sets out the principles by which the new Local Plan will be produced and examined against. There are a number of key paragraphs in relation to the promotion of this site through the local plan process including:

- The need to identify land for the authority's whole area, including any needs which cannot be met in neighbouring areas (paragraph 66).
- The need to identify a sufficient supply of sites taking account of availability, suitability and likely economic viability (paragraph 68).
- The plan maker's need to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development, including in discussions with neighbouring authorities (paragraph 141).
- The valuable opportunity that the National Forest offers to improve the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife (paragraph 146).

References to the relevant sections of the NPPF are included throughout this document and reference has also been made to further guidance provided within the Planning Practice Guidance.

4. Site Context

The site is located on the north-western edge of Ashby-de-la-Zouch, approximately 1 mile north west of the town centre. The site is within walking distance of shops and services in Ashby-de-la-Zouch.

Access & Movement

The site is accessed from Burton Road. Burton Road is a single carriageway which joins the A511 at Boundary to the north and Derby Road in Ashby-de-la-Zouch to the south east. There is a footpath along the road's eastern edge (the same side of the road as the site).

The site is located within walking distance (0.3 miles / 6 minutes) of shops and services on Burton Road.

The site is also within walking distance of regular bus services to Burton-upon-Trent and East Midlands Airport.

There is a Public Right of Way (PRoW) running through the site which links into a wide network of PRoWs in the surrounding area.

Train Services

The closest railway station is Burton-on-Trent which can be reached by a 21 minute car journey or via bus. Burton-on-Trent provides regular services to Cardiff via Gloucester, Birmingham New Street, Edinburgh via Leeds and Nottingham.

Bus Services

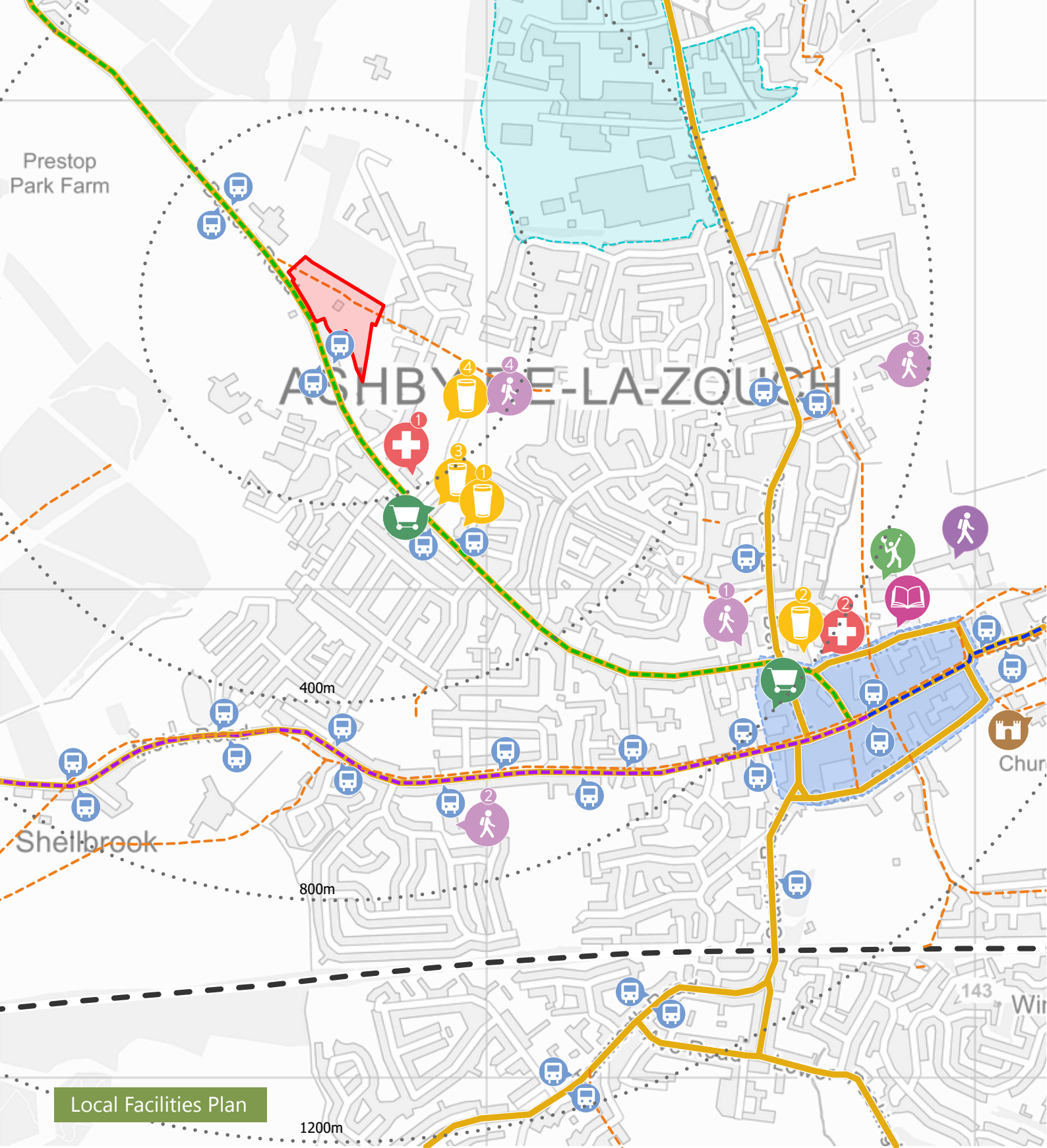
The closest bus stops to the site are located:

- On Burton road, approximately 0.1 miles, 2 minutes walk south from the site access serving the 9 route.
- On Moira Road, approximately 0.8 miles, 16 minutes walk south of the site serving the 29 route.

The 9 bus route runs between Burton-upon-Trent and East Midlands Airport with a daytime frequency of once an hour. The 29 route runs between Coalville and Burton-upon-Trent via Swadlincote also with a daytime frequency of once an hour.

Local Facilities and Services Table

Type	Description	Walking Distance	Walk / Cycle Time
Education	Ashby CofE Primary School	1.3 km / 0.8 miles	16 minutes / 4 minutes
	Ashby Hill Top Primary School	1.4 km / 0.9 miles	18 minutes / 5 minutes
	Woodcote Primary School	1.9 km / 1.2 miles	23 minutes / 7 minutes
	Ivanhoe College	1.8 km / 1.1 miles	21 minutes / 6 minutes
	Ashby Hastings Primary School	0.7km / 0.4 miles	9 minutes / 2 minutes
Food Retail	Co-op Food	0.5 km / 0.3 miles	6 minutes / 1 minute
Pubs, Cafes, Restaurants and Leisure	The Beeches Pub and Carvery	0.6 km / 0.4 miles	7 minutes / 1 minute
	The Plough on the Green	1.4 km / 0.9 miles	18 minutes / 5 minutes
	Hood Park Leisure Centre	1.6 km / 1.0 mile	19 minutes / 5 minutes
	Ashby Library	1.6 km / 1.0 mile	19 minutes / 5 minutes
	The Olive Branch	0.5km / 0.3 miles	6 minutes / 1 minute
	The Bistro of Ashby (within the Springfields supported living development)	0.7km / 0.4 miles	9 minutes / 2 minutes
Medical Centres and Pharmacies	Castle Medical Group and Dean and Smedley Pharmacy	0.5 km / 0.3 miles	5 minutes / 1 minute
	Ashby Pharmacy	1.4 km / 0.9 miles	18 minutes / 5 minutes
Local Centre	Ashby-de-la-Zouch Town Centre	1.4 km / 0.9 miles	18 minutes / 5 minutes



Local Facilities Plan

- | | | | | | | | |
|---|-------------------|---|---------------------|---|--|---|-----------------------------------|
|  | The Proposed Site |  | Bus Route 9 |  | Pubs & Eateries |  | Ashby-de-la-Zouch Library |
|  | Local Centre |  | Public Right of Way |  | 1. The Beeches Pub and Carvery
2. The Plough on the Green
3. The Olive Branch
4. The Bistro of Ashby |  | Ashby-De-La-Zouch Castle |
|  | Industrial Estate |  | Walking Distances |  | Primary Schools |  | Bus Stops |
|  | Local Roads |  | Co-op Food |  | 1. Ashby CofE Primary School
2. Ashby Hill Top Primary School
3. Woodcote Primary School
4. Ashby Hastings Primary School |  | Hood Park Leisure Centre and Lido |
|  | Railway Line | | GPs and Pharmacies |  | 1. Castle Medical Group and Dean and Smedley Pharmacy
2. Ashby Pharmacy | | |
|  | Bus Route 129 | | | | Secondary Schools and Colleges | | |
|  | Bus Route 29 | | | | 1. Ivanhoe College | | |

5. Opportunities & Constraints

The findings from the initial site and context assessment have been evaluated to identify the emerging constraints and opportunities relevant to the development of the site.

The composite plan in this section presents the analysis of these elements, the qualities of the site and its immediate setting that provides the context for future development proposals. The positive features and opportunities on and around the site should be retained, enhanced and incorporated into the scheme where possible to strengthen local distinctiveness and create a sense of place.

Key Opportunities

There is significant existing vegetation (hedgerows, trees and other planting) along the site boundaries which can be retained and enhanced to add character to the development and enhance views.

There is an existing Public Right of Way on site which can be enhanced to provide better access and overlooking for residents of the site and the local area.

The site is in close proximity to nearby bus stops just two minutes' walk from the site.

There is potential to utilise the existing topography of the site for sustainable drainage.

There is potential for a new safe access directly onto Burton Road.

There are local community facilities, shop and schools within walking distance of the site.






There is an opportunity to provide better pedestrian and cycle connections through the site from Burton Road to Spring Avenua and on towards the town centre, benefiting local residents by making nearby bus stops and other services more accessible.

Key Constraints

Existing properties adjoining the site will need to be carefully considered and an appropriate design response proposed.

The site topography slopes down towards the southern part of the site and will need to be considered.



-  Site Boundary
-  Burton Road
-  Existing Trees and Hedgerows
-  Public Right of Way showing walked alignment around existing farmstead
-  10m Contours

Access & Transport

Burton Road is a single carriageway road which connects Ashby-de-la-Zouch Town Centre to the south east and joins the A511 Ashby Road to the north west, which provides direct access to the A42 (which links the M42 with the M1) and Swadlincote and Burton on Trent.

Access is proposed off Burton Road where the appropriate visibility splays are considered to be achievable. The suitability of taking access off Burton Road will be demonstrated through the provision of appropriate drawings and Statements submitted with any future planning application.

An existing footpath runs along the north side of Burton Road, along the southern boundary of the site, and provides the opportunity to enable safe pedestrian access to the facilities located in Ashby de la Zouch Town Centre, approximately 1.2km (0.75 miles) to the south east.

The Concept Plan shows the properties centred around a primary route through the centre of the Site. An appropriate level of vehicle parking can be provided per dwelling, in accordance with local standards.

A bus stop is located to the south of the site on Burton Road which provides services to a range of destinations including Ashby de la Zouch Town Centre and Tesco, Burton on Trent, Swadlincote and Coalville.

Public Right of Way

There is an existing Public Right of Way (PRoW) which crosses the Site from south east to north west.

As part of the proposal it will be necessary to make a small diversion of the PRoW along the road / footpaths through the Site. It is considered that the PRoW will be enhanced with better access for local residents and improved surveillance from the new dwellings.

Whilst the proposed development will change the character along this small stretch of the PRoW, it will continue out into the countryside beyond the Site. It appears that a similar approach has been taken through the new residential development to the east of the Site.

Flood Risk & Drainage

The site is located entirely within Flood Zone 1 and therefore has a low probability of flooding (less than 1 in 1,000 annual probability) and the principle of development is therefore acceptable from a flood risk perspective. In addition, the Environment Agency's online Flood Risk Map does not identify the Site as being susceptible to surface water flooding.

The site is approximately 1.9ha in size and therefore a Flood Risk Assessment would be prepared and submitted with any forthcoming planning application.

In order to manage water on site, the proposal has been informed by the provision of Sustainable Urban Drainage Systems including an attenuation pond to the south of the site. This method of drainage is supported by local and national planning policy.

Landscape

The site is located in the National Forest. There are no other known statutory or non-statutory landscape designations on the site or adjoining it.

The site features mature trees and hedgerows to its boundaries and is otherwise predominately mowed grassland. Where possible the existing trees and hedgerow have been retained and the landscape character has been enhanced with the provision of a high quality area of public open space to the south.

The landscape led approach to the development of the site ensures the proposal meets guidance with regard to tree planting in the National Forest and helps the development assimilate into its surroundings.

The proposal seeks to respond to Policy requirements to retain and enhance existing landscaping and provide open space on site. This landscape led approach has resulted in a high quality development proposal which respects the character of the surrounding area and provides landscape enhancements.

Ecology

There are no statutory or non-statutory designated sites of nature conservation interest located within or adjoining the site boundary.

The majority of the mature landscaping is sought to be retained and enhanced, along with the existing woodland to the north. Therefore it is anticipated that the proposal would have limited impact on ecology and through the enhancement of landscaping will provide opportunities for net gains to biodiversity.

Heritage & Archaeology

The site is not located within, adjoining or within the setting of a Conservation Area. The Site does not contain any Listed Buildings nor does it adjoin any Listed Buildings.

The site has no known historical connections and as such no archaeological remains of historical value are expected. Should any be found on site, appropriate action would be taken such as the instruction of an appropriately qualified archaeologist to survey the site.

Social Infrastructure

The site has existing opportunities to connect to the services and facilities within Ashby-de-la- Zouch which will be encouraged by the provision of footpaths within the site connecting to the existing footpaths along Burton Road.

The Site is surrounded by recent residential developments immediately adjacent to the Site to the east and to the south on the opposite side of Burton Road. The Site has the potential to enhance the community in this location.

A medical centre, pharmacy, co-op food store and pub are all located on Burton Road, a short walk from the Site.

6. The Proposals

Key Guiding Design Principles

The plan for the site has been informed by the vision, site analysis and identified constraints and opportunities. The plan shows the key design principles which underpin the development of the site, as set out here (numbers correspond to the plan opposite):

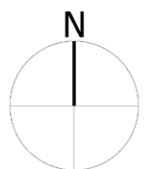
- ① Landscape Buffer - Knits the development into the surrounding landscape, creating a green boundary whilst enhancing views and privacy for both existing and proposed dwellings.
- ② Adjacent Houses - Houses adjacent to the site are factored into the design with proposed dwellings siding on and continuing the building line where possible.
- ③ Dual sided residential streets and courtyards - In conjunction with dual aspect homes the street will be secure, well overlooked and communal.
- ④ A new area of accessible public open space - This area of open space will serve both the new residential community.
- ⑤ Proposed new attenuation pond.
- ⑥ Public Right of Way across the site is enhanced offering connectivity to Pedestrian and cyclists through the site. There will be a requirement to make minor adjustments to the existing alignment.
- ⑦ Where possible, existing landscape features will be retained and incorporated within the design.



Indicative example image of high quality Owl Homes Development



- Site Boundary
- Amended Public Right of Way



7. Development Benefits

The proposal will deliver an attractive well-connected residential development of approximately 43 high quality homes, set within a strong landscape setting, with an attractive public open space as part of the development.



Creation of high quality homes for all

The development will create approximately 43 new high quality homes within the town of Ashby-de-la-Zouch, sensitive to the local setting and context whilst expanding the existing residential community. The Site has the potential to accommodate a range of dwelling types and size and 30% of dwellings will be affordable in accordance with the requirements of North West Leicestershire's Local Plan.



A development which is well connected and enhances local connectivity

The development is in a highly sustainable location within walking distance of a wide range of facilities and services in Ashby-de-la-Zouch. It also incorporates and enhances an existing PRoW running across the site to improve local pedestrian connectivity.



A development which sits within the local landscape and responds to the local character

The planting surrounding the site will be maintained and enhanced to add to the character of the development and inform new public open space. New public open space will be created on the site, benefiting both the new and existing communities.

8. Deliverability

Owl Homes are a modern, privately-owned property developer, specialising in the delivery of sustainable high-quality residential dwellings throughout the Midlands.

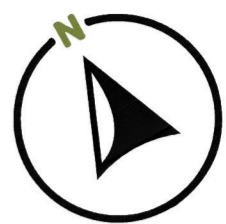
Passionate about design and quality of construction, Owl Homes have the skills, experience and creative flair to blend traditional values with the latest trends and practical modern day living. Owl Homes carefully consider the design, specification and construction throughout the delivery of all new homes.



Indicative example image of high quality Owl Homes Development



Notes
 © Radford Architectural Services Ltd. Do not scale from this drawing.
 Refer to figured dimensions only. Contractors must check all
 dimensions on site.



Revision	Date	Amendment	Initials

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Client		OWL HOMES	
Project			
BURTON ROAD, ASHBY DE LA ZOUC			
Title			
CONCEPT MASTERPLAN			
Dwg No.			
1127-22-100			
Revision		Scale @A2	
.		1:500	
Drawn		Date	
DS		JAN 2020	

BURTON ROAD

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ATTENUATION POND

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1F

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

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

31527/A3/P2a/CF/EP/KV/bc
11th March 2022

Dear Sir/Madam,

North West Leicestershire District Council – North West Leicestershire Local Plan Review: Development Strategy Options and Policy Options – Land at Loughborough Road, Coleorton

Introduction

Barton Willmore write on behalf of Owl Homes, who are working with the landowners in respect of their interest at Land at Loughborough Road, Coleorton ('the Site') in connection with the above public consultation on the Regulation 18 Development Strategy and Policy Options Local Plan Review consultation.

This representation relates specifically to the Site and should be read in conjunction with the details outlined below. We accompany our letter with the following documents which show the Site's suitability, availability and deliverability as a residential allocation:

1. Site Location Plan – Appendix 1
2. Vision Document – Appendix 2
3. Concept Masterplan – Appendix 3
4. Consultation Response Form – Appendix 4

This consultation is the 'substantive review' of the North West Leicestershire Local Plan, now referred to simply as 'the Local Plan Review'. The Local Plan was adopted in November 2017 and a 'partial review' concerning amendments to Policy S1 only has already been undertaken and found sound, subject to modifications, by the examining Inspector in February 2021. The North West Leicestershire Local Plan (as amended by the Partial Review) was adopted in March 2021.

Throughout this time, the 'substantive' review has been progressing, and amongst other work, a 'Call for Sites' has been undertaken, inviting submissions for potential housing and employment sites to be considered for inclusion in the Local Plan Review. The last Call for Sites closed in October 2020.

The Site was submitted for consideration through the Call for Sites as part of the Local Plan Review. The site is contained within the 2021 SHELAA, with reference Cn13. The Site is considered 'potentially suitable', 'available' and 'potentially achievable' however concerns were identified regarding highways, ecology and geo/environmental factors. The suitability of taking access off Loughborough Road will be demonstrated through the provision of appropriate drawings and statement submitted with an application. Ecological survey work will be undertaken to support the proposal, with appropriate mitigation proposed where required. A Coal Mining Risk Assessment would be submitted with an application due part of the site being located in the Coal Development High Risk Area.

As outlined in the SHELAA, the Site lies outside of, but adjoins, the Limits to Development of Coleorton, which is identified as a Sustainable Village. A change to the Limits to Development would be required for the site to be considered suitable.

We provide detailed responses in respect of the relevant questions below:

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

We agree with the objectives of the Local Plan Review.

We consider it imperative that the Local Plan Review not just supports, but ensures the delivery of new homes, including affordable houses, to meet local housing needs. Paragraph 61 of the National Planning Policy Framework (NPPF) 2021 sets out that when determining the minimum number of homes needed, strategic policies should be informed by a local housing need assessment. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes) (Paragraph 62).

This is particularly important given the District is required to address some of the unmet housing need from Leicester City Council. Paragraph 11(b) of the NPPF states that strategic policies should, as a minimum, provide for objectively assessed need for housing and other uses, as well as any needs that cannot be met within neighbouring areas. These figures are starting points, and actual need may be higher. We agree that such development should be of a high quality, sustainable, and respond well to local character to create safe places to live, work and travel.

We agree that new infrastructure should be delivered across the District, and that employment opportunities should be provided to support the District's economy. New housing is required to facilitate employment, therefore the two should be considered holistically. Town and Local Centres play important roles in serving communities, and we agree that their vitality and viability should be enhanced.

We agree that new developments should be prepared to adapt to climate change; conserve heritage and heritage assets; conserve the natural environment; ensure efficient use of resources; maintain access to services and facilities; and ensure development is supported by physical and social infrastructure.

Taking these points into account, we offer the following suggested additions to the Objectives.

Objective 2 could refer to meeting neighbouring needs, as North West Leicestershire will be required to address some unmet need from Leicester City. It could also address the nationwide need to significantly boost the supply of housing (Paragraph 60 of the NPPF), the delivery of which is considered in the recently published Government Research Briefing Paper: Tackling the under-supply of housing in England¹.

Objective 3 could address the sustainability of new housing in terms of locating developments next to existing services and facilities, which would benefit both the community and the sustained provision of local amenities. This links to possible amendments to Objective 7, which could address new housing, employment and services being located in sustainable locations to reduce the need to travel. This would support the objective of reducing carbon emissions and adapting to climate change through changed behaviours.

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

The Site is located within the Coleorton (Lower Moor Road area) area, as outlined in Appendix B of the 2021 Settlement Study² and adjacent to the Limits to Development. This area is one of the 'Sustainable Villages' within the Settlement Hierarchy and is considered to 'have a limited range of services and facilities' and where 'a limited amount of growth will take place within the defined Limits to Development'.

As the settlement of Coleorton is suitable for a range of development, it may be that suitable sites on the edge of the village are acceptable. As such, the reference to 'within the limits' should be removed.

We agree with the Settlement Hierarchy and agree that Coleorton should remain as a Sustainable Village and should deliver growth. Coleorton offers residents amenities and services including a primary school, convenience shop and post office, public houses, and public transport connections to neighbouring areas including Leicester, Burton, Ashby de la Zouch and Loughborough.

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

Not applicable.

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

We agree that the 'Low Scenario' (359 dwellings) and 'Medium Scenario' (448 dwellings) should not be considered reasonable approaches to housing growth within the District. Neither of these scenarios perform well against the factors influencing housing need and would not sufficiently address the needs of North West Leicestershire or the unmet need the District would need to accommodate from Leicester City.

We agree that 'High 1 Scenario' (512 dwellings) would be a more balanced approach than the Low and Medium Scenarios, as it would provide a buffer for addressing Leicester City's unmet need. However, it is still below demographic trends, at 38% below the Principal Demographic Projection,

¹ <https://commonslibrary.parliament.uk/research-briefings/cbp-7671/>

²

https://www.nwleics.gov.uk/files/documents/settlement_study_2021_appendix_b/Settlement%20Study%2021%20Appendix%20B.pdf

and build rates are more than allowed for under this scenario. The Strategic Growth Plan that this figure is based upon is also now over three years old, having been published in December 2018.

We consider that 'High 2 Scenario' (730 dwellings) would be the most appropriate approach to addressing the amount of housing growth within the District. We agree that this approach, out of all those tested, provides the greatest level of flexibility to address unmet need, which we consider is particularly important as the amount of unmet need to be accommodated in the District is not yet known.

As such, out of the options tested we support High 2 Scenario. Notwithstanding that, the Council should seek to plan for as much housing as possible and we reserve the right to comment further at a later date and as the technical evidence is updated (noting that the recent census data is due to be released in the near future).

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

The NPPF is underpinned by the presumption in favour of sustainable development, and Paragraph 11 states that plans and decisions should apply this presumption. Paragraph 11(a) states that for plan making, all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects. Paragraph 8 sets out that the planning system should aim to ensure that sufficient land of the right type is available in the right places and at the right time to support growth. The needs of present and future generations should be met by ensuring a sufficient number and range of homes are provided.

To promote sustainable development in rural areas, Paragraph 79 of the NPPF states that housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.

The Council's settlement hierarchy places Coleorton as a Sustainable Village which is the fourth tier of settlement. The Council's Settlement Study provides a comparative assessment of the relative sustainability of settlements within the District³. The Study finds that Coleorton benefits from amenities including a local primary school, shop and post office. The Settlement is well served by public transport which enables connectivity to higher tier settlements such as Leicester, Burton, Ashby de la Zouch and Loughborough.

We therefore support the Council's approach which focuses on options 3a and 7b, given they seek to locate housing in the most sustainable locations. The Site at Loughborough Road is well placed to sit within this spatial strategy and provide much needed housing. We agree that an approach based around a new settlement is not the way forward, and note the Inspector's recommendations in the Uttlesford Local Plan⁴, that there should not be an over reliance on these given the inherent risks and lead-in times.

In addition, Paragraph 69 of the NPPF states that small and medium sized sites can make an important contribution to meeting the housing requirement of an area, and are often built out relatively quickly. This is supported by research conducted by Lichfields in their paper 'Start to Finish' (February 2020)⁵

³ https://www.nwleics.gov.uk/files/documents/settlement_study_2021/Settlement%20Study%202021.pdf

⁴ <https://uttlesford.moderngov.co.uk/documents/s17756/Appendix%201%20-%20Inspectors%20Letter.pdf>

⁵ <https://lichfields.uk/content/insights/start-to-finish>

which shows that smaller sites have the fastest average completion rates (Figure 4 of that report) and the highest proportionate build out rates (Figure 7 of that report).

Having a number of sites of various sizes, including smaller sizes, would reduce risk in terms of deliverability than focusing larger sites only. It would also help to frontload delivery as these sites can be brought forwards quickly.

As such, for the reasons outlined above, we consider Option 7b would be the most appropriate proposed approach to the distribution of housing growth at this time. This approach seeks to locate development in the most sustainable locations and would deliver housing in a range of settlements within the hierarchy, allow greater certainty over the deliverability of housing within the District, and support villages and their communities in thriving and growing, in accordance with the NPPF. As set out above, we consider that a range of sizes is also important, and this should be taken into account.

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

The PPG states that Councils need to take into account self-build and custom housebuilding registers when preparing planning policies, and that they are also likely to be material considerations in determining planning applications for self and custom builds⁶.

As there is evidence of demand for self-build and custom housebuilding, we agree that it would be appropriate to include a relevant policy.

Notwithstanding this, we consider that such a policy should either seek to provide such housing on specific allocations or within large-scale developments where it can be successfully incorporated. Smaller sites should not be required to provide an element of such housing given the issues surrounding practicality. We note that there is a relatively low demand and, as such, we consider this approach would meet the need. Further, any viability evidence should suitably test any requirements to ensure that the Plan is deliverable.

As such, we object to the policy as currently proposed and consider it is not justified, effective or consistent with national policy as required by Paragraph 35 of the NPPF.

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

Paragraph 130(f) of the NPPF 2021 states that planning policies and decisions should ensure that developments create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. Footnote 49 states that planning policies for housing should make use of the Government's optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the nationally described space standards, where the need for an internal space standard can be justified.

The PPG states that evidence regarding need, viability and timing is needed to include the Space Standards in policy. The Development Strategy and Policy Options document states that the 'majority' of developments exceed the NDSS with those not meeting the standard being in some of the smaller settlements.

We agree with the proposed policy on space standards in principle. However, as outlined within the Consultation Document, and in accordance with the PPG, we consider the impact on viability would

⁶ Paragraph: 014 Reference ID: 57-014-20210508

need to be carefully assessed, particularly in the smallest settlements and most constrained development sites.

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

Please see our answer to Question 7. Further to this, we consider that planning policy should not seek to replicate Building Regulations, where possible, to avoid a duplication of assessment and requirements.

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

As above, Paragraph 130(f) and Footnote 49 of the NPPF encourage the creation of accessible places. Currently, Policy H6 requires developments of 50 or more dwellings to provide a proportion which are suitable for occupation or easily accessible in accordance with Part M4(2) of the Buildings Regulations. This proposed policy would extend the requirement to all new residential dwellings.

The PPG states that where a local planning authority adopts a policy to provide enhanced accessibility or adaptability, they should clearly state in their Local Plan what proportion of new dwellings should comply with the requirements. Local Plan policies should also take into account site specific factors such as vulnerability to flooding, site topography, and other circumstances which may make a specific site less suitable for M4(2) and M4(3) compliant dwellings, particularly where step free access cannot be achieved or is not viable. Where step-free access is not viable, neither of the Optional Requirements in Part M should be applied⁷.

In principle, we would agree with the proposed policy. However, as noted in the PPG, the policy should take account of site constraints including flooding and topography, as well as viability, so as not to hinder the development of housing within the District if the standards are not achievable on all new dwellings. Any thresholds set out in policy should take the above into account.

Part M of Building Regulations makes a distinction between wheelchair accessible (a home readily useable by a wheelchair user at the point of completion) and wheelchair adaptable (a home that can be easily adapted to meet the needs of a household including wheelchair users) dwellings.

The PPG states that Local Plan policies for wheelchair accessible homes should be applied only to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling⁸.

Again, in principle, we consider that Part M4(3)(a) wheelchair adaptable dwellings could be applied to market housing. However, the policy should clearly state what proportion of dwellings should comply with these factors and account for site specific constraints, vulnerabilities, and viability issues.

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

Not applicable.

⁷ Paragraph: 008 Reference ID: 56-008-20160519

⁸ Paragraph: 009 Reference ID: 56-009-20150327

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

Not applicable.

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

We agree that it is important to improve the health and wellbeing of our communities and agree with the principle of the proposed policy. Any requirements of the policy should also be tested to ensure viability and deliverability is not undermined.

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

Please see the answer to Question 18.

Q18 Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?

The health and wellbeing of communities is a fundamental principle of planning. Chapter 8 of the NPPF is dedicated to promoting healthy and safe communities and there is additional guidance contained within the PPG. Policies and decisions should aim to achieve healthy, inclusive and safe places which promote social interaction; are safe and accessible; and enable and support healthy lifestyles.

The Consultation outlines that the District faces health and well-being challenges within its communities. Whilst we consider that this is an important objective for the District and its residents,

we consider that for smaller scale and less strategic developments, these matters can be addressed through existing national policy requirements.

We also consider that such a policy could be overly onerous on smaller scale developments and such initiatives would have the greatest impact on strategic scale developments. As outlined in the consultation document, requiring Health Impact Assessments or Health Impact Screening Statements could place significant strain on LPA resources, when the benefits and outcomes for smaller scale developments could be relatively limited.

As such, we would suggest that Health Impact requirements are focussed on large (100+) sites.

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

The only part of this policy that would be applicable to our response is criteria 5, which requires all new developments to incorporate proposals for on-site electricity and heat production from renewable sources.

We agree with the principle of such a requirement. However, flexibility should be built into any requirements to take account of site-specific issues. For example, it is unlikely that wind production will be feasible on smaller sites. Any requirements should also be included in viability testing.

Parameters for the requirements and the preparation of a Supplementary Planning Document as suggested would assist applicants in preparing developments and understanding the Council's requirements in advance of submitting applications. We therefore support this approach and reserve the right to comment further in the future.

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

Please see our answer to Question 24.

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

Please see our answer to Question 24.

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

Please see our answer to Question 24.

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

Please see our answer to Question 24.

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

We agree with the introduction of a policy for addressing carbon emissions. We consider that the policy should retain the clause regarding technical feasibility and economic viability to ensure each scheme and any constraints can be assessed individually.

As outlined in our response to Question 19, we consider the preparation of a Supplementary Planning Document would assist applicants in preparing developments and understanding the Council's requirements. Any requirements should also be tested to ensure that viability and deliverability is not adversely impacted.

Finally, we consider that planning policies should not seek to replicate Building Regulations.

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

Any policy should be tested in terms of viability and deliverability. Any requirements should also be suitably evidenced and justified.

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

No additional questions.

Conclusions

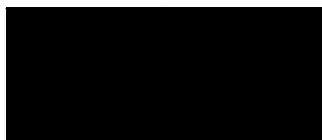
We support the review of the North West Leicestershire Local Plan and the Council's pro-active approach to providing for housing, including wider housing needs. We consider that a range of sites in the most sustainable locations should be provided. Sites that are smaller should also be included to ensure deliverability and to facilitate early growth.

The site at Land at Loughborough Road, Coleorton, would represent a sustainable development in a location that provides amenities for its residents through the provision of bus services, a local primary school, shop and post office.

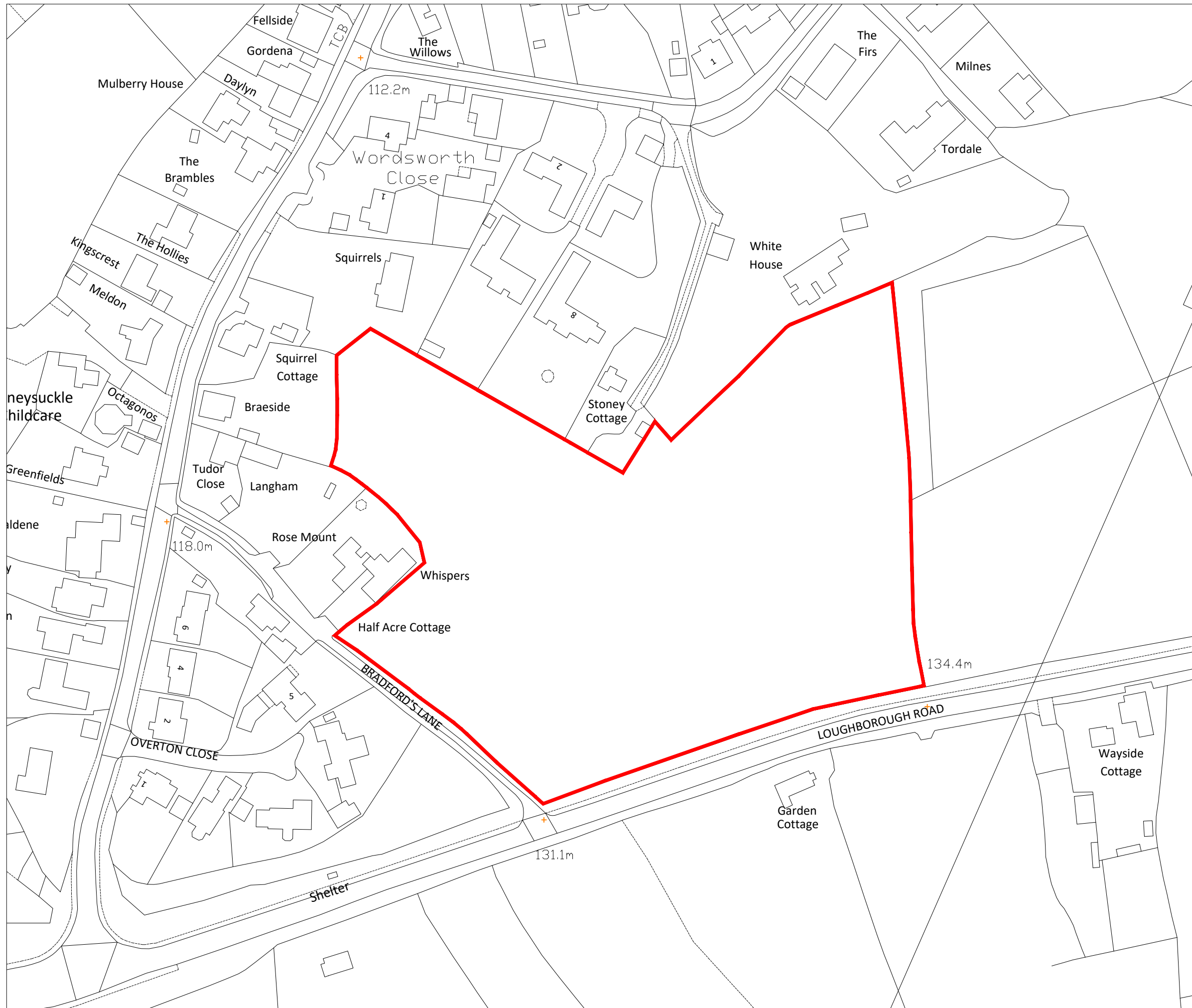
We hope that the submitted Site Location Plan (Appendix 1), Vision Document (Appendix 2) and Concept Masterplan (Appendix 3) assist with your assessment of the Site at this initial stage. We look forward to commenting further on the next steps of the Local Plan Review and on future consultation for site allocations and amendments to Limits to Development around settlements.

We trust that you will take these comments as helpful in progressing the Plan. Should you require any further information, please do not hesitate to contact me as per the details of this letter.

Yours faithfully,



KATHRYN VENTHAM
Partner

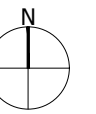


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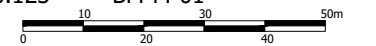
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 Site Boundary



Project
**Land at Loughborough Road,
 Coleorton**
 Drawing Title
Site Location Plan

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Project No	Drawing No	Revision	
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LOUGHBOROUGH ROAD
COLEORTON

Vision Document
March 2022

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Desk Top Publishing and Graphic Design by Barton Willmore

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Date: 11/03/2022 Revision: 08 Status: Draft Author: DW Checked by: LH



1. The Vision

// An attractive and well-connected residential development of high quality homes, set within a strong landscape setting, with an area of attractive public open space as part of the development. **//**



Creation of high quality homes for all

The development will create new high quality homes within the village of Coleorton, sensitive to the local setting and context whilst expanding the Coleorton residential community.



A development which increases connectivity and enhances legibility

As part of the development, the existing PRow will be retained and enhanced and a new connection created onto Loughborough Road, improving connectivity and links for residents of the site and the local area.



A development which sits within the local landscape and responds to the local character

The planting surrounding the site will be maintained and enhanced where required to add to the character of the development and inform new public open space. New public open space will be created on the site, benefiting both the new and existing communities.

2. Introduction

This Vision Document has been prepared by Barton Willmore on behalf of Owl Homes. Owl Homes is working with landowners to support proposals for residential development at a site off Loughborough Road, Coleorton, Leicestershire.

The purpose of this document is to support the promotion of the site to accommodate residential development and associated public open space. The key aims and objectives of the document are to:

- Present a vision and design framework to guide and shape the proposals
- Review the site in the context of current Planning Policy
- Present an initial understanding of the site and the local context
- Present the emerging concept masterplan, supported by an explanation of the key design principles that have informed it.



Site Location Plan

Site Location

The site is located off Loughborough Road, Coleorton.

Coleorton is a village within North West Leicestershire District, Leicestershire, situated 2 miles north of Coalville, 3 miles east of Ashby-de-la-Zouch and 8 miles west of Loughborough.

The village is relatively dispersed over a wide area, centred around Loughborough Road and Lower Moor Road.

The site is located centrally within Coleorton and is accessed from the A512, Loughborough Road which runs along the site's southern boundary. Loughborough Road provides excellent connectivity running between the A42 junction at Ashby-de-la-Zouch to the west and the M1 and Loughborough to the east. The A42 provides a direct route to Birmingham whilst the M1 provides connections to Leicester, Nottingham and the wider strategic road network.

The Site

The site measures 2.2ha and is currently grassland (not in agricultural use). It is bounded as follows:

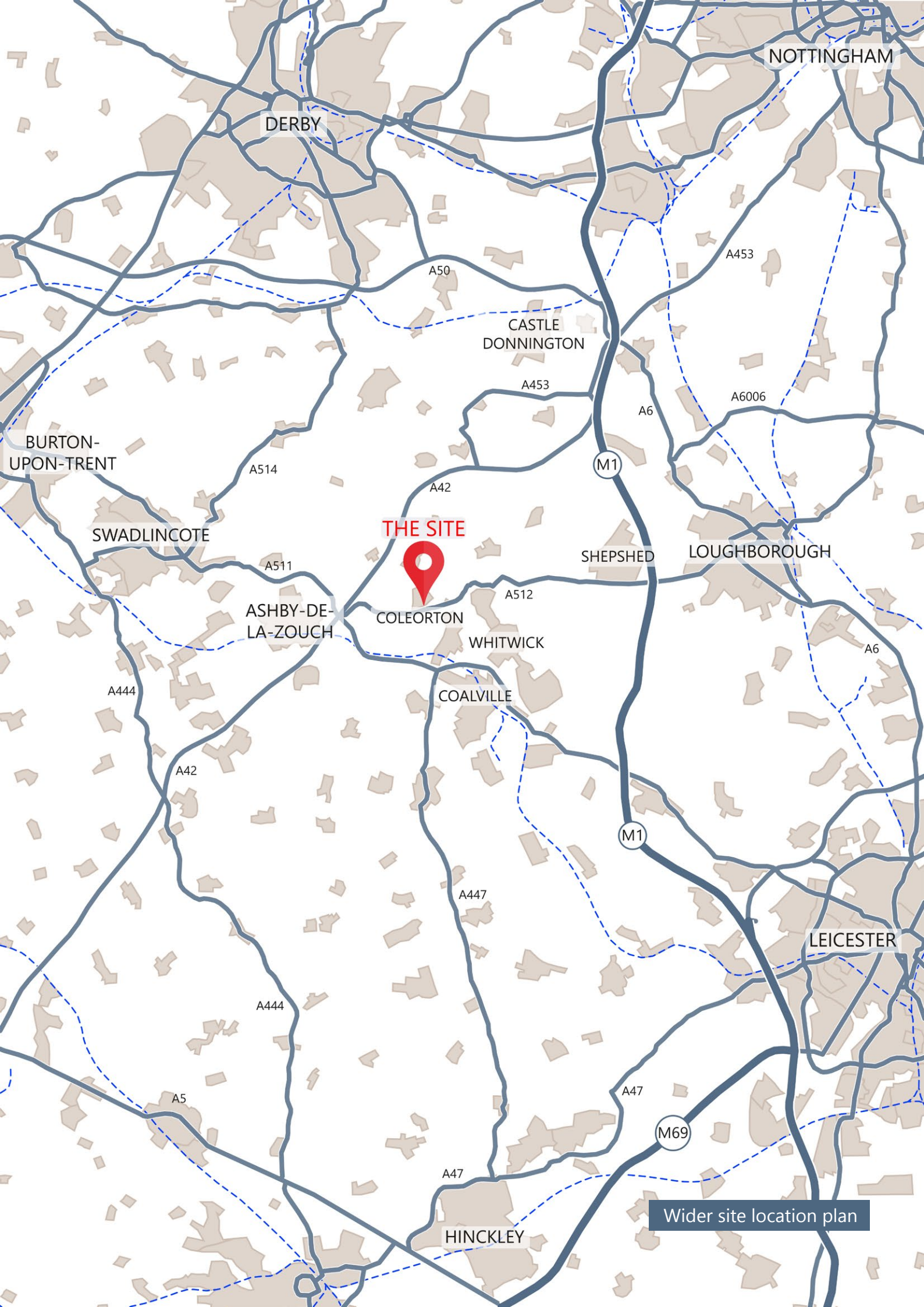
Northern Boundary: The rears of existing dwellings with boundary planting mark the Northern boundary of the site.

Eastern Boundary: An agricultural field lies immediately to the east of the site with the George Coleorton Pub and some existing dwellings beyond.

Southern Boundary: The A512 Loughborough Road runs along the southern boundary of the site with a mixture of dwellings, open countryside and agricultural land beyond it.

Western Boundary: Bradford's lane runs along the western boundary of the site with existing dwellings beyond.

— Site Boundary



NOTTINGHAM

DERBY

A50

A453

CASTLE
DONNINGTON

A453

A6006

A6

M1

BURTON-
UPON-TRENT

A514

SWADLINCOTE

A511

THE SITE



SHEPshed

LOUGHBOROUGH

ASHBY-DE-
LA-ZOUCH

COLEORTON

A512

WHITWICK

A6

A444

COALVILLE

M1

A42

A447

LEICESTER

A444

A5

A47

M69

A47

HINCKLEY

Wider site location plan

3. Planning Context

Local Planning Policy

The Development Plan in relation to this site comprises:

- North West Leicestershire District Council Local Plan (2021).

The North West Leicestershire District Council Local Plan was adopted in November 2017 and sets out the vision and strategy for development within the District up until 2031. It allocates sites including those to meet employment and housing needs. It identifies a requirement of 9,620 dwellings and 66ha of employment land over the plan period and states that an early review will be required due to a mismatch in the type of employment land provision (Policy S1).

The adopted Local Plan includes strategic and development management policies including: Policy S1 (Future Housing and Economic Development Needs); Policy S2 (settlement hierarchy); Policy S3 (Countryside); Policy D1 (Design of New Development); Policy D2 (Amenity); Policy H4 (Affordable Housing); Policy H6 (House Types and Mix); Policy IF3 (Open Space, Sport and Recreation Facilities); Policy IF7 (Parking Provision and New Development); and Policy EN3 (National Forest).

The Site lies outside of, but adjacent to, the Limits to Development for Coleorton. The adopted Proposals Map identifies that the Site is located in the Countryside and the National Forest. Policy S2 (Settlement Hierarchy) identifies Coleorton as a 'Sustainable Village'. Sustainable Villages are the fourth tier of the settlement hierarchy. They are identified as having a limited range of services and facilities. The Local Plan envisages that a 'limit amount of growth will take place within Key Service Centres.

Emerging Policy

The Local Plan Review is being undertaken in two parts: the Partial Review; and the Substantive Review.

A first stage consultation for the Partial Review ran from February to April 2018 and the Emerging Options consultation followed, between November 2018 and January 2019.

Partial Review

The Partial Review concerned amendments to Policy S1 only, relating to housing and employment requirements. The examining Inspector found the Partial Review sound, subject to modifications, in February 2021 and the North West Leicestershire Local Plan (as amended by the Partial Review) was adopted in March 2021.

Substantive Review

The Substantive Review, now referred to simply as 'the Local Plan Review' is wider ranging and has been progressing throughout this time. The latest Call for Sites closed in October 2020.

This review is taking into account changes that have occurred since adoption such as the revised National Planning Policy Framework (NPPF) publication in 2021; changes to the Use Classes Order in September 2020; addressing Leicester City Council's unmet need for housing and employment land; the publication of the Planning for the Future White Paper; and the standard method calculation for housing need, in addition to the implications of extending the plan period to 2039.

The current timetable for the Local Plan Review is as follows:

- Development Strategy Options and Policy Options – January/February 2022 – current stage
- Consult on potential site allocations – Spring 2022
- Consult on draft policies – Autumn 2022
- Agree publication version (Regulation 19) – June 2023

- Consult on Publication Local Plan (Regulation 19) – June/July 2023
- Submission – October 2023
- Examination – January 2024
- Adoption – Mid 2024

This Development Strategy and Policy Options consultation is a Regulation 18 stage public consultation. The consultation is structured into 8 broad topics with some divided into individual policy areas. Some sections include preferred policy options or specific policy wording and each section includes consultation questions.

This consultation does not cover all matters to be included in the Local Plan Review. Future consultations will include sites proposed for allocation and amendments to Limits to Development around settlements.

Evidence Base

The Council are producing evidence for the Local Plan Review. The Evidence Base includes a Sustainability Appraisal, Settlement Study, Strategic Housing and Economic Land Availability Assessment (SHELAA) 2021 and documents and studies relating to employment land, retail uses, renewable and low carbon energy, housing need and landscape.

The Site was submitted for consideration through the Call for Sites as part of the Local Plan Review in February 2020. The site is contained within the 2021 SHELAA, with reference Cn13. The Site is considered 'potentially suitable', 'available' and 'potentially achievable' however concerns were identified regarding highways, ecology and geo/environmental factors. As outlined in the SHELAA, the Site lies outside of, but adjoins, the Limits to Development of the part of Coleorton identified as a Sustainable Village. A change to the Limits to Development would be required for the site to be considered suitable.

Supplementary Planning Guidance/Document

Good Design SPD (2017)

This Document sets out the Council's approach to the design of development proposals, building on the

Policies of the adopted Local Plan. The guidance has informed the layout and design of the indicative layout included within this Vision Document.

Affordable Housing SPD (2021)

This Document was adopted in December 2021 with the purpose of supporting the delivery of Affordable Housing in the District. It provides further detail about the application of the Affordable Housing Policies in the Local Plan.

Neighbourhood Plans

At the time of writing there the Site is not located within a Neighbourhood Plan area, however it is close to the proposed boundary of the Pre-Submission Swannington Neighbourhood Plan

Other Material Considerations

National Planning Policy Framework (NPPF) (2021)

The NPPF sets out the principles by which the new Local Plan will be produced and examined against. There are a number of key paragraphs in relation to the promotion of this site through the local plan process including:

- The need to identify land for the authority's whole area, including any needs which cannot be met in neighbouring areas (paragraph 66).
- The need to identify a sufficient supply of sites taking account of availability, suitability and likely economic viability (paragraph 68).
- The plan maker's need to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development, including in discussions with neighbouring authorities (paragraph 141).
- The valuable opportunity that the National Forest offers to improve the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife (paragraph 146).

References to the relevant sections of the NPPF are included throughout this document and reference has also been made to further guidance provided within the Planning Practice Guidance.

4. Site Context

The site is located in the centre of Coleorton and approximately 2 miles north of Coalville. The site is within walking distance of shops and services in Coleorton and Peggs Green villages.

Access & Movement

The site is accessed from the A512, Loughborough Road. Loughborough Road is a single carriageway which joins the A42 at Ashby-de-la-Zouch to the west and the M1 and Loughborough to the east. There is a footpath along the road's northern edge (the site's southern boundary).

The site is located within walking distance (0.2 miles / 4 minutes) of services in Coleorton village.

The site is also within walking distance of regular bus services to Burton-upon-Trent and Swadlincote.

There is a Public Right of Way (PRoW) running diagonally through the site with a wide network of PRoWs in the surrounding area.

Train Services

The closest railway stations are Loughborough and Burton-on-Trent and can be reached by a 23 minute and 27 minute car journey respectively. Loughborough provides regular services to London St. Pancras, Lincoln, Leicester, Sheffield and Nottingham whilst Burton-on-Trent provides regular services to Cardiff via Gloucester, Birmingham New Street, Edinburgh via Leeds and Nottingham.

Bus Services

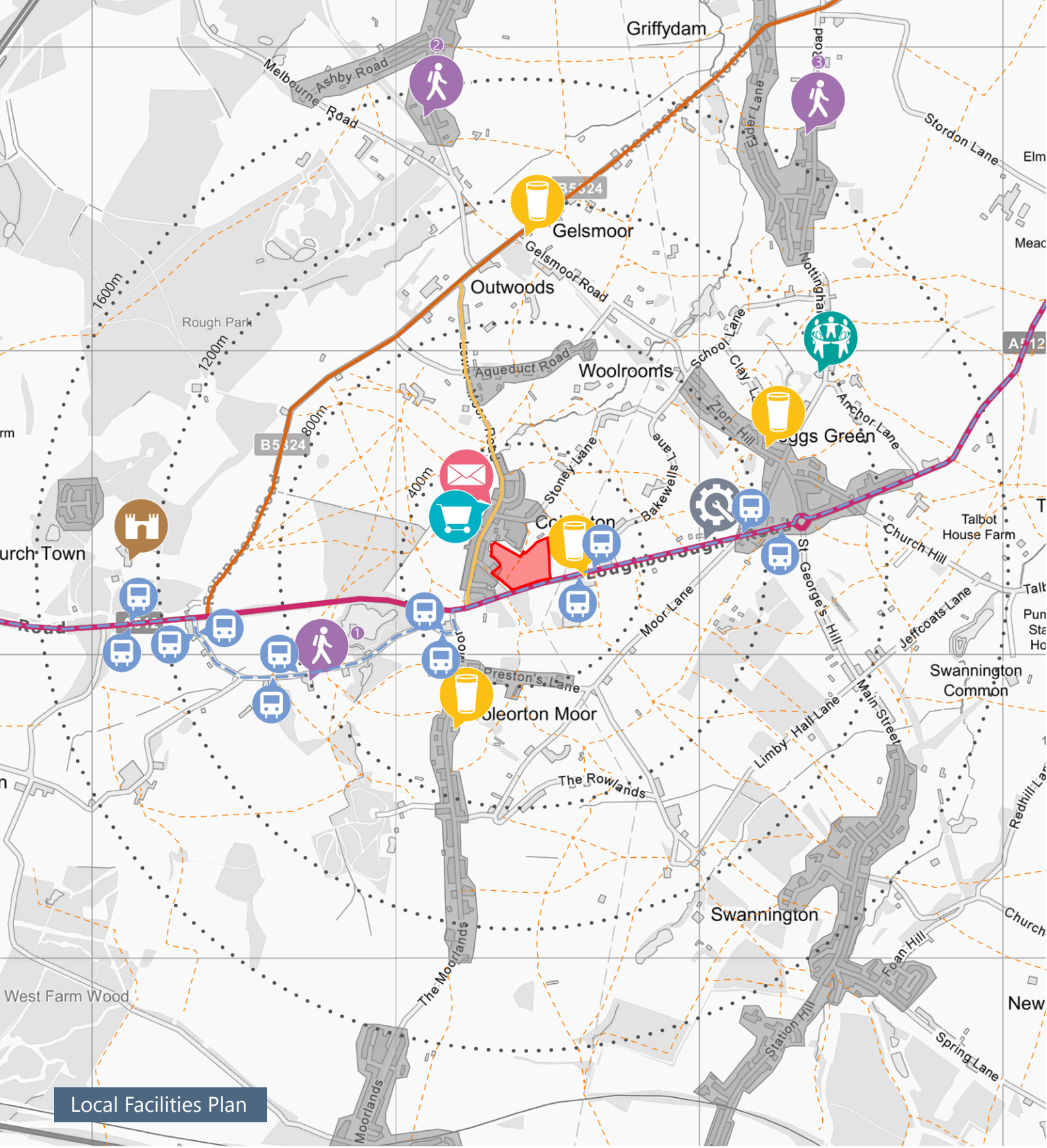
The closest bus stops to the site are located:

- On Loughborough road, approximately 0.1 miles, 2 minutes walk west from the site access serving the 29 route.
- On Zion Hill, approximately 0.6 miles, 12 minutes walk west of the site serving the 129 route.

The 29 route runs between Coalville and Burton-upon-Trent via Swadlincote with a daytime frequency of twice an hour. The 129 bus route runs between Ashby-de-la-Zouch and Loughborough with a daytime frequency of one every two-three hours.

Local Facilities & Services

Type	Description	Walking Distance	Walk / Cycle Time
Education	Viscount Beaumonts CofE Primary School	1.0 km / 0.6 miles	11 minutes / 5 minutes
	Newbold CofE Primary School	1.8 km / 1.1 miles	23 minutes / 8 minutes
	Griffydham Primary School	2.1 km / 1.3 miles	26 minutes / 8 minutes
Food Retail	Coleorton Village Store (and Post Office)	0.5 km / 0.3 miles	6 minutes / 2 minutes
Pubs, Cafes, Restaurants and Leisure	The George Coleorton	0.2 km / 0.1 miles	3 minute / 1 minute
	The Angel Inn	0.6 km / 0.4 miles	9 minute / 3 minutes
	New Inn	1.1 km / 0.7 miles	13 minutes / 4 minutes
	Beaumont Centre (Village Hall)	1.3 km / 0.8 miles	15 minutes / 4 minutes
	Gelsmoor Inn	1.4 km / 0.9 mile	17 minutes / 6 minutes



Local Facilities Plan

-  Site Boundary
-  Urban Areas
-  Loughborough Road / A512
-  Rempstone Road / B5324
-  Lower Moor Road
-  Bus Route (29A)
-  Public Rights of Way
-  Schools
1. Viscount Beaumonts C of E Primary School
2. Newbold C of E Primary School
3. Griffydam Primary school
-  Colerton Post Office
-  Colerton Village Store
-  Colerton Hall & St Mary the Virgin's Church
-  Public Houses
-  Colerton Garage & Petrol Station
-  Route 29A Bus Stops
-  Beaumont Centre Village Hall

5. Opportunities & Constraints

The findings from the initial site and context assessment have been evaluated to identify the emerging constraints and opportunities relevant to the development of the site.

The composite plan in this section presents the analysis of these elements, the qualities of the site and its immediate setting that provides the context for future development proposals. The positive features and opportunities on and around the site should be retained, enhanced and incorporated into the scheme where possible, to strengthen local distinctiveness

Key Opportunities

There is significant existing vegetation (hedgerows, trees and other planting) along the site boundaries which can be retained and enhanced to add character to the development.

There is an existing PRow on site which can be enhanced to provide better access for residents of the site and the local area.

The site is in close proximity to nearby bus stops, two minutes' walk from the site.

There is potential to utilise the existing topography of the site for sustainable drainage

There is potential for a new access directly onto Loughborough Road

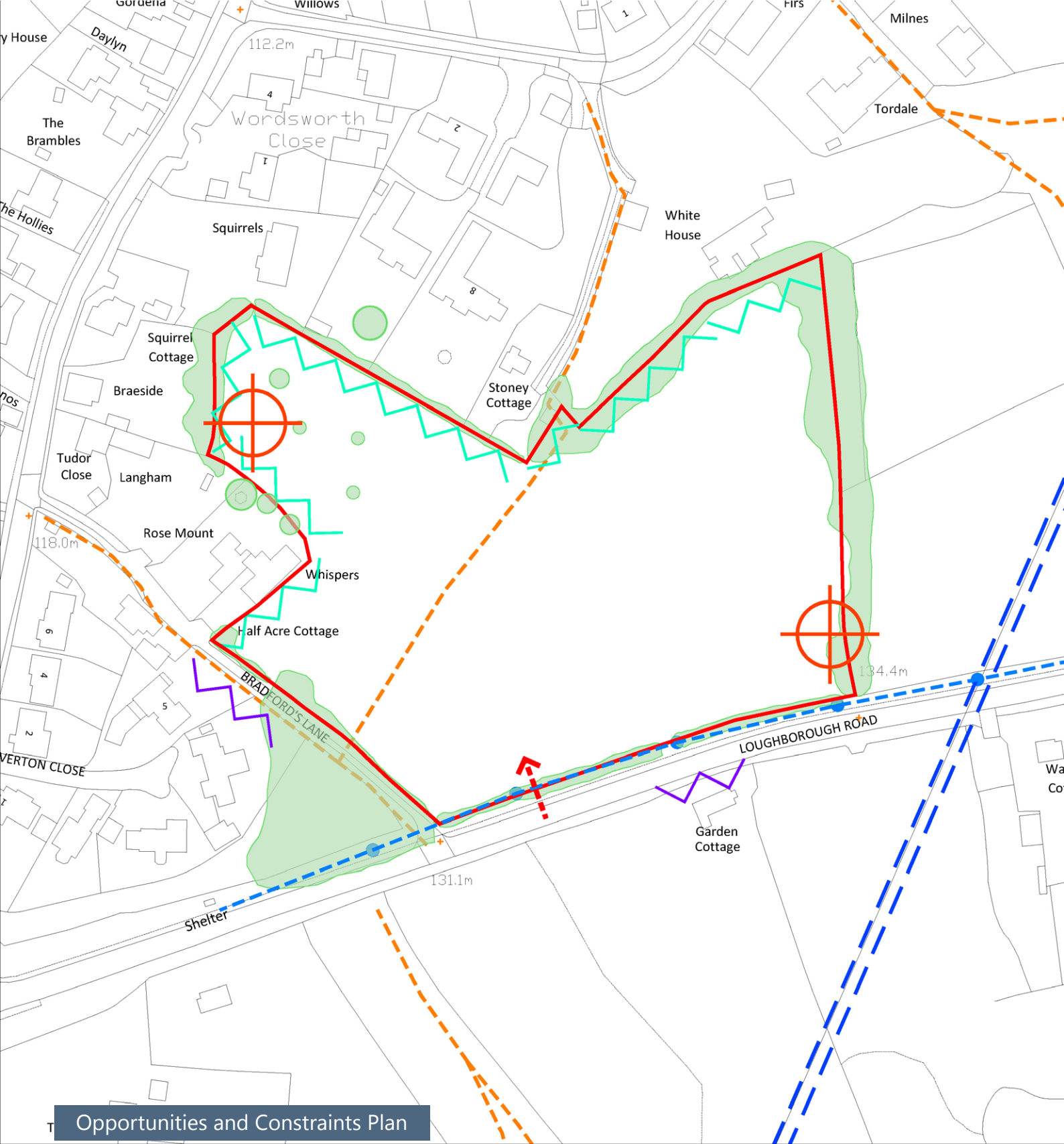
There are local community facilities, shop and schools within walking distance of the site

There is an opportunity to provide better pedestrian and cycle connections through the site from Loughborough Road and Bradford Lane to the village centre of Coleorton, benefiting local residents by making nearby bus stops and other services more accessible.

Key Constraints

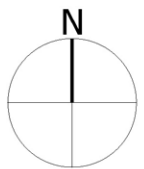
Adjacent properties to the north should be backed on to.

Part of the Site lies within the Coal Development High Risk Area and there are disused mine shafts within the Site area.



- Site Boundary
- - -> Proposed Site Access
- - - Public Rights of Way
- - - - - Overhead Lines
- = = = Overhead Lines - 132KV
- ~ ~ ~ Rears of Adjacent Properties

- ~ ~ ~ Fronts of Adjacent Properties
- Existing Trees / Landscape
- ⊕ Disused Mineshaft (10m offset)



Access & Transport

Loughborough Road is a single carriageway road which connects to the A42 and Ashby-de-la-Zouch to the west and Thringstone, Shepshed, the M1 Junction 23 and Loughborough to the east. Access is proposed off Loughborough Road where the appropriate visibility splays are considered to be achievable. Concerns were raised in the SHELAA about the access, however the suitability of taking access off Loughborough Road will be demonstrated through the provision of appropriate drawings and Statements submitted with an application.

An existing footpath runs along the north side of Loughborough Road, along the southern boundary of the site, and provides the opportunity to enable safe pedestrian access to the facilities located in Coleorton and the surrounding area.

The Concept Plan shows the properties centred around a primary route through the centre of the Site with a small number of cul-de-sacs. An appropriate level of vehicle parking can be provided per dwelling, in accordance with local standards.

Flood Risk & Drainage

The site is entirely within Flood Zone 1 and therefore has a low probability of flooding (less than 1 in 1,000 annual probability). The site is approximately 2.18ha in size and therefore a Flood Risk Assessment would be prepared and submitted with any forthcoming planning application.

In order to manage water on site, the proposal has been informed by the provision of Sustainable Urban Drainage Systems including an attenuation pond to the north west of the site. This method of drainage is supported by local and national planning policy.

Landscape

The site is located in the National Forest. There are no other known statutory or non-statutory landscape designations on the site or adjoining it.

The site features mature trees and hedgerows to its boundaries and is otherwise predominately grassland. Where possible the existing trees and hedgerow will be retained and the landscape character will be enhanced with the provision of a high quality area of public space.

The landscape led approach to the development of the site ensures the proposal meets guidance with regard to tree planting in the National Forest and helps the development assimilate into its surroundings.

The proposal seeks to respond to Policy requirements to retain and enhance existing landscaping and provide open space on site. This landscape led approach has resulted in a high quality development proposal which respects the character of the surrounding area and provides landscape enhancements.

Ecology

There are no statutory or non-statutory designated sites of nature conservation interest located within or adjoining the site boundary.

The site does not have any existing buildings and the majority of the mature landscaping is sought to be retained. Therefore, it is anticipated that the proposal would have limited impact on ecology and through the enhancement of landscaping will provide opportunities for net gains to biodiversity.

Concerns regarding ecology were noted in the Council's SHELAA however survey work will be undertaken to support the proposal with appropriate mitigation proposed where required.

Heritage & Archaeology

The site is not located within, adjoining or within the setting of a Conservation Area. The Site does not contain any Listed Buildings nor does it adjoin any Listed Buildings.

The site has no known historical connections and as such no archaeological remains of historical value are expected. Should any be found on site, appropriate action would be taken such as the instruction of an appropriately qualified archaeologist to survey the site.

Ground Conditions

The majority of the site is within a Coal Development Low Risk Area, however a small part of the site, the south east corner, is within a Coal Development High Risk Area. A Coal Mining Risk Assessment would be submitted with an application.

Social Infrastructure

The site has existing opportunities to connect to the services and facilities of Coleorton, Ashby-de-la-Zouch and Coleville which will be encouraged by the provision of footpaths within the site connecting to the existing footpaths along Loughborough Road and to nearby bus stops.

6. The Proposals

Key Guiding Design Principles

The plan for the site has been informed by the vision, site analysis and identified constraints and opportunities. The plan shows the key design principles which underpin the development of the site, as set out here (numbers correspond to the plan opposite):

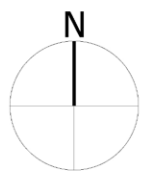
- ① Landscape Buffer - Knits the development into the surrounding landscape, creating a green boundary whilst maintaining views and privacy for both existing and proposed dwellings.
- ② Adjacent Houses - Houses adjacent to the site are factored into the design with proposed dwellings siding on and continuing the building line where possible.
- ③ Dual sided residential streets and courtyards - In conjunction with dual aspect homes the street will be secure, well overlooked and communal.
- ④ New areas of public open space - This area of open space will serve both the existing and new residential communities.
- ⑤ Proposed new attenuation pond informed by the site's topography.
- ⑥ Public Right of Way across the site is enhanced offering connectivity to Pedestrian and cyclists through the site.



Indicative example image of high quality Owl Homes Development



- Site Boundary
- Public Right of Way



7. Development Benefits

The proposal will deliver an attractive well-connected residential development of approximately 46 high quality homes, set within a strong landscape setting, with a large, attractive public open space as part of the development.



Creation of high quality homes for all

The development will create approximately 46 new high quality homes within the village of Coleorton, sensitive to the local setting and context whilst expanding the Coleorton residential community. The Site has the potential to accommodate a range of dwelling type and size and 30% of dwellings will be affordable in accordance with the requirements of North West Leicestershire's Local Plan.



A development which increases connectivity and enhances legibility

As part of the development, the existing PRow will be retained and enhanced and a new connection created onto Loughborough Road, improving connectivity and links for residents of the site and the local area.



A development which sits within the local landscape and responds to the local character

The planting surrounding the site will be maintained and enhanced to add to the character of the development and inform new public open space. New public open space will be created on the site, benefiting both the new and existing communities.

8. Deliverability

Owl Homes are a modern, privately-owned property developer, specialising in the delivery of sustainable high-quality residential dwellings throughout the Midlands.

Passionate about design and quality of construction, Owl Homes have the skills, experience and creative flair to blend traditional values with the latest trends and practical modern day living. Owl Homes carefully consider the design, specification and construction throughout the delivery of all new homes.

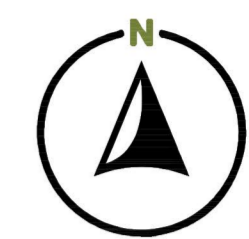


Indicative example image of high quality Owl Homes Development

Squirrels

House

Notes
© Radford Architectural Services Ltd. Do not scale from this drawing.
Refer to figured dimensions only. Contractors must check all dimensions on site.



Squirrel Cottage

eside

Stoney Cottage

ATTENUATION POND

SWALE

SWALE

Whispers

Half Acre Cottage

BRADFORD'S LANE

Revision	Date	Amendment	Initials

Radford ARCHITECTURAL SERVICES
 T 01902 762854 M 07977 253860
 W www.radford-architectural.co.uk
 E radfordarchitecturalservices@gmail.com

Client	
Project	
LOUGHBOROUGH ROAD, COLEORTON	
Title	
CONCEPT MASTERPLAN	
Dwg No.	
1128-22-100	
Revision	Scale @A2
.	1:500
Drawn	Date
DS	JAN 2022





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

Consultation Response Form – Loughborough Road, Coleorton

Details of what we are consulting on, and why, can be found on the Council website at www.nwleics.gov.uk/pages/local_plan_review. You can also participate in the consultation online. This form has two parts-
Part A – Personal details
Part B – Your response to the consultation question/s. Please fill in a separate sheet for each question you wish to respond to.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Owl Homes C/O Agent	Miss
First Name		Caroline
Last Name		Featherston
[Job Title]		Senior Planner
[Organisation]		Barton Willmore
Address Line 1		9 th Floor, Bank House
Address Line 2		8 Cherry Street
Address Line 3		Birmingham
Address Line 4		
Postcode		B2 5AL
Telephone		0121 711 4166
Email address		caroline.featherston@bartonwillmore.co.uk

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...

Questions Answered:

- Q1 Do you agree with these Local Plan Review Objectives? If not, why not?
- Q2 Do you agree with the proposed settlement hierarchy? If not, why not?
- 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.
- 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
- Q6 Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?
- Q7 Do you agree with the proposed policy on Space Standards? If not, why not?
- Q8 Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?
- Q9 Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?
- Q16 Do you agree with the proposed health and wellbeing policy? If not, why not?
- Q17 Do you agree with the proposed Health Impact Assessment policy? If not, why not?
- Q18 Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?
- Q19 Do you agree with the proposed renewable energy policy? If not, why not?
- Q20 Do you agree with the preferred policy approach for energy efficiency? If not, why not?
- Q21 Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?
- Q22 Do you agree with the preferred policy approach for overheating? If not, why not?
- Q23 Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?
- Q24 Do you agree with the proposed policy for reducing carbon emissions? If not, why not?
- Q25 Do you agree with the proposed policy for water efficiency standards? If not, why not?

Please refer to our separate cover letter for our responses to these questions.

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

Caroline Featherston

Date

11/03/2022

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

The deadline for responses is the end of Monday 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.

06 MAR 2022

06 MAR 2022

3 March 2022

Planning Policy & Land Charges Team
North West Leicestershire District Council
Whitwick Road
COALVILLE
LE67 3PJ

Dear Sirs,

EMP90 - Land South of East Midlands Airport
and South West of J23a M1

I strongly object to building housing on greenfield sites,
[This inappropriate statement has been redacted]

These are needed to grow our own food, and have to bring it
from abroad, with all the added pollution it would entail,
and also bearing in mind events in the World to-day.

Further it would make such an impact on village life.

Why are brown sites not top of the agenda?

Yours faithfully,

(Mrs. R.P. Adkin)



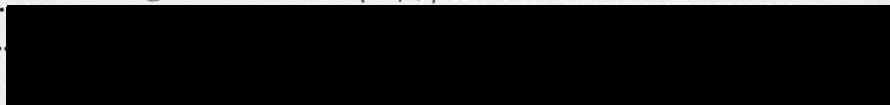
By Email. planning.policy@nwleicestershire.gov.uk

Local Plan Review. Consultation Response

Name

PAUL BUTTERWORTH

Address



Dear Sirs,

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

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

My objections are based on the following:-

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

To: Ian Nelson c: Chris Elston

Detailed response to Local Plan consultation submitted 28 March 2022

Dear Ian

Firstly thanks again for working with us in order to get this more detailed response to you. Whilst I am the one submitting this document to you both I wanted to stress that it has been evolved, discussed, reviewed and approved by all of the Parish Councils noted in Appendix 1, including a cross party group of District Councillors.

We appreciate your support to date not only to this group but also to those evolving Neighbourhood Plans and we look forward to continuing this 'working together' approach to develop an aspirational and deliverable set of aligned plans. We very much see this as the start of the process and hope that by drawing on our local knowledge and skills the resulting Local & Neighbourhood Plans will be something we can all feel proud of.

You will see from the attached response we agree with some, but not all of the recommendations and where we don't agree we have tried to be clear on the reason why. There is a significant strength of local feeling behind our stated views and we look forward to discussing them with you and your team in due course.

There are a number of things we feel very strongly about and its worth pointing out a few up front namely:

- The need for a cautious evolution of the plan given the wider uncertain economic environment without committing to the 'worst case' scenarios too soon. This might be through prescribed decision making (or milestone) stages to ensure a plan can be generated now but adjusted in the future once there is more certainty.
- More co-operation with other authorities including Nottinghamshire & South Derbyshire
- A reasonable, fair and proportionate settlement on the unmet needs of Leicester.
- The pursuit of no more than the Higher 1 housing numbers for now.
- Making best endeavours to pursue a new settlement strategy above all others.
- A cautious and more sustainable approach to warehousing and employment land.
- A stronger focus on greenspace and valued landscapes

Once again thank you for your support of this group to date and we look forward to engaging with you and your team after Easter once you have had time to digest this.

Best Regards

On behalf of the group

John McClelland

1. Introduction

- a. This response is submitted on behalf of the group of the local parish council's which surround East Midlands Airport (EMA) and the new Freeport zone (EMAGIC) in Northwest Leicestershire (NWL). The group is also supported by a cross party group of NWLDC District Councillors who were elected to represent the residents in these areas. Appendix 1 provides a detailed list of those involved in the group and their roles.
- b. It should be stressed that we very much see this formal response **as the start of a 'working together' process** between this group and NWLDC. Firstly, due to the fact that some of the key supporting evidence base and data are still evolving to inform the plan, for instance Freeport proposals, updated HEDNA, negotiations on unmet needs. Secondly to recognise that Neighbourhood Plans are evolving in many Parishes and the NPPF guidelines on plan making requires a close working relationship to:

'..... direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan'
- c. As a starting point for this we would propose an initial meeting with NWLDC just after Easter to review and share, from our respective perspectives, current thinking on areas of separation, local greenspace designation, housing and employment sites in our Parishes. By working together on this constructively we hope to arrive at a set of Neighbourhood and Local plans which support NWLDC's strategic objectives but also meet the needs of the communities we serve.
- d. Finally, whilst Policy S3 is not in the consultation document itself it is nevertheless especially important that this should remain as strongly worded as currently, or even strengthened to protect local green spaces, areas of separation, and valued landscapes. This would be in line with the recent strengthening of the NPPF guidelines to protect and enhance the environment.

2. Approach to Strategy & Plan creation

- a. NPPF requirements for plan making

NPPF 15 requires that the plan **'should provide a positive vision for the future and a platform for local people to shape their surroundings'**. As we stated in our initial response any form of a 'developed' approach to policy creation is unlikely to be supported at Parish level. This is in line with the Planning Inspector's historic views of the Authority's previous shortcomings in this regard. All Parishes will endeavour to work with the Authority to formulate and deliver a Local Plan that is the *right* way forward for the locality, not necessarily the *easy* way forward.

In terms of plan making NPPF16 states *'Plans should:'*

- a) *Be prepared with the objective of contributing to the achievement of **sustainable development***
- b) ***Aspirational** but deliverable*
- c) *Be shaped by early, proportionate and **effective engagement between plan makers and communities, local organisations, etc.***
- d) *.....*

We support all three of these key requirements and seek to work together to achieve sustainable development through **aspirational but deliverable** plans in our area.

b. Uncertainty in the economic environment

The plan should recognise the uncertainty in general economic environment and the likelihood of a downturn in economic activity relative to previous forecasts. The impacts of the Pandemic, war in Ukraine, energy crisis are all driving a cost of living increase and lower disposable incomes for goods. This calls for a prudent approach in this plan, deferring where possible *any* major decisions that may result in giving up more countryside or open green space to development, for instance until there is more certainty in 5 years' time.

c. Attitude to risk

It is appropriate that there is a balanced and proportionate attitude to risk across different policies and that risks are not just added to each other which is not best industry practice. We could not help but notice the development land requirements in the GLHearn report, which forms the basis for the consultation, is extremely risk averse in using the second highest forecast method, then adding a 33% flexibility margin based on the last 5 years completion. Planning for risk should be balanced recognising the plan will be revisited every 5 years. A time based approach to key decisions and risks between now and 2039 is required with no need to make them all today. Irrespective of wider national and international events, the spirit of the current approach does feel as though all 'worst case' planning assumptions are being combined, resulting in a 'worst case plus' direction of travel at a very early point. Balance and caution are needed at this formative stage.

d) Leicestershire unmet need

We would be concerned if NWLDC decided to take on more of Leicestershire's unmet need in a way that was not fair and proportionate, making the plan more challenging to deliver and thus giving up more countryside in less and less appropriate places. NWLDC has taken more than its fair share over the last five years and needs to look to its other stated objectives before volunteering to give up more.

e) Duty to co-operate

The NPPF Section 3 Item 24 requires that, in preparing Local Plans, Councils have a duty to cooperate across administrative boundaries.

*'Local Planning authorities and Local Councils are under a duty to co-operate with each other, and with other prescribed bodies on strategic matters **that cross administrative boundaries**'*

Items 25-27 go on to say that strategic matters require this co-operation and should result in a statement of common ground. As such, given the strategic nature of Logistics and Warehousing, infrastructure and housing needs etc. we would expect to see tangible and substantial evidence of this co-operation with Nottinghamshire and South Derbyshire who geographically are positioned alongside the NWLDC by the multi modal transport hubs at EMA and SEGRO. Taking up even more development land in the Local Plan without evidence of this would not be supported given the amount of countryside and amenity already given up by residents in this part of NWL.

f. Neighbourhood Plans

The NPPF requirements on the role of Neighbourhood Plans are clear and we welcome the support from NWLDC to date in supporting their creation locally. The NPPF states:

*28. Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. **This can include allocating sites, the provision of infrastructure and community facilities***

at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.

29. Neighbourhood planning gives communities the power to develop a shared vision for their area. **Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area or undermine those strategic policies.**

To be effective however working together is key and we look forward to the commencement of this process after Easter.

g. Testing of plans

As part of the process the NPPF states: *Local plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:*

*(a) Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs and is informed by agreements with other authorities, so that **unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development.***

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

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

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

h. Developer contributions

The NPPF’s require that plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure (such as that needed for education, health, transport, flood and water management, green and digital infrastructure).

Based on past experiences, to avoid developers avoiding their obligations, at the outset policies and planning approvals with **S106 contributions need to be tightly drawn up to ensure developer fulfils its requirement before the full build is complete. Policies in the Local Plan should require these to be agreed at outline planning stage in a staged way. Early consultation should be sought with Parish Council Planning Committees in order for these statutory consultees to be able to shape the timeliness of S106 delivery with the substantial local knowledge that exists.**

3. Approach to the environment

a. NWLDC priorities

We are concerned that the proposed Local Plan is not as strong as it could be with respect to the environment and protection of the valued greenspaces, landscapes and views that remain after the last 5 years of cumulative development on a massive scale. This is particularly so when the NPPF’s have been recently strengthened in this respect.

The Council’s own Delivery Plan for 2020-21 is an important document that provides a local perspective to the Council’s key priorities that the new LP can help to deliver. The Delivery Plan lists five priorities

that show support for the local economy, businesses and communities.... but not the environment. Do we infer from this that the Council does not see the protection, conservation and enhancement of the local environment as a priority over the next few years? If so, that would be of great concern if this approach follows through to the LP

A number of important changes to the NPPF were introduced in July 2021 to support Council's in delivering better places to live and work and to ensure that communities have a greater influence over the location and design of development. The environmental objective wording has been strengthened with a requirement to 'protect and enhance' the environment and 'improve biodiversity' rather than 'contribute to' protection and 'helping to improve biodiversity' as written in the previous version of NPPF.

NPPF paragraph 11 a) retains the presumption in favour of sustainable development, but plan making now has a more green focus including the requirement to 'improve the environment'. The LPR provides the opportunity for the Council to provide a greener focus to the new LP in keeping with NPPF.

Put simply, more weight is needed within the Delivery Plan in order to reflect the strengthened requirement of seeking to protect and enhance the environment.

b. Landscape sensitivity and value

NPPF paragraph 170 retains the requirement for policies and decisions to contribute to and enhance the natural and local environment by, amongst other things, protecting and enhancing valued landscapes and recognising the intrinsic character and beauty of the countryside. The Local Plan Review (LPR) provides the opportunity for the Council to provide up to date local landscape evidence to inform the new Local Plan, in accordance with NPPF.

Objective 9 in the Local Plan refers to '*conserve and enhance landscape characteras well as its other valued landscapes*' however we do not feel there is an appropriate evidence base to define 'valued landscapes'

Appropriate landscape sensitivity assessment in accordance with the latest guidance from Natural England ('*An approach to landscape sensitivity assessment to inform spatial planning and land management 2019*') that takes into account **landscape character assessment at the local scale** in accordance with latest guidance '*An Approach to Landscape Character Assessment 2014*' should be used to inform strategic spatial planning and land management. This should be accompanied by policies and proposals requiring applicants to demonstrate that environmental (as well as economic and social) effects of development are acceptable, for example by requiring landscape and visual impact assessment of a proposal in accordance with latest guidance in GLVIA3.3 (The Landscape Institute and Institute of Environmental Management & Assessment, 'Guidelines for Landscape and Visual Impact Assessment', Third Edition, 2013).

c. Landscape evidence base

Noticeably there is no landscape character assessment (LCA) in the list of evidence documents at Appendix 1. The adopted local plan relies on LCA at the national, regional and county scales, rather than at the local scale. Whilst the 1994 National Forest Character Assessment and the 2008 Charnwood Forest LCA provide local-scale assessments of the National Forest and Charnwood Forest areas, LCA coverage of the rest of the NWL Council area relies on Natural England's National Character Area (NCA) profiles (2013-15), the East Midlands Regional LCA (2010) and the Leicester Leicestershire and Rutland Landscape and Woodland Strategy (2001). The NWL Settlement Fringe Assessment (2010) and the NWL Landscape Sensitivity Study (2019-21) adopt the landscape character descriptions from the National Character Area profiles, **but what is required is an up-to-date baseline local LCA that takes into account the significant development and other landscape change within NWL. This will help in understanding of the local landscape, in informing judgements (for**

example on landscape sensitivity including what may be valued by a local community) and decisions concerning the management of change.

A robust, auditable and transparent landscape evidence base should follow the latest guidance (as previously noted) to ensure that assessment criteria and indicators are appropriate to the particular landscape and to particular development scenarios.

As referred to above, the NWL Landscape Sensitivity Study, 2019, adopts the key landscape characteristics from the NCA profiles. The study uses the character profiles at the national scale in the absence of a regional LCA; however, the East Midlands Regional LCA was published in 2010 and thus was available for use in the study. **Using national-level characteristics is too broad a scale for the assessment of sensitivity of land around settlements.** Importantly, the study is a strategic assessment to be used as the context for more detailed studies of individual sites; it follows methodology in GLVIA3 which provides guidance on landscape and visual assessment of specific development proposals (rather than following guidance on landscape sensitivity to the principle of a particular development type scenario) but **it does not make judgements on the appropriateness of specific proposals on individual sites; and no community engagement was undertaken for the study (a crucial aspect of latest guidance on landscape sensitivity).**

Furthermore, the NWL Landscape Sensitivity Study **does not consider cumulative impacts which is a major concern in the Castle Donington area; developments to the north of the A50 and at EMAGIC are not considered in the study.**

Whilst the study may provide useful background to the new LP **it must be made clear that development is not necessarily appropriate in areas of lower sensitivity identified in the study; more site-specific information, not least informed by detailed site visits and community and stakeholder engagement, will be required so that local developments and cumulative impacts can be fully assessed.**

In summary given these various shortcomings to the evidence base we want to work with NWL in defining, at local level, the valued landscapes worthy of conserving and enhancing in our specific area.

It is also worth noting that over the last two years, the willingness of Planning Officers to even visit application sites has reduced to a very minimal level. It is imperative that Planning teams visit the locality for which they are responsible, especially when there is a specific application under review. Google maps and street view is not sufficient in terms of an analysis tool. Parish Councillors would welcome to opportunity to meet with Planning Officers and 'walk the patch'.

4. Response to specific consultation questions

Question 1 Do you agree with these Local Plan Review objectives ?

NO

- a. We noted in Section 3 that the NWLDC Delivery Plan lists five priorities that show support for the local economy, businesses and communities.... but not the Environment and are concerned this is not a priority for the Local Plan. We feel the objectives should be strengthened to provide a basis for policies in the Local Plan that give stronger protection for the countryside, local greenspace, and valued

landscapes. This should include measures to retain the character of our settlements from further encroaching development. This is particularly pertinent given the loss of countryside and amenity from the cumulative impact of development over the last 5 years. This lack of focus in the objectives can lead to weaker policies which can be exploited by developers chasing land in this sought-after area.

- b. For instance, there is no mention in Objective 8 of Conservation Areas specifically which would like to see included.
- c. Likewise, the mention of *...its other valued landscapes* in Objective 9 has no objective data behind it in the evidence base to define where they are such that they can be considered in the planning process? As NPPF 175 states *'planning policies should contribute to and enhance the natural and local environment by – 'protecting and enhancing valued landscapes'* We would like to work with NWLDC to define these in our area.
- d. Furthermore, how can it be assured that the dependencies in the sustainable objectives, of which there are many, are acknowledged e.g., Health and Well Being suffers if access to shops, education, sport, recreation, green space and cultural facilities increase the need to travel and if economy and housing are developed ahead of proper community provision (objectives 1, 3, 4, 7, 11).

Question 2 – Do you agree with the proposed settlement hierarchy?

YES

Question 3 – Do you agree with the approach to Local Housing Needs Villages?

YES

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

HIGH 1 STRONGLY PREFERRED

- a. Our opinion is that 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. 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 satisfies the requirement.
- b. However, as the housing requirement for Leicester City is based on its own demographics and economic needs, it would seem to be preferable that a high proportion of the Leicester unmet need should be accommodated in close proximity to this area. It should be exceptional for that unmet need to be sought to be met further afield. No exceptional reasons have been put forward. For this reason NWL, having no joint boundary with the city, should be expected to meet a smaller proportion of the City's unmet need than those Districts with joint boundaries to the city.
- c. 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 lower 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.

The reasons put forward for the HIGH 2 Scenario are therefore considered to be unsound. HIGH 1 is the correct way forward.

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

HIGH 1 /OPTION 8 PREFERRED

- a. Considering that the High 1 Scenario is our preferred basis for future housing projections, we would still prefer Option 8. This is based on the fact that the Principle Towns and Key Service Centres already have large allocations of housing within the existing Local Plan that are still to be built or even receive planning permissions 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.

Using the approach above there is ample time for all Compulsory Purchase of land or Public Private Partnerships to be pursued with the intention of the policy and the Planning Authority driving the best case scenario to deliver aspirational but achievable development, rather than be developer led. It is noted that Officers have shown a willingness to meet with experts in this regard and a District Councillor is arranging this.

Should a new settlement approach be unacceptable then very reluctantly Option 3a would be our second choice for High1 Scenario. This would only be considered acceptable after substantial evidence is provided that the concept of a new settlement has been progressed as far as possible and best endeavours have been made to do so.

- b. If the High 2 Scenario were to be progressed, then Option 7b appears to be the best compromise of the options presented. However, we would prefer the New Settlement to take a much 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).

- c. Whichever option is progressed, if the New Settlement, where it is presently proposed, forms a significant part of the solution, we strongly argue that the Housing Requirements for the surrounding Sustainable Villages should be reduced from their present numbers. This would help to prevent our Parishioners suffering the double blow of major disruption from infrastructure development and long term construction of the New Settlement, whilst also being expected to endure continued expansion within the villages.
- d. Whatever the final decisions the Housing Requirement figures will be needed to be agreed for several emerging Neighbourhood Plans and we look forward to working with NWLDC to achieve this.
- e. We also believe that there should be maximum separation between the New Settlement and existing villages built into any Masterplan for the new development.
- f. Finally, we believe that there should be more and tangible liaison with neighbouring authorities on cross border strategic decisions. The housing needs generated by developments such as significant new employment sites and also associated with the Freeport are pertinent to all neighbouring authorities. The type of housing required due to the new employment sites also needs to be carefully considered. It is likely that there will be significant demand for more affordable housing to cater for the type of employment that is generated.

Question 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

- a. Summary - We strongly favour Option 3 in line with the approach suggested by the Stantec study to await the next review of the Local Plan. This is particularly so given the forecast downturn in economic indicators, rising inflation and the reduction in disposable income that will surely follow the cost of living crisis. This would be consistent with a prudent and proportionate response to providing a flexible and deliverable plan required by the NPPF's.
- b. Table 7 shows the Stantec study which recommends 47Ha for which there is currently 38.4 of supply to 2039. This leaves an actual shortfall of only 8.6Ha. The rest of the forecast caters for a risk margin of an additional 6.37Ha and losses margin of 18.2Ha. We will deal with these in c. & d.
- c. Risk - Given the economic climate has changed considerable since the report the main risk is of a downturn/recession rather than an upturn so we challenge the idea that 5 years of recent completions should be the basis of calculating a risk margin. These are exceptional times, and the past will not be a good indicator of the future. A more prudent approach to allocating risk margins is required, including even accepting the prospect of negative margins for a downturn in the early years of the plan.
- d. Loss margin - We also question the sustainability of an approach which allocates more sites/country-side to allow for 100% of the forecast loss. **We believe that policy for re-use of existing employment lands already allocated must form part of the Local Plan before new sites are allocated.** By following the Stantec recommendation to wait and see, NWLDC would have time for a detailed study of existing sites to identify those which should be offered for reuse/redevelopment as part of the next Local Plan.
- e. Unmet need -If Leicestershire 23Ha of unmet need were distributed evenly between NWLDC and the five other rural Leicestershire Districts, each district would need to accommodate an additional 4Ha. For the same reasons and logic put forward in our response to housing need, we would expect this to be an absolute maximum and the other five districts which border Leicester to take more as this would provide a more sustainable solution from a travel and availability of workforce perspective.
- f. Evidence base - We await the updated HEDNA report and details of the Freeport proposals before we comment further on this.

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

OPTION 3

- a. Summary – Given our position on Question 10 to wait until the next Local Plan then this question at this time becomes a moot point.
- b. In general, however we prefer a strategy based on Option 3 which distributes smaller industrial units and offices across more sites, preferably in areas where unemployment is highest and where low cost commuting is easiest. This would make most sense. On balance we believe this would be a better and more sustainable approach than that recommended by Stantec for substantial sites & critical mass. This has been a policy to date around the EMA and the corollary is that roads, services and local residential amenity is severely impacted.
- c. Unlike strategic scale development, building multiple smaller industrial units and offices in the already stretched areas under Option 1 & 2 is also unlikely to bring in the necessary critical mass to fund a corresponding growth in the infrastructure necessary for it to be absorbed.

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

NO

- a. In answer to the direct question we are unconvinced by the reasons put forward as to why such a large (50%) proportion is necessary, proportionate or sustainable. Particularly when, as stated in Paragraph 6.24 of the consultation document over the last 5 years:

‘The level of provision in NWL alone has exceeded what was predicted for the whole of Leicester and Leicestershire up to 2031 in the Strategic Distribution Study (2017)’

- b. However our response to this question goes well beyond direct question to the heart of the assumptions and conclusions which has led to NWLDC proposing the allocation of an additional 106,000 square metres of land for development.

Paragraph 6.26 refers to the key evidence base for this decision as the report titled ‘Warehousing and Logistics in Leicester and Leicestershire, managing growth and change (April 2021). We will refer to this from now on as *the report*.

- c. We have several major concerns with *the report* itself and the recommendations and conclusions being drawn from it by both GLHearn and NWL as follows:

- I. Plan timing vs GLH forecast timing - *The report* covers the period to 2041 whilst the Local Plan covers the period to 2039. By a simple mathematical interpolation between 2036 and 2041 from *the reports* data on Page 11 it can be shown that the 2039 net demand for road sites reduces from 212,000 sqm to 72,000 sqm and for rail sites from 719,000 sqm to 613,000sqm (Appendix 2). The corollary of this is that even at a 50% take up by NWL the land needed for road served sites would reduce from 106,000 sqm to 36,000 sqm
- II. Risk & uncertainty - The report was based on data at March 2020 and by *the report’s* own admission this was at the height of the pandemic and there was uncertainty ahead. Since then, events have further deteriorated putting pressure on future growth. This therefore requires a more prudent approach to the forecast and any risk margins added. The past is no longer a credible predictor of the future.

In this respect adding a 33.3% upwards risk margin onto the base forecast based on the last 5 years of completions seems excessive and disproportionate in the current

uncertain economic climate. This equates to a huge 644,000 sqm being added to the forecast across both road and rail sites.

In addition this 33% risk margin is added to the gross forecast which consists of two elements, one for growth, and one for replacement which is the dominant element accounting for 84% of the forecast value. Whilst adding a risk element (upwards or downwards) to any economic growth prediction would make logical sense, adding 33% to the replacement element seems illogical and implies that a third more warehouses could be retired earlier from use than the 30 years used in the model. This seems excessive particularly if the model predicts a growing demand. Also, as we will argue in our next point such an approach for Local Planning is unsustainable.

It should be noted also that the chosen model selected from the eight on offer was itself the second highest with a total forecast need of 1,928,000 sqm. For illustrative purposes if a simple average forecast of the 8 models on offer would have been used the forecast would be 1,752,000 sqm.

In summary a more prudent and logical approach to adding risk margin is needed in the modelling.

- III. The need for a sustainable policy - The majority of the demand to 2041 in *the report*, some 1.62m sqm (84%), comes from an assumption that 100% of the land utilised for strategic warehouses on reaching a 30 year life will no longer be suitable for re-use. This is referred to as the *High Scenario* and is adopted as the basis of the forecast recommendation. In simple terms it assumes there are 21 years until 2041 so 21/30 of the existing total 2.3m sqm of stock will need to be replaced 100%. The commerciality of businesses abandoning warehouses after just 30 years should also be considered. It does make business sense to do this. In practice, the warehouses would be renewed on their current site, either as part of organic enhancement or as part of a holistic modernization. The sites would not just be abandoned resulting in a need for more warehouse land. This does not make economic sense and a 30 year lifespan, or any other lifespan, of warehousing should not drive future need for more warehousing land.

We feel strongly that any policy in the Local Plan which is based on such an assumption is and at odds with the NPPF requirements on protecting the environment, increasing the use of brownfield sites and promoting sustainable development policies.

Such a policy, without any objective assessment of the re-use or potential for longer life of specific sites (*100 referred to in the report*,) would drive a spiral of land allocation to new sites at less and less appropriate locations leaving vast swathes of brownfield sites behind. We would not support such an approach. There must be some objective data assessment to ascertain how much of this already allocated land could be re-used. Indeed it should be policy that these sites are reutilised first unless there was an overwhelming case not to, and this must be a high bar to overcome. NWLDC should set clear targets and policies on this in the Local Plan.

As an example of the sensitivity let's consider what would happen if the life of existing 1.62m sqm of stock which falls in the replacement window by 2041 could be extended to 40 years (called the *Low Scenario* in *the report*). Or to put it another way if only 25% of the existing land already built upon (405,000 sqm) could be reused at 30 years (ref Table 29 in *the report*). The effect of this would be net replacement demand to 2041 for rail and road sites would drop from 1,620,000 sqm to 1,215,000 sqm. Applying the same 643,000 sqm risk margin which we disputed earlier, the report would still conclude that with the current allocations we are in surplus on road served sites by 19,000 sqm at the end of 2041. (Appendix 2).

Adjusting this for 2039 the replacement requirement would become 1,099,000 sqm **leading to a surplus of 102,000 sqm of road served sites at the end of 2039 including the significant risk margin of 33%.**

It is clear therefore the impact a sustainable re-use or life extension policy would have on the forecast and this needs to be taken into account.

d. Timing of key decisions

The report provides forecast data at points in 2036 and 2041. If we look at 2036, some 13 years from when the plan will come into force, the data shows that, even with the same significant risk margins applied to this shorter period, there would still be a surplus of road served sites of 48,000 sqm. (Appendix 2). Thus no immediate decisions to allocate more land for strategic warehousing in this plan are necessary at this stage.

e. Proposed way forward

The economic climate has changed since *the report* was compiled and the likely short term direction for economic growth is downwards for the variety of reasons previously expressed. This calls for a prudent approach before offering up more land for development. This is especially so when using the reports own forecast which show that by 2036, including the 643,000 sqm risk margin, there would still be a forecast surplus of 48,000 sqm. The reality will likely be better.

The current replacement policy is not sustainable and decisions should be deferred until the next Local Plan to allow time to develop a site by site analysis and policies on re-use. As the data shows a 25% re-use or life extension policy on existing sites would yield another 405,000 sqm of land and avoid the risk of tearing up more countryside whilst leaving a wasteland behind. This would provide a surplus of over 100,000 sqm by 2039.

Professional advice should be taken to look at applying a sensible approach to the risk margins to be applied and on what elements of the forecast. We do not believe that the current methodology is proportionate or logical nor would represent best industry practice. We should not allocate more land than necessary due to this factor.

Similarly demand numbers should be adjusted to reflect 2039 and not used in their raw form from whatever the supporting evidence is, in this case 2041.

Question 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

We strongly favour Option 1 to delete Policy Ec2(2) as it encourages unwarranted applications in a way that is tactical and not part of the overarching strategy which places employment land in more appropriate locations by design.

It is easy for large developers to create a justification of urgent need or demand through hundreds of pages of reports from consultants and in a similar way to overcome statutory obstacles. The policy to date has led to loss of countryside and the building of facilities on designated flood plains creating risk for residents. Sites should be specified for development through a logical strategic planning process and any requirement for flexibility to react to urgent circumstances addressed in the structure of the Local Plan. Perhaps sites are graded by their appropriateness to meet a balanced scorecard against NWLDC objectives, similar to the sustainability assessment process for housing but broader. In situations of truly urgent need when existing sites were built out and allocations used up, then reserve sites in less appropriate locations can come forward as part of a thought through strategic plan.

Developers will always want to acquire sites closest to their markets with good transport links and thus the existence of such a policy would ultimately end up create a massing of sites in a concentrated area which will

destroy the character of that area and will not be sustainable. Evidence of this is all around us with low unemployment in this area and workers travelling to the sites from far away. Policy Ec2(2) is not sustainable.

The consultation document makes clear the NPPF requirement to be able to 'be sufficiently flexible to deal with changing circumstances' over the plan's lifetime. As an example, it states '*if the economy grows more strongly*'. However, in the current economic climate with forecasts now lower than when the evidence base was created the plan needs to be equally flexible to a downturn in the way land is allocated so that countryside is not given up unnecessarily. Once it is given up it is gone forever so a different mechanism to provide the flexibility the NPPF requires must be found that caters for changes in both directions.

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

OPTION 1

Option 1 is our preferred option so that sites can be selected which give these starts ups the best chance of success, rather than be scattered around other sites. This co-location into a single area will also allow pooling of administrative functions to lower costs and also encourage sharing of knowledge and ideas between the business owners as they grow together.

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

OPTION 1

Option 1 is our preferred solution. Enforcing will not work in a low unemployment area and may stifle the business's ability to get the best people. Also it is hard to see how this could work administratively in an effective way as there would be many ways to get around the 'numbers game' and trying to monitor this would be non-added value for an already stretched Council.

Submitted on behalf of:

Castle Donington Parish Council

Kegworth Parish Council

Long Whatton & Diseworth Parish Council

Lockington cum Hemington Parish Council

Breedon Parish Council

Cllr C Sewell / Cllr T Saffell / Cllr R Morris / Cllr M Hay / Cllr R Canny

28th March 2022

APPENDIX 1 Membership of the Local Working Group

Parish Councils

Sam Lockwood – Long Whatton & Diseworth PC

Dave Bamford – Long Whatton & Diseworth PC

John McLelland – Lockington cum Hemington PC

Mark Rogers – Castle Donington PC

Ray Morris – Breedon PC

Roy Bates – Breedon PC

Ray Sutton – Kegworth PC

Angus Shields – Isley

District Councillors

Cllr. Rachel Canny

Cllr. Carol Sewell

Cllr. Ray Morris

Cllr. Tony Saffell

Cllr. Michael Hay

APPENDIX 2 – Calculations in support of answer to Question 12

GL Hearn total forecast - different model outcomes	2041 needs in 000s sqm	
Labour demand model	-50	
Labour demand sensitivity	161	
VOA trend	1941	
Low replacement, central traffic growth	2061	
Low replacement sensitivity test	2166	
High replacement, central traffic growth	2466	
High replacement sensitivity test traffic growth	2571	GLH Executive recommendation Page 10
Completions trend	2702	
Average of above for reference:	1752	

GLH recommended forecast model to 2041	2571	
Made up from :		
Traffic growth demand (sensitivity test) model	308	GLH Recommendation Page 110 / Table 36
Replacement demand to 2041 High scenario 70% (21/30 yearsx2.3m sqm)	1620	GLH Recommendation Page 105 / Table 29
Includes flexibility margin at 33% based on last 5 years completions	643	GLH Recommendation Page 10
GLH split recommendation 43% (26% &60% also modelled)	Rail served sites (43%)	Road served sites (57%)
Split between rail and road	1106	1466
Less existing supply (NWLDC figures April 21):	-387	-1131
Leicestershire shortfall in Local Plan@April 21	719	335
Less Netherfield Lane (NWLDC figure)		-34
Less Hinkley (assuming mainly B8 NWLDC)		-89
Final Leicestershire shortfall @2022		212
Offer to take 50% by NWLDC in LP consultation		106

Adjust for 2039 not 2041		
Total Forecast to 2039 assuming (2036+ 0.6*(2041-2036))	2325	
Split between rail and road at 57% road	1000	1326 Page 11 ((1466-1117)*.6)+1117
Less existing supply:	-387	-1131
	613	
Leicestershire shortfall in Local Plan		195
Less Netherfield Lane		-34
Less Hinkley (assuming mainly B8)		-89
Final Leicestershire shortfall @ 2022		72
Offer to take 50%		36

Sustainable option example -assume lower replacement /higher re-use scenario (40 years lifespan / 25% reuse)		Adjust for 2039
GLH recommended forecast model to 2041	2166	2022
Made up from :		
Traffic growth demand (sensitivity test) model	308	Page 110 - Table 36 280
Replacement demand to 2041 High scenario 70% (21/40 yearsx2.3m sqm)	1215	Page 105 -Table 29 1099
Includes flexibility margin at 33% based on last 5 years completions	643	643
GLH split recommendation 43% (26% &60% also modelled)	Rail served sites (43%)	Road served sites (57%)
Split between rail and road	931	1235
Less existing supply (NWLDC figures April 21):	-387	-1131
Leicestershire shortfall in Local Plan	544	104
Less Netherfield Lane (NWLDC figure)		-34
Less Hinkley (assuming mainly B8 NWLDC)		-89
		-19
		-102



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

Consultation Response Form

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

Part A – Personal details

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

PART A – Personal Details

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

	Personal Details	Agent’s Details (if applicable)
Title	Mr	
First Name	Martin	
Last Name	Cooper	
[Job Title]	Retired	
[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 to

The option 8 New settlement of 5100 dwellings sites A and B.
 The sites chosen for this development are not suitable for a settlement of this size.

The roads infrastructure locally is not suitable for the level of traffic that the sites would generate. The roads are small and 2 major visitor sites Donington Race Track and East Midlands airport are on the same roads that the Development would use. The roads to the Airport and the race track get totally congested at Race times and when the Download festival is on people trying to get to the Airport from the M1 often have to leave their transport and walk to the airport to catch their flights

Employment

If this development is predicated on the availability of work locally then I fear that will not be available. East Midlands Airport had considered a few years ago that it would expand and double the workforce from 8,000 to 16,000. However I believe that in order to meet carbon zero in the 2030's it is very unlikely that air traffic will increase and in fact will decrease over time. The Airport and it's surrounding businesses already have employees recruited from Derbyshire, Northwest Leicestershire, Nottinghamshire etc with significant rat runs developed particularly across Swarkestone Bridge and through Kings Newton. These developments will exacerbate the traffic problems in the area and particularly at Swarkestone Bridge. Melbourne in Derbyshire has seen a great deal of housing development in recent years, which is continuing and this large development would be very close. (*Qu.Do you liaise with your Colleagues in Derbyshire to make sure that jointly you are not building too much infrastructure in a local area?*)

Noise - Donington Race Track. During race days and practicing which seems to occur most days, the noise locally is very loud especially with an easterly wind. These housing developments will be much closer to the source than the outlying villages and that might be a problem for the development particularly Site A to the West of the A453

Airport Noise pollution from the airport is quite high particularly at night with night time cargo planes landing and taking off many of which are old and noisy. The East Midlands airport is the only airport in the country that allows night flights throughout the night and noise for the new developments could be a real problem since they are so close.

Site Drainage From the Report - *Sites A and B – They would drain to the Diseworth and Long Whatton Brooks.* Site A west of the A453 is likely to drain to the Ramsley Brook which is at the bottom of the Hill and travels towards Melbourne, also sewerage is likely to go that way too unless it is proposed to pump it over the hill to Castle Donington STW.

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

M J Cooper

Date

14/03/2022

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

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

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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 & Land Charges Team,
NWLDC Council Offices,
Whitwick Road,
Coalville
LE67 3FJ

Date 7th March 2022

Local Plan Review. Consultation Response

Name Andy Foxam
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

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

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

....

Yours Faithfully,



Andy Foxall

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

By Post:- Planning Policy & Land Charges Team, NWLDC Council Offices, Whitwick Road, Coalville LE67 3FJ

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

Local Plan Review. Consultation Response

Name

D. M. Blenkinsop

Address

[REDACTED]

Dear Sirs,

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

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

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.

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Yours Faithfully,

Sign. 

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

Local Plan Review. Consultation Response

Name WILLIAM BLEWKINSOPP

Address



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Yours Faithfully,

Sign. 

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

Date 9th March 2022

Local Plan Review. Consultation Response

Name David J. Moores
Address [REDACTED]

Dear Sirs,

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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.

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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

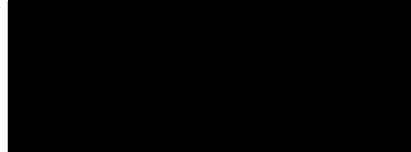
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16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and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

This large developments so close to a rural village merited more consideration on the effect it will have to the local environment, with the loss of agricultural land and green spaces.

Yours Faithfully,



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

By Post:- Planning Policy & Land Charges Team, NWLDC Council Offices, Whitwick Road, Coalville LE67 3FJ

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

Date

Local Plan Review. Consultation Response

Name

ERIKA WOOD

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.
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....

Yours Faithfully,

A large black rectangular redaction box covering the signature and name of the sender.

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

By Post:- Planning Policy & Land Charges Team, NWLDC Council Offices, Whitwick Road,
Coalville LE67 3FJ

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

Date 9TH MARCH 2022

Local Plan Review. Consultation Response

Name G.K. Brooke
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].

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By email:- 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

GILLIAN MORGAN

Address

[REDACTED]

Dear Sirs, -

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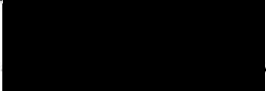
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Yours Faithfully,

Sign.... 

The Detailed Template Letter:-

Local Plan Review. Consultation Response

Name

HELEN CONNOLLY

Address

[REDACTED 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. ~10 miles away. The principal transport used will be the car as no viable public transport system exists.

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

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

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

10. LP Page 18. [Pollution]. This 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 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.

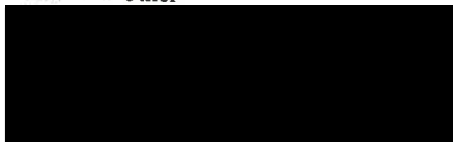
17. L.P. [2017. Page 62] Policy Ec2. SHELAA 2021 – Appendix 2 [page 170] states that EMP90 would need to comply with Policy Ec2. It does not. There is no evidence that EMP90 satisfies "...an immediate need for additional employment land". It is merely a glint in the eyes of the landowners and the developers. 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~~



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

Date 9th March 2022

Local Plan Review. Consultation Response

Name DAVID & DIANA CHERRY
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,

[REDACTED]

[REDACTED]

By email:- 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

Mrs B Burgess



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Yours Faithfully,

[Redacted Signature]

[Redacted Name]

Local Plan Review. Consultation Response

Name

..... SUSAN SMITH

Address

.....

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

Date 9TH MARCH 2022

Local Plan Review. Consultation Response

Name SANDRA MOORES
Address [REDACTED]

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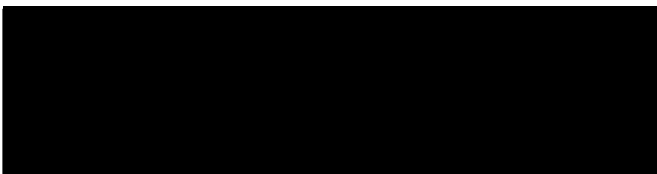
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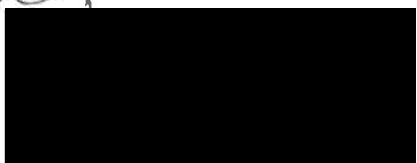


Yours Faithfully,

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

By Post:- Planning Policy & Land Charges Team, NWLDC Council Offices, Whitwick Road, Coalville LE67 3FJ

We moved into the village 51 years ago. It was peaceful and rural. What you are proposing is completely at odds within a Conservation village.



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

Date

Local Plan Review. Consultation Response

Name J. ALMY PRICF
Address .. [REDACTED] [REDACTED]

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

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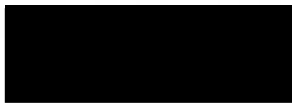
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15. Summary. These proposals are both ill conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of an opportunistic landowner/owners and an exploitative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

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

....

Yours Faithfully,



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

By Post:- Planning Policy & Land Charges Team, NWLDC Council Offices, Whitwick Road, Coalville LE67 3FJ



11 March 2022

Potential land development around Isley Walton and

Potential development of land for industrial use (EMP90)

Dear Sir/Madam

I wish to add my voice to the concerns of Diseworth residents about the potential land development proposals above.

How to kill a village

Already Diseworth is hemmed in by the M1, A42, A453, Donington Race Track and East Midlands Airport – plus possible future development of HS2.

The expansion of EMA from the A453 to Long Holden will remove a lovely area of countryside for peaceful recreation.

The housing development surrounding Isley Walton seems crazy – the A453 is already a very busy road and access to the M1/A42 is a struggle at the moment, particularly at peak times. Who are these houses for? The plan implies that they are for workers from Leicester but road travel will be a nightmare leading to rat runs through Diseworth and Kegworth. Or are they to house potential workers for the EMA expansion?

I suspect that the air pollution in this area is already high – often the smell of aircraft fuel is quite offensive in Diseworth. Is it regularly monitored? An additional 4,700 homes will certainly not improve matters.

From my personal view I try to 'promote self care' and 'increase physical activity' by regular walks from Diseworth allowing me to 'age well' – all points raised in the Local Plan.

I feel as though the planners are intending to merge Diseworth with a huge conglomerate of houses and EMA – in short strangling the village.

I endorse the points made in the template letter (attached)

Yours sincerely



Patricia Jackson

The Template Letter:-

Local Plan Review. Consultation Response

Name MRS. P. A. JACKSON

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 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.

Local Plan Review. Consultation Response

Name
Address

MRS PAMELA PARKER

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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.

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Yours Faithfully,

Sign 

The Short Template Letter:-

Local Plan Review. Consultation Response

Name Mrs Lesley Giles
Address  

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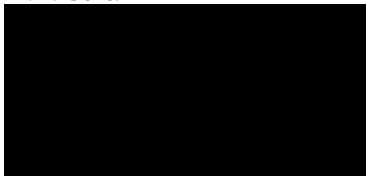
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Yours Faithfully,

.....A.N. Other



As a resident of Long Whatton we are very concerned about the impact of the extra traffic through our village and Smithy Lane, Smithy Lane is already very busy and there are accidents on the bad to bend every winter.



The Short Template Letter:-

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Name Mrs J Moorhouse

Address

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HS2 is also on our doorstep, which is unacceptable.

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

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

Yours Faithfully,

.....A.N. Other

The industrial development at Wisborough
between the A453 & Hobbers Lane, will
create unacceptable light pollution within
the village.

The Short Template Letter:-

Local Plan Review. Consultation Response

Name MRS J CLUER

Address [REDACTED]

Dear Sirs,

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

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

My objections are based on the following:-

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

1. **Objective 1.** Health and wellbeing. Both proposals fail this test.
2. **Objective 3.** High quality housing stock and reflection of local context. Both proposals fail this test. Neither will reflect local context. Further, IW1 will be overcrowded and cramped.
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6. **Objective 11.** Protect and enhance the natural environment. Again, both proposals miserably fail this test. The construction of 4,700 houses and 100 hectares of concrete on historical open countryside and farmland cannot achieve this aim.
7. **Countryside.** National Planning Policy Framework [Local Plan Policy S3] states that account should be taken of the different roles and character of different areas and the intrinsic character and beauty of the countryside. Both proposals fall short of this requirement.

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

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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.

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Yours Faithfully,

...

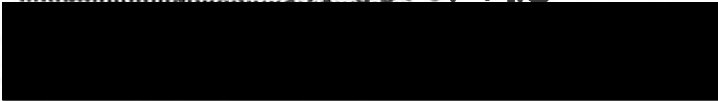
MRS. JENNIFER CLUER.

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

Local Plan Review. Consultation Response

Name **MRS. SYNTHIA JORDAN**

Address



Dear Sirs,

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

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

My objections are based on the following:-

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

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

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

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Yours Faithfully,

Sign 

The Short Template Letter:-

Local Plan Review. Consultation Response

Name **MRS Betty BARSON**

Address [REDACTED]

Dear Sirs,

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Yours Faithfully,

.....A.N. Other

8/3/22.

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

Local Plan Review. Consultation Response

Name **MR & MRS. SPRINGTHORPE**
Address [Redacted]

Dear Sirs,

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Yours Faithfully,
Sign.....

Graham Brooks

To: planning.policy@nwleicestershire.gov.uk
Subject: local plan review, consultation response re Isley Walton and EMP90

Dear Sirs,

I am appalled at your proposals for the building of a new town at Isley Walton and industrial development south of the A453 EMP90.

What happened to the previous commitments of NO COMMERCIAL DEVELOPMENT SOUTH OF A453 given when refusing previous proposed developments on EMP90. The LCC plan also stated 'A green barrier will be maintained between the Airport conglomeration and the surrounding villages'.

Is the council opening the door to legal claims from the previous rejected developers.

Whilst I am unlikely to be around to see any of the proposals proceed your willingness to totally change the local environment detrimentally is astounding.

MY objections are based on the above and your own NWLDC local plan covering this area

- 1) Reduce travel, this is a failure. Both proposals will increase traffic and encourage increased traffic flow through all the surrounding villages.
- 2) Analysis of current traffic flows will show that the vast majority of employees at and around the airport travel from the surrounding towns and cities.
- 3) Effective flood protection is ignored. EMP90 is to be built on a valley site with Hyams lane at its base and outpour onto Grimesgate. Currently, as arable land, the run off is delayed except in heavy prolonged downpour, when added to the runoff from the airport, downstream flooding occurs. [only after DHL site was concreted over]] EMP90 will only increase this problem
- 4) Objective 10 of the local plan was the preservation and enhancement of our natural and rural heritage. Diseworth is open countryside and farming. It is not commercial development. Commercial development should be on the Brownfield site coming at Ratcliffe-on-Soar.
- 5) This is where roads have been improved North and East of the airport.
- 6) Objective 11 of your plan also was to protect and enhance the natural environment. These proposals should be rejected on this item alone.
- 7) How you can propose a new Town at Isley Walton on prime arable land, without any nearby utilities, shopping facilities, adding at a minimum 14000 additional cars onto already crowded country roads
- 8) Finally, objective 1 of the local plan is to maintain and improve the Health and Wellbeing of the people of Leicestershire. It does the opposite, it would add congestion and pollution to a rural environment.

IN conclusion both proposals are contrary to the current local plan and should be rejected in total status quo should apply.

9) Graham Brooks 

