



**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	DAWN	
Last Name	TUOR	
[Job Title]	RETIRED	
[Organisation]	N/A	
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...

Q1

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

PLEASE REFER TO ATTACHED
SEPARATE PAGE.

(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.

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

Policy Option No. 9:

Surely to conserve and enhance the districts natural environment and other valued landscapes, would it not be more appropriate to NOT tear up these precious rolling agricultural landscapes and replace with housing? There are enough 'brownfield sites' in Leicestershire to accommodate all the housing you are proposing in this plan. In terms of reducing carbon and encouraging green spaces, would it not be better to help struggling farmers to grow our own produce in this country, instead of burning fossil fuels to ship food over to the UK.

Policy Option No. 10:

The proposed New Settlement South West of EMA is NOT a brownfield site. Therefore, completely contradicting the idea of conserving and enhancing the districts natural environments. Castle Donington is at present a small market 'Town', enjoying a close-knit community. The Local Plan Review would see the merging together with Castle Donington villages such as Hemington, Lockington, Diseworth, encouraging the area into becoming an urban sprawl.

Policy Option No. 11:

Providing 4,000 plus more homes in the immediate area will also need more retail and entertainment. If that is not provided people will get in their cars and drive somewhere else. As far as employment in the Town, this is mainly warehousing and factory work. Plus, employment at East Midlands Airport. A lot of these are potentially short terms employments, meaning people move on enticed away from the area with better prospects.

Reviewer: Ms Dawn Tudor – [REDACTED] – February 2022.



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	Personal Details	Agent's Details (if applicable)
Title	MR	
First Name	STEPHEN	
Last Name	PEMBER	
[Job Title]	RETIRED	
[Organisation]		
Address Line 1	[REDACTED]	
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Address Line 3		
Address Line 4		
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Signed

[Redacted Signature]

Date

24-02-22

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Q

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

Please refer to comments
on attached sheets

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

Q1. Objective 2.

I do not agree with any more new homes being built in Castle Donington on the sites shown on the map CD10 (two sites) CD12, CD11 and CD7. No housing or industrial units should be constructed on sites CD3 and CD5 as planning has been refused on appeal. Development on site CD3 and CD5 would impact on the Parish boundaries of Hemington and Castle Donington. The current construction site CD4, will when completed increase the area of housing in Castle Donington by approximately 30%. Castle Donington does not have the services of infrastructure to cope with that development let alone the proposed developments at CD10 (two sites) CD12, CD9, CD7 and CD11.

CD10 (two sites) this development is outside the current limits of development and would destroy 93 hectares of irreplaceable agricultural land. Both sites at CD10 are isolated from any village amenities and could only be described as unacceptable urban sprawl. Site CD12 is a green space with hedgerows and trees and again should not be used for development. The proposed development at CD11 is situated too close to East Midlands Airport and the noise of aircraft, which operate day and night would be unacceptable to any residents. The access road to this site would be Diseworth Lane. This would lead to an increase in traffic from this development using the main road through Castle Donington and would therefore increase pollution for occupants of houses bordering the road and beyond. Another factor is the pollution from East Midlands Airport.

Proposed Development IW1. This area is currently outside the limits of development. I do not agree with any form of development on this land, this area is 316 hectares of irreplaceable agricultural land. This land is a wonderful example of rolling Leicestershire countryside with uninterrupted views across to Charnwood, Beacon Hill and Bardon Hill. The iconic views across similar countryside towards Breedon on the Hill Church both from Melbourne Road and Isley Walton would be destroyed. The construction of housing on IW1 would also destroy the integrity and identity of Diseworth, Isley Walton and Castle Donington. All three of which would be joined together by a huge unacceptable urban sprawl development. The villages of Tonge, Breedon and Melbourne would also be severely impacted by development on this site as hugely increased traffic volumes and thousands of site traffic movements each week. This disturbance could go on between 11-20 years which is totally unacceptable.

Families buying property within any of the areas CD10 x 2, CD11, CD12 and IW1 will expect to be provided with parking for at least two vehicles at each property. If the maximum number of houses were built on each site (approximately 6,500) there is a very high probability of between 10 & 12,000 vehicles being present. This could equate to nearly 50,000 vehicles journeys from this site per day. The pollution from this extra traffic area would be enormous and the exhaust fumes would be immense.

Having lived in this area all my life, firstly in Diseworth up to the age of five, and Castle Donington for sixty years, I have considerable knowledge of the affects that development has had on the area. Unburnt aviation fuel falls on all areas surrounding the EMA when planes land and take off. The smell of this fuel is unmistakable and noticeable most days. Occupants of areas IW1 CD10 x 2, CD12, CD11, CD9 and the current development CD4 will be affected by this. The harm that the inhalation of this vapour by young children and adults over many years may possibly have serious health implications for them. Noise pollution is also a major issue for all the villages and towns surrounding EMA which operates passenger and cargo flights 24 hours a day. These noise levels would seriously affect any of those living in any proposed new developments. The noise from Donington Park Race Circuit is extremely loud, this does not only apply to race days but on many days when testing, practice, training and track days take place. This noise pollution will also impact severely upon the

areas suggested for development ie. IW1, CD10 (one and two) CD11, CD12 and CD9. Part of the proposed development IW1 will also sit in a valley. This will act as a natural pollution sink for some polluting gases, unburnt aviation fuel and exhaust fumes from a huge increase in vehicle journeys. The proximity of the M1, A42, A50 and A453 will also contribute to noise pollution and vehicle pollution for IW1 in particular but may also affect other proposed developments due to the huge increase in local traffic that will occur. The sites at IW1, CD10 x 2, CD11, CD12 and CD9 will not help industry or employment in Castle Donington or Ashby and the surrounding area. These sites of unacceptable urban sprawl are adjacent to major transport routes, and it is highly likely the people living on these housing estates will use all the major traffic routes to travel some distance to work in cities etc. These housing areas will effectively become commuter towns and estates. The recent large housing developments at Kibworth have lost their existing bus routes and new bus routes have been cancelled. Therefore, there is no guarantee that use of private vehicles will be reduced.

Q1 Objective 9.

The last thing that the development of IW1, CD10 x 2, CD11 and CD12 will do is conserve and enhance the districts natural environment. These developments will have a catastrophic effect upon the wildlife in these areas. Every hedgerow acts as a wildlife corridor, as invaluable nesting sites for farmland and other birds as well as amphibians, reptiles, mammals and invertebrates. The hedgerows are mature and interlinked and with interspersed mature trees. This area has been undisturbed for decades and the four circular woods known as the dumps plantation have been there for generations. Any disturbance to these woods would have a huge impact on the wildlife within them, they may also be a habitat for bats. The streams that run through the site at IW1 would be at pollution risk from accidental spillages and run off from the land, they form an irreplaceable wildlife corridor and habitat for many species of birds mammals and invertebrates. Otters and Water voles have been recorded in this area and both protected species. The white clawed crayfish is present in a number of streams and in the surrounding areas. Although there may not be a record of them in the streams running through IW1, it does not mean that they are not present. A full survey of the streams would need to be carried out by a specially qualified ecologist to determine whether they are present. Also fish species such as Minnow and Bullhead may also be present along with amphibians such as frogs, toads and great crested newts and reptiles such as grass snake. These streams may also be a habitat for kingfishers, herons and Egrets, which may feed on fish and amphibians present in the streams and grey wagtails which feed on insects and aquatic invertebrates. The open farmland areas in IW1 and CD10 x 2 are an ideal habitat for brown hares, a species that is becoming increasingly rare. Hares are regularly seen in these areas and should therefore not be developed and inevitably destroy this irreplaceable habitat. The development of this land and destruction of irreplaceable agricultural land would release enormous amounts of carbon from the soil. This area of green space is acting as a huge carbon sink. The presence of large areas of vegetation and microbial activity in the ground enables many pollutants that fall onto the land to be absorbed and in some cases neutralised.

Question 12.

Castle Donington has more than enough strategic warehousing. Many units are still unlet and therefore there is no reason to build any more. Developers have admitted that some of the current builds are purely speculative builds and there is no guarantee that they will be let in the near future. There is at least one unit in Castle Donington of 300,000 sq feet which still remains unlet after a considerable length of time.

Question 26.

The huge carbon footprint created by the importation of food into the UK must be addressed. Russia and Ukraine supply nearly 40% of cereals imported into the UK, it is therefore essential that the UK grows its own food to feed its population. Not one square inch of irreplaceable agriculture land and irreplaceable wildlife habitat should be destroyed by housing or industrial developments.

There does not appear to be a list of brownfield sites included in the consultation in order that the public can formulate their opinions. A full list of all the brownfield sites in Leicestershire should be published. Unfortunately, developers want to use greenfield sites to build on because it is easier for them. The council should insist on developers using brownfields sites. The council should apply for a brownfield land release fund from the government in order that brownfield sites can be prepared and made safe for development. This should be made a priority for both LCC and NWLDC. Many brownfield sites are situated in cities which is where many young people wish to work to avoid travel and expense therefore all efforts should be made to build on these city brownfield sites.

Developers always promise to build excellent services and amenities and carry out improvements. This rarely happens. All services for example in Castle Donington are stretched to the limit, there are not enough medical services for the population now and the town centre is far too small to accommodate any increase in its population. Traffic calming measures should have been introduced on the main road through Castle Donington by developers. They were supposed to be building a new public house to serve the housing development in CD4. No such action has been taken by them so far. They are building a new junior school, but this is likely to struggle to cope with the number of places required when CD4 is completed. Any further development in Castle Donington would completely overwhelm other education facilities and other services. The junior school proposed at IW1 may have to accommodate over 1,000 students at some point in the future if all the proposed housing is built.

I would implore NWLDC not to build any more housing or industrial units in this area and destroy completely the iconic countryside, irreplaceable farmland and wonderful countryside views from the surrounding villages. Many visitors and tourists to the area comment on the wonderful countryside in this area especially the views over to Charnwood and to Breedon on the Hill Church. All efforts should be made to build on brownfield sites and not destroy our amazing countryside.

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

Local Plan Review. Consultation Response

Name a wykes.....

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.

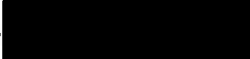
14. Over Development. In general terms Diseworth and our local environs have already accepted significant development in recent history. We have had the rail/freight interchange which has generated a huge increase in HGV traffic, likewise from the development of the DHL and UPS air freight hubs at EMA. 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.....  11-3-22

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

tolerated. There has to be a point at which this cumulative development is considered enough and is halted. We are now suffering wholesale destruction of our heritage.

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

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

Yours Faithfully,

A solid black rectangular redaction box covering the signature area.

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

Date 8th March 2022

Local Plan Review. Consultation Response

Name
Address

ELIZABETH JARROLD

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

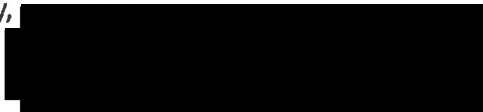
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16. Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own guidance and primary planning objectives. This would not be a principled or sustainable position and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

....

Yours Faithfully,

A large black rectangular redaction box covering the signature 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



Dear Sir or Madam,

Whatever are you thinking of, 750 acres of land for building a new town. Don't you know there is a shortage of land for agriculture you can't keep taking precious land for house building you need it to grow food. There is war in Ukraine where we import wheat from well I doubt whether we will get wheat from there this year the place is a bomb site, so we must grow more food for ourselves and not be so dependent on other countries. Besides didn't you see that programme not that long ago which highlighted how shabby and shoddy they build houses nowadays. Stepsted is expanding and off the A6 between Houghton and Hatfield. Perkinson homes are building on prime farmland where will it

and so I don't agree with this
scheme there's plenty of new housing
going up without ruining Desborough or
Hong Whallon for that matter.

Yours sincerely,

[Redacted Signature]

NWL Council Planners have set out 'Development Strategy Policy Options' for development around our villages.

URGENT: We need to voice our objections now to be able to influence any planning to follow.

Failure to object opens the door to developers having a field day to do what they want without effective control and to exclude us from consultation.

This identified industrial zone plan comes is right up to Diseworth's boundary at Hyam's Lane and Clements Gate, which will cause:

- Extra 10,000 vehicles to our congested local roads
- Loss of countryside walks and clean air
- Suffer noise and light pollution
- Environmental degradation
- Industrialisation of our countryside
- Loss of rural village life

We have a template letter (do make it your own) at:

<https://www.lwdpc.org.uk/planning-apps.html>

Or ask for a direct copy from Jim at [REDACTED]

Written objections deadline is 14th March, send to:

Email to planning.policy@nwleicestershire.gov.uk

Or post to:

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

Please ACT NOW to safeguard our community

and our way of life.

Diseworth & Long Whatton YOUR VOICE is important



Have your say . . .

East Midlands Airport

Potential development of land around Isley Walton



Housing being considered for more people than living in Kegworth!

Council Planners want to know what you think to their idea of Isley Walton New Town

These are our villages and communities to protect! Use your voice!

NWL Council Planners have set out 'Development Strategy Policy Options' for development around EMA & our villages.

URGENT: We need to voice our objections now to be able to influence any planning to follow.

Failure to object opens the door to developers to having a field day to do what they want without effective control **and to exclude us from consultation.**

This identified plan is for 4,700 homes over 780 acres of countryside next to Diseworth, which will cause:

- Extra 10,000 vehicles to our congested local roads
- Rat run through our villages to Loughborough
- Heavy traffic congestion on A453
- Loss of countryside walks and clean air
- Suffer years of noise and disruption
- Environmental degradation
- Urbanisation of our countryside
- Loss of rural village life

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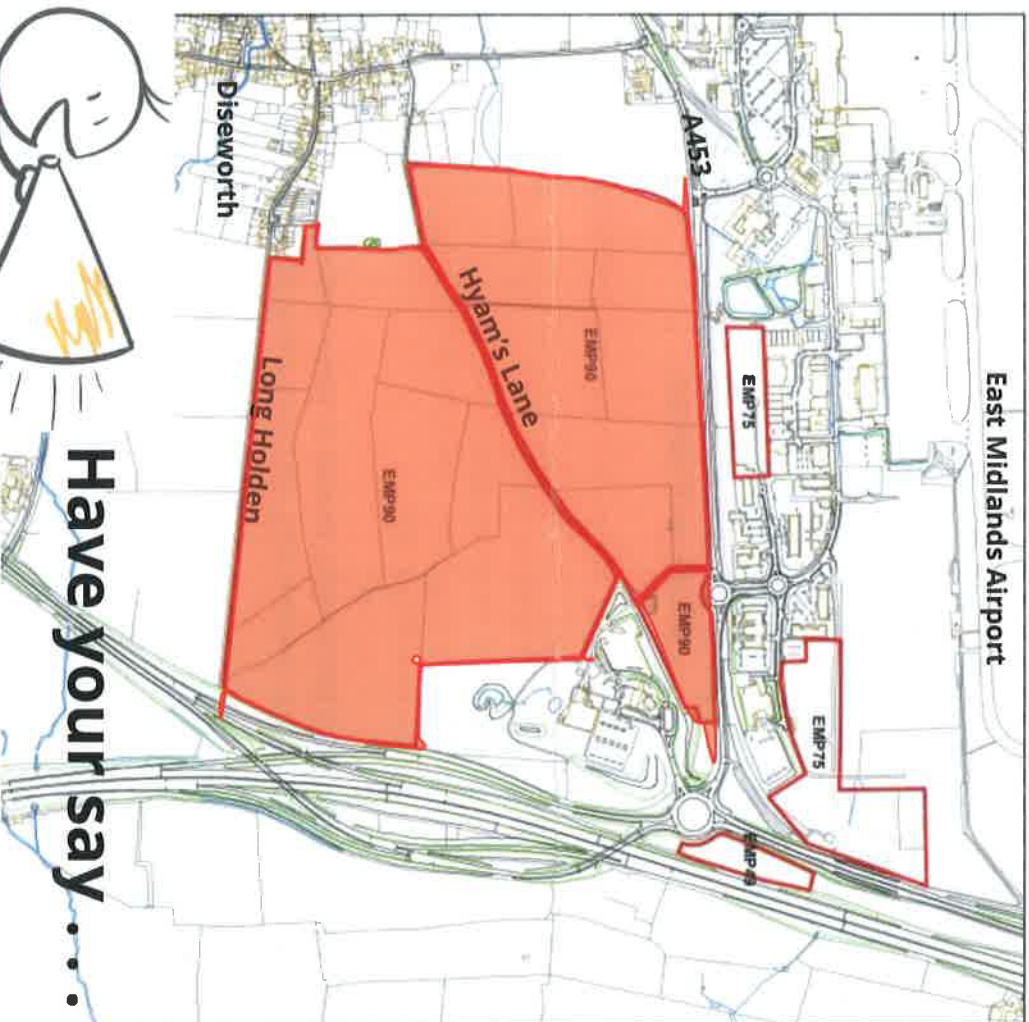
Planning Policy & Land Charges Team, North West Leicestershire District Council, council Offices, Whitwick Rd, Coalville LE67 3FJ

Please ACT NOW to safeguard our community and our way of life.

NWL Council Planners have set out 'Development Strategy Policy Options' for development around our villages.

Potential development of land for industrial use

EMP 90 - Land south of East Midlands Airport and south west of J23a M1



Have your say....

YOUR VOICE

is important



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

Date

Local Plan Review. Consultation Response

Name
Address

WILLIAM JARROLD

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.

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....

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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**

John Hurley

Local Plan Review. Consultation Response

Dear Sirs,

I would firstly like to say that when I moved to Diseworth, I did so because of its rural location with great access to open countryside. I did not envisage that it could end up being in the middle of a huge housing/industrial estate.

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

My objections are based on the following: -

The NWLDC Local Plan [2017 – As amended 2021] sets out 15 primary objectives. The Isley Walton [IW1] and Diseworth/Long Whatton industrial proposals [EMP90] both fail to meet several of these objectives.

- 1. Objective 1.** Health and wellbeing. Both proposals fail this test.
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John Hurley



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Yours Faithfully,



J W Hurley

Local Plan Review. Consultation Response

Name Mr.Garry Needham

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.

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

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

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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.

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

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

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

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

Yours Faithfully

A solid black rectangular redaction box covering the signature of the sender.

9/3/22

Local Plan Review. Consultation Response

Name .Mr & Mrs M Horne

Address



Dear Sirs,

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

- 1. LP. 5.25. Policy S3.** The NPPF states that planning needs to *"take account of the different roles and character of different areas,"* and that planning should recognise *"the intrinsic character and beauty of the countryside"*. Neither of these proposals complies with either of these criteria. The role and character of the proposed sites consist solely and only of open countryside and farmland. The sites are also outside the Limits of Development and situated in designated countryside so are also both at variance with the Planning Policy in this regard [Policy S3].
- 2. L.P. 5.24.** In respect of the NWLDC Settlement Hierarchy [LP page 25], Isley Walton does not feature, even as a 'hamlet'. L.P. 5.24. states that *"There are also small groups of buildings in the countryside that sometimes have a settlement name and may be best described as hamlets and that have no facilities. Development proposals in these settlements will be considered against Policy S3 (Countryside)"*. The IW1 development is not compliant with that requirement - see LP 25 comment above.
- 3. LP. 5.17.** A core principle of the NPPF is to *"focus significant development in locations which are or can be made sustainable"*. At present the IW1 proposal is not sustainable. It is doubtful if it can be made so without huge cost to the local environment, wholesale change to local lies wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? On some days in Diseworth we are plagued with the smell of aviation fuel. It will be no better in the proposed Isley Walton development. infrastructure and without considerable ongoing CO2 pollution. All at variance with the principles of the Local Plan. In respect of the EMP90 site, as acknowledged in the SHELAA, it is not sustainable *"The site.... is not sustainably located, would need to be supported by a comprehensive sustainable access strategy"*. The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the

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

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

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

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

7. LP. 4.6. Objective 9 - *"New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the district, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs)."* In respect of IW1 it is improbable that there will be effective management of flood risk - whatever efforts NWLDC and/or it's partners undertake to

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

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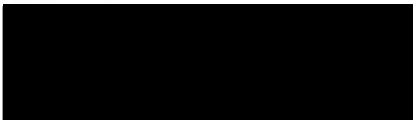
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Yours Faithfully

Mr Michael Horne
Mrs Anne Horne



14 MAR 2022

Friday 11th March 2022

Dear Sir/Madam

With reference to The North West Leicestershire Local Plan Review. Development Strategy and Policy Options January 2022, I have a few comments.

Q2 : Although I understand the hierarchy which puts Coalville and places surrounding it as The Principle Town, I would have thought that Ashby was a preferred settlement area as It has so much more to offer than Coalville, particularly since the museum at Snibston was closed.

Q5: The large scale development near Castle Donington should be the centre plank of the proposal. This is one area where new employment would be centred. It would be much better environmentally if housing was within easy access of this rise in employment. Fewer and shorter car journeys to work. In addition it would bring with it new infrastructure rather than using existing infrastructure which is stretched so much already.

Q19/ Q24 Although I welcome plans to increase renewable energy, I feel strongly that all new houses should be built with solar panels and heat pumps, along with great insulation. I appreciate that builders will moan that this is too expensive to do, but I feel we need a change in mind set if we are to tackle climate change.

In 8.6, Health and Wellbeing one of the objectives stated is 'Provision of accessible green infrastructure' In recent years, Coalville has seen many of the green spaces surrounding the town taken away for housing. People need green areas where they can walk at the very least. For this reason I am totally opposed to the potential sites C73 , C82 and C76 taken for housing. IN the case of C73 as well as providing walking opportunities for so many it is a necessary green buffer between existing housing and the Quarry

Yours Sincerely

Jenny Read



11 March 2022

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

Local Plan Review. Consultation Response

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] 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]. 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 lives wellbeing and emotional stability in that mix, never mind traffic exhaust pollution, light pollution, noise pollution, air pollution, green spaces, countryside views etc? 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 and would not protect the village from noise and light pollution.

4. LP. 4.6. Objective 1 - *"Promote the health and wellbeing of the district's population"* To suggest that either proposals comply with this objective is a farce. 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. Diseworth, is a designated 'Conservation Village - with all that this implies. To have our local environment transformed so significantly cannot be good for health and wellbeing.

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 4700 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". 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 18000 houses required for housing in Leicester overspill. 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 want to 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 4700 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 about 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 non-porous hard landscaping 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 all 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 replace 100 hectares of natural draining land with 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 south of the A453 is 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 significant 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 ridge and furrow dating from 17th century. 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*". How ironic that they are suggesting that the rules cannot be met, so just change to rules! Any reasonable argument would suggest 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 inadequate suggestion that will not protect the village from 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 significant noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This is a centre of loud and continuous 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 immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise. The Airport is also unrestricted and operates an increasingly busy regime of night flights. 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 HS2 project. This will run to the south of the site, will take many years to build and will generate noise and disruption for the new and existing residents.

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 to match the airport operations. This will comprise of the growl from countless lorries, 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 4700 houses will produce around 16000 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 exists, 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 7million 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 development 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. Farming Demand and Effect of the Ukraine war. It is already accepted that the scale of real demand for additional properties is not accurately known. But the situation with Russia has clearly shown that we are overly dependent upon wheat imports from Russia and the Ukraine.

Would it not be wiser to leave farmland as farmland to help with our own food production, rather than gamble it away on unnecessary industrial and residential development?

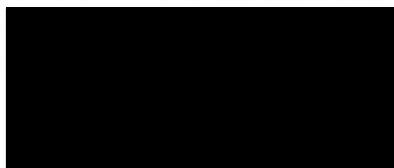
16. LP 5.17. Policy S2. Settlement Hierarchy. I note that Diseworth is classed as a 'Sustainable Village'. These are defined as "*...Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development*". Please provide 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 greedy gamble for the landowners and the developers. There is little prospect of a sustainable transport policy. 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 thought-out schemes, in the wrong place, and an unprecedented over ambitious scale, and would provide no benefit to the local people or environment. They are promoted only by the alliance of opportunistic landowners and exploitative developers who clearly have no real knowledge or interest in the locality. They exist only because no regard is given to the consequence of their development on either the local communities or on the environment. Further, they endeavour to ride roughshod over pretty much every relevant NPPF planning principle and the principled objectives and planning criteria presently in place in the current NWLDC Local Plan and which should remain. Additionally, the LHA Guidance Policy is compromised.

Conclusion and Planning Integrity. In order for this proposal to progress it will be necessary for NWLDC to compromise, ignore, or remove its own rules and 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 application is not an acceptable practice.

Yours Faithfully



Kevin & Teresa Walker.

RE-
Development Strategy Policy
Options - NWL Council Planning

6.3.22

Dear Sirs/Madam,

I have seen plans (EMPG) of Land south of East Midlands Airport, and south west of J23A M1, on the edge of Dixwott village.

I am writing to strongly object to this here, potential development, with the plan for 4,700 more over 780 acres of countryside - leading to the urbanisation of the village of Dixwott and the surrounding area. This would potentially lead to heavy traffic, noise, disruption, loss of rural village life in the nearby village of Long Whetton. 'Creeping urbanisation' may not be allowed on such a large scale.

Yours faithfully,

Charles K Brompton



Local Plan Review. Consultation Response

To whom it may concern,

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

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

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

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

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

access strategy". The only way to achieve sustainability would be at the expense of the destruction of the local ecology, environment, countryside and the effective destruction of the character of the conservation village of Diseworth. A separation of a mere 75 metres is inadequate and unsustainable.

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

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

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

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

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

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

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

10. LP Page 18. [Pollution]. This 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 pantechonics and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

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

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

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

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

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

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

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

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

There is no question other than that the site is exceedingly “...detrimental to the amenities of...nearby residential properties and the wider environment” – vis. Diseworth.

18. Summary. These proposals are both ill-conceived schemes, in the wrong place, on an unprecedented scale, would not be of benefit to the local environment. They are promoted only by the alliance of 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 large black rectangular redaction box covering the signature area.

CK Brompton

The Template Letter:-

Local Plan Review. Consultation Response

Name JOHN KITCHING

Address

Dear Sirs,

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

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

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

1. **LP. 4.6. Objective 3** - *"Ensure new development is of a high quality of design and layout whilst having due regard to the need to accommodate national standards in a way that reflects local context and circumstances"*. The proposal fails to meet these criteria. The proposal is that the site accommodates 4.7k houses. SHELAA [page 363] shows that this number assumes 100 percent housing density. This does not equate to a "high quality of design and layout". However, SHELAA [page 362] also states that they plan to include a school, local centre and some employment accommodation. There are also issues with flooding on part of the site that might well preclude full use of the area. All of this makes it impossible to comply with the objective.
1. **LP. 4.6. Objective 4** – *Ensure regard is had to reducing the need to travel and to maintaining access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks, health and social care*. The development is non-compliant with this objective. One of the major considerations is to accommodate some of the 18k demand for housing in Leicester. It is therefore illogical to build them at the far end of the county. This will not reduce travel - even if a few are already commuting - but will exacerbate both road congestion and pollution. There can be no doubt that most of the demographic who create this demand live and work in Leicester and will stay close to their families and place of work in Leicester. They will not be attracted to a 30 mile daily commute. Additionally the policy requires that travel should be reduced. This cannot happen where little public transport infrastructure exists. It is highly unlikely that the number of new jobs created, even in the medium to long term, by local expansion will generate demand to fill 4.7k homes. This new village will therefore become primally a dormitory town, thus

increasing, rather than reducing, travel. Domestic shopping will be at the prime supermarkets [ASHBY, Loughborough, etc, as will recreation and entertainment. ~10 miles away. The principal mode of transport will be the car as local as no viable public transport system exists.

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

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

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

infrastructure construction. These developments have cumulatively been eroding both the character of the area and the intrinsic beauty of the countryside [see para 1 above]. This runs contrary to NPPF Policy 3 and must be recognised along with provision to curtail this erosion.

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

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

14 MAR 2022

Mr R Sanderson


10 March 2022

Planning Department
North West Leicestershire District Council
Coalville
Leics.

Dear Sirs

Planning Development : Isley Walton (SHELAA2021)

I am writing to add my objections to the possibility of substantial development around Isley Walton and in particular its impact on Diseworth village in which I live.

Any such development would have a severe impact on my village and my personal life - noise, traffic to say the least.

I have attached a copy of an objection sent to you by Mr Ian Robertson, another resident of my village. This is to confirm my support for the responses he has set out.

Yours faithfully



for Robert Sanderson

detailed response is below. Please acknowledge receipt of this memo.

Name Ian Robertson
Address [REDACTED]

My response to the Local Plan [LP] Review is restricted to the potential development of land [316 hectares] based around Isley Walton [SHELAA 2021. IW1] which has its eastern boundary adjacent to the western edge of the conservation village of 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 hours a day. This will comprise of the growl from diesel engines of countless parttechnicons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

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

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

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

13. LP 1.1 The Big Picture. The opening statement of the local Plan offers a stark definition :- *“What is planning?:- The purpose of planning is to help achieve sustainable development. This means ensuring that providing for the needs of the current generation does not make life worse for future generations.”*

As with para 12 above the proposed developments, IW1 and EMP90 both become even more unsustainable when viewed from the greater perspective in respect of loss of agricultural land, rural amenities and heritage.. The IW site alone will take 316 hectares and the EMP90 will swallow a further 100 hectares. The Castle Donington development is on agricultural land, as is the rail/freight interchange, as is the Garendon project, as is the Amazon warehousing scheme, as is the DHL development. And so it goes on. The Cambridge Institute for Sustainability Leadership [CISL 2014] study predicts that by 2030 there could be a shortfall of up to 7m hectares of agricultural land required to fulfil national food and sustainable energy production. We are already in a hugely unsustainable position and are designing to catastrophically fail our future generations if we continue to rape the countryside - countless times - in an endless quest of blind greed. The impact of these two developments, one to the west and the other to the east, of Diseworth would be devastating – and we still have HS2 to come [to the south of the village]. Approval of this scheme would signal a failure of the LP - at the first sentence of the document - its own definition of Planning.

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

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

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

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

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

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

Yours Faithfully

I K Robertson





**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	ROBERT	
Last Name	ADEY	
[Job Title]		
[Organisation]	RADEY	
Address Line 1	[REDACTED]	
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone		
Email address		

PART B – Your Representation

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

Please state which consultation question your response relates...

Q 2

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

^{NO} Acreston should have a higher settlement hierarchy ranking because the adjoining South Derbyshire buildings of various kinds significantly boosts the services and liveability and combined matches the characteristics of a higher tier in the settlement hierarchy. Different local authorities have different services on their hierarchy menu. A pub 100 metres in Derbyshire should count for Leicestershire and a Church 100 metres in Leicestershire should count for Derbyshire. Google images for Acreston and plenty are of Derbyshire a modern version of it looks like a duck and quacks like a duck. People aren't panned in in border areas and though admittedly more complicated in assessing full recognition of the benefits locally should be ascertained whether Leicestershire, Derbyshire, Warwickshire or Staffordshire. Some account should also be made not just on what exists but its location and transport significant developments nearby and suitability to become something.

Acreston shares very similar location advantages and transport links that attracted the Merca park developed, a superb location close right at the centre of the country close to the M42, A42 and wider Motorway network great for all the Midland cities and further a field. This large employment site with some local housing permission gives the opportunity to give sought after close to home work choices while problematic to town centres the internet age allows the M42 and A44 to easily deliver avoiding many car journeys as it's already passing by. There also seems a good chance of the Ivanhoe line reopening and Acreston would be quite convenient to local stations to squeeze fullest advantage out of Burton Leicestershire train links should it occur.

(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 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

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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	ROBERT	
Last Name	ADEY	
[Job Title]		
[Organisation]	R ADEY	
Address Line 1	[REDACTED]	
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 3

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

No In 2018 Huffington Post UK found that if present trends continue there will be 63 people over the age of 65 for every 100 people of working age in rural areas by 2038, this would be 24 more people over 65 than in 2014 and twice the average of urban areas. The National planning policy framework July 2021 NPPF on rural housing paragraph 79 says '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 it will support local services. Where there are groups of smaller settlements developments in one village may support services in a village nearby.'

NWLDC approach to local housing needs villages (local ambition and is similar to what has led to at best stagnation in rural areas. Much more needs to be done to re-balance the age profiles with younger age groups needing more housing and work places. More jobs helps housing; more housing helps jobs! win win

More development in rural areas to aid vitality and viability. The NPPF wants villages to thrive. The NPPF says groups of smaller settlements can function together and new housing interact with groups or clusters of villages. Aiming to include a bit smaller satellite village with a nearby sustainable village for a combined proportionate new share of new housing and services or plan for clusters of villages to combine to provide the same as sustainable villages. Would reconnect and reinvigorate rural areas. Large urban housing schemes have greatly dominated provision in some areas and many authorities with rural areas are looking at what can be done with development across all settlements in the countryside with clustering to reinvigorate these areas to match the aims of the NPPF or Rural Area environment Continued

(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...

Q 3

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

For white collar jobs working from home was a very sensible change to address the Corona Virus pandemic.

Lots of blue collar workers in keyworker roles ~~had were~~ needed to continue to attend work in very similar processes. Some easing of housing rules or accommodation or combination of work-eat rest provision for blue collar workers should be addressed. A change from "essential" to "would make a lot of sense" as a planning hurdle would be good. Considerations of public access should also be considered rural to town.

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

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Yes

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Signed

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13/3/2022

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OPTIONS & POLICY OPTIONS**
January 2022

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{Job Title}		
{Organisation}	RADEY	
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
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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.

Leicester city is expected to have a unmet housing need of about 18000 dwellings and North West Leicestershire will need to build an extra share of these added to their own requirements. This could very well lead to the High 2 scenario of 730 dwellings especially if the share was calculated according to recent house building numbers which would indicate a more confidence in deliverability.

The policies of leveling up are yet to be fully decided and different housing number equations are put forward but The Times is often worth reading and its article of November 5 2021 relaying Michael Goves interest in a housing formula devised by Chris Waller a former Treasury economist and included in the "Building back Britain Commission report" the first line states "Hundreds of thousands of new homes will be needed across the North and Midlands. Boost in employment across leveling up areas will lead to significant increase in demand for housing."

An index calculating places best suited to leveling up included Wolverhampton and Coventry right near the top and Derby Leicester and Birmingham 9th and 10th equal. It suggested a corresponding increase in Birmingham housebuilding from 4829 to 12430 a year and as Birmingham already has high unmet housing need a position similar to other Midlands cities. Not a certainty but probably a housing formula worth keeping an eye on.

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

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Last Name	ADEY	
[Job Title]		
[Organisation]		
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Telephone		
Email address		

PART B – Your Representation

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

Please state which consultation question your response relates...

Q 5

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

NO. I expect a High 2 scenario of 730 dwellings and I think Option 9b should be chosen.

I think high housing targets need a very wide choice of sites giving the chance of a wide variety of housing and wide variety of builders by size or type.

Some smaller sites are required by the NPPF and are likely to be more attractive to smaller builders whose building numbers have greatly reduced since 2008 and return is encouraged. Providing smaller sites and smaller settlements increases the opportunities to do this. A wider spread of settlements and size of sites also enhances the opportunities for self and custom builders and can give homeowners scope themselves to pursue innovative state of the art green housing schemes such as Howgate close near the village of Farning in Nottinghamshire that was visited by and included in an article of Land and Business, Feb 22 CMA magazine.

The development of East Midlands Airport with East Midlands gateway and the alteration of the future HS2 station to East Midlands Parkway near a new settlement in this area makes good sense. Across the district new or upgraded infrastructure and developments change places and can needed housing in all size of settlement to fully optimize the new opportunities. A smaller settlement can be more suitable for housing to match today's and tomorrow's job opportunities than a larger settlement that suited and was convenient for the jobs in heavy industry 100 years ago.

HS2 stations in Birmingham especially Interchange will also lead to increases in housing. Housing demand especially with the Interchange station and widespread Birmingham green belt restrictions are likely to push a significant amount of this

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

Continued

PART B – Your Representation

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

Please state which consultation question your response relates...

Q 5

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

Continued
up the M42/A42 corridor towards Ashby.
The man who helped me, his brother and his best
friends dad both moved from Tamworth to Ashby.
I go for breakfast in Morra and the family next
to me are all wearing Birmingham City shirts.
I'm paying for my Sunday paper in the Tesco
express in Measham pre covid and the lads
behind are talking about going to the pub to watch
the Villa Blues derby. Just instances of population
movement that's got a high likelihood of continuing.
A lot of disruption will occur during HS2 construction
to East Midlands Parkway and this will complicate
housing provision. A full wide range of new housing
options to replace and extra as adjustment to HS2
to be done sympathetically.
Major new infrastructure as job opportunities
warrant matching new housing plans. Smaller settlements
may be closest and building here could best match
close work home interaction that is sought.
Merica park is and the Ivanhoe line would be
significant changes opportunities to match housing
for the best advantage. (The Integrated rail plan
is thought to give the reintroduction of the Ivanhoe
line passenger service a reasonable chance of selection)

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

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Yes

<input checked="" type="checkbox"/>
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DEVELOPMENT STRATEGY OPTIONS & POLICY OPTIONS

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[Job Title]		
[Organisation]	R ADEY	
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PART B – Your Representation

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

Please state which consultation question your response relates...

Q6

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

People shouldn't be put off reg. the self build register by high fees.

Far higher percentages of self and custom build houses are achieved in many countries

Policies offering a very wide range of self and custom build site choice would boost numbers.

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

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Yes

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Email address		

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.

Bill Gates and Steve Allen started Microsoft in a garage.

Jeff Bezos started Amazon in his garage

Steve Jobs started Apple in his parents garage

Walt Disney had his first studio in his uncle's garage.

Small employment locations are essential but the other sizes are also important.

No missing ranges on the employment site size ladder.

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

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Yes

<input checked="" type="checkbox"/>
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PART B – Your Representation

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Please state which consultation question your response relates...

Q 26

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

Please read and Consider the CLA Sustainable Communities. The Role of Housing in strengthening the rural economy. It is a good translation of my views into "Planning language"

Places of one to more than one district should have that score aggregated.

Some whole of Midlands input might help show the multi use of edge of district areas.

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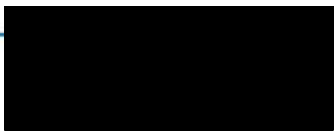
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Particularly
ROBERT ADEY Q26

Home → News →

Government is 'letting rural communities down', says CLA

New report shows desperate need for sustainable, small-scale housing developments

Written by [Jonathan Roberts](#). First published on March 4th, 2022.



The Country Land and Business Association (CLA) has called on the Government to overhaul its approach to housing in rural communities. The approach laid out in the CLA's latest Rural Powerhouse report will help tackle the housing crisis in villages, where homes are becoming increasingly unaffordable to local people.

The CLA's report, entitled '[Sustainable Communities: the role of housing in strengthening the rural economy](#)', highlights the transformative economic and social benefits small-scale developments could bring to rural communities. Government needs to develop an approach that allows for a small number of homes to be built in a large number of villages. This will support local employment and strengthen the social fabric of these areas by ensuring pubs, shops and schools can stay open.

However, this style of organic, incremental growth will only be possible if supported by a more accommodating planning framework.

Under the current system, large-scale developments which negatively alter the nature of local communities are favoured over more modest proposals.

The call comes after Levelling Up Secretary Michael Gove opted **not to proceed** with reforms of the cumbersome and complicated planning system, leaving the Government short of its housebuilding targets. After four Housing Secretaries in as many years, it is time the Government took housebuilding seriously.

The report shows[1] that in 2020 over 260,000 people in rural areas were on a housing waiting list. If the rural planning system was reformed to allow for small-scale developments, the Government could see this figure significantly reduced.

The rigid planning system means housebuilding cannot keep up with population demand, further draining the countryside of its young people and workforce. Even after the pandemic-fuelled surge of interest in rural homes, this lag in housebuilding is seeing the rural economy continue to fall behind.

The paper sets out five clear changes to the planning system. These include:

1) Smaller number of houses in a larger number of villages – return to a National Planning Policy Framework (NPPF) promoting organic, incremental growth in settlements with fewer than 3,000 residents.

2) Reform local authority sustainability assessments – change assessments to ensure they are more reflective of the services that could be supported *if* development were enabled, and give more weight to digital connectivity.

3) Mandatory housing needs assessments across all rural settlements – Undertake housing need assessments for settlements that have not previously been allocated housing, in addition to those that already have, to ensure need is properly identified and met.

4) Extension of permitted development rights – allow permitted development on rural exception sites to provide much-needed affordable rental housing options for the benefit of local communities.

5) Inheritance tax exemptions – extend conditional IHT exemptions to affordable rented housing for the period in which homes remain let as such.



For rural areas to thrive, there needs to be an adequate, available, and diverse supply of homes...without it, we prevent young families from continuing to live in their community.

— *Mark Tufnell*

Mark Tufnell, President of the CLA, commented:

“Fundamental flaws in today’s planning system are letting rural communities down. For too long, its unnecessary red tape has held back the initiation of projects, stifling investment, innovation and entrepreneurship in the countryside.

We are disappointed to see the Government U-turn on previous promises to

simplify the planning framework. The housing crisis has not gone away, and this marks yet another missed opportunity to bring prosperity to rural areas. If the Government is serious about meeting its housebuilding targets this must change.

For rural areas to thrive, there needs to be an adequate, available, and diverse supply of homes, which includes different tenure types of varying sizes. Without it, we prevent young families from continuing to live in their community, key workers from being based near their places of work, and the elderly from downsizing.

Viable solutions are available. We call on the Secretary of State for Housing, Communities and Local Government to listen to the changing needs of rural communities and deliver on his 'levelling up' promises. We must make meaningful changes to our planning system – beginning with making policy changes to allow a greater number of small-scale developments across our villages. Only the Government has the necessary policy levers at its fingertips to action this, and reverse decades of settlements being held in aspic."

Read the CLA's new report here

[Visit this document's library page >](#)

File name: Sustainable_Communities_final_report.pdf

File type: PDF

File size: 513.5 KB

Download file



Key contact:



Jonathan Roberts

Director of External Affairs

How membership of the Country Land and Business Association can help you

Join our network of 28,000 landowners, rural business owners and professionals

Why join?

Rural Powerhouse

Our Rural Powerhouse membership is helping to unlock the potential of the rural economy.

Our Rural Powerhouse campaign is helping to unleash the potential of the rural economy

[Find out more about our campaign](#)

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SUSTAINABLE COMMUNITIES: THE ROLE OF HOUSING IN STRENGTHENING THE RURAL ECONOMY



Sustainable Communities: the role of housing in strengthening the rural economy

Contacts

For more information on *Sustainable Communities: the role of housing in strengthening the rural economy*, published in February 2022, contact:

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Sustainable Communities: the role of housing in strengthening the rural economy

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1. Introduction

According to Defra figures, the rural economy is 18% less productive than the national average. Closing this gap would add up to £43bn to the economy in England alone, implying the creation of hundreds of thousands of good jobs and a very positive knock-on impact on the viability of small towns and villages as places to live. To achieve this, a number of measures are necessary, including investment in skills and digital and electrical infrastructure, wholesale planning reform – and a renewed focus on housing.

Rural communities in England and Wales continue to face a number of distinct challenges compared to their urban counterparts: a population ageing at a faster rate, proportionally fewer affordable homes, pressure on house prices from second home ownership and a larger gap between house prices and wages.

These challenges are largely the result of a planning system which is not fit for purpose for rural development. The system continues to favour large-scale developments that so often fundamentally and negatively alter the fabric of the local community. Likewise, this same system ignores the advantages of small-scale developments that would improve the viability of small, rural villages. These communities, often disregarded as unsustainable villages in local plans, are thus denied the opportunity to improve their sustainability.

The lack of available and affordable homes in rural areas has resulted in young people having to move to urban areas, which not only has a knock-on effect for local employers but has led to the reduction of key rural services and amenities, such as public transport, banks, schools, and pubs which continues to hold back the economies in rural areas. This systemic failure of government planning policy is steadily killing rural communities.

Whilst Covid-19 was devastating for so many people and businesses, the increasing demand for rural homes and changes in societal patterns present new opportunities for rural areas. If rural areas are able to grow in order to meet the increasing demand, as well as accommodate the existing need, then communities, economies, and the environment in rural areas could be transformed.

This CLA report, *Sustainable Communities: the role of housing in strengthening the rural economy*, looks at the opportunities and challenges facing rural communities in a post-pandemic England and Wales, highlighting the importance for organic, incremental growth in rural areas. The recommendations set out in this publication are critical for rural renewal, for levelling up the economy and for diverse, sustainable, and resilient communities.

Mark Tufnell

President

Country Land and Business Association (CLA)

CLA recommendations

In order to create sustainable communities and strengthen the rural economy through housing, the CLA believes the following actions are necessary.

- 1 The National Planning Policy Framework (NPPF) must return to a policy which promotes organic incremental growth in settlements of fewer than 3,000 inhabitants, which would lead to a small number of houses in a larger number of villages.
- 2 Local authority sustainability assessments should be reformed, to place greater emphasis on digital connectivity in recognition of the services that can be accessed online; and to assess which services could be supported if development were enabled.
- 3 Local planning authorities should be mandated to undertake a housing needs assessment across all rural settlements without a housing allocation so that identified local need can be met at a local level.
- 4 Permitted development rights should be introduced for new-build affordable housing for discounted rent on rural exception sites.
- 5 Conditional exemption from inheritance tax should be expanded to affordable rented housing for the period the homes remain let as such.

2. The rural housing crisis

In many rural areas, housing has become divorced from local people and their incomes, with the market being driven by second homeowners and retirees. The pressure has become more acute since the start of the Covid-19 pandemic, with a surge in the number of rural properties being used for holiday lettings, owing to restrictions on international travel and with more people looking to move from towns and cities due to an increase in home working. With demand continuing to outstrip supply, rural house prices continue to rise and, as a result, local people are often priced out of home ownership and rely on the rental market.

However, there is a severe shortage of rural affordable homes, and this puts additional pressure on the private rented sector, which now supports double the number of low-income families than it did twenty years ago.¹ CLA members recognise the importance of affordable homes to their community: 60% of respondents to a recent member survey let homes below market rent, with 24% of all homes let below market rent, to help people live near to where they work and to enable younger people to remain living in their community. Our members are, in effect, taking on the role of a social landlord when the provision of social housing should be through the social sector rather than the private sector, and this is a clear market failure.

The pricing out of the younger generation has resulted in rural areas ageing faster than other parts of the country, yet with the least provision of suitable homes for the elderly. The loss of young people and full-time occupiers in rural areas continues to contribute to the closure and loss of key services and amenities, which will only be exacerbated by the pandemic.

For rural areas to thrive, there needs to be an adequate, available, and diverse supply of homes, which includes different tenure types of varying sizes. The existing lack of homes in rural areas prevents young families to continue living in their community, key workers to be based near to their places of work and the elderly to downsize.

Key Statistics



In 2019, the average house price was 8.6 times the average earnings in rural areas compared to 7.4 times in urban areas, excluding London. In some rural areas, the ratio is over ten times.*

* DEFRA, [Statistical Digest of Rural England 2021](#)



In 2019, private rent accounted for more than 35% of many key workers' post-tax income in over nine out of ten rural areas, making them unaffordable.*

* CPRE, [Homes for heroes: affordable housing for rural key workers](#)



In 2020, there were over 260,000 people on a housing waiting list in rural areas* and fewer than 4,500 social homes were built in rural areas in 2019-20.**

* Gov.uk, [Live Table 600: Numbers of households on local authorities' housing waiting lists by district: England, 31 March 1987-2021](#)

** Gov.uk, [Table 1011: additional affordable housing supply, detailed breakdown by local authority](#)



The number of families classified as homeless in rural towns and villages across England has increased by 85% between 2018 and 2019.*

* CPRE, [Social housing waiting lists grow for over half of rural councils](#)



In 2019, only 9% of rural dwellings were affordable compared to 19% of urban dwellings.*

* Gov.uk, [Digest supplementary data tables, rural living](#)



In 2019, 25% of the rural population was aged over 65 compared to 17% of the urban population.*

* Affordable Housing Commission, [A National Housing Conversion Fund](#)



From 2012-17, 52 rural schools shut their doors to pupils, roughly one a month, and post offices closed at a similar rate. Between March 2013 and December 2016 1,365 rural pubs closed, that's seven pubs a week.*

* DEFRA, [Statistical Digest of Rural England 2021](#)

1. Affordable Housing Commission, [A National Housing Conversion Fund](#), 2020

3. An unsupportive planning system

3.1 Sustainable communities

Sustainable communities are places where people want to live and work, now and in the future. They meet social needs, promote economic success, and protect and enhance the environment. Communities must have the opportunity to grow and develop in order to continue to be sustainable. The Taylor Review (2008) sums it up well with its emphasis on “action, not just maintaining the status quo, and it’s about more than just the environment, it has to address environmental, social and economic issues together.”²

However, local plan policies continue to overlook the need for proportional development in smaller rural settlements. In 2017, the CLA’s report: *Sustainable Villages* found that more than 2,000 villages across England and Wales were deemed to be unsustainable due to a lack of public services.

This is an outcome of local authorities undertaking sustainability assessments and placing settlements in a hierarchy according to their services. Housing is then allocated to those towards the top of the hierarchy, such as in market towns and large villages, ignoring the needs of smaller villages and hamlets and perpetuating a vicious cycle.

A sustainability assessment is based on a list of services which the local authority believes are necessary for a community to thrive. Most local authorities include a post office, primary school, food shop, GP, village hall, pub, and bus service in their assessment. However, far fewer include broadband when determining the sustainability of a settlement, ignoring the changing role technology will continue to play in rural areas. Using antiquated methodology to measure the viability of an area is flawed and needs reform.

The assumption that a lack of services means that smaller rural communities are unsustainable for new homes is damaging, actively diminishing the sustainability of these settlements. If sustainability was at the heart of planning decision-making, then these settlements would be able to grow to meet social needs, promote economic success and protect and enhance environmental objectives.

Rather than local authorities assessing rural settlements on what services they do not have, especially when so many have been lost, **settlements should be assessed on what services could be supported if development were enabled in addition to taking greater account of digital connectivity.** The shift in emphasis to support incremental, organic growth in smaller rural settlements is fundamental for the survival of rural communities.

Making it easier to build homes in rural areas does not mean concreting over the countryside and destroying communities but preserving the identity of communities by incrementally adding homes through small-scale development. The fact that many communities find themselves battling large-scale developments underscores the lack of sustainable development in the past which has left rural areas behind and directly contributed to the situation today. Unsustainable villages are entirely a failure of government planning policy, and it does not have to be this way.

3.2 Rural housing need

Local planning authorities are required to calculate the housing need for their authority and ensure that they have a five-year land supply. As outlined above, sites are allocated towards the top of the hierarchy, resulting in significant expansions to market towns and larger villages, and little opportunity for smaller settlements. Once again, the methodology consistently puts rural areas at a disadvantage, and reiterates how unfit for purpose the planning system is.

2. Taylor Review, 2008

To ensure that the housing needs of rural communities are met within the community, **local planning authorities should be required to conduct housing needs assessments in settlements not allocated housing in their local plans.** This will not only enable housing to be delivered within the settlement where it is needed, but will allow for the size, type, and tenure to be identified.

This is particularly important for rural communities that have an ageing population, but where homes are less likely to be adapted for the elderly³ and are more likely to be larger, older, and detached than urban homes.⁴ The lack of suitable homes for the elderly prevents those who would like to scale down to a more manageable property from doing so, as they would not be able to remain in their community, often where their family and support network are.

3.3 Rural exception sites

Rural exception sites are a very important mechanism for delivering affordable rural homes on land which would otherwise not gain planning permission. However, the rural exception site policy continues to be underutilised due to high upfront costs for the landowner including professional fees and surveys, uncertainty with the planning system, a risk of right to buy, local perceptions and the inheritance tax burden if the landowner wants to retain and manage the affordable rented provision in-house.

To mitigate the uncertainty of the planning system and encourage more rural exception sites to be brought forward, **permitted development rights for new-build affordable housing for discounted rent on rural exception sites should be introduced.** This would enable a rural landowner to have the principle of development agreed before incurring significant costs and taking on a disproportionate risk.

Rented property is currently considered an investment asset and included when calculating the value of the estate for inheritance tax purposes. Rural landowners are unlikely to want to invest in building new affordable homes if it increases the inheritance tax faced by their families when financial returns are only likely to be marginal. **A conditional exemption from inheritance tax for affordable housing for the period they remain let at affordable rent should be introduced** to encourage landowners to bring forward land for affordable homes whilst giving the option to retain and manage the homes in-house.

3. APPG: [Rural Housing for an Ageing Population: Preserving Independence](#)

4. English Housing Survey, Live Tables 2019

4. Rural housing in a post-pandemic England and Wales

4.1 Rural communities and Covid-19

For many, Covid-19 has fundamentally transformed the value of home and community. Whether it be the home's ability to transform into a classroom, offer a space to work remotely from, or provide a sanctuary to stay safe during the global pandemic, home has never been more important. The pandemic has also shone a light on the importance of community, with recent research showing that the pandemic has helped to reignite people's interest in their local community and sparked a desire to be more involved.⁵

Multiple lockdowns brought into focus people's living arrangements, such as no or inadequate gardens, overcrowding in the city and distance from those in their communities. As well as access to outdoor space and cleaner air, homes in rural areas are on average 38% larger than homes in urban areas and are therefore often better at meeting the needs of families and working remotely.⁶

This has resulted in a surge of interest in rural homes. A survey commissioned by the CLA of over 1,000 Londoners found that 44% of respondents were more likely to consider moving to the countryside as a result of the pandemic versus just 9% saying the contrary. People aged 18-34 are most likely to consider moving to the countryside, at 55% compared to 38% of people aged 35+. These young people could help revitalise the rural economy, if suitable housing were available.

Although the average rural house price has continued to rise, the strong demand is best illustrated by an increase in value of over 14% for rural homes in England and Wales between May 2020-21, compared to an increase of just under 7% in urban areas⁷, with Savills predicting continued growth.⁸

Research shows that over the next decade, an additional 124,000 households are expected to move to rural areas, three times the current annual new build rate.⁹

4.2 The opportunity

The increase in urban to rural migration is a huge opportunity. The movement of young people to the countryside would be a welcome reversal and could be fundamental in improving economic success, the health of communities and environmental stewardship in rural areas.

The rural economy is as diverse as the urban economy, supporting over 250 different business types. 17% of the population live in rural areas, whereas 24% of all registered businesses operate there. However, there is still an 18% productivity gap between urban and rural areas which, if closed, would add £43bn to the national economy, showing how much potential there is in the rural economy.

There is a close interaction between economy, community, and environment in rural areas. However, the planning system continues to be a barrier for appropriate and much-needed development in the countryside in the misplaced belief that this supports communities and the environment.

Environmentally good land management produces a valuable backdrop for inward investment and tourism, but that management will only work on the back of the profitable use of land and buildings. Housing and economic development are interdependent and vital for rural areas to grow and prosper in a sustainable way.

5. The National Lottery Community Fund, [2021: importance of communities set to remain high as people identify loneliness and isolation as a key issue to tackle in their local area](#)

6. English Housing Survey, Stock Profile, live tables 2018

7. Hamptons, [Rural price growth twice the urban average](#) June 2021

8. Savills, [Mainstream Residential Property Forecasts 2021](#)

9. CPRE, [Rural Recovery and Revitalisation](#) October 2020

If rural areas are able to meet the existing need but also the growing demand for homes, then more diverse, resilient, and sustainable communities would emerge, helping close the 18% productivity gap and unleashing the potential of the rural economy.

4.3 The challenge

If rural areas are not able to grow, the disparity between the supply of homes and the demand of homes will worsen, leading to an even greater affordability crisis. House prices will rise, continuing to price out local people – particularly the younger generation – who want to live and work where they grew up; increasing the need to either travel for work in rural areas (sometimes from urban areas); and increasing the migration to urban areas to work and live, whilst the availability and affordability of rented homes will continue to be stretched.

The short-term movement of younger people from cities to the countryside as a result of the pandemic must be capitalised on in the long term. This means that it is critical for rural areas to have the facilities, infrastructure, services, and amenities the younger generation want so they continue to stay in the countryside past the pandemic.

It is essential for rural areas to be digitally connected. 85% of working adults want to use a hybrid approach of home and office working in future and a recent poll showed that 82% of 1,500 UK business owners are considering changing future working practices to allow more staff to work from home as a result of the Covid-19 pandemic.¹⁰ In addition to remote working, digital connectivity reduces isolation and opens up access to services like banking, shopping, education, healthcare, communication, employment, and entertainment services.

10. Gartner, [Gartner Survey Reveals 82% of Company Leaders Plan to Allow Employees to Work Remotely Some of the Time](#), 2020

5. CLA recommendations

The CLA's Rural Powerhouse campaign aims to unleash the potential of the rural economy by closing the rural productivity gap and transforming the lives of millions of people who live and work in the countryside.

The second theme of the campaign is "a planning system designed for rural communities" which calls for a simpler and properly resourced planning system to support, enable and enhance development in rural areas.

5.1 Incremental housing growth

The National Planning Policy Framework (NPPF) must return to a policy which promotes organic, incremental growth in settlements of fewer than 3,000 inhabitants.

Planning policy should promote the organic, incremental growth of villages and smaller rural settlements, so that local need is met at a local level. A smaller number of houses in a larger number of villages would support the sustainability of rural areas, reversing decades of settlements being held in aspic, unable to incrementally grow to meet the changing needs of the community.

The 2017 Housing White Paper, *Fixing our broken housing market*, identified that housebuilding is too slow and the construction industry is too reliant on a small number of big players. Building more, smaller sites could address both of these problems, as smaller sites can often be built out more quickly than larger sites and use small and medium-sized enterprises (SMEs), which aligns with the Government's ambition to attract smaller builders into the housing market.

5.2 Sustainability assessments

The way in which local authorities currently assess the sustainability of settlements is outdated and harmful to smaller villages and hamlets. Rather than judging a settlement solely on what services they or their neighbouring settlements have, the assessment must be reformed to consider what services could be supported if development were enabled.

For example, if a community has lost its school or pub, it may be that a small-scale, proportional development of family homes could enable the school or pub to come back into use. It may also be that a development of housing for the elderly allows larger homes best suited to families to be freed up, enabling younger families to return.

In addition, digital connectivity must be given greater weight in the sustainability assessment, not only for its role in connecting communities to services which may have been lost, such as a bank or a doctor's surgery, but also for its role in enabling people to work and run businesses from home as well as the social and well-being benefits.

5.3 Housing needs assessments

The housing need of rural communities should be met within the community, rather than within the wider local authority. Local planning authorities should be required to conduct a housing needs assessment in settlements not allocated housing in the local plan. The housing needs assessments should identify the number of homes needed: market, affordable rented, shared ownership, houses under the First Homes scheme, housing for the elderly, and serviced self-build plots.

In order to ensure there are resources to carry this out, the Government should allocate funding from the Community Housing Fund to local authorities for housing needs assessments. These could then be completed by the local authority, the community, or the parish council.

Identified local housing need should then be met, where possible, within the local community. A similar approach should be taken to the rural exception site policy, whereby several plots of land are identified and reviewed, until a suitable site is found.

5.4 Permitted development rights

The uncertainty and high cost of the planning system is a barrier for many rural landowners. Permitted development rights would remove the uncertainty and encourage more rural landowners to provide critically needed affordable housing for rent aimed at the local community.

The new permitted development rights could allow the construction of between one to nine affordable dwellings for rent on a rural exception site. Prior approval would be required and would need to be the subject of carefully thought-through criteria. There would also need to be a condition that the housing must be built, retained, and managed by the landowner for the benefit of the local community.

5.5 Inheritance tax conditional exemption

Rural landowners are key to the provision of rural housing but rented property is currently considered an investment asset and therefore, on death, will be subject to inheritance tax. This is a barrier to landowners who would not want to increase the inheritance tax faced by their families, especially where the long-term financial returns are only likely to be marginal.

This proposal postpones the payment of inheritance tax, which can act as a significant barrier to many landowners bringing forward new housing for their local communities. The proposal can be achieved by amending the definition of designated property in section 31(1) Inheritance Act 1984 to include affordable property.

A recent report by English Rural and CPRE has estimated that “for every 10 new affordable homes built, the economy will be boosted by £1.4 million, supporting 26 jobs and generating £250,000 in government revenue.”¹¹ When multiplied by the number of affordable homes needed, this could have a significant impact on jobs and well-being across the economy.

11. English Rural, CPRE, [Rural recovery and revitalisation](#), 2020

6. Case study – Lawrenny, Pembrokeshire Coast National Park, Wales

6.1 Background

In May 2020, the village of Lawrenny obtained planning permission for 39 new homes, workspaces, and a new village green, after fifty years of perseverance, lobbying and determination navigating the planning system. The development is hoped to be finished in 2026.

In 1969, David Lort-Philips took over the family farm, becoming responsible for the future of an estate village, Lawrenny, that had fallen into disrepair. Previously populated by retired or active farm workers, it soon became clear that despite building up the dairy herd, the number of people that the estate could afford to employ on the land would have to fall, reducing the need to house farmworkers.

For the village to regain its former vitality as a living, working rural community – previously based on agriculture, but also on other traditional but long-gone activities such as quarrying, and fishing – new ideas were needed. For a remote, rural community, the only solution was to provide the village with modern housing and working premises.

The vision fifty years ago, which has now become Lawrenny's flagship statement, is for a community which encourages people to live, work and play, ensuring that the village has the critical mass to support economic activity and infrastructure as a post-agricultural community.

6.2 The planning system

Lawrenny, one of many examples across England and Wales, felt the full impact of a planning system which continues to deem small, rural settlements as unsustainable, limiting development opportunities. In 1970, a plan was prepared by local architects, envisaging the total removal of farming activities from a site within an undefined settlement boundary, but within a few yards of existing housing. An outline plan was taken to the relevant planning authority, then a special National Park committee. The concept was approved in outline and detailed plans awaited.


Fifty years later, following decades of lobbying, three statutory development planning exercises plus attendant enquiries, the application was progressed from original concept to final planning approval for the addition of 39 houses in May 2020.

Lawrenny's situation in a National Park only worsened their issues with planning. Local planning authorities continue to ignore the economic needs of village communities in designated areas. It is too often assumed that communities located in designated areas derive particular financial benefit from simply being where they are. Tourism businesses in particular which use this as their principal and only brand often find activity highly seasonal and vulnerable, while the settlements around them struggle with the social issues arising from excessive second home ownership.

6.3 Sustainability

There are five principles underlying Lawrenny's development and sustainability: human, social, financial, natural, and intellectual. This strategy is already working at Lawrenny, before the development has finished, with a diverse mix of families who live and run businesses in the village.

Like many rural villages, over the years Lawrenny has lost a number of its services, including its school and post office. Now with a diverse population, the village has enabled a number of local amenities to return, with many more hoped for in the future. For example, the village supports a local shop which can now be accessed 24/7 using contactless technology, facilitated by a community project to install broadband in the village. The village also has a successful pub, a very busy cricket and football club, and a popular hostel.



The design of the new development has been named an “exemplar of rural development in Wales” by the Design Commission for Wales. It is based on the history of the settlement, including the traditional features and curtilages of the 18th century buildings. It reflects the local vernacular, with smart sourcing of local materials, and future-facing sustainability features (energy, water, waste etc) connected to the working organic farm ecosystem.

The 39 new homes (of which seven are affordable) and the inclusion of new offices and workshops, will help Lawrenny to remain a living village and to support amenities so often lacking in communities in deeply rural areas.

7. Conclusion and summary of recommendations

Conclusion

Housing is central to the sustainability, viability, and vitality of rural communities. For the economy in rural areas to thrive, for the health and well-being of communities and for a well-managed environment, there needs to be an adequate supply of rural homes in the right place and of the right size and tenure.

The growing demand for rural homes in a post-pandemic England and Wales offers important opportunities for levelling up the economy in rural areas, and urgent action is necessary to avoid an even greater disparity between supply and demand, and a deepening of the rural housing crisis.

For the risk to become an opportunity, the planning system must support and enable organic, incremental growth in all rural communities. This can only be achieved if local housing need is assessed and met within the community, rather than within the wider authority and if local planning authorities change the way they assess the sustainability of settlements.

In order to encourage and support more land to be brought forward for rural affordable housing, the risk, uncertainty, and high cost of obtaining planning permission must be mitigated by introducing permitted development rights for rural exception sites. In addition, the inheritance tax burden for a landowner building and retaining affordable homes for rent must be removed, so that more landowners can choose to build affordable rented homes despite the low returns.

The recommendations in this CLA report, *Sustainable Communities: the role of housing in strengthening the rural economy*, are critical for rural renewal, levelling up the economy and for diverse, sustainable, and resilient communities.

Summary of recommendations

In order to create sustainable communities and strengthen the rural economy through housing, the CLA believes the following actions are necessary.

- 1 The National Planning Policy Framework (NPPF) must return to a policy which promotes organic incremental growth in settlements of fewer than 3,000 inhabitants, which would lead to a small number of houses in a larger number of villages.
- 2 Local authority sustainability assessments should be reformed, to place greater emphasis on digital connectivity in recognition of the services that can be accessed online; and to assess which services could be supported if development were enabled.
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- 5 Conditional exemption from inheritance tax should be expanded to affordable rented housing for the period the homes remain let as such.

SUSTAINABLE COMMUNITIES:
THE ROLE OF HOUSING
IN STRENGTHENING
THE RURAL ECONOMY

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Local Plan Review. Consultation Response

Name Mrs. Pauline Needham.

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. 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 Doomsday book. In respect of EMP90 nothing will be protected or enhanced. Designated countryside – of over a thousand years standing – will be razed to the ground and totally covered in concrete. Not so much as a blade of grass will, in reality, survive. The SHELAA even concedes that "*In view of its scale, it is more likely that a change to policy/strategy would be required*". So, the argument is that if the proposal doesn't fit the rules, then the rules will need to be changed to fit the proposal. Any argument of integrity would rule that if the proposal does not fit the rules, then change, or withdraw, the proposal. SHELAA further states "*In respect of ecology, natural vegetation buffers of 5m to existing hedgerows and 10m to offsite ponds are recommended*". This is an empty soundbite that will achieve nothing on a fully industrialised 100 hectare site.

10. LP Page 18. [Pollution]. This states that:- "*..new development is not itself detrimentally affected by noise.*". Anyone purchasing a property on the IW1 site will need to be aware that it was built with a known unsustainable noise problem. The site is immediately adjacent to Donington Park Racing Circuit. This has been in place for 90 years and is a good local employment provider as well as contributing to the local economy. It is also a centre of high noise production. A new town on its doorstep would be a retrograde step for both the householders and the circuit, thus rendering the site unsustainable. The East Midlands Airport westerly take-off and easterly landing paths are almost immediately to the north of, and above, the proposed settlement. The site has no lateral protection from take-off and landing traffic noise [always high]. The Airport is also unrestricted and operates an increasingly busy regime of night flights - with freight operators using [very largely] old and noisy aircraft. Again, this renders the site unsustainable from a health and wellbeing perspective [4.6. Objective 1.] as well as from noise and pollution. You

can double glaze and insulate your house but that is not effective when a window is open - and you can't double glaze your garden. There will also be the problem of the vanity project that is HS2. This will run to the south of the site, will be many years in the build and will generate noise [whatever HS2 may claim]. In respect if the EMP90 site the converse holds true. It will not suffer noise but it will most certainly generate noise, no doubt 24 hours a day. This will comprise of the growl from diesel engines of countless pantechnicons and the sound of incessant and over loud reverser klaxons – no more than 75 metres from the village boundary. The sound of birdsong will become extinct.

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

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

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

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

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

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

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

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

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

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

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

Yours Faithfully





March 8th 2022

Dear Planners,

I wish to record my strong objections to:

The proposed "Isley Walton New Town" development

My objections are:

1. Further areas of green space and farmland will be swallowed up when much has already disappeared locally. This has a serious impact on wildlife which is declining rapidly at a time when we are reminded daily about loss of habitats and the need to promote a more "green" environment. This loss also affects the mental well-being of local people who are seeing such areas, together with their therapeutic benefits, eroded.
2. The road system cannot accommodate the thousands of vehicles which will need to use it, whatever the planned changes to the A453. Even working on a figure of ONE car per household (a clear underestimate), this will mean an extra four or five thousand vehicles. Moreover, many of these vehicles will use (whatever the system) the road between Diseworth and Long Whatton as a "rat-run", a road that already suffers from drivers speeding along it.
3. This is, in spite of previous developments at EMA, still a rural area but will become attached to quite a large town. It will need to be a town as no local facilities exist and so a school, shops, a surgery and health facilities, etc., etc. will need to be provided if Ashby and Castle Donington (already completely over-loaded) are not to be swamped. The argument is, of course, development is needed and it has to go somewhere but the inhabitants of Diseworth cannot be accused of "nimbyism"; we already have two major roads, an airport and a racetrack. We would be grateful to remain a VILLAGE.

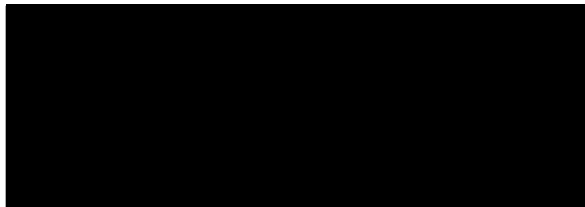
I also have the following objections to **the development of a large-scale industrial site south of the A453 (aka Freeport):**

1. As with my previous comments, this development also eats up more green spaces and farmland, increases the pressure on inadequate roads, adds to noise and air pollution, and takes away the rural environment of the village.
2. It also increases the risk of flooding which has become an increasing problem in recent years. Covering more land with concrete and tarmac adds to the already serious problem of run-off. This is even more serious for our neighbours in Long Whatton who feel the full brunt of the various streams which accumulate before entering their village.

I understand that this particular development is somewhat of a "done deal" since central government is enthusiastically backing the plan in their drive for "progress". This being so, objections are probably merely a paper exercise.

However, I strongly believe that this village should be accorded some respect by there being a **considerable** area of green space between Diseworth and the industrial site to lessen its impact as far as possible. To offer a patch of grassland and a few trees would be an insult and give the impression that the quality of life of villagers is of no importance in the face of commerce.

Yours faithfully,



(Mrs Shirley Briggs)

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

Local Plan Review. Consultation Response

Name

DEVA PLATT

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



8/3/22