



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	MR.	/
First Name	RICHARD	
Last Name	SMITH	
Job Title (where relevant)	RETIRED.	
Organisation (where relevant)	—	
House/Property Number or Name	[REDACTED]	
Street		
Town/Village		
Postcode		
Telephone		
Email address		

PART B – Your Representation

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

1. To which consultation document does this representation relate?	Proposed policies
	<input checked="" type="checkbox"/> Proposed housing and employment allocations
	Proposed Limits to Development Review

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

Use this box to set out your response. **POLICY IW 1**

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

- 1) LOSS OF AGRICULTURAL LAND
- 2) OVERDEVELOPMENT OF RURAL AREA.
- 3) MASSIVE IMPACT ON TRAFFIC ON THE ALREADY OVERLOADED A453 AIRPORT RACE TRAFFIC FOR TRUCKS HUGE QUARRY LORRIES FROM BREEDON. DHL ETC.
- 4) DISEWORTH ALREADY SUBJECT TO FLOODING PROBLEMS THIS CAN ONLY GET WORSE
- 5) ALREADY PROPOSED FREEPORT ADJACENT TO DISEWORTH WE WILL BE TOTALLY SURROUNDED BY MASSIVE DEVELOPMENTS RURAL VILLAGE SWALLOWED UP BY SPECULATIVE BUILDING.
- 6) DISEWORTH ALREADY A RAT RUN FOR THE AIRPORT AND WAREHOUSING CAN ONLY GET WORSE.
- 7) WILL ANY DEVELOPMENT INCREASE DOCTORS SURGERY AND SCHOOLS. CASTLE DONNINGTON SURGERY ALREADY OVERLOADED?
- 8) DISEWORTH IS SUPPOSED TO BE A CONSERVATION VILLAGE HOW IS THIS PROTECTED.?
- 9) ANY BIG HOUSING DEVELOPMENT HERE WILL BE USED BY DERBY AND NOTTINGHAM BOTH LEASER (CANT)

9) CONTD. TO COMMUTE TO THAN LEICESTER?

10) INCREASED AIR POLLUTION CONSIDER ALL THE LOCAL AREA AIRPORT, WAREHOUSING RACE TRACK MOTORWAYS ALREADY.

11) LOSS OF MORE WILDLIFE AND GREEN AREAS. JUST LOOK AT A MAP OF THIS AREA IN 1970'S AND EVEN AS IT STANDS NOW. HOW CAN WE PRODUCE FOOD FOR THIS COUNTRY.

12) ALL LOCAL DEVELOPMENTS (HOUSING) CASTLE DOWNINGTON LOUGHBOROUGH MASSIVE DEVELOPMENTS ALREADY HAPPENING ARE ALL (MIDDLE CLASS) PRICES. HOW WILL THIS HELP LOWER PAID WORKERS.

FOR ALL THE ABOVE I OBJECT STRONGLY TO THE PROPOSALS FOR IW1 ISLEY WOODHOUSE DEVELOPMENT.

COMMENTS ON FREEPORT DEVELOPMENT EMP 90.

- 1) DISEWORTH WILL BECOME HOUSES IN A LOGISTICS PARK.
- 2) SITE SLOPES TO VILLAGE WHICH ALREADY HAS FLOODING PROBLEMS.
- 3) VILLAGE WILL BE EVEN MORE OF RAT RUN FOR ANY WAREHOUSING FOR ANY WORKERS FROM THE SOUTH.

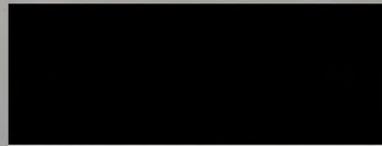
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PAGE 4

EMP 90 CONTO

- 3) GENERAL INCREASE IN TRAFFIC NOT ONLY THROUGH VILLAGE BUT ON THE ALREADY OVERLOADED A453. ANY BLOCKS ON M1 OR M42 CAUSES CHAOS.
- 4) YET MORE LOSS OF AGRICULTURAL LAND FOR SPECULATIVE WAREHOUSES, DRIVE ROUND AREA TO SEE NUMBER OF EMPTY WAREHOUSES. EVEN TOWARDS NOTTINGHAM
- 5) BROWN FIELD SITES SHOULD BE USED NOT GREEN FIELDS LOSS OF BIODIVERSITY AS WELL AS AGRICULTURAL LAND
- 6) NO AMOUNT OF SCREENING CAN PROTECT DISEWORTH FROM NOISE AND LIGHT POLLUTION IT HASNT WORKED FOR THE AIRPORT!
- 7) ALL DEVELOPMENTS SHOULD AT LEAST BE KEPT NORTH OF THE A453. WHICH IS ALREADY RUINED

FOR THE ABOVE REASONS I ASK THAT NULDC DO NOT ACCEPT EMP90 SITE FOR POTENTIAL DEVELOPMENT.

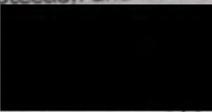


12 MARCH 2026

Declaration

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

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

Signed: 

Date: 12 MARCH 2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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



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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Stuart	
Last Name	Dudley	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	[REDACTED]	
Street		
Town/Village		
Postcode		
Telephone		
Email address		

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INTRODUCTION:

I am an electronics engineer aged 61 who moved to Diseworth 2 years ago. I have invested the entire of my life savings in a property that I was expecting to last me the rest of my life, in a small quiet rural village. I chose Diseworth specifically because it has a great sense of history, and in spite of the proximity to the airport, is relatively nice and quiet. I need a quiet undisturbed environment in order to get quality sleep and lots of exercise in the surrounding countryside. Almost immediately after moving, I have been subjected to these horrendous proposals that threaten to ruin my plans and potentially cost me a fortune. The plans are so far reaching that they would transform Diseworth forever, destroying the very identity of the village. They seem almost cruel in their total disregard for the local population of the village, putting mere profit above all other considerations. The effect on myself has already been detrimental, causing me to feel anxious and uncertain for the future. I will now try to address the proposed policies. I apologise if I am not always 100% objective, but I assume I am a human being who is writing to another human being who will understand my position.

Firstly, there is the process. The council has had years to prepare this plan, and gives us residents a minimal amount of time to prepare and submit a response. The plan is so huge, difficult to digest, and repetitive in content that it is almost designed to be unintelligible. It isn't even mentioned on the council website homepage meaning you have to look for it – it's almost like it is being kept a secret. There should be a big banner on the homepage stating "New devastating local plan – have your say within the next 4 weeks or else!" For every response you get there will be many others who are not fortunate enough to be given a realistic chance to respond.

THE CONTENT:

I will quote snippets from the plan wherever convenient, before giving my response to them. In the case where a section is just too big, I will give a response to the entire section. I will address

in particular the Freeport and Isley Woodhouse proposals:

Paragraph 3.5:

"by ensuring that sufficient land of the right types is available in the right places" These proposals are most definitely NOT in the right places:

Firstly, they are going to have a huge impact on a historic conservation village, a place that in one of my recent conversations with NWLEICS planning I was told "must be protected". These are the words of the NWLEICS employee. Protection of conservation areas is about a whole lot more than just dictating what kind of mortar developers are allowed to use. It is about the setting and character of the area, both of which are going to be destroyed forever. What's the point of protecting the buildings and ruining their setting?? There has already been a trend towards permitting excessive and unsuitable infill developments in Diseworth which have eroded the character of the village. Now this is being taken to the next level where the conservation status of Diseworth is being completely disregarded in favour of facilitating short-term financial gain for a small number of people who are not of this locality. It is shameful that we might be the last generation to have experienced Diseworth as a historic village.

Secondly, the requirement for housing in NWLEICS is certainly not all concentrated on the northern border - the choice of this location looks like it is based more on convenience for the council and developers than the needs of the immediate population.

Thirdly, given the scale of the buildings and intended use of the "**strategic distribution**", it beggars belief that it might be sited so close to an established community. B8 sheds are absolutely HUGE. I know that staff at the council who are reading this will already know this to be true – anyone who cares to review the plans cannot fail to see the inappropriateness of them. The flagrant disregard for the local population is at direct odds with the concept of "**social objectives**". The power station at Ratcliffe on Soar is due to be decommissioned soon, freeing up a huge area of land that would be far more suitable for this type of development.

Continued on next page.....

"to support strong, vibrant and healthy communities". It is not morally acceptable to detract from the quality of life of a community in order to promote a policy that is meant to do the exact opposite. The health of the population of Diseworth is already suffering as a result of this. This is absolutely not an exaggeration. People are suspended in a state of disbelief that they should be on the receiving end of yet another dose of corporate bullying – and that is what this is. An industrial development of this scale creates a huge impact on the area around it and the separation from the village is woefully inadequate. If these schemes go ahead there will most certainly be an increase in inconsiderate parking and through traffic in the village for 24 hours a day, resulting in noise, loss of sleep and endangerment of local children. I have seen first-hand how tired shift workers sometimes drive when on the way to work at the airport and Freeport. A Kegworth counsellor told how Freeport workers dump their cars in the village and car share the last half mile. Tree planting cannot screen diesel particulates or light pollution, or prevent further flooding caused by runoff from concreted fields, or prevent industrial businesses from polluting Diseworth brook (for which a legal action is currently in place against the airport). Tree planting cannot block the sound of revving engines or reversing sounders. They cannot even mask the visual destruction of the setting in which the existing community is living due to the monstrously huge scale of the proposed B8 buildings. Proposers of the Freeport have repeatedly refused to engage with the residents of Diseworth because they think they don't need to. Also, how could they walk around the village and the threatened fields and not feel embarrassed by what is on the table? It is remarkable that the government that is supposed to act in our interest can impose stress and anxiety on an entire community with apparent impunity.

"by fostering a well-designed, beautiful and safe places". It is not morally acceptable to detract from the beauty of a place in order to promote a policy that is meant to do the exact opposite.

"open spaces that reflect current and future needs and support communities' health, social and cultural well-being". I'm hoping that whoever is reviewing my response is really getting to see the duplicity of these proposed schemes. The health, social and cultural wellbeing of Diseworth is under DIRECT THREAT. The heritage and environment of the East Midlands is being eroded and must be protected for future generations, not just the profit margin.

"– to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy". This clause in particular needs close scrutiny.

The proposed developments are not protecting our natural environment, they directly threaten it. Development of green spaces is now the default method for infrastructure provision, regardless of the needs of urban areas. Many cities and towns, including those in NWLEICS, are experiencing a retail downturn as a result of online trading and an industrial downturn as a result of over-dependence on imports. Now would be a perfectly logical time to make those towns and cities once again a beautiful place for people to live, rather than an industrial and retail wasteland.

The proposed developments are not protecting our historic environment, they directly threaten it. It would be inconceivable to place industrial warehouses as a backdrop to York Minster so why

is it suitable as a Backdrop to the spire of the 11th century church of Diseworth St Michael?

The proposed developments are not making effective use of land. Now would be a perfectly logical time to value and protect our food producing land and the people who farm it, particularly as the global food situation becomes increasingly unstable. Growing global tensions threaten our wellbeing, our food chain and the very trade that a Freeport is based upon. However, as we all know, green spaces are an easier and cheaper target, and farmers are forced into accepting payoffs to give up their land because they are not paid enough for their produce to make the living that they deserve. Effective use of land would be the re-purposing of Ratcliffe power station to a Freeport development where farmland is not lost, infrastructure already exists and the scale of the Freeport buildings would actually be LESS imposing on the surroundings than the existing structures.

How concreting over fields and hedgerows is improving biodiversity I have yet to understand.

Now we come to the prudent use of natural resources and the minimisation of waste and pollution. Our neighbours at East Midlands Airport, regardless of what your personal opinion on airports is, cannot be trusted to be champions of any of the above. Their management of the vital resource of water involves filling up huge man-made ponds and releasing the water into Diseworth brook. This policy has historically resulted in the population of the village having to put up with the consequences. Can we trust them to manage even more water in this shoddy way? It also appears they may have added chemical pollution to their "management policy", allegedly allowing de-icing chemicals to flow into the natural surroundings including Diseworth brook. I eagerly await the outcome of the legal action on this subject. Make no mistake, MAG is a profit making enterprise as is Segro. The surrounding environment is not high on their list of priorities. MAG and Segro policies are to penalise legitimate car users, forcing them to drive and park in the neighbouring communities. The camera vans at the airport are nothing but a money-making scheme, extorting excessive charges for people attempting to pick up/drop off legitimate passengers, again displacing the problem to their neighbours who have no realistic means of defence.

Climate change and low carbon are of course best tackled by keeping our agriculture local, thus reducing the need for mass movement of foodstuffs globally. This will become more apparent if the global political climate continues to degenerate.

So my summary of Paragraph 3.5 is that none of those objectives are being met in the context of Diseworth as an existing strong, vibrant and healthy rural community. Nor are they met for the wider populations in the towns and cities who need and deserve improvements to their town centres, their local housing stock and their sometimes deteriorating urban environment.

Paragraph 3.12:

"We are required to ensure that the policies in the plan, including the provision of infrastructure, will not make development unviable as this will mean much needed development will not take place." I would argue that the concentration of all this development in a single rural area is intended purely to try to keep costs down rather than meet any of the actual criteria that should matter more, such as environment, pollution, needs of rural and urban populations etc. as I have

discussed above.

Paragraph 3.23:

"With particular regard to North West Leicestershire, the SGP identifies the Leicestershire International Gateway (focussed on the northern parts of the A42 and the M1 around East Midlands Airport), as one of several locations for growth." This policy was adopted in complete disregard to the needs and lifestyle of the existing population, particularly of Diseworth. To propose to almost completely change the environment of an existing historic rural conservation village is nothing more than corporate bullying.

Paragraph 3.28:

"distribution of housing and employment development across the district". There is no element of distribution in the proposals. The developments are concentrated in a single area that best suits the needs of persons other than the local population.

Paragraph 4.4:

"[Enabling health and wellbeing]". The proposed overbearing plans for the north of the district do not take into account the health or wellbeing of the local population. The plans are more about conveniently concentrating the developments together into a single area and being prepared to disregards and if necessary fight the local population in order to get them adopted.

"[Ensuring the delivery of new homes]". The proposed Isley Woodhouse plan is a strategy to meet targets without spending too much money. The housing needs of the population as a whole will not be met by housing provision in a distant corner of the district. This proposed strategy does not take into account the makeup and structure of urban populations or their needs or wishes to keep their neighbourhoods intact. Instead it makes provision for housing in an area where there is currently no need for it.

"[Achieving high quality development]". The proposed Isley Woodhouse plan is a strategy to meet targets without spending too much money. Quality should mean improvement of the environment, not destruction of it.

"[Reducing the need to travel]". I have personal experience of this aspect of the proposals. The existing developments in the area have greatly increased road traffic in the district and have likewise increased the risk of road accidents as people race to work at all hours of the day and night, often whilst tired. I have been on the receiving end of several scares resulting from people intent on getting to the freeport or airport quickly without any care for other road users. Tailgating and undercutting are but two of the new norms. The Freeport will be a magnet for businesses who will favour tax incentives over any logistical or environmental considerations, meaning they will reject more suitable sites in their own locality and thus will actually increase the need to travel. Imposing penalties for car use does not put people off using their cars. They simply dump them near the workplace (in villages like Kegworth) and car share the last half mile. Diseworth will be subject to a huge increase in through traffic and parking, and the population of Diseworth will just be expected to put up with it for what reason?

“[Supporting the district's economy]”. The biggest winners will be the big businesses who stand to make the most money. The population of Diseworth will not benefit in any way whatsoever from having a Freeport planted on their doorstep, and whilst that population is relatively small, their voices should be listened to and their needs and wishes taken into account.

“[Enhancing our town and local centres]”. The concentration of development in the north of the district does not in any way meet this target. The towns that need new high quality housing and improvements to their infrastructure will be overlooked in favour of concentrated low cost green-field development. The populations of the towns will be expected to drive to access any of the new employment rather than walk or cycle to a new smaller scale development in their neighbourhood.

“[Mitigating for and adapting to climate change]”. I have already touched on this one. There is no doubt that these developments will increase pollution in the locality and the businesses running these facilities (such as MAG) cannot be trusted to put the environment of local populations above the desire for profit. Climate change requires reducing global movement of goods and foodstuffs, not building freeports to encourage it. Do not forget that air, sea and road travel will all increase if the developments go ahead.

“[Conserving and enhancing our heritage]”. I have already touched on this one. The proposed developments are so overbearing that they will spell the beginning of the end for Diseworth as a historically important rural conservation village. The current generations will be the last people who will remember that time and their descendants will never get the chance to see what the lifestyle of Diseworth was like. Try pondering this point whilst considering that it costs the residents of Diseworth thousands of pounds to jump through all the hoops to make small improvements to their properties (approval of bricks, mortar, roof tiles, archaeological surveys etc etc).

“[Conserving and enhancing our natural environment]”. I can't believe that I am expected to respond to this one! In what way is putting concrete and tarmac on huge swathes of green productive land and natural habitat going any way whatsoever to achieving this goal??? Come on, let's stop pretending, and move those developments to places where the environmental impact is less – urban brownfield sites in communities that actually would welcome them for example, or existing industrial sites that are ready for redevelopment.

“[Ensuring the efficient use of natural resources]”. I have already touched on the airport's wasteful, inept (and now it seems possibly illegal) management of water. They care not about this as long as they are not taken to task, and whether the local population like it or not they care not at all. The 24 hour nature of the proposed Freeport site will necessitate additional heating and lighting over a conventional daytime site. This means more use of natural resources, not less. In what way is an entire new town a more efficient use of resources over strategic and careful targeting of housing in areas where it is most needed? Where street lighting etc already exist? Where infrastructure is already in place and just needs upgrading?

“[Ensuring sufficient infrastructure]”. The infrastructure around the airport is already woefully inadequate for purpose. Put the infrastructure where it is most needed – close to the centres of

populations that would welcome it, or in areas where it makes less impact.

Paragraph 4.14:

"Based on the Stantec study, there is a need for some 255,090 sqm (2017-40) of new employment floorspace." This new floorspace seems to be concentrated in green areas where it is cheapest to build. Why? Are we so changed as a population that we have forgotten why green spaces were once protected? Or is it simply convenient to forget? Most persons working in these new employment floorspaces will travel to their locations from the towns and cities where they live, towns and cities that would welcome employment in local areas. B8 sheds are not a suitable backdrop to a heritage conservation area. It's not difficult to see why this is true.

Paragraph 4.25:

Diseworth is here defined as a "sustainable village". In what way can the impact on Diseworth be compared to any of the other villages in that category? It would be more accurate to have a new category defined as "villages designated for corporate obliteration" in which there is but one member. The existence of Diseworth will not be sustained by these proposals, it will be directly and rather cynically threatened.

The rest of section 4:

It is not acceptable that Diseworth seems to have lost its right to an identity as a rural village simply because long ago somebody decided it was expedient to build an airfield close to it. At that time Diseworth was already over 1000 years old. Diseworth and the people who live there should be protected from excessive, unwelcome and overbearing changes.

Section 5:

This section seems to be about "**creating attractive places**". This section should include a policy to "protect attractive places from inappropriate and damaging developments". Without this inclusion, it is a meaningless section. Robbing Peter to pay Paul is not the way civilisation is meant to work. Ways in which the Freeport proposals contravene this section are shown below:

"Impact on amenity is a fundamental consideration when determining planning applications. Noise, odour, light and overlooking associated with new development are key amenity factors and can adversely impact the quality of life of future occupants or existing residents in the vicinity."

"Prevent new and existing development from contributing to, being put at unacceptable risk from or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability (paragraph 174e)."

"Ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development (paragraph 185)."

"mitigate and reduce to a minimum potential adverse impacts resulting from noise from new development – and avoid noise giving rise to significant adverse impacts on health and the quality of life (paragraph 185a)."

“Limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. (paragraph 185c).”

And the requirements below are most certainly not going to be met:

“Draft Policy AP2 – Amenity (1) New development should be designed to minimise its impact on the amenity and quiet enjoyment of both future residents and existing residents in the vicinity of the development. Development proposals will be supported where: (a) They do not have a significant adverse effect on the living conditions of existing residents through the loss of privacy, excessive overshadowing and overbearing impact. (b) They do not generate a level of activity, noise, vibration, pollution or unpleasant odour emission, which cannot be mitigated to an appropriate standard and so, would have an adverse impact on amenity and living conditions. (2) Development which is sensitive to noise or unpleasant odour emissions will not be permitted where it would adversely affect future occupants. (3) Proposals for external lighting schemes should be designed to minimise potential pollution from glare or light spillage. The intensity of lighting should be necessary to achieve its purpose, and the benefits of the lighting scheme must be shown to outweigh any adverse effects”

It is not logical to take into consideration in this section the individual needs of a historic building with regards to sensitive modification and then ignore the needs of an entire community with regards to integrity, setting, environment and amenity.

Section 6:

I have already commented on the Isley Woodhouse development as being an inappropriate development in an inappropriate place. It is a convenient site for developers but not for the local population around it who will experience increases in traffic and associated noise and pollution, plus loss of healthy places to roam.

Paragraph 7.4:

“• North West Leicestershire has historically been a net importer of labour. In 2015, some 11,500 more workers commuted into the district than commuted out. • Despite this net inflow of workers, people who work here earn less on average than people who live here.” These points are just two that illustrate the inappropriate nature of the intensive building of warehouses in the north of the district. There is not a need for such jobs in this area, so commuting will increase, and the jobs created will not help to raise the average levels of pay.

Paragraph 7.7:

This paragraph lists Ratcliffe power station as part of the Freeport. This is a huge source of potentially suitable land for the proposed Freeport developments. A Freeport development at Ratcliffe would actually IMPROVE the local environment due to the immense scale of the existing power station buildings which could be removed to site the much smaller B8 sheds. Nobody has yet come up with any rational argument why a plot of land south of the A453 directly abutting an existing rural community with conservation status is a more suitable place to put B8 sheds. Also, the power station has the entire infrastructure already in place! There has been a lot of opacity surrounding this entire issue and it is time somebody took the decision to expose this as the land-grab-for-profit that it actually is. There is nothing in the local plan that suggests this development will in any way meet the required criteria regarding the impact on the people who would have this imposed upon them. Then there is of course the fact that this development will

detract from any other proposed ones in the midlands area, including those warehouses currently sitting vacant because there are no tax incentives to occupy them.

Paragraph 7.19:

"sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity". The key to this requirement is the right land in the right place. This is not the *right land* because it is food producing land and food production will become more important as global stability continues to deteriorate. It is not the *right place* because it is too close to people's homes – FAR TOO CLOSE. This development will not meet the requirements for the quality of life of the existing population, nor will destroying green open spaces meet any of the environmental objectives.

I'm beaten by the huge number of words in this document which as a layman I haven't the time or understanding to digest. The deadline for a response is so ridiculously near. So my summary is:

CONCLUSION:

"Isley Woodhouse and Segro are together (as indeed geographically together they are, separated only by a small historic settlement) a development of excessive scale that will permanently damage the local area, adversely affecting the health and wellbeing of the existing population (probably driving some of them away), adversely affecting food production and habitat, potentially increase flooding and definitely increase local pollution of every kind (light, noise, emissions to both the air and water). The proposals are in direct contravention of so many of the conditions that they are supposed to meet that it is quite extraordinary that they are proposed at all. I object very strongly to the two excessive proposed developments either side of Diseworth on the grounds stated above and require that my concerns are given some consideration. Diseworth and its residents should NOT be "thrown under the bus"."

Declaration

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

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Date: 03/03/2023

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	Personal Details	Agent's Details (if applicable)
Title	Miss	
First Name	Judith	
Last Name	Billington	
Job Title (where relevant)	Research Manager	
Organisation (where relevant)	Loughborough University	
House/Property Number or Name	██████████	
Street	██████████	
Town/Village	██████████	
Postcode	██████████	
Telephone		
Email address	██████████	

PART B – Your Representation

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

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

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

Use this box to set out your response.

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

Document: Proposed Policies for Consultation

3. Background to the local plan, para. 3.5 and 3.23

Ridiculous assumptions on benefits of this proposed over development, no consideration for those who lose out in so many ways, must try harder ...it needs to be win-win, not at the expense of the existing businesses and community.

4. Strategy paras. 4.4 -4.17

The number of houses is unrealistic, will there be amenities from the outset? There is no capacity at existing health providers now.

5. Creating Attractive spaces (renewable energy) Para 5.33

Solar panels must be on the roofs of buildings...no need to lose agricultural land to panels...and there is an enormous local concentration of knowledge on all types of renewable energy in the area.

6. Housing, para 4.109

See comments below, it's a ridiculous plan, over ambitious, catastrophic impact all around and no guarantee of real growth, will just generate a series of relocations ...and new home buyers are being sold a terrible quality of life. Families will be living at the end of the runway of an international freight airport, 27/7 light, noise, air pollution and an 'en suite' race track? I thought it was a joke when first muted, wrong plan, wrong place for all.

7. The Economy, paras. 7.19 & 7.20

The policy should NOT be changed (Ec 1 and 2) with regards to development in the countryside.

Document: Proposed Housing and Employment. Allocations for Consultation

3. Housing completions and commitments, para 3.7

Don't understand the logic (and the plans don't help) of having so much development in the north of county? So

many ways to distribute development to increase benefits and minimise negative impact (win-win)

4. Housing allocations (Isley Woodhouse), paras. 4.101 – 4.116

Is this a joke? Wrong plan wrong place, disproportionate investment in area and disproportionate in terms of negative impact upon the area.

The environmental impact will be absolutely devastating, and as a local resident likely to be directly impacted, I am very concerned about flooding and the negative impact this has upon quality of my life, the cost of my property insurances and maintenance and the future resale value of my property. I have no confidence that we can manage flooding if there is any more development up-stream from the villages of Diseworth and Long Whatton.

5. General needs employment allocations (small/medium warehouses) para. 5.1 to 5.4

There are already excessive units in this northern part of the county, do we really need everything within a stones throw of the airport? There is no rationale for this and it is disproportionate if you take account of surrounding capacity already completed and unoccupied.

6. Potential locations for strategic distribution, (big sheds B8) para6.1 to 6.10

The development of the freeport/sergo shows no consideration for more appropriate locations. The environmental and human impact will be really excessive, this is all unnecessary and I cannot believe that there is any mitigation sufficient to reduce the impact on local residents. Trees and a bit of landscaping will not screen a 24/7 large scale operation, the quality of our lives and our health will suffer living adjacent to these warehouses.

Document: Draft Local Plan

Plan is over concentrated in an already over congested area around the intersections of M1 J23a, J24 A42 and East Midlands airport.

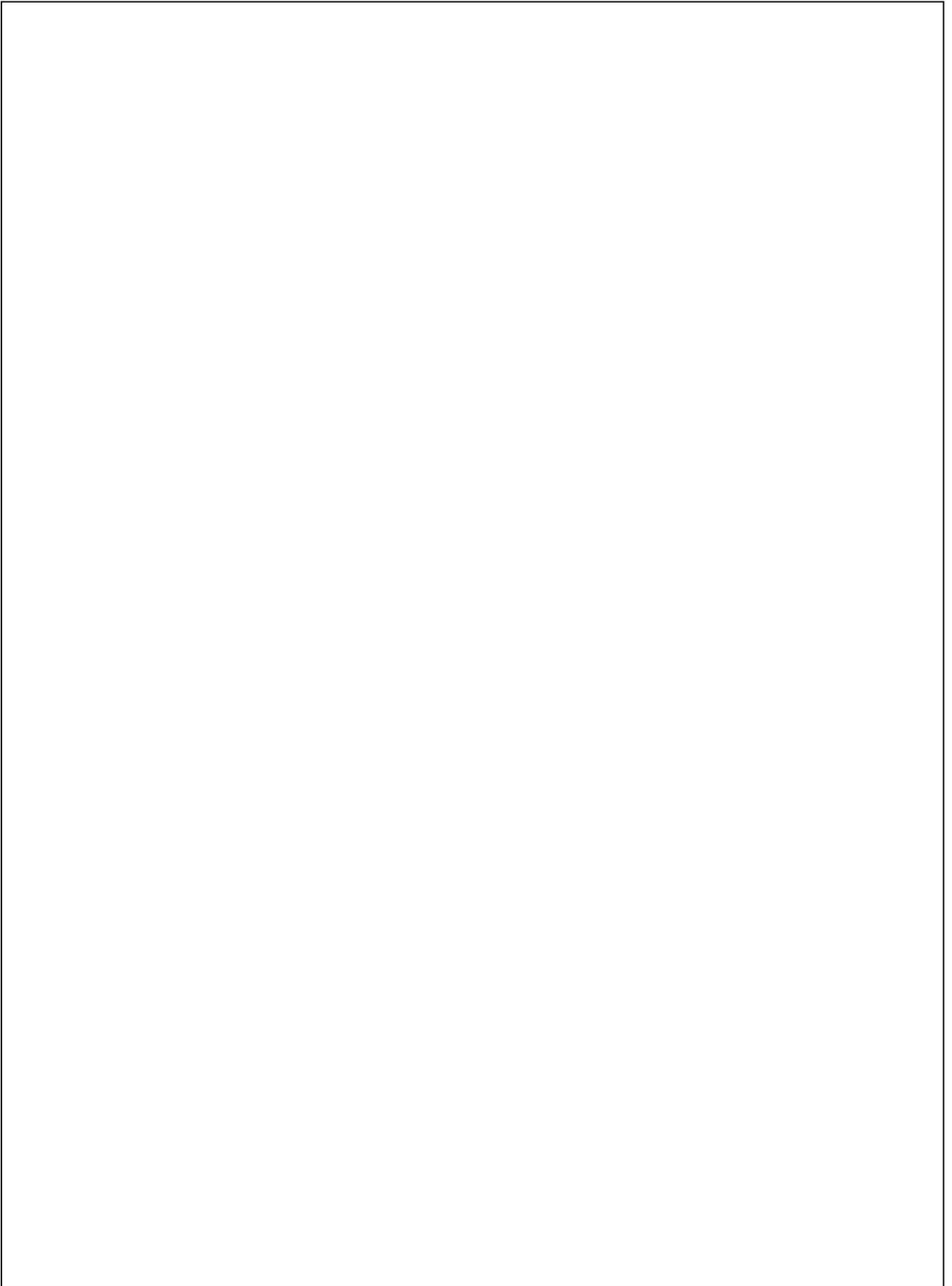
This is blatant badly thought-out overdevelopment and the negative impact it will have on local business and occupants is not addressed. Sweeping assumptions are being made around benefits at individual and business level, without proper consideration of any other scenarios. What impact will new developments have on those already living and running businesses in the area? Assumptions are flawed, not everyone wants to live near their place of work, post pandemic many people have hybrid roles, they do not need to attend physically at work every day or at all. I believe the Isley Woodhouse development offers a sub-standard quality of life to new occupants at the outset!! They will experience ridiculous levels of air, light and noise pollution living next to a 24/7 freight airport and a race circuit on what is one of the busiest motorway intersections of the Midlands.

The adverse implications on existing infrastructure are not fully researched and evidenced. We are already suffering locally from traffic congestion, pollution, an excessive burden on medical services, insufficient policing, inadequate emergency services and local council service provision. We pick our own litter up, clear our own road gullies and unblock drains to mitigate flooding etc etc the list is never ending.

We will lose farmland, and wildlife and along with that any opportunity for local food production and agriculture.

The justification and rationale used for the basis of modelling to calculate housing and employment land requirements are NOT properly justified. It is likely that this development will just be a way in which existing big business will just divert towards this area, thus increasing their profit margins by lowering their cost base. This isn't growth, it is diverting development from elsewhere, as big companies chase low cost operations.

There has been absolutely zero attempt to communicate things in a way which is properly inclusive. I feel this is deliberate. Not everyone has time/ability/confidence/means and the will to access all of the multiple layers of policy out for consultation.



Declaration

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

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

Signed: Judith Billington

Date: 12/3/24

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Please complete both Part A and Part B.

PART A – Personal Details

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Craig	
Last Name	Jones	
Job Title (where relevant)	NA	
Organisation (where relevant)	NA	
House/Property Number or Name		
Street		
Town/Village		
Postcode		
Telephone		
Email address		

PART B – Your Representation

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

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

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

Use this box to set out your response.

The Proposed New Housing Settlement at Isley Woodhouse (Policy IW1)

The proposed settlement would be too close to Diseworth and would severely impact the character of the village. My house backs onto Diseworth Brook and my garden floods in severe rain or when the holding ponds from the airport are opened, the impact of additional flooding could threaten my house. During particularly heavy rain the run-off onto The Bowley makes the street impassable, any additional flooding poses a high risk to the surrounding area. The proposed development will destroy a large area of farmland and miles of ancient hedgerows. After moving to the village, I was in awe of the variety of wildlife present surrounding the village. The proposed development would destroy miles of habitat and the biodiversity of the area would be greatly reduced at a time when species are disappearing at a faster rate than ever. How would the development replace the biodiversity and habitat? The traffic infrastructure around the village is insufficient to cope with huge increase to the volume of traffic that would come with such a large increase to the local population. The plan is poorly considered as it places all the housing in one area, surely it would be better to spread the development over different areas, so the roads are not overwhelmed. Diseworth is listed as conservation village, I do not believe the proposal outlines how this is to be maintained.

For the reasons described, I do not support the new town development of Isley Woodhouse (Policy IW1)

The Potential Location for the Freeport Development (EMP90)

The character of the village would be destroyed and would no longer be a rural village, but instead part of an industrial park. The suggested land is too sloped and would be difficult to build on. The increase in traffic would overwhelm the local roads; the roads around the village cannot cope when a diversion routes traffic through the village, never mind the excess traffic caused by the freeport itself. The green spaces around Diseworth would be destroyed, and the increase in air and noise pollution would negatively impact my quality of life and mental health. Replacing soil with concrete will increase the risk of flooding, the runoff will find its way into the village. The loss of biodiversity and habitat is a great concern, it is not possible to replace this loss in the local area and the established wildlife would be displaced. I do not accept that the development can be mitigate by any means suggested in the proposal, the resulting noise and pollution would negatively affect my wellbeing. The Local Plan states "We do consider that the potential impacts on Diseworth , particularly in terms of heritage, landscape and amenity, are likely to be unacceptable based on the current extent so designated Freeport land", so why is land that by your own definition unacceptable being considered?

For the reasons described, I am asking NWLDC not to include the EMP90 site for potential development

Declaration

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

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

Signed:



Date: 12.3.24

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Personal Details

Agent's Details (if applicable)

Title	Mr	
First Name	Alan	
Last Name	Clark	
Job Title (where relevant)	Retired	
Organisation (where relevant)	N/A	
House/Property Number or Name	█	
Street		
Town/Village	██████████	
Postcode	██████	
Telephone	██████	
Email address	██████████	
	██████████	

PART B – Your Representation

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

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

2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.
IW1 and EMP90

Use this box to set out your response.

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

IW1

I would like to make the following comments about the proposed new housing settlement at Isley Woodhouse.

In my opinion the proposed site is too close to the village of Diseworth as well as the airport.

If I have got this correct it is likely to destroy approx. 750 acres of agricultural land (as well as many miles of hedgerows) which is probably not a beneficial outcome at the present time.

Having lived in Diseworth since 2008 there have been numerous flooding issues and I have great concerns that this new development will only add to that problem.

Alongside flooding there will be an increase in noise pollution and light pollution, which is already at a high level due to the presence of the airport and motorway network, not forgetting HS2 in the future

I aslo have major concerns about the increase in air pollution especially as the prevailing winds will ensure any additional air pollution will affect the village of Diseworth.

This is surely something which needs to be extensively surveyed and considered by the planning Committee

Will the road infrastructure be able to cope with such a large number of new houses being built?

Therefore I do not support the new town development of Isley Woodhouse (Policy IW1)

EMP90

I would also like to make the following comments about the proposed new Freeport development (Policy No. EMP90)

Whilst I can see the reasons why the developers would like to use this area I believe that there are probably better areas around the location of J24 of the M1 which could be used and would have less affect on a population the size of Diseworth.

Can you advise me if alternative sites have been fully researched

The air, noise and light pollution will have a major effect on the villages of both Diseworth and Long Whatton and any increase in these can (and I'm sure will) have a detrimental effect on peoples mental as well as physical health. It will also be impossible to create any really effective "screening" of the proposed site to the people who live closest to the site

The increase in flooding risk is a major issue and if a 100% guarantee that the site will not add to the current risk of flooding then the proposal should not go ahead.

The road infrastructure is already under pressure and it will be difficult to see how all the additional traffic and traffic movement can be effectively managed.

Again the destruction of agricultural land and the resulting affect on wildlife is something which should take precedence over a Freeport development.

Therefore I am asking NWLDC not to include the EMP90 site for potential development

Declaration

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

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

Signed: Alan Clark

Date: 12/03/2024

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	Personal Details	Agent's Details (if applicable)
Title	MRS	
First Name	KAREN	
Last Name	JEPSON	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
Street	██████████	
Town/Village	██████████	
Postcode	██████████	
Telephone	██████████	
Email address	██████████████████	

PART B – Your Representation

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

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

Use this box to set out your response.

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

1. THE PROPOSED HOUSING AND EMPLOYMENT ALLOCATIONS :ISLEY WOODHOUSE (POLICY 111)

I would like to raise issues objecting to this proposed development and have summarised the following points:

It contradicts the governments manifesto of advising protection of agricultural land and conservation areas and rural communities. Equally it contradicts Leicestershire strategic growth plan of aiming to develop in major strategic locations and reduce the amount that takes place in existing towns, villages and rural areas. The proposed development is directly in contradiction to the plan, being entirely rural in its vicinity and the adjoining areas. the site of the development is far from ideal, being so close to Diseworth and Castle Donington.

What evidence is there to demonstrate all other options and locations have been fully researched and considered, and what evidence demonstrates that opinions have been sought as to how many people would consider relocating there and what businesses have been asked to comment .

Many agencies have informed governments and councils that destruction of rural land impacts on nature, wildlife, food production, and the mental health and general well being of populations. Where has this been taken into consideration, given that over 700 acres of agricultural land and wildlife habitation will be destroyed ?. The strive for biodiversity nationally, much publicised in several arenas, cannot be achieved with developments in these landscapes. Equally the very negative effects of air, light and noise production of over development in such a space are a major factor, especially when these are already an issue due to the proximity to the airport.

When considering this alongside planned freeport proposal the issues will be intensified .

What evidence is there to demonstrate that the impact of the development on infrastructures has been fully considered in these proposals, roads, accesses, essential services, water, drainage ,sewage etc. Maintenance of existing roads is clearly already underfunded and under pressure, in reference to the number of road repairs not currently being undertaken. where is the funding to build and maintain even more?

In particular, Diseworth and Long Whatton have seen considerable flooding and extra building is likely to prevent adequate drainage on land known to be affected and will increase the risk considerably. The amount of run off water and the levels of water in the brooks is significant. Last autumn, winter, and now beginning of spring, the villages have experienced many occasions where roads have been impassable for times, due to run off water, and the impact of the brooks having overflowed .

To include the provision of schools and commerce as a 'bonus' within the proposed development does not show that consideration has been made of the number of child places not taken up in the areas.

The conservations status of Diseworth, its very significant history and heritage will be seriously compromised by the impact of such a large development.

I do not support the new town development of Isley Woodhouse , policy IW1

2. THE POTENTIAL LOCATION OFR THE FREEPORT DEVELOPMENT (EMP90)

I would like object to above development and summarise the issues of concern, many of which replicate the previous points of policy IW1:

All the points raised in the response to IW1, with the exception of provision of schools apply also to this development.

The conservation status of the village will be significantly affected, along with its historical uses as farming community and its rural heritage, a point already used and recognised in the plan itself! So, has this area been considered without researching other sites, as a matter of commercial and logistic convenience ?.

Living in such a zone is likely to impact on the health of the local community. Such aspects have been well documented by health professionals. The impact of noise, light and air pollution will be great and will impact the health of the local population, in direct contradiction to the government's views on health and well being of the nation. Nor could it be considered that these issues can be limited due to any interventions such as buffering.

There is an abundance of wildlife in the proposed development area which would be destroyed.

The village already experiences considerable disturbance and environmental pollution of noise, light and air due to the existing functions of EMA, DHL, and other 24 hr businesses and services.

The government insists that it is committed to a plan to reduce carbon foot print and has challenged county and local councils accordingly. This development would not support that aim by its location on a green site, rather than brown.

What evidence is there that other locations, other options, including brown sites and areas other than agricultural, rural spaces have been fully researched and evaluated .

Roads are already under pressure, particularly in terms of maintenance and when diversions are necessary, the current systems cannot cope with the outcomes.

Achievement of biodiversity is automatically lost with this development due to the destruction of the land and habitations and environment. I

The position the development, upper end of the village, on a slope, its height and size will increase the level of run off in wet weather, already being experienced by the village and the act of building structures will directly impact the drainage aspects. Flooding should be a major concern. It is disastrous for the villagers, expensive, distressing, and an extra *known* problem for residents in terms of very wet weather, which climate watchers tell u is only going to increase in the future but also expensive to 'fix' for councils and the inclusion of such factors in future governments plans is already a priority . Where is the evidence that demonstrates that to create such a huge development when concrete and other building materials do not allow drainage has been well researched and is suitable for the area proposed?.

It directly contradicts the governments manifesto of protecting agricultural land and rural communities.

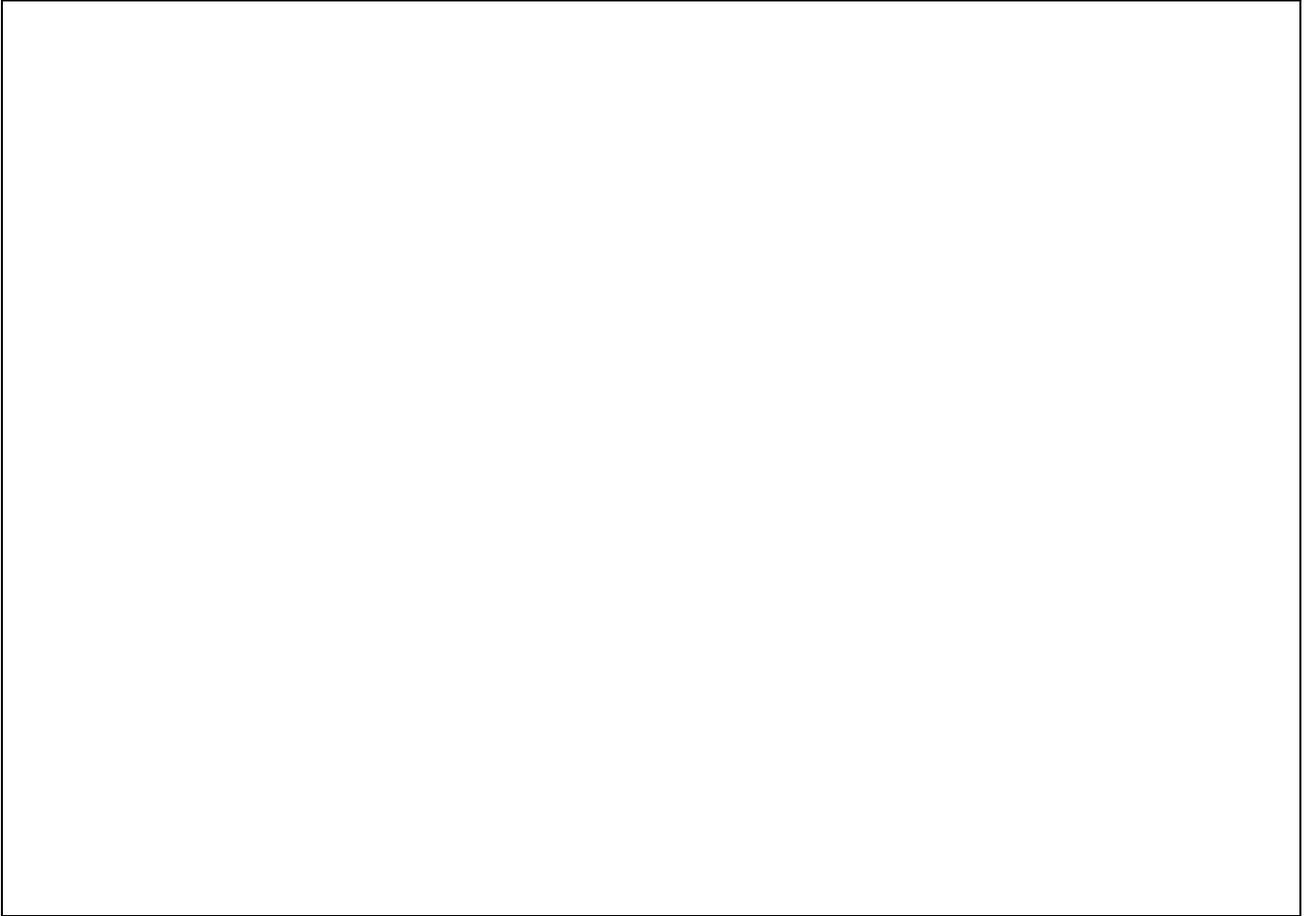
What safety factors have been explored, and evaluated to demonstrate this development?.

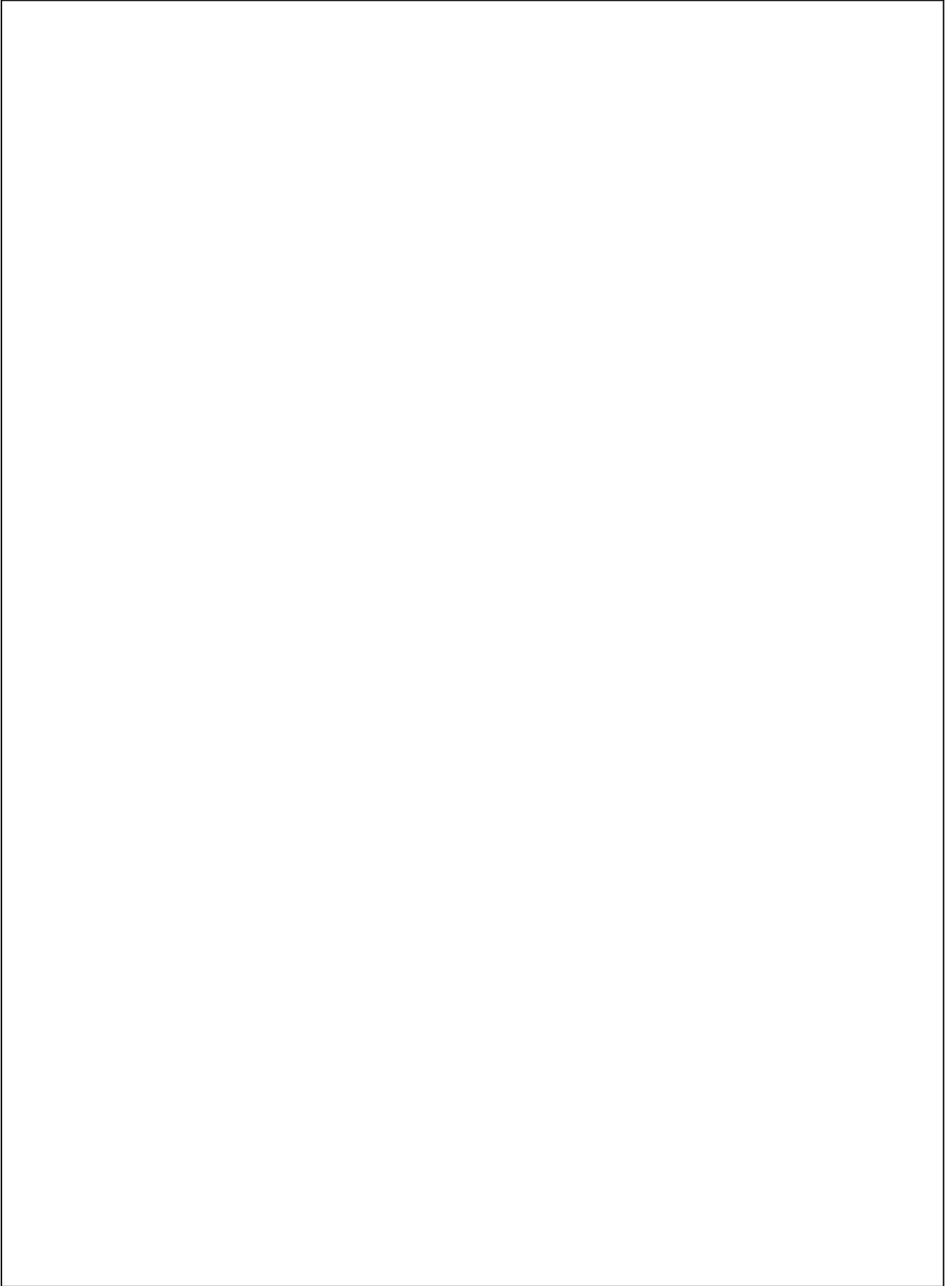
The level of employment suggested is unlikely, as evidenced by previous developments, some current buildings already remain empty and unused , and therefore no operators are employed.

The 'green' area of the village will be lost and therefore the village no longer a green environment, issues that many agencies are striving to avoid in our countryside.

I consider it morally wrong to wilfully destroy agricultural, rural green land in the pursuit of commercial greed, convenience and enterprise, none of which has been satisfactorily demonstrably evidenced as well founded, well researched and with any outcomes evaluated and proven favourable to the village, to the communities, to the county and nationally. Or indeed researched and proven otherwise.

Therefore I ask that NWLDC do not include ten EMP90 site as a potential area for development.





Declaration

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

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

Signed: K E Jepson

Date: 12/03/2024

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From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: DRAFT NORTH WEST LEICESTERSHIRE LOCAL PLAN 2020-2040 PROPOSED LIMITS TO DEVELOPMENT FOR CONSULTATION
Date: 12 March 2024 16:50:21
Attachments: [BH_EMP_001_employment_plan_0-A3.pdf](#)

I am writing further to a recent consultation submission using the online form.

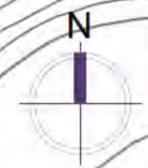
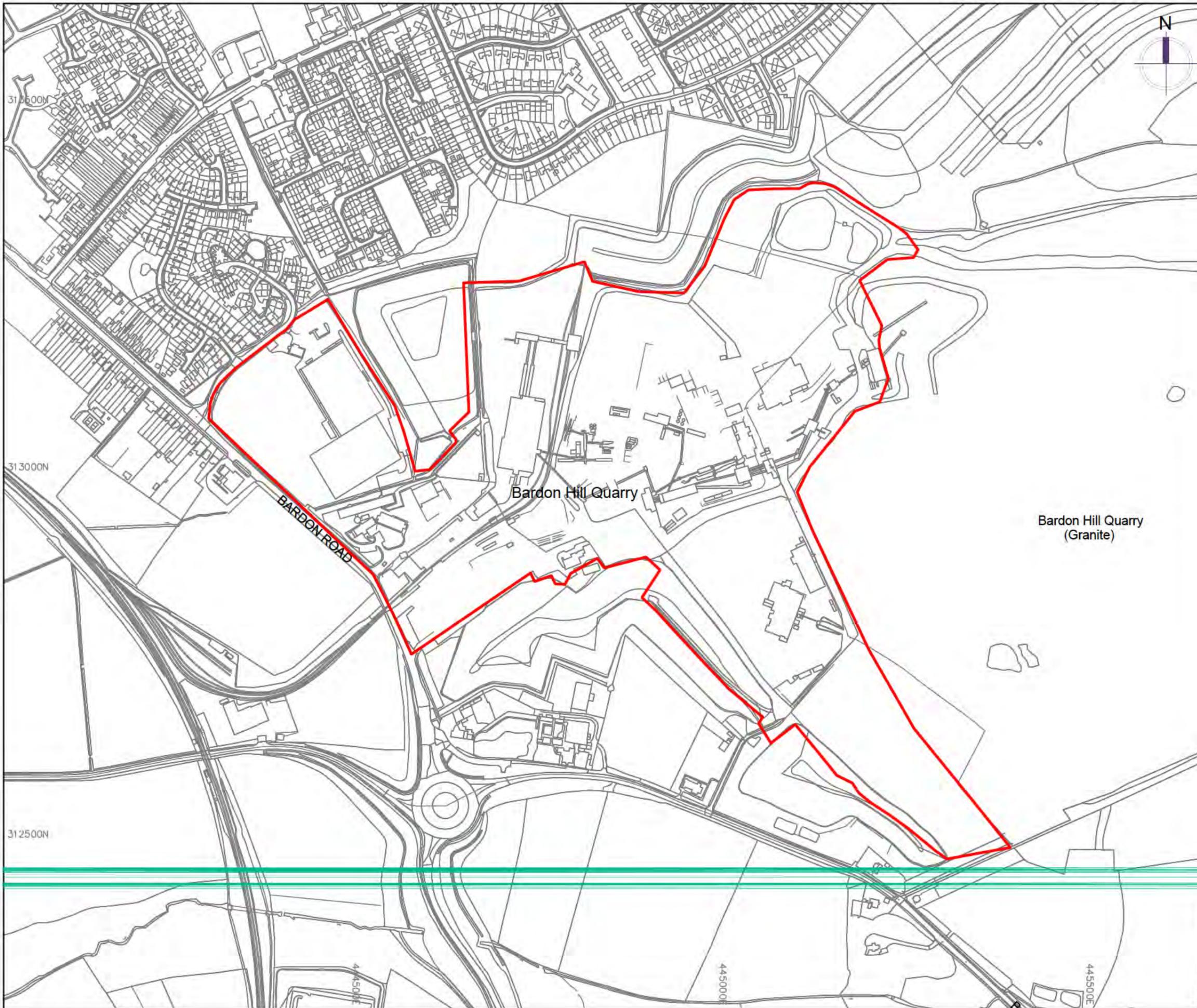
I am seeking amendments to the Limits of Development and the attached land to be included and LtD/CUA/08 to be amended accordingly.

Many thanks for the opportunity to comment on the development limits

Kind Regards

Kirsten Cunningham
Estates Manager

[REDACTED]



Legend:
 Employment Land



Site Name Bardon Hill Quarry and Offices		
Drawing Title Employment Land		
SCALE: 1:5000	Size: A3	DRAWING No.
DATE: February 2024	01	
By: SW		

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: NWLDC Local Plan Consultation Representations (Heath and Bell)
Date: 12 March 2024 17:07:38
Attachments: [image001.png](#)
[Publication Consultation Response Form FINAL NWLLP Knights Plc 120324.pdf](#)
[NWLDC Local Plan Reps Letter Final 120324.pdf](#)
[LW&D PC Neighbourhood Plan Reps Letter Final 120324.pdf](#)

Good afternoon

On behalf of our clients, Mr Nick Heath, Mr David Bell and Mrs Linda Bell, please find attached formal representations on the NWLDC Local Plan Consultation.

I would be grateful if you could provide confirmation of receipt.

Thanks

Louise Thorne BA (Hons) BTP MRTPI
Partner

Knights

[REDACTED]
[REDACTED]
[REDACTED]

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	Personal Details	Agent's Details (if applicable)
Title	Mr/Mrs	Mrs
First Name	Nick Heath David Bell Linda Bell	Louise
Last Name	N/A	Thorne
Job Title (where relevant)	N/A	Partner – Town Planner
Organisation (where relevant)	N/A	Knights Plc
House/Property Number or Name	C/O Agent	██████████
Street		██████████
Town/Village		██████████
Postcode		██████
Telephone	N/A	██████████
Email address	N/A	████████████████████

PART B – Your Representation

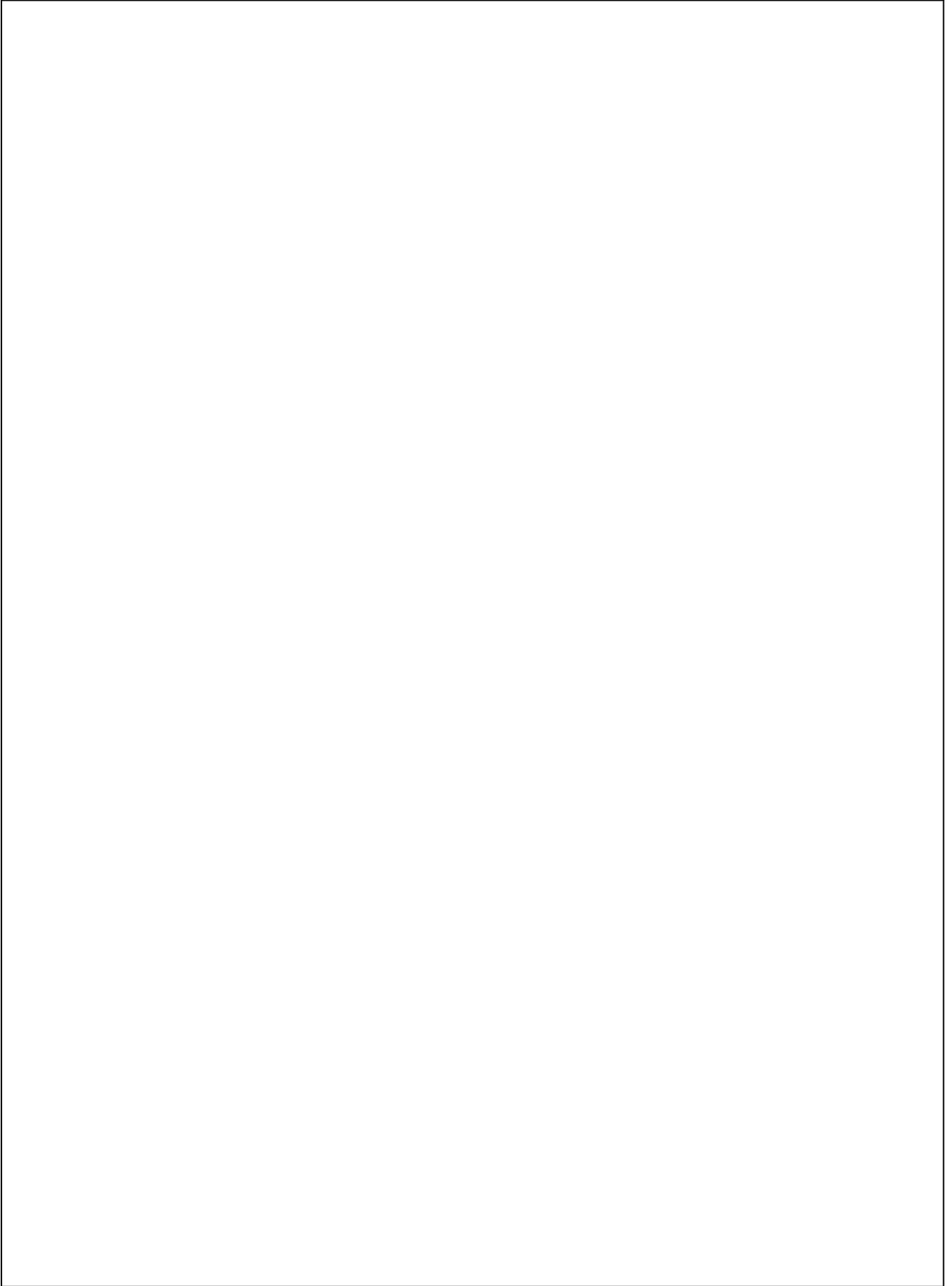
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	✓	Proposed housing and employment allocations
		Proposed Limits to Development Review

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

Use this box to set out your response.

[Please see accompanying covering letter from Knights Plc dated 12/03/24.](#)



Declaration

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

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

Signed: [Louise Thorne for Knights Plc](#)

Date: [12th March 2024](#)

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

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

Knights

Planning Policy & Land Charges Team
North West Leicestershire District Council
PO Box 11051
Coalville
Leicestershire
LE67 0FW

Dear Sir/Madam

North West Leicestershire Draft Local Plan 2020-2040: Public Consultation

Policy S2 – Settlement Hierarchy (Strategic Policy) & Proposed Housing and Employment Allocations

Former Site of Tea Kettle Hall, The Green, Diseworth, Derby, DE74 2QH

We write on behalf of our client, Mr Nick Heath (acting for the land owners, Mr David Bell and Mrs Linda Bell), in respect of land at the former site of Tea Kettle Hall, The Green, Diseworth, Derby, DE74 2QH. Knights Plc and the landowners have been actively promoting the site for residential development through the development plan process with both North-West Leicestershire District Council and Long Whatton and Diseworth Parish Council since 2018.

We are pleased to see that the site has been identified as the Parish Council's preferred housing site allocation within Diseworth within the Pre-Submission Draft Long Whatton and Diseworth Neighbourhood Plan which is currently under consultation.

The site is located within the 'sustainable village' of Diseworth where Draft **Strategic Policy S2 'Settlement Hierarchy'** is clear that *'some development in these settlements will be appropriate. Any further development in such settlements will be restricted to either infilling or previously developed land which is well related to the settlement concerned'*.

It is further noted in Paragraph 4.76 of the '**Proposed Housing and Employment Allocations for Consultation Document**' states *'The Parish Councils at Breedon on the Hill and Long Whatton and Diseworth are currently preparing Neighbourhood Plans in which they are proposing to allocate housing sites. On this basis, we do not plan to allocate sites in the Local Plan in these settlements. However, if these allocations are not forthcoming, we may potentially allocate sites in a future version of the Local*

BY EMAIL

Date

12 March 2024

Our Reference

LTHO1/NIC894/2

Your Reference

Please ask for

Louise Thorne

DDI

01332 497613

Email

louise.thorne

@knightsplc.com

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Knights

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Plan'.

We have made formal representations to Long Whatton and Diseworth Parish Council neighbourhood Plan consultation advising of our clients full support for the draft housing allocation for Tea Kettle Hall as set out in the Pre-Submission Neighbourhood Plan consultation. We have also confirmed that the site is immediately available and that the requirements as set out in the draft policy are achievable. We enclose a copy of our letter or representation and would ask that this be recorded by NWLDC as part of this Local Plan consultation.

If you have any questions or require any further information, please contact Louise Thorne – Planning Partner [REDACTED]

Yours sincerely

[REDACTED]

LOUISE THORNE

Cc. Long Whatton and Diseworth Parish Council

Knights

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Long Whatton and Diseworth Parish Council
Peggs Barn
Main Street
Hemington
Derby
DE74 2RB

Dear Sir/Madam

Long Whatton and Diseworth Neighbourhood Plan – Pre Submission Consultation

Proposed Policy LW&D23: Tea Kettle Hall, Diseworth

Former Site of Tea Kettle Hall, The Green, Diseworth, Derby, DE74 2QH

We write on behalf of our client, Mr Nick Heath (acting for the land owners, Mr David Bell and Mrs Linda Bell), in respect of land at the former site of Tea Kettle Hall, The Green, Diseworth, Derby, DE74 2QH. The site has been identified as the Parish Council's preferred housing site allocation within Diseworth within the Pre-Submission Draft Long Whatton and Diseworth Neighbourhood Plan.

We can confirm the allocation of this site for housing is fully supported by Mr Nick Heath, Mr David Bell and Mrs Linda Bell and that the site is immediately available for development. Knights Plc and the landowners have been actively promoting the site for residential development through the development plan process with both North-West Leicestershire District Council and Long Whatton and Diseworth Parish Council since 2018. We are therefore pleased to see the site identified as a preferred housing site allocation within the Pre-Submission Draft Neighbourhood Plan (Draft Policy LW&D23).

The site is a brownfield site and its development would represent a sustainable form of development on previously developed land. The site is capable of meeting all the criteria set out within Draft Policy LW&D23, specifically:

- The site could adequately deliver up to 13 dwellings, all either single storey or with a low profile, this would ensure that the impacts of the development on the surrounding countryside are minimised and that the development follows primarily the footprint of the former Tea

BY EMAIL

Date

12 March 2024

Our Reference

LTHO1/NIC894/2

Your Reference

Policy LW&D23: Tea Kettle
Hall, Diseworth

Please ask for

Louise Thorne

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louise.thorne
@knightsplc.com

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Kettle Hall and its' curtilage;

- Despite being a brownfield site, the site could provide affordable housing in line with greenfield requirements, allowing for up to 30% affordable housing with first priority being given to people who meet local connections criteria;
- Access to the site could be taken from Long Mere Lane with no vehicular access from The Green;
- The site could deliver a pedestrian crossing across The Green (B5401) to ensure pedestrian connectivity to the remainder of the village;
- Existing landscape planting and boundary treatments could be reinforced to further enhance on-site landscaping, screening and biodiversity, including the retention of the scrub woodland to the south of the site. This would ensure that the development is well screened and assimilated into the wider landscape;
- The existing cross site culvert (Diseworth Brook) could be replaced with a new overland watercourse to reduce flood risk in the Long Mere Lane area; and
- Proposals for the site would be informed by a suite of appropriate technical assessments taking into account matters such as ecology, flood risk and cultural heritage.

Overall, the development of the site would represent the re-use of previously developed land providing required housing for local residents/people with a local connection in preference to the development of a greenfield site. The site has a unique set of circumstances given its previous use and has the potential to provide a high quality, low impact development which would bring about a number of economic, environmental and social benefits as set out above.

The site is not covered by any statutory or non-statutory landscape, heritage or ecological designations, is not located within a Conservation Area and is located within Flood Zone 1 which represents a low risk from flooding. Opportunities exist to reduce flood risk in the local area through the development of the site.

The site has an extant planning permission for a hotel and restaurant, the building of which could legally re-commence. The extant hotel use would result in a significant built form on the site which would not be in keeping with the locality or the transitional nature of the locality. A hotel development would also bring about additional development such as signage and would open up the frontage if the site with The Green. It is our client's preference to develop the site for a low impact residential development which would be screened from The Green, would assimilate into the locality and bring about far greater environmental and infrastructure improvements than the extant hotel scheme.

Knights

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The landowners fully support the site allocation for housing in the Pre-Submission Draft Neighbourhood Plan (Draft Policy LW&D23) and will continue to offer this support through the subsequent submission, examination and referendum stages.

As you will be aware, consultation is also on-going on the draft version of the North West Leicestershire Local Plan (NWLLP). Diseworth is identified as a 'sustainable village' under NWLLP draft **Strategic Policy S2 'Settlement Hierarchy'**. That policy is clear that *'some development in these settlements (sustainable villages) will be appropriate. Any further development in such settlements will be restricted to either infilling or previously developed land which is well related to the settlement concerned'.*

It is further noted in Paragraph 4.76 of the NWLLP '**Proposed Housing and Employment Allocations for Consultation Document**' that *'the Parish Councils at Breedon on the Hill and Long Whatton and Diseworth are currently preparing Neighbourhood Plans in which they are proposing to allocate housing sites. On this basis, we do not plan to allocate sites in the Local Plan in these settlements. However, if these allocations are not forthcoming, we may potentially allocate sites in a future version of the Local Plan'*.

On the basis of the above, for clarity we have therefore written to North West Leicestershire District Council (NWLDC) in response to the draft NWLLP consultation, advising of the joint landowners full support for the proposed allocation of Tea Kettle Hall for residential development in the Neighbourhood Plan, copying this letter to them. We also enclose a copy of our letter to NWLDC for your records.

If you require any further information in respect of the site, please contact Louise Thorne, Planning Partner [REDACTED]

Yours sincerely

[REDACTED]
LOUISE THORNE

Cc. North West Leicestershire District Council Draft Local Plan – Planning Policy Team

Knights

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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Alicia	
Last Name	Smithies	
Job Title (where relevant)	N/A	
Organisation (where relevant)	N/A	
House/Property Number or Name	██████████	
Street	██████████	
Town/Village	██████████	
Postcode	██████████	
Telephone	██████████	
Email address	████████████████████	

PART B – Your Representation

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

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

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

Use this box to set out your response.

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

My objections are to both the proposed new housing development at Isley Woodhouse – Policy IW1 – located on adjacent fields to the west of Diseworth and to the proposed construction of a Freepoint – EMP90 – adjacent to Grimes Gate, on the fields at the top of Diseworth.

Objections to Isley Woodhouse (IW1) development:

The main concern relates to the impact of rain water run-off which can in turn lead to **flood damage**. We live next to Diseworth brook and already have great difficulty securing home insurance. All of the insurers that I have contacted ask if you live within 100 meters of a body of water and all ask whether there is potential of flood in your area. Whilst I speak for myself, I know that I am not alone in this concern and with the unprecedented amount of rainfall that we have been encountering in the past couple of years along with Global Warming this situation will not improve, but has the potential only to get worse. Diseworth brook is a small tributary that, when we moved into the village 26 years ago, was a mere trickle and seemingly posed no threat. Now it has, cumulating over the last few years, had to cope with an unacceptable volume of water. It has burst its bank on numerous occasions over the past ten years and within the last year at least twice. The building of thousands of houses in the near vicinity is not going to improve matters and will only have an adverse affect. The brook is not designed or capable of carrying large bodies of water and the run-off from the fields, that are potentially going to be built on, that once could absorb the water and which flow downhill towards Diseworth, will have a devastating effect.

It is not only unacceptable to knowingly create a flood situation – it is irresponsible.

Another concern is the volume of **traffic** that a large housing development will create which in turn will add to **pollution** in the area – particularly micro particles which adversely affect health.

The current road networks namely the A453 cannot cope with the volume of traffic during peak times and this is a single carriageway. There are no proposals for new road networks on the plan and should there be a need to increase the network this will, again, cause additional run-off and add to flood potential, negatively impact the environment along with creating more disruption and pollution whilst the roads are being constructed.

When looking at the proposed plans, I noted that it stated that once the 4,500 houses had been built the Biodiversity in the area would be improved. When asked the question of exactly how that would be achieved the representative could give no useful answer and seemed at a loss. You cannot possibly build on over 700 acres of field and increase the biodiversity. What would in fact be caused is a loss of wildlife, plant life, hedgerows and trees. The houses and traffic would also cause potential hazards for any wildlife that managed to remain.

Light pollution, noise, litter, antisocial behaviour and crime levels will inevitably increase with the construction of 4,500 houses.

I have concerns too at the level of services that would be made available to meet the needs of all the residents in these new builds. Currently the doctors and midwife services are under strain. I see no proposals to increase these services.

Objections to the Freeport – Policy EMP90

I reiterate all my concerns as documented above – namely **flood potential, noise, pollution, light pollution** and **bio diversity**.

Diseworth is in a conservation area and our house is in the centre of that and as such we cannot even pollard a tree without asking for permission. If a tree dies, we have to replace it. We also have to have planning permission to alter any part of our property and it has to look in keeping with the village. This is one of the things that I like about Diseworth and the Council. Although it is hard work at times, I understand that it is about maintaining standards, keeping natural beauty and preserving eco systems. How then, is it ok to build a load of large, unsightly warehouses at the top of the road? Not only will this not be in keeping with the look and feel of a village, but it will cause huge problems with run-off – especially as the fields point downhill towards Diseworth, meaning that the excess water will fill our streets and ultimately, if the volume becomes too great, our houses!

Lorries will be coming back and forth at all times of day and night, creating excess noise, light pollution and air pollution.

Again, fields containing wildlife and plant life will be dug over to make way for unsightly warehouses where no animal or plant can survive.

Declaration

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

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

Signed: Alicia Smithies

Date: Tuesday 12th March 2024

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Please complete both Part A and Part B.

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	Personal Details	Agent's Details (if applicable)
Title	MR	
First Name	PAUL	
Last Name	JEPSON	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
Street	██████████	
Town/Village	██████████	
Postcode	██████████	
Telephone	██████████	
Email address	████████████████████	

PART B – Your Representation

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

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

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

Use this box to set out your response.

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

1. THE PROPOSED HOUSING AND EMPLOYMENT ALLOCATIONS :ISLEY WOODHOUSE (POLICY 111)

I would like to raise issues objecting to this proposed development and have summarised the following points:

My main concern is the increase in flooding risk for Diseworth. We already experience problems from the airports balancing ponds which discharge into the brook which is in the area of the proposed development. Any increase to the run off water could be disastrous for Diseworth and other villages further downstream.

Close proximity to the airport, racetrack and other industrial units is not a good location for residential development.

Road networks in the area are already under pressure. What has been considered to address the extra traffic this would bring.

This will be a large residential development with few facilities. Residents would have to travel for most requirements increasing pollution.

This is good, productive ancient agricultural land which should not be developed when there are brown field sites elsewhere.

Diseworth village is a conservation area and a development this close cannot fail to have a detrimental effect on it

I do not support the new town development of Isley Woodhouse , policy IW1

2. THE POTENTIAL LOCATION OF THE FREEPORT DEVELOPMENT (EMP90)

I would like object to above development and summarise the issues of concern, many of which replicate the previous points of policy IW1:

The position the development, upper end of the village, on a slope, its height and size will increase the level of run off in wet weather, already being experienced by the village and the act of building structures will directly impact the drainage aspects. Flooding should be a major concern. It is disastrous for the villagers, expensive, distressing, and an extra *known* problem for residents in terms of very wet weather, which climate watchers tell u is only going to increase in the future but also expensive to 'fix' for councils and the inclusion of such factors in future governments plans is already a priority . Where is the evidence that demonstrates that to create such a huge development when concrete and other building materials do not allow drainage has been well researched and is suitable for the area proposed?.

It directly contradicts the governments manifesto of protecting agricultural land and rural communities.

The conservation status of Diseworth will be significantly affected, along with its historical uses as farming community and its rural heritage, a point already used and recognised in the plan itself! So, has this area been considered without researching other sites, as a matter of commercial and logistic convenience ?

Living in such a zone is likely to impact on the health of the local community. Such aspects have been well documented by health professionals. The impact of noise, light and air pollution will be great and will impact the health of the local population, in direct contradiction to the government's views on health and well being of the nation. Nor could it be considered that these issues can be limited due to any interventions such as buffering.

The village already experiences considerable disturbance and environmental pollution of noise, light and air due to the existing functions of EMA, DHL, and other 24 hr businesses and services.

The government insists that it is committed to a plan to reduce carbon foot print and has challenged county and local councils accordingly. This development would not support that aim by its location on a green site, rather than brown.

What evidence is there that other locations, other options, including brown sites and areas other than agricultural, rural spaces have been fully researched and evaluated .

Roads are already under pressure, particularly in terms or maintenance and when diversions are necessary, the current systems cannot cope with the outcomes.

There is an abundance of wildlife in the proposed development area which would be destroyed.

Achievement of biodiversity is automatically lost with this development due to the destruction of the land

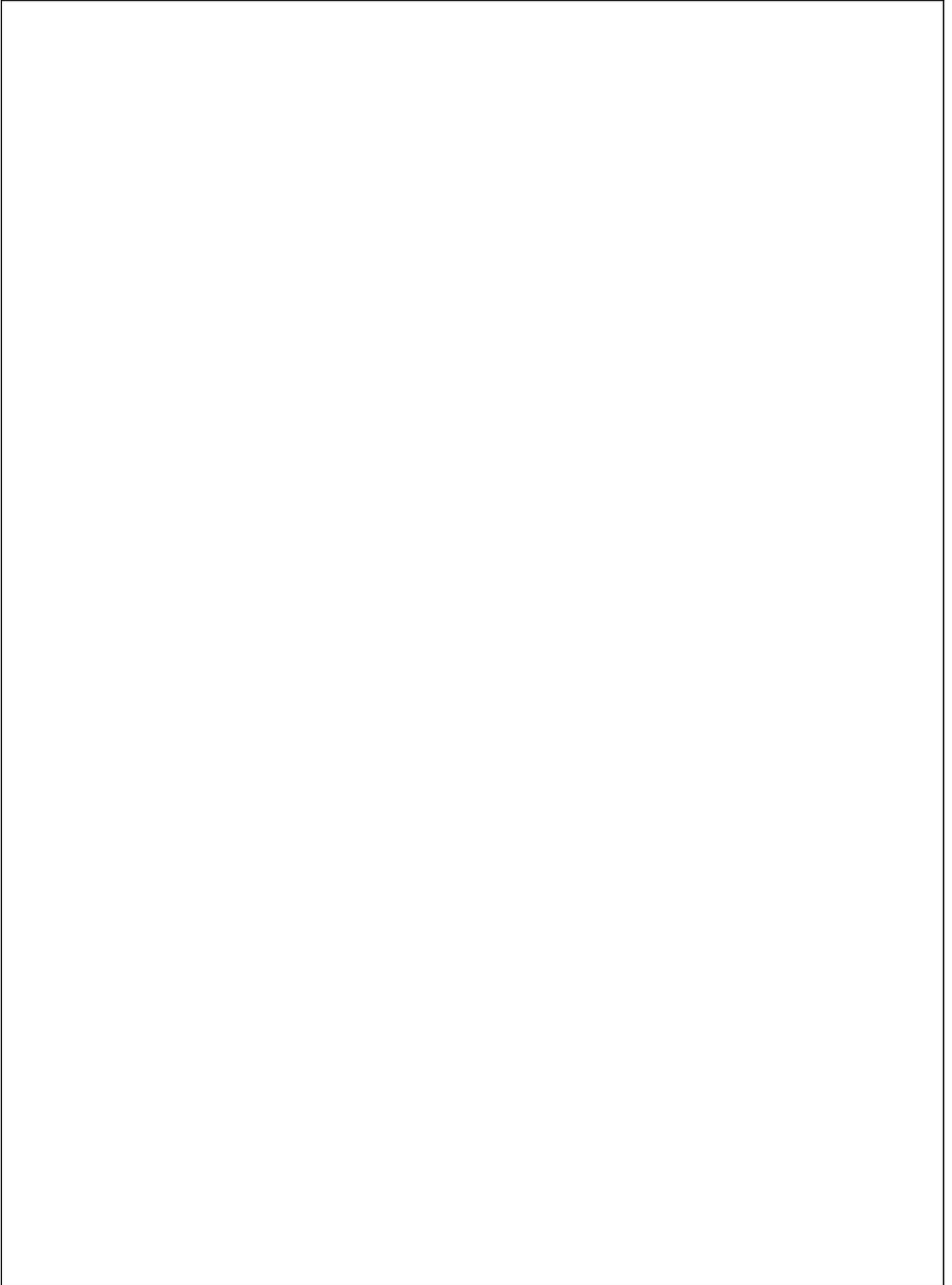
and habitations and environment. I

The level of employment suggested is unlikely, as evidenced by previous developments, some current buildings already remain empty and unused , and therefore no operators are employed.

The 'green' area of the village will be lost and therefore the village no longer a green environment, issues that many agencies are striving to avoid in our countryside.

I consider it morally wrong to wilfully destroy agricultural, rural green land in the pursuit of commercial greed, convenience and enterprise, none of which has been satisfactorily demonstrably evidenced as well founded, well researched and with any outcomes evaluated and proven favourable to the village, to the communities, to the county and nationally. Or indeed researched and proven otherwise.

Therefore I ask that NWLDC do not include the EMP90 site as a potential area for development.



Declaration

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

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

Signed: Paul Jepson

Date: 12/03/2024

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Please complete both Part A and Part B.

PART A – Personal Details

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	Personal Details	Agent's Details (if applicable)
Title	MRS	
First Name	SUSAN	
Last Name	SMITH	
Job Title (where relevant)	RETIRED TEACHER	
Organisation (where relevant)	—	
House/Property Number or Name		
Street		
Town/Village		
Postcode		
Telephone		
Email address		

PART B – Your Representation

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

1. To which consultation document does this representation relate?	Proposed policies
	<input checked="" type="checkbox"/> Proposed housing and employment allocations
	Proposed Limits to Development Review

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

Use this box to set out your response.

POLICY 101

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

- Increased traffic on the A453 and surrounding roads which are already too busy (M1 M42)
- Loss of agricultural land when we should be growing more food in UK
- risk of flooding to Doseworth which already has a problem, with more concrete covering fields
- the development either side of Doseworth is going to be in the village and spoil the open area round the ~~area~~ village

- there will be more noise from traffic which when combined with SEGRV and airport traffic, plus the race track will be a noise nuisance
- many people in Diseworth enjoy walking in the surrounding area
The 2 developments will limit the possibility of walking and cycling near to Diseworth and could affect our mental health and well-being
- the destruction of so much hedgerow and trees will spoil the biodiversity in the area.
- Disewill is likely to become worse of a rat run with increased traffic
- litter is already a problem and could become worse with more traffic as most of the litter is thrown from cars.

For the above reasons I strongly object to the development of Isoley Woodhaxe Development proposals. (Proposal 14)

The potential location for the
FREEPORT DEVELOPMENT (EMP90)

- I am writing to object to the above development for the following reasons:
- The plan to the development has not been thought through as it is in the wrong place and there are alternatives
- Government should be putting such developments on brown field sites and not on agricultural land.
- The current road systems cannot cope with the amount of traffic (the M1 is frequently blocked) - added traffic would worsen this
- The land slopes down to the village, which already has a flooding problem, and more ~~can~~ ^{concrete} will exacerbate the problem
- The 'green lungs of Dissington' will be lost - having an adverse effect on residents
- The village is already a 'rat run' for airport workers and this will be made worse by workers at the freeport site

[REDACTED] 12.3.24

Declaration

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

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

Signed:



Date:

12.3.24

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



Planning Policy and Land Charges Team,
North West Leicestershire District Council
PO Box 11051
Coalville
LE67 0FW

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

Catherine Townend
Spatial Planner

[Redacted]
[Redacted]
[Redacted]
[Redacted]

[Redacted]

13 March 2024

Dear Sir or Madam,

Regulation 18 Consultation on the Draft North West Leicestershire Local Plan

Thank you for providing National Highways with the opportunity to comment on the draft Local Plan for North West Leicestershire. We understand this to be the Regulation 18 consultation which represents your preferred options for development.

National Highways (formally Highways England) has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.

With regards to the district of North West Leicestershire and this consultation, our principal interest is in safeguarding the M1 and M42 motorways, and the A42, A50, and A453 trunk roads which all route through the district.

Policy Context

Our handling of development plan consultations is informed by DfT Circular 01/2022: The Strategic Road Network and the Delivery of Sustainable Development ('the Circular'). This sets out how interactions with the Strategic Road Network should be considered in the making of plans and development management considerations. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.

Consultation Documents

We note that the draft Local Plan sets out the planning policies on where and how development will take place in North West Leicestershire during the plan period to 31 March 2040. The intention is for the new draft Local Plan to replace the current Local Plan (adopted March 2021).

This consultation relates to three consultation documents:

- Proposed Policies for Consultation
- Proposed Housing and Employment Allocations for Consultation
- Proposed Limits to Development for Consultation

General Approach

National Highways was previously consulted on the Local Plan strategy and provided comments in February 2022. The Strategy section of the consultation document sets out the overall strategy for the Local Plan, made-up of a series of different policies which will contribute to achieving the Local Plan objectives.

Housing and Employment Need

The standard method for calculating housing need has resulted in a minimum annual housing requirement of 372 dwellings each year for North West Leicestershire. However, by helping to accommodate some of Leicester City Council's unmet need, this figure has risen to 686 dwellings per year, equating to 13,720 dwellings over the Plan period.

For employment, based on a study commissioned in 2020, the Council has identified a need for some 255,090 sqm (2017-40) of new employment floorspace. However, taking account of a range of factors such as the amount of development which has already been built and permitted, the net requirements from 2023 to 2040 are for up to 10,506sqm (1.75 ha) of new office floorspace and at least 114,562sqm (28.64 ha) of industrial and smaller-scale warehousing.

In addition to general employment land, the Council also need to make provision for strategic distribution and has identified a need for an additional 768,000 sqm (307 hectares) at rail served sites and 392,000 sqm (112 hectares) at non-rail served sites across Leicester and Leicestershire for the period 2020-41. The Council has proposed that 50% of the outstanding Leicester and Leicestershire requirement for road-served strategic distribution floorspace be met in the district. This has amounted to approximately 106,000 sqm once permissions granted subsequently, are accounted for.

Spatial Strategy

A Settlement Study undertaken by the Council in 2021 set out a settlement hierarchy to distinguish between the roles and functions of different settlements and to guide the location of future development.

Six settlements were identified as offering the most comprehensive range of services and facilities and they also, to a varying extent, serve other settlements. These settlements form the central part of the Council's settlement hierarchy and will accommodate the vast majority of new development:

- Ashby de la Zouch;
- Castle Donington;
- Coalville Urban Area;
- Ibstock;
- Kegworth; and
- Measham

An exception to the above is the new settlement being proposed to the south of East Midlands Airport known as Isley Woodhouse. This is a long-term development that will go beyond the end of the Plan period eventually delivering over 4,000 dwellings.

National Highways Comments

Upon review of the consultation documents, we can set out our comments as follows:

Site Allocations

Housing Allocations

We have reviewed the proposed housing and employment allocations document and note that none of the proposed housing sites share a common boundary with the SRN, and as such, there will be no physical interface between those allocations and our network. In light of this, we have no objections in principle to any of the proposed housing allocations.

Notwithstanding this, given the size and proximity to our network of the Isley Woodhouse allocations, this development (in particular) is likely to have a material traffic impact on the SRN. A Transport Assessment submitted in support of any planning application pertaining to this site should demonstrate the extent of traffic impacts. Junctions of interest to National Highways with respect of this site will include M1

Junction 23a/ A453 Finger Farm roundabout, M1 junction 24, A50 junction 1, and A42 junction 14.

I can advise that pre-applications discussions between National Highways, the Applicant, and Leicestershire County Council (as the local highway authority) have been ongoing for some time which has resulted in considerable progress towards agreeing the methodology for assessing the traffic impacts.

Whilst this work is ongoing, it is likely that the traffic impacts from this development will result in the need for infrastructure improvements to the SRN at some or all of the above-mentioned junctions. We would therefore draw your attention to later comments in this consultation response with reference to infrastructure requirements.

With respect of the policy wording for Isley Woodhouse (Policy IW1), we welcome that the requirement for a comprehensive masterplan and phasing plans to identify all necessary on-site and off-site highway improvements has been referenced. Further to this, National Highways would suggest that an Outline or Hybrid application will be necessary for the whole site rather than incremental full applications coming forward, to ensure that highways infrastructure is delivered and coordinated in a timely way. We would welcome this inclusion in policy.

In addition to the above, please see our further comments later in relation to assessing the cumulative impacts of Local Plan growth through a Strategic Transport Assessment.

Employment Allocations

In relation to the proposed employment allocations, our site-specific comments are as follows:

Land at Burton Road, Oakthorpe (EMP60)

The site appears to share a common boundary with the A42 trunk road. Nonetheless it is understood that access to the site is likely to be taken from Burton Road which is part of the local highway network managed by Leicestershire County Council. As such, we have no objections to this allocation in principle, subject to a Transport Assessment setting out the traffic and transport impacts, and an assessment of other potential boundary related impacts. The above submissions should accompany any planning application for this site. With regards to drainage, it should be noted that the discharge of surface water into National Highways drainage systems is not permitted.

Land North of Derby Road (A6), Kegworth (EMP73 (part))

The 14.8ha site appears to straddle the A453 Remembrance Way to the northeast of M1 junction 24. Both the A453 and M1 are the responsibility of National Highways.

It is noted that the site is proposed to be accessed via the A6 Derby Road, via a link under the A453. Consideration will need to be given the feasibility of the link under the A453 and how this might impact the SRN.

Notwithstanding the above comment, consideration should be given to how the allocation of this land would affect the ability to deliver future highways improvements to M1 junction 24 and the A453.

Whilst this land is not currently safeguarded by National Highways for a future scheme, given the significant amount of growth proposed to be allocated within the vicinity of M1 junction 24 (by this Local Plan and the adjacent Greater Nottingham Core Strategy) it is likely that a substantial scheme requiring land outside the existing highway boundary will be required to accommodate this growth.

The Strategic Transport Assessment should ultimately determine the traffic impacts of Local Plan growth which should inform the Infrastructure Delivery Plan (IDP). However, we would suggest that the Council needs to make early consideration of the transport infrastructure that may be necessary to accommodate the proposed growth and how it will be delivered.

Potential Location: EMP90 - Land south of East Midlands Airport

Land south of East Midlands Airport (81ha) is one of two locations identified in the Local Plan for a potential strategic distribution site. This site is included as one of three East Midlands Freeport sites which was designated with this status by the Government in March 2021.

It is recognised in the consultation document that in designating the Freeport, the Government did not undertake an assessment of the planning merits of the site. The acceptability of the proposal in planning terms is a matter for this new Local Plan, which will include (but not be limited to) its likely impact on the road network, including both J23a and J24 of the M1. We welcome this statement and consider that the impacts of this site should also be considered in the context of the nearby Isley Woodhouse housing allocation.

Subject to a Transport Assessment identifying the likely traffic impacts and any necessary mitigation however, National Highways does not have any objections in principle to this allocation which would be accessed from the local road network.

Potential Location: EMP8 - Land to the north of J11 A/M42

Land east of the A444 and west of A42 Stretton Le Field has been identified by the Council as having potential for 28 hectares of strategic distribution.

The site is immediately adjacent to the A/M42 to the north-west quadrant of the circulatory. We note the policy wording that if the site is allocated “the provision of a safe and appropriate vehicular access to the road network to the satisfaction of Highways England and Leicestershire Highways Authority” would need to be addressed. It should be noted that an access directly from the SRN would not be permitted however, we consider that the site could be accessed from the Local Road Network, and therefore we do not have any objections in principle to this allocation with regards to access.

Alongside access though, potential impacts on the operation of the network would also need to be considered as part of a robust transport evidence base and this could be stated more clearly in this section.

Finally, we would refer the Council back to our previous comments in relation to highways infrastructure. Whilst National Highways does not have the powers to safeguard this land for infrastructure delivery without a committed scheme in place, the Council should consider the longer-term consequences of Local Plan growth and whether allocations so close to an SRN junction may preclude the future safeguarding of land for highway improvements.

Transport Evidence Base

The NPPF expects local plans and spatial development strategies to be underpinned by a clear and transparent evidence base which informs the authority’s preferred approach to land use and strategic transport options, and the formulation of policies and allocations that will be subject to public consultation.

National Highways expects this process to explore all options to reduce a reliance on the SRN for local journeys including a reduction in the need to travel and integrating land use considerations with the need to maximise opportunities for walking, wheeling, cycling, public transport and shared travel.

The Transport Decarbonisation Plan indicates that carbon emissions from car and van use is the largest component of the United Kingdom’s total transport emissions. While action is being taken to decarbonise transport such that all new cars and vans will be fully zero emission at the tailpipe from 2035, the proposed location of growth in current plan periods and whether new developments would be genuinely sustainable remain

important factors in demonstrating that a local authority area is on a pathway to net zero by 2050 and therefore compliant with the requirements of the Climate Change Act 2008.

Alongside this, the Council should identify the key issues within their study area regarding transport provision and accessibility, setting out how the plan or strategy can address these key issues in consultation with National Highways.

It is the responsibility of the Council undertaking its strategic policy-making function to present a robust transport evidence base in support of its plan or strategy. National Highways can review measures that would help to avoid or significantly reduce the need for additional infrastructure on the SRN where development can be delivered through identified improvements to the local transport network, to include infrastructure that promotes walking, wheeling, cycling, public transport and shared travel. A robust evidence base will be required, including demand forecasting models, which inform analysis of alternatives by accounting for the effects of possible mitigation scenarios that shift demand into less carbon-intensive forms of travel.

It is evident that significant growth is proposed to come forward across the North West Leicestershire district throughout the Plan period and given their proximity to SRN junctions, National Highways will be interested in understanding the traffic impacts of allocations proposed at all the listed settlements, and Isley Woodhouse, as well as the cumulative impacts from Local Plan growth in terms of capacity and safety.

In view of this, National Highways would expect to be consulted on a Strategic Transport Assessment which identifies the traffic and transport implications of Local Plan growth and what infrastructure may be required to help deliver that growth.

As a minimum, we would expect that the Transport Assessment is shared with us for our review and comments. However, we would prefer to engage with you earlier in the process to help scope the necessary requirements for establishing a robust transport evidence base. We believe that this collaborative approach will help to ensure that the likely residual transport infrastructure needs, timescales and potential funding requirements are understood.

Infrastructure Delivery

As per Dft Policy 01/2022 paragraph 34, the transport evidence should provide a means of demonstrating to the examining inspector that planned growth is deliverable, and that the funding, partners and relevant processes are in place to enable the delivery of *infrastructure*; or that there is a realistic prospect that longer term investment can be secured within the timescales envisaged.

The Infrastructure Delivery Plan (IDP) Part 1 was completed in 2022 setting out the existing provision and capacity constraints on the SRN in the North West Leicestershire area. We note that a second part of the study will be undertaken which will assess the implications of each specific housing and employment allocation as part of this Local

Plan and identify what and how much infrastructure will be required. We would welcome further engagement with the Council in the development of this Plan to ensure that the SRN infrastructure is appropriately considered and safeguarded.

Please also see our later comment with respect to Policy IF5: Transport Infrastructure and New Development.

Additional comments on Policies

In addition to the above, National Highways makes specific comments on the below policies set out in the draft Local Plan:

Draft Policy AP3 – Renewable Energy (Strategic Policy)

Policy AP3 of the Local Plan sets out the Council's policy on proposed development for the production of renewable energy. National Highways is supportive of such proposals in principle, however we would like to draw your attention to DfT policy with respect of proposals close the SRN.

As set out in DfT Circular 01/2022 paragraph 65-67, wind turbines should not be located where motorists need to pay particular attention to the driving task, such as the immediate vicinity of connections, sharp bends, and crossings for pedestrians, cyclists and horse-riders. To mitigate the risks to the safety of road users arising from structural or mechanical failure, wind turbines should be sited a minimum of height + 50 metres or height x 1.5 (whichever is the lesser) from the highway boundary of the SRN.

In addition, as per DfT Circular 01/2022 paragraph 70, some developments, notably solar farms, wind turbines and those with expansive glass facades, have the potential to create glint and glare which can be a distraction for drivers. Where these developments would be visible from the SRN, National Highways should be consulted on an appropriate assessment of the intensity of solar reflection likely to be produced. This should satisfy National Highways that safety on the SRN is not compromised.

Draft Policy Ec8 – East Midlands Airport

Any expansions at East Midlands airport are likely to increase vehicle trips on the surrounding road network, including the Strategic Road Network managed by National Highways.

It should therefore be included in policy that new development that gives rise to a material increase in airport capacity or capability will be required to... *'be supported by a Transport Assessment or Transport Statement which identifies the anticipated traffic and transport impacts'*.

Draft Policy Ec11– Donington Park Circuit

Our previous comments in relation to East Midlands airport are also applicable to this policy.

Draft Policy IF1 – Development and Infrastructure (Strategic Policy)

Please see below comments for IF5.

As per the below, the policy should include reference to other mechanisms (not just financial contributions) for securing infrastructure improvements.

Draft Policy IF5: Transport Infrastructure and New Development

We welcome the focus on promoting sustainable travel across the district and for new developments to be accessed by well-designed pedestrian and cycle links and a bus link, where necessary. This includes the preparation of the Local and Walking Cycling Infrastructure Plan (LCWIP) for the district which will help to provide appropriate infrastructure for supporting mode shift.

In reference to the establishment of the transport evidence base, we would welcome a small amendment to the wording to include the following reference to the strategic road network.

*'New development that is likely to generate significant amounts of movement on the local highway network **and strategic road network** will require a Transport Assessment or Transport Statement to assess and mitigate any negative transport impacts'*.

In addition, National Highways notes that the policy focuses on securing transport infrastructure through financial contributions. However, we would recommend the text be amended so the delivery mechanisms under the Highways Act 1980 through Section 278 Agreements are also included for the delivery of highway mitigation.

Section 106 contributions can be an effective way of securing developer investment towards necessary highways mitigation. However, securing the 'forward funding' of highways schemes in the timescales necessary to deliver growth cannot be guaranteed, and any shortfalls in funding could jeopardise the delivery of a scheme. As such, there is a risk to highway authorities in accepting a S106 contribution which may allow the development to proceed without necessarily having the required mitigation in place.

A Section 278 agreement is an alternative method of securing highway improvements which puts the developer (or consortium of developers) in control of the highway scheme delivery, and subsequently more in control of when their development can come forward. For schemes on the SRN, National Highways would oversee the delivery of the highways scheme via the Section 278 process, but it would be fully designed, funded, and delivered by the developer.

References to Highways England

Finally, as a minor point, references throughout the document to "Highways England" should be replaced with "National Highways".

Duty to Cooperate and Cross Boundary Matters

As a statutory consultee, National Highways welcomes the opportunity to further engage with North West Leicestershire District Council to address transport infrastructure matters that have cross border implications with neighbouring authorities and key statutory agencies and ensure, where possible, that policy approaches are consistent.

For any developments which have an impact on neighbouring Local Authorities, National Highways advises a joined-up approach in which National Highways, North West Leicestershire District Council and other local authorities attend joint meetings with the future developer or applicants. This will ensure that the interests of all parties are protected, and a combined solution is derived.

We understand that a Duty to Cooperate statement will be published to inform the next version of the Local Plan and National Highways would welcome inclusion within the statement as a statutory consultee.

We have no further comments to make at this time but look forward to engaging with you further as you progress your Local Plan.

Yours sincerely,

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

Catherine Townend
Midlands Operations Directorate
Email: 



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Gary	
Last Name	Woods	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
Street	██████████	
Town/Village	██████	
Postcode	██████	
Telephone		
Email address	████████████████████	

PART B – Your Representation

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

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

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

Use this box to set out your response.

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

The proposed new housing settlement at Isley Woodhouse (Policy IW1)

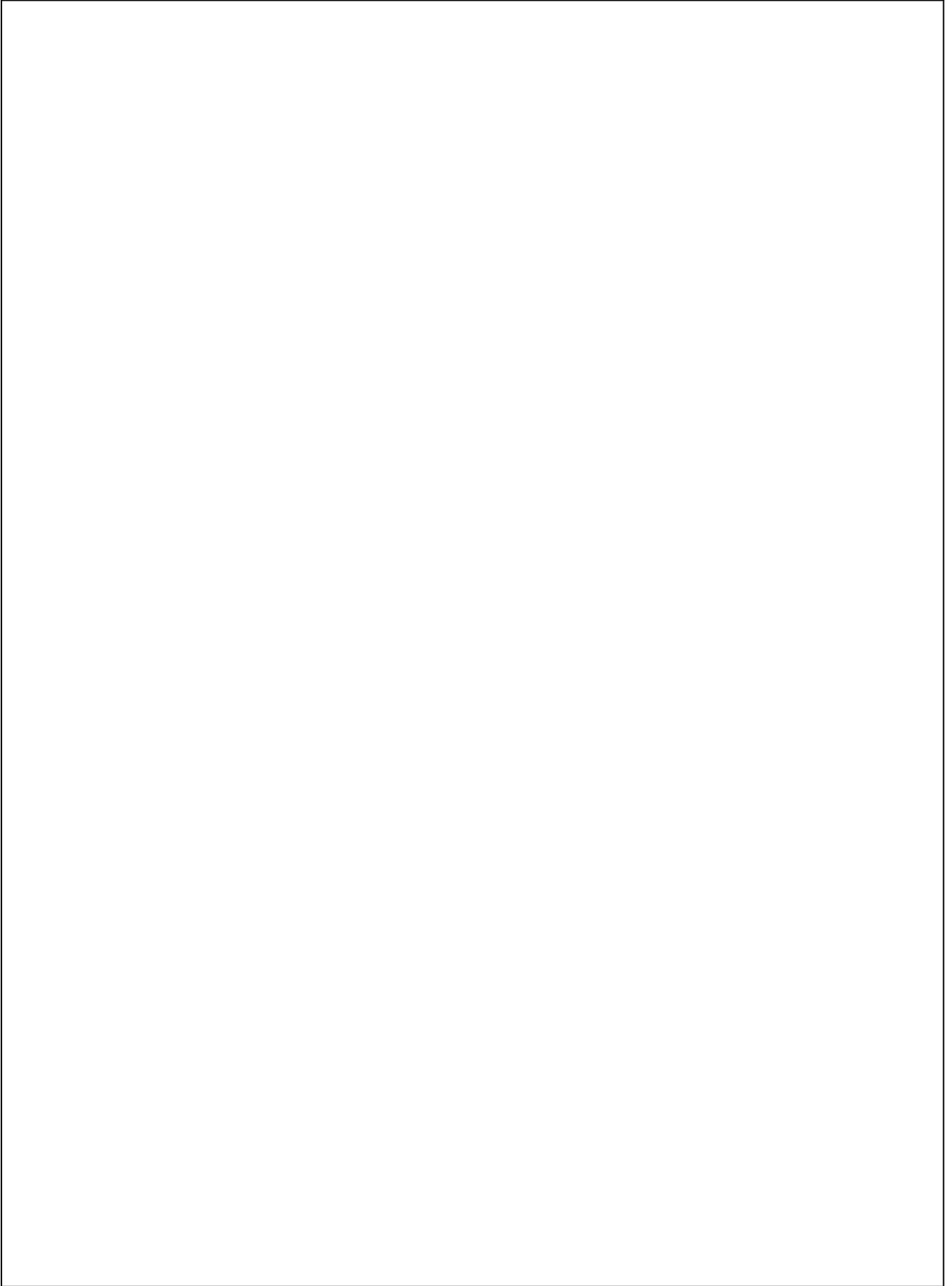
- It is in the wrong place as it will destroy the rural nature of Diseworth and the remaining countryside for a huge area
- It will add massively to the already problematic flooding issues for Diseworth and Long Whatton.
- It will destroy 750 acres of agricultural land and miles of ancient hedges for nesting birds
- Increases in litter, noise and light pollution as a result of over development.
- It is frankly immoral to existing residents and lazy planning by an uncaring Council
- How will the conservation village status of Diseworth be maintained?
- Therefore I do not support the new town development of Isley Woodhouse (Policy IW1)

The potential Location for Freeport development (EMP90)

- What will happen to the conservation village status, no longer a rural village but part of a logistics park. – this is obscene
- The site is on a slope so will contribute to further flooding issues – it is clearly the wrong location
- Increased vehicle traffic will lead to more road safety issues on an already busy road. Also there will be increased noise disruption. Can you imagine living nearly with 24 x 7 vehicle reversing beep beep! I won't

be able to open my window in the summer, nor sit in the garden!

- Current road system infrastructure can't cope with the existing traffic, and also when vehicles use a the village as a rat run. Litter is also a concern.
- We will no longer be a village and the reasons for living here and the green lungs of the village will be destroyed due to noise and light/air pollution
- There was NO consultation with residents before any freeport status or planning proposals submitted
- We absolutely do not accept that the development can be mitigated by buffering, screening or any other term used to suggest the developments impact can be minimised. It will not shield or stop any of the pollutions, e.g. air, noise, light from traffic, road changes, 24/7 noise and light. It is not conducive to well-being or health.
- My mental health is already suffering as a result of this potential development and it will only get worse.
- The Local Plan states "We do consider that the potential impacts on Diseworth, particularly in terms of heritage, landscape and amenity, are likely to be unacceptable based on the current extent of the designated Freeport land" so why are you including the very land that you KNOW is unacceptable? Therefore, do not include this land! It is quite simply a disgusting, ill-conceived and immoral proposal by all parties involved – as a council you should be rejecting the proposal!!
- Therefore I am asking NWLDC not to include the EMP90 site for potential development



Declaration

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

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

Signed:

Date:

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Response to Draft Local Plan
Date: 13 March 2024 13:41:17
Attachments: [response to local plan Allman.pdf](#)

Please find response to local plan. Please note that I object strongly to the developments around Diseworth and believe they constitute a very serious flood risk to the village.

Regards

Andrew Allman

[REDACTED]
[REDACTED]
[REDACTED]



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

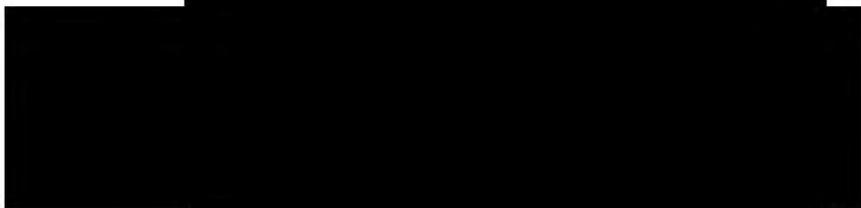
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Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Andrew	
Last Name	Allman	
Job Title (where relevant)	Resident	
Organisation (where relevant)		
House/Property Number or Name	[REDACTED]	
Street		
Town/Village		
Postcode		
Telephone		
Email address		



PART B – Your Representation

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

1. To which consultation document does this representation relate?	<input type="checkbox"/>	Proposed policies
	<input checked="" type="checkbox"/>	Proposed housing and employment allocations
	<input type="checkbox"/>	Proposed Limits to Development Review

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

Use this box to set out your response.

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

Use this box to set out your response.

I have lived in Diseworth for over 20 years. Before commenting on both developments, I would like to make the following points on Diseworth as a community:

- Diseworth is already a **greatly stressed** village because of changing climate, the airport and motorways before any of the material proposed development changes:
 - We have not experienced flooding in the village for the first 17 years of my time in Diseworth. In the last 3 years, incidences of flooding have increased dramatically as your records must show. We suffer from flooding from run off from the airport and local fields. My next-door neighbour has been flooded twice in the last 12 months because of run off from local fields. Incidences of heavy rainfall are increasing in line with climate change. The village lives in real fear of flooding during heavy rain before the 2 developments that have been approved. This is not a NIMBY speaking, but someone who has had to help a neighbour clear out their flooded house for the 2nd time in 12 months. Local fields are currently soaked and holding back water from the village.
 - We are close to the castle Donnington racetrack airport, M1 and M42. When there are major events or problems on the motor ways, we get the knock on from the increase in traffic this causes. There are many times sin the year when we are unable to access the A453 due to traffic build up.
 - The motorway and airport both mean that we suffer from increasing amounts of air and noise pollution. Diseworth is in a dip and air pollution tends to gather in our village from both.
 - There has been increasing amounts of new housing in the village with no changes to local transport, schooling, or shops.
 - Changes to local transport mean that buses to Leicester and Derby have been stopped.
 - Diseworth school is on a blind bend and has issues with traffic and parking.



Picture showing amount of water currently being held by one of fields where SEGRO development is proposed. All fields are currently full and will all need somewhere to go if development proposed.



Picture showing extensive floods on 2nd January on Ladygate caused by run off from fields where Segro development is proposed

Picture showing extensive floods on 2nd January on The Bowley caused by run off from fields where Isley Walton town is proposed



Proposed new housing settlement at Isley Woodhouse (policy IW1)

I have the following point I would like to make regarding this development building on the comments above:

- The new housing settlement sits on the drainage plain for the area that feeds the Diseworth brook. The drainage flows to the brook and then on to Long Whatton and the Soar. Any increase in concrete in this area will increase the speed at which water reaches the brook and naturally lead to an increasing chance of more flooding in Diseworth and Long Whatton. Climate change over the next 30 years will exponentially increase this risk. I cannot see how a material increase in floods risk can be avoided. Our village is already gravely threatened by floods and the last thing we need is for local authorities to increase this risk.
- We have recently been sent a leaflet from NW Leicestershire stating that we need to work in partnership to maintain the local environment. I believe this development will destroy at least 750 acres of agricultural land and accompanying hedges. I do not support the destruction of this large area of countryside.
- The size of the suggest new town will put massive stress on local traffic unless there is significant and environment degrading investment in new roads. I believe most of the inhabitants of this new town will require access to the M1 and M42 at peak hours placing great stress on the roads around Diseworth.
- The size of the development will add significantly to the noise, air and light pollution already suffered by Diseworth.
- Our GP provision is very poor in the area and the new town risks this becoming worse.
- This development threatens the status of Diseworth as a rural conservation village.
- I cannot understand the need for putting all NW Leicestershire housing development needs into one basket. There must be an alternative of spreading the new housing equally around the area.

I believe the establishment of a new town at Isley Woodhouse will destroy significant amounts of green fields and will increase traffic, light, and air pollution for the local area materially. Most importantly, I think that increasing traffic and flood run off post a terminal and unnecessary threat to the already stressed villages of Diseworth and Long Whatton. If this goes ahead, I hope the council will take responsibility for flood victims that occur as a result. *I very strongly object to this proposal.*

Potential Location for the Freeport Development (EMP90)

- The Freeport Development sits on the drainage plain for the area that feeds the Diseworth brook. Currently these fields provide a soak area for rainwater before it flows to the brook and then on to Long Whatton and the Soar. All slopes for this development lead to our village. Any increase in concrete in this area will **dramatically** increase the speed at which water reaches the brook and naturally lead to more flooding in Diseworth and Long Whatton. Climate change over the next 30 years will exponentially increase this risk. We suffer currently from run off from the airport, I cannot see how if another massive area of concrete next to the village, a material increase in floods risk can be avoided. Our village is already gravely threatened by floods and the

last thing we need is for local authorities to increase this risk. I believe approval of this scheme will directly lead to increased flooding in our village and cannot be mitigated by design.

- We regularly take our dog a walk up to the area where the freeport is proposed. We have recently been sent a leaflet from NW Leicestershire stating that we need to work in partnership to maintain the local environment. I believe this development will destroy many acres of agricultural land and accompanying hedges. I agree with NW Leicestershire re the environment, and I do not support the destruction of this large area of countryside.
- The size of the development and the types of vehicles using it, will put massive stress on local traffic unless there is significant and environment degrading investment in new roads locally. Current road systems cannot cope with traffic. I believe most of the users of this development will require access to the M1 and M42 at peak hours placing great stress on the roads around Diseworth and the airport.
- The size of the development will add significantly to the noise, air and light pollution already suffered by Diseworth threatening the health and wellbeing of residents especially the young.
- We have no public transport to the area. How will workers travel to this development?
- I cannot understand where the workers for this development will come from. My understanding is that local towns such as Loughborough and Leicester are at full employment. This will mean that workers will need to travel a considerable distance to work at this site.
- This development threatens the status of Diseworth as a rural conservation village. You recently put condition on an extension we had done which stated we could have no lights facing upwards. It is hypocrisy as best to enforce these standards on residents whilst allowing countryside changing developments in the next field to our village.
- The size of this development mean that it will be very difficult to mitigate the impacts above on the village.
- I believe the imposition of Freeport status on this land is undemocratic and believe it should go through a normal planning process.

Taking all the above into account, I believe this proposal put the villages of Diseworth and Long Whatton at significant risk from ruinous flooding, traffic, and pollution. If this scheme goes ahead, the council has been made aware of risk and should take accountability for flood and health victims that results. As a long-standing resident, I strongly object to this proposal and ask NWLDC NOT to include site EMP90 for potential development.

Cumulative Impact

I believe that the impact of the schemes above should be considered by planning authorities, separately but also cumulatively. Both schemes will materially impact upon the village and materially increase traffic, pollution and most importantly flooding in the area. However, if they both occur, it is likely that the change will be more significant and threaten the existence of our local communities.

The council have been warned of this risk and should take accountability if the they give approval and the many issues that will arise as forecast in this objection letter. .

Declaration

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

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

Signed

Date:

13/3/24

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

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

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

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

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

Protect Diseworth

Response to NWLDC Draft Local Plan Consultation 2020-2040

13 March 2024

Introduction.

Protect Diseworth [a part of WINGS Communities Ltd.] is a community group with a remit to protect the best interests of the Conservation Village of Diseworth and its environs. We have been active since 1998 and are independent from our local Parish Council but are generally aligned with their views.

Our Response.

We have responded to two documents within the Draft Local Plan. Each paragraph of our response is consecutively numbered for ease of reference, as well as stating the paragraph reference given in the relative Draft Local Plan document.

Our recommendation to NWLDC on each point that we make is highlighted in bold print at the end of the respective paragraph.

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Summary

A. In broad terms we recognise that there is much to be commended in this Draft Local Plan [DLP]. We comment only on those aspects of the plan that give us cause for concern. We make no apology for the length of this response. The DLP itself is long, complex, difficult to navigate and difficult to fully understand and is worthy of serious review. We ask only that NWLDC read, heed and act on our concerns.

B. Specifically, we have great concerns for the overt support within the DLP for the building of the new settlement at Isley Woodhouse [IW1] and for the support of the development of the EMAGIC Freeport site [EMP90] – even if somewhat measured at this stage.

C. We see the arguments set out in the DLP in support of these two proposals as tenuous and flawed at best and disingenuous and simply wrong at worst. Further, the inherent support in the DLP for these two proposals flies in the face of most of the positive policies otherwise designed to promote best practice in supporting the health and well-being of people, countryside, sustainability, environment, flood control, pollution, climate change, green energy, quality of life, house build requirements, employment opportunities and heritage, etc. within the DLP.

D. Both the IW1 ‘New Settlement’ proposal and the EMP90 ‘EMAGIC Freeport’ sites are derived only from the happy collision, on the one hand with landowners wanting to sell, and on the other, with developers wanting to build – a mere marriage of convenience. It certainly provides no basis upon which to proceed with fundamental regional planning policies. There is no other sound basis for promoting either of these sites. Attempting to create strategic regional planning policies based on a platform of convenient build for profit and shareholder value – in an area already enjoying low unemployment, high levels of development, and to suggest the use of yet more greenfield land – will not result in planning strategies, or policies, that bear even scant scrutiny.

E. The DLP would seem to give no consideration, nor have any policies that look at the effects of cumulative development. Whilst projects individually consider adjacent developments there is no overarching strategy that looks at the region as a whole and the area around East Midlands Airport and M1 Junction 24 in particular in respect of sustainable development and at the curbing of overdevelopment.

F. The enforced shortsighted bias of bringing yet more development to this particular area of N.W. Leicestershire [via LCC, SGP, LLEP, NWLDC Sustainability Appraisal, LLSGP, LIG, etc.] is already in the process of destroying a hitherto strongly rural environment. To continue to support and exacerbate this destruction of heritage and environment will be a crime on the same level of amoral corruption and vandalism as the deliberate and wanton felling of the Sycamore Gap Tree in Northumberland. The only difference being that whilst the Sycamore Gap Tree can be replaced and will mature within a lifetime, once the thousand acre Isley Woodhouse and EMAGIC sites are destroyed here, the heritage of the area will be gone forever.

G. Of particular concern is the lack of publication of Policy Ec2(2) replacement in the present LP and separately, any meaningful modelling of an accurate forecast requirement of Strategic B8 warehousing. It is simply not tenable to produce a DLP that omits both vital policies and modelling that are required to influence the content of a response – and of the DLP itself. Further, it is also concerning that these elements are withheld, insofar as such omissions could lead to unkind speculation that obfuscation and sleight of hand are in play.

H. Missing from the DLP are any policies or strategies designed to preserve and protect agriculture and food production in the region. Both of these activities are the historic engines that have driven our landscape, our rural economy and provided the lifeblood of the region. Whilst we need to progress and evolve we also need our farms. It should be noted that a B8 shed will no more support our farmers that it will support a hedgerow or provide clean air.

J. Also missing from the DLP is any overarching policy or strategy to guide and control transport infrastructure. The regions' Strategic Road Network is already overstretched and envisaged development will break it completely unless major investment is forthcoming. From where will this be found? And how will road safety, already compromised on our country roads, be maintained?

K. There is no proposed policy within the DLP that makes provision for guidance on the social safety and security of large developments, either industrial or community. In the case of the IW1 'New Settlement' proposal it is estimated that the police will require a staff of 20 to service this site alone. They will require accommodation and facilities. This oversight should be remedied and clear policy guidance should be given to potential developers that they will be required to underwrite required social safety and security facilities for all large community developments.

L. NWLDC cannot allow LCC and/or Central Government to browbeat it into producing a Local Plan that is not sustainably deliverable and that can only lead to reducing the region to chaos and unsustainable environmental poverty for those who follow on after 2040.

M. Recently sent to every householder within NWLDC, by NWLDC [along with the Council Tax demand for 2024-25], was a leaflet with a profound message:- *'Love your neighbourhood. Working together to make our environment better.'* It read. The Regulation 19 version of the NWLDC DLP must reflect the integrity and sincerity of its own exhortation. If not, then neither the new Local Plan, nor NWLDC, will retain that integrity.

NWLDC Document:-

"PROPOSED POLICIES FOR CONSULTATION"

3. BACKGROUND TO THE LOCAL PLAN

The Leicester and Leicestershire Strategic Growth Plan [SGP].

1. Para. 3.23. states *“With particular regard to North West Leicestershire, the SGP identifies the Leicestershire International Gateway (focussed on the northern parts of the A42 and the M1 around East Midlands Airport [EMA]), as one of several locations for growth....”*

Developed in 2018, the SGP has been driving concentrated growth to the northeast of the county, focused as above. The consequence has been exponential growth in the area having already taken place or being planned to take place, with little or no consideration to the effects of the impacts on infrastructure, environment, habitat, etc, that this cumulative growth has had, and is having, on the locality, particularly around Kegworth, Diseworth and Castle Donington. We are now under siege in this part of the county and this Draft Local Plan, in concert with the SGP and the LLEP, now indicates that we are set to have to further absorb some 75% of the region’s employment land requirement and 80% of the region’s housing requirement and all within a one mile radius of EMA. This is an Orwellian construct and is unacceptable. **NWLDC cannot stand by and allow the wanton destruction of this rural region, its agriculture, its environment, its biodiversity, countryside, heritage, quality of life and the well-being of its local residents. Your own para. 3.5. in the document refers.**

4. STRATEGY

2. Para 4.4. We support the 11 Plan Objectives listed but think that a 12th. objective needs to be added:- **12. Take notice of the adverse impacts of over-development [cumulative] in any one area by more evenly spreading employment, housing needs and opportunities over the region to better distribute wealth and quality of life. [or words to that effect]. In any event, to apply a principle of proportionality for development to better align with population distribution densities.**

3. Para 4.9. This states that Leicester City Council increased its unmet housing need by 35% in 2020 and claims that it cannot accommodate all of this requirement [18,700 houses] within its own boundaries. That is a massive increase and worthy of challenge, not least because central government is now pushing for urban development as town centres visibly decay. A visit to Loughborough town centre on any working day will confirm, shockingly, that it is now almost a concrete desert – displaying way more shutters than shops. It is in brownfield sites like Loughborough that growth, stimulation and accommodation are needed, not on productive greenfield sites. **NWLDC should challenge the modelling behind these numbers and anyway review them in the light of recent government announcements. Pushing urban development requirements into a rural area 25 miles away from the perceived demand is trying to solve the wrong problem in the wrong way, in the wrong place and is strategically incoherent. It will only create new long term structural problems and will ultimately fail.**

4. Para. 4.11. states that as a consequence of Leicester City's inability to absorb its own housing requirement NWLDC has agreed [or been required?] to accept a part of the shortfall. Thus, the NWLDC housing requirement has increased from a build rate of 481 p.a. to 686 p.a. [see para 5 below], an uplift of 43%. The logic behind this is that, despite the disconnect between Leicester and the N.E. of the county, better employment growth is expected in the northeast. This logic does not bear scrutiny. No sane person now resident and working in Leicester is going to move 25 miles north to then commute 25 miles south. Further, if people were to migrate north for better job prospects, where would the labour required to fill the vacated jobs in the City come from and where would those people live? This is mere smoke and mirrors. We contend that this strategy is simply an attempt to justify the build of the 'Isley Woodhouse' settlement. Leicester City Council and Leicestershire County Council must recognise that this is an unreasonable and unacceptable strategy based on dubious modelling. **NWLDC must recognise that to build a disproportionate number of the county's housing requirement in the north of northwest Leicestershire is both a contrived and unworkable solution that has no logic.**

5. Para. 4.12. The number of 686 houses required to be built per year is worthy of challenge. Derived from the NWLDC Sustainability Appraisal [2022] – this document is a highly subjective series of assumptions, estimates and projections dressed up to produce an exact science. **NWLDC should review and challenge the veracity of this calculation, especially considering present government thinking on housing allocations and placements.**

6. Para 4.15 cites the Leicester and Leicestershire Strategic Distribution Study (2021) as providing the basis for calculating the scale of strategic distribution warehouses [units over 9k sqm – B8]. In common with the NWLDC Sustainability Appraisal, used to calculate the house number requirement, this arrives at a speculative number based, at best, on a subjective 'High End' forecast to which is added a further contingency. **NWLDC should review and challenge the modelling used with a view to determining a more accurate and realistic requirement.**

7. Para 4.16. This para confirms that 50% of the entire county requirement of strategic distribution warehousing [B8 sheds] until 2040, some 106,000sqm - or 40 hectares - is now planned to be sited in NWLDC. This is pernicious and unrealistic. There are 7 Districts within the county. Despite any perception of faster growth occurring in NWLDC [merely a construct of policy, already overheated] to proportionately only allocate the other 6 districts with 8% each is to deprive them of employment opportunity on the one hand and to overburden NWLDC with both eyesore and loss of countryside as well as massive over-development, on the other. **NWLDC should re-visit this policy and insist that a more realistic and even-handed distribution and required development plan is produced.**

8. Para. 4.17 *"The requirement for land for strategic B8 (warehousing) of more than 9,000 sqm will have regard to the outcome from the Leicester & Leicestershire Apportionment of Strategic Distribution Floorspace study"*. This would seem to rather negate the content of para. 4.16 above. If the requirement is not yet known where does the number of 106,000sqm come from? **Clarification required. NWLDC must recognise that it is**

unreasonable to consult when it hasn't yet defined its own policy. It is also indicative that this consultation is premature.

Draft Policy S1.

9. (1). As stated in [our] paras. 4 and 5 above, we challenge the integrity of the 686 housing requirement number. It is based on the high end of an already high assumed number and is further swollen with an additional 10% contingency. **NWLDC should review.**

10. (3). Deferring the requirement of strategic B8 warehousing is unsatisfactory. [see also our comments at [our] paras. 6, 7 and 8 above]. **NWLDC must make this available for consultation.**

11. (4) *For the avoidance of doubt*, we dispute the integrity of the modelling that arrived at the annualised district housing requirement for the five-year land supply and for Housing Delivery being 686 dwellings each year. [see also our comments at [our] paras. 4, 5 and 9 above]. **NWLDC should review this number.**

12. (5) We agree with the five objectives listed [(a) to (d)] and request that a 6th be added:- (e). **Ensuring that no one area in the district is subjected to loss of amenity, countryside or wellbeing by virtue of overdevelopment.**

13. Para 4.24 describes the process by which it was determined that a 'New Settlement' is required at 'Isley Woodhouse'. [Our] Paras 23 to 38 of this response set out in more detail why this is a mis-conceived strategy in the planning of the future housing demand and distribution requirement. **NWLDC should take note.**

5. CREATING ATTRACTIVE PLACES

Policy AP3 Renewable Energy [Strategic Policy].

14. 'If not in Policy AP3, then at an alternative appropriate location within the Draft Local Plan, **NWLDC should publish a policy that mandates that all new buildings must support roof mounted solar panels unless specific exemption is granted within an approved planning approval. If necessary, by the use of Section 106 agreements and/or requesting a statutory change in Central Government policy.**

15. Para. 5.33. Energy hierarchy. This para. describes the hierarchy that must be used to minimise energy consumption in new build properties. Bulit point 3 of this para. states:- "*Renewable Energy: After reducing energy and employing energy efficiency measures, steps should be taken to make up for any shortfalls in energy needs through renewable sources. This can be achieved through strategic building design that has the facilities and capacity to both store and deliver energy from renewable sources*". **NWLDC should strengthen this policy to make it compulsory and mandate the use of solar roof panels on all new builds – as per suggestion in para 14 above. If necessary, it should prevail upon Central Government to mandate the policy.**

Policy AP5 – Health and Wellbeing (Strategic Policy)

16. We support the 7 actions [(a) to (g)] detailed in the Table at page 39 and would add one further action. **Ensure that rural communities, countryside and the environment are protected from over-development.**

6. HOUSING

Para. 6.6. Policy H1 Housing Strategy [Strategic Policy].

17. As argued elsewhere in this response [our paras. 4, 5 and 9 above], we suggest that **NWLDC review the modelling that determines the housing numbers required and their distribution as determined in policies S1 and S2.**

7. THE ECONOMY.

Para 7.7. East Midlands Freeport.

18. The detailed Protect Diseworth response to the East Midlands Freeport inclusion in the DLP can be found at [our] paras. 42 to 57 below in our response to the **‘Proposed Housing and Employment Allocations for Consultation’ document.**

19. In essence this argues that the EMP90 site south of East Midlands Airport and east of Diseworth is unnecessary, unwarranted, unwanted, an erosion of heritage, countryside environment and is not compliant with the existing LP Policy Ec2(2) - which we note is not defined in this Draft LP. **NWLDC must recognise that if Policy Ec2(2) is to be changed to suit this site then there is no point in having a Local Plan at all, either the LP is robust, or it is not. In any event the present Policy Ec2(2) is robust and should not be changed to suit the convenience of Freeport designation.**

20. **Paras. 7.19 and 7.20** leave Policies Ec1 and Ec2 undefined. This is wholly unacceptable. **See comments immediately above.**

21. **Para. 7.2.6. Policy Ec4 – Employment Uses on Unidentified Sites.** We agree with the requirements and constraints in this policy and request that a further requirement be included in (3):- **That such development does not adversely impact the locality by virtue of over-development.**

Document :-

“Proposed Housing and Employment Allocations for Consultation”

3. Housing Completions and Commitments

Housing need and Supply Summary.

22. Para. 3.7. Table 2 indicates that the region requires a total of 5,600 houses, over and above those already in train, to be built within the duration of the Draft Local Plan [up to 2040]. As stated elsewhere [our paras. 4, 5, 9, 13 and 25] we contend that this number is open to challenge. **NWLDC must review.**

[Para. 3.8 advises that the proposed housing allocation sites for these 5,600 houses are listed in Section 3. **We assume that this is a typo and should read Section 4**].

4. Housing Allocations.

23. Para 4.5. lists the 22 sites on which the 5,693 required houses are to be built by 2040. With 1,900 to be built at Isley Woodhouse [IW1] by 2040 this brings the planned build total to 6,676 units, an ‘over-supply’ of 983 properties – that is, over and above an already ‘high end’ forecast requirement. The table advises that eventually 4,500 properties will be built on the new, rural and isolated ‘Isley Woodhouse’ site [IW1]. In other words, by 2050 80% of the entire regions’ housing requirement will be built in the top northwest corner of the county. **NWLDC must recognise that it is not logical to place 80% of total demand in one corner of the region. It is even less logical to do so when no adequate supporting infrastructure exists. To do either would be a mistake. To do both is to plan for heavy commuting, inefficiency, waste, exorbitant cost and failure. Strategically, house build needs to correlate with housing demand; i.e. build homes where people live and work.**

24. Footnote 9 states that only 1,900 of the target 4,500 houses at Isley Woodhouse will be built by 2040. Whilst this will produce an over-supply of 983 houses it will not sustain the promised addition of schools, surgery, social amenities, light industry, etc. and so will fail as a sustainable development. **NWLDC must produce a plan that is both logical and which actually meets requirements. Further, in light of recent government announcements, to both ease housing target numbers and to encourage greater urban housing development, NWLDC must review their calculated requirements.**

Para. 4.101 New Settlement. Isley Woodhouse IW1

25. There has been no consultation on the naming of this proposed settlement. Whilst perhaps not part of any statutory process, it would surely be diplomatic to involve the people in local communities who will be affected. **Can NWLDC explain who in their organisation decided that they had the remit to provide the name ‘Isley Woodhouse’?**

26. Para. 4.101 quotes NPPF [para.73]:-

“The supply of large numbers of new homes can often be best achieved through planning for..... new settlements provided they are well located....”.

This proposed settlement fails to meet even this single opening criterion. Planning to build up to 4,500 houses located no more than 300 yards to the south of the runway threshold and Safety Zone of a major regional 24 hour a day operational airport [the only one in Europe and one which claims to be the busiest cargo [heavier, louder, more polluting] night-time operating airport in the UK] and also a significant internationally recognised motor racing circuit, is a plan to fail. To build so close to one of these significant noise generators could be classed as a bad mistake. To build immediately adjacent to both, at once, is nothing short of negligent and would exemplify the very best of bad planning practice if carried through. It is certainly demonstrative that the settlement is not *“..well located”*. **NWLDC should revisit and review this proposal with a view to be seen not to fail.**

27. Para 4.103 quotes The Leicester and Leicestershire Strategic Growth Plan [LLSGP] [which sets out strategy for growth across the county]. It says, in relation to Isley Woodhouse, that this includes proposing:-

“to build more development in major strategic locations and to reduce the amount that takes place in existing towns, villages and rural areas”.

This statement is somewhat confusing. If a ‘strategic location’, is not in an existing town or village then it must be in a rural location [unless in a city perhaps, or even at sea?]. In any event, the building of this settlement on the site proposed is not compatible with the stated aim of *reducing the amount of development in a rural area*. The chosen site could not be more rural, is outside the Limits of Development and is within designated Countryside. Further, the proposed industrial build element of the settlement is not compliant with Policy Ec2(2). Building such an urban scale town, by its very size, nature and location, will change the historic rural landscape and heritage of the site to one of urban/industrial conurbation, protecting neither villages nor rural areas and which will be in direct conflict with those policies designed to protect ‘sustainable’ villages. **NWLDC should comply with the LLSGP in respect of the proposed development and accept that plans for the new settlement are outwith both this plan and that of Policy Ec2(2).**

28. Paras 4.104-4.108 describe the methodologies used to ‘fix’ the proposed development at Isley Woodhouse. The claim that the Leicestershire International Gateway will generate employment at a faster rate than can be accommodated by housebuilding over the next 15 years is at best fanciful and at worst, wholly subjective. The only justification for the build, in reality, is that the landowners are willing to sell and the developers are willing to buy and build. This happy coincidence provides a solution to the imperative for NWLDC to meet an imposed [and questionable] housebuilding target. Truly a riddle wrapped in a mystery inside an enigma. There is nothing strategic here, it is simply a soft option solution posing as a strategic masterstroke. **NWLDC should recognise that building Isley Woodhouse will provide no strategic benefit to either the locality or the region and is derived from the science of convenience only.**

29. Para. 4.109 [pp 63] maps the subject site. We note that the map is cropped such that it fails to picture the site's proximity to Diseworth on its eastern border and to both East Midlands Airport and Donington Park Motor Racing Circuit on its northern border. **This is disingenuous and should be corrected in the final Local Plan submission so as to reveal the true unsuitability of its location.**

30. 4.109 Sub para. 1 [a] pp. 63 states that 1,900 houses at Isley Woodhouse will be built by 2040. A target to meet only 42% of the finished product over a 15-year period renders sub paras b – f as nothing more than a meaningless wish list. 1,900 mixed build properties ranging from market, affordable, self-build, bungalows, sheltered and/or nursing/care homes will not support 4,600 sq. metres of employment floorspace [especially if householders are, allegedly, commuting to the Leicestershire International Gateway employment zone], new schools, doctors' surgery, shops, restaurant, pub, community venues, etc, etc. This is aspirational only and not realistic. **NWLDC must recognise that the result of this build will be an abdication of planning responsibility and will result in the creation of massive problems for those who follow on beyond 2040.**

31. 4.109 Sub para. 2 describes the principles by which the development will be guided and delivered. Again, these statements are aspirational. Given the exceedingly slow rate of projected growth – eleven years beyond the life of this DLP [as stated by the developers], few if any, of the proposed amenities will be achieved until there is sufficient critical mass as the project nears completion in 2051. **NWLDC must recognise that the principles by which the development will be guided will, in very large part, not be met within the duration of the new Local Plan – if at all.**

32. 4.109 Para. 4 is noted. We agree with the principle that [if granted at all] planning permissions will only be allowed if they adhere to an agreed masterplan and design code. **NWLDC must ensure that, in the case of Isley Woodhouse at least, this should be expanded to include a policy/policies that apply draconian sanctions to the developers in the event of non-compliance and/or non-performance.**

33. 4.110. See comments in preceding para above.

34. 4.111. This para. describes infrastructure impacts and mitigations generated by Isley Woodhouse [IW1], Freeport [EMP90] and Castle Donington expansion and how they will impact the local and national road network, as well as sewerage, potable water and electricity supply. We would also include flood prevention. There are significantly more than these three projects in play within our immediate locality and all are/will be vying to use local infrastructure. These should be brought into scope in all transport and services modelling. The reality is that our local road and SRN systems are already at breaking point. We are now reaching the point where local road safety is highly likely to be severely compromised. Further, the land allocated for IW1 and EMP90 covers large areas of the water catchment that flows into Diseworth Brook – which too often floods within the village. Replacing hundreds of hectares of farmland with hardstanding and building will bring a significantly heightened and additional flood risk to the village. The area of land grab is so large that zero impact mitigation will almost certainly prove to be uneconomic. In policy terms, it must be absolute that all new developments have an immutable guarantee in law that no increased risk of flood to existing

properties in the parishes affected, will occur. **NWLDC must develop policies and strategies that properly address issues of cumulative development, particularly in relation to transport, flood, pollution and environmental impacts.**

35. 4.112. This para. addresses the infrastructure requirements that will be generated by the new settlement and defers any detailed strategies to the Regulation 19 version of the Plan. This is unsatisfactory. The ultimate build will generate some 10k plus daily vehicle movements alone. Additionally, there will also be significant generation of commercial traffic to/from the proposed industrial element of the development. The local rural road network is already saturated from the effects of cumulative development projects, is already verging on becoming unsafe and is in danger of becoming simply dangerous. Lack of forward planning will only make it more difficult and more expensive to find solutions as the project matures. **NWLDC must address these issues at this stage. There must be full transparency and consultation with the public. Deferment is neither sensible nor responsible.**

36. 4.113. This para. recommends the build of mixed housing, including affordable housing in an effort to reduce commuting. If the ultimate target for the project is 4.7k homes then there will also have to be a high number of industrial buildings on site to achieve the objective. The idea that only workers for the [proposed] Freeport [EMP90] will live in Isley Woodhouse is a fantasy not born out by any empirical data. Further, given that an element of design here is to absorb the 'overspill' from Leicester City, any argument claiming reduction in commuting activity compounds the fantasy. **NWLDC must accept that this is not a realistic prospect. The reality will be that the settlement will be a dormitory town with high levels of commuting from the start – and its destiny will be to remain a dormitory town.**

37. 4.115. This para. endeavours to assure that the development will be of high quality and will mitigate impacts on the landscape '*as much as possible*' – which won't be very much at all. 4,700 houses is 4,700 houses, however they're dressed up. **NWLDC must accept the consequence of allowing urban development in a rural area. Once lost, the countryside will be gone forever – as will the food production, wildlife and nature that it presently supports and will displace.**

38. 4.116. This para. discusses the proximity of the proposed site to both East Midlands Airport and Donington Park Motor racing circuit [both of these given special status in the Proposed Policies Document at Policy Ec8 and Ec11 respectively, as being important economic generators]. It recognises that both produce '*a significant amount of noise*'. The described solution is to carry out a noise assessment and to build industrial units on the northern border of the site to shield noise from domestic housing. This is nothing more than smoke and mirrors. No cordon of industrial buildings will shield houses from a departing jet at full take-off power at [generally] no more than 300ft above ground level and only a mere 3 or 4 hundred yards or so distant – and even if they did, the workers in those buildings would not be shielded. It is also likely that the industrial units will concentrate and funnel noise into the townscape. Likewise, the noise from the racetrack cannot be effectively mitigated [see also our comments at [our] paras. 26 – 28]. **NWLDC must recognise that to adopt such a plan in pursuit of allowing this development is a plan to fail. Further, it is not possible to triple glaze a garden, an open window or a school playground.**

5. GENERAL NEEDS EMPLOYMENT ALLOCATIONS.

39. Para. 5.1. This para. examines the calculated amount of land required for office and industrial use in the district. Table 3 provides the resultant calculated numbers – 10,500 sqm office space and 114,500 sqm warehousing. No explanation is provided to explain or justify the baseline figures. **NWLDC should rectify this with provision of explanation.**

40. Para. 5.2. This para lists 6 sites to be allocated to meet the calculated figures cited above. Four of these sites, two at Kegworth, one at Castle Donington and one at Isley Woodhouse are all within a one mile radius of East Midlands Airport and M1 junction 24. Between them they are planned provide 75% of the calculated office/industrial land requirement for the entire NWLDC region up to 2040.

This is plainly neither a viable nor a sensible set of choices. Employment opportunities should be distributed evenly and fairly across the region - to where people live in their existing communities. Further, all of these four proposed sites will serve, and be served by Junction 24 of the M1. J24, M1 is already saturated and burdened with heavy use to/from A50, A453, A6 and A42. To add a further substantial burden to this SRN node is a nonsense. It should also be noted that EMP90 [400,000 sqm Freeport allocated land south of A453 at J23A M1] is not included as a site allocated to contribute to the perceived requirement of 125,000sqm of office and industrial space. If that project comes forward then there will be 486,000sqm of industrial space crammed into a one mile radius area in the northeast of the county – a massive over-supply of 390% of the requirement for the entire region for the next 15 years. **NWLDC must review this proposed strategy. It is abundantly clear that the present proposals, allocations, distribution and calculations are absurd, even allowing for Strategic Distribution [B8 sheds].**

41. Paras. 5.3. and 5.4 both concede that the figures quoted at 5.1 are speculative. **We accept that NWLDC will keep these provisions under review and request that we are further consulted when updated figures become available - supposedly in April 2024.**

6. Potential Locations for Strategic Distribution.

42. Para. 6.1. states that *“All the SHELAA sites which are potentially suitable for strategic distribution uses have been appraised as part of our detailed site assessment work. This work is on a site-by-site basis and does not factor in wider issues which will also influence the final selection of site/s for inclusion in the Plan”.*

This statement recognises that the suitability of a site must take account of ‘wider issues’ but gives no clarity as to what that might mean. **NWLDC must make it clear that a part of the site selection process will preclude allowing overdevelopment within the locality of any one area of the District and/or further unsustainable stress on infrastructure, including the road network.**

6.3. East Midlands Freeport.

43. Para. 6.3 advises that the Government has ‘designated’ 100ha of land south of A453, west of J23A M1 and immediately to the east of the conservation village of Diseworth, as a part of the East Midlands Freeport project. It also advises that this land was promoted in the Strategic Housing and Employment Land Availability Assessment 2021 [SHELAA]. The NWLDC comment in the SHELAA [EMP90] at the time stated that :- *“The site lies in an area identified as Countryside in the Local Plan and to comply with current Local Plan policy it would need to satisfy Policy Ec2(2). In view of its scale, it is more likely that a change of policy/strategy would be required”*. Policy Ec2(2) in the present Local Plan [LP] states:-

“Where evidence indicates an immediate need or demand for additional employment land (B1, B2 and B8) in North West Leicestershire that cannot be met from land allocated in this plan, the Council will consider favourably proposals that meet the identified need in appropriate locations subject to the proposal:

(a) Being accessible or will be made accessible by a choice of means of transport, including sustainable transport modes, as a consequence of planning permission being granted for the development; and

(b) Having good access to the strategic highway network (M1, M42/A42 and A50) and an acceptable impact on the capacity of that network, including any junctions; and

(c) Not being detrimental to the amenities of any nearby residential properties or the wider environment.

44. It is therefore clear that development on this site is NOT compliant with present LP planning policy in any of the three tests required to be met by Ec2(2). Not only is there no evidence of an immediate need for employment land, but there would also be significant adverse impacts on the already overstretched local and Strategic Road Network [SRN] and on the historic stand-alone rural setting of the designated conservation village of Diseworth. **No wonder NWLDC wish to moderate this policy. It is not convenient.**

45. Policy Ec2(2) in the Draft Local Plan, now out for consultation, is not defined. Instead the following statement [taken from Proposed Policies For Consultation document para. 7.21] replaces the text in the current plan:-

“Policy Ec2 – Employment Commitments (Strategic Policy) 7.21. We will include this policy in the next version of the Local Plan (Publication version/ Regulation 19). The policy will list sites with planning permission for employment uses where construction has not yet started. Policy Ec2 is also likely to include the considerations which would apply if planning permission at one of the employment commitment sites were to lapse and a new planning application was required.”

46. This is simply quite unacceptable. In considering this site NWLDC are having to face a highly controversial project, under pressure from Central Government and County Hall. To ease the way, it would seem that the existing Policy Ec2(2) problem is being sidestepped. Whilst it cannot be categorically stated that the strategy now is one of ‘if the project doesn’t fit the

rules, then change the rules', that is the clear inference to be drawn from this DLP statement. **NWLDC must recognise that to remove Policy Ec2(2) from this Draft, if carried forward to the Regulation 19 submission, would totally undermine any integrity in any future Local Plan. Either an LP is robust, or it is not. In any event the present drafting of Policy Ec2(2) is sound and should not be changed. Further, NWLDC should not produce a Draft Local Plan for consultation when no Ec2 policy is offered for consultation. Additionally, when a draft Ec2 policy is available it must be offered for general consultation.**

47. Para. 6.4. Advises that there is pressure to '*develop the site quickly*' as government tax incentives are due to expire in 2026. All the promoters of the Freeport project; Central Government, East Midlands Airport [MAG Group], SEGRO, the Freeport Board, LCC, as well as NWLDC [as the designated planning authority], have consistently stated that the project will have to meet the rigours of full local Planning Committee approval. Attempting to develop the site quickly because tax incentives could be compromised is no way to ensure that due diligence is carried out in the planning process, any more than it is sound planning to develop the site merely because it is there. To succumb to either of these pressures would demonstrate extremely bad planning from which future generations will suffer at length. **NWLDC cannot allow themselves to be rushed or pressurised into adjudicating on this project and must ensure that due process is properly and fully carried out in an objective manner – and in accordance with the LP and other relevant planning policies.**

48. Para. 6.5. This para. exemplifies the perceived benefits, in employment and economic terms, that NWLDC think will be derived from East Midlands Airport, the 'Leicestershire International Gateway' and the government supported Freeport projects. We fundamentally disagree with this prognosis.

*The land area required will not support the strategy. Cumulative development has already swallowed too much countryside and cannot realistically sustain any further erosion.

* Local and SRN networks are already at capacity and will not support the strategy.

*Employment, especially 'quality job' employment will not support the strategy – as is amply demonstrated by the employment profile at the East Midlands Gateway project.

*General infrastructure – pressures on sewerage, electricity supply, flood control, environment, pollution levels, etc., will not support the strategy.

*The cost of infrastructure mitigation requirements are unaffordable, both locally and nationally.

*Existing local plan requirements and policies will not support the strategy.

*Claimed employment numbers and benefits are uncorroborated and highly subjective.

*the concentration of 75% of the entire regional employment requirement of the region in a single one mile radius area is highly flawed and absurd.

*The addition of 400,000 sqm of industrial space [NWLDC SHELAA 2021, EMP90 Page 171], to be provided by the proposed Freeport, makes a nonsense of the entire employment land requirement strategy for Northwest Leicestershire.

NWLDC must reconsider both its industrial warehousing strategy and the wisdom of regarding the Freeport EMAGIC project on the proposed EMP90 site as a significantly positive proposition. It categorically is not.

49. Paras. 6.6 – 6.8. set out to list the difficulties and drawbacks inherent in developing the EMP90 Freeport site.

We argue that the fact that the land has been “designated” as a tax-free zone as a part of the Freeport project should have little, if any, bearing on NWLDC having the freedom to develop an optimum and well considered set of design strategies - allowing for sustainable development and planning in the District up to 2040 through the DLP. If there is no need for this Freeport intervention then it should not be considered. If Government then attempts to impose it, NWLDC [and LCC] should resist it. NWLDC effectively demonstrates in paras. 6.6. to 6.8. that the EMP90 site is inappropriate and unsustainable. **NWLDC should heed their own observations on this proposal. These are well founded and NWLDC should therefore have the courage to reject any planning application relating to EMP90.**

50. In the context of the Freeport, we know that the process adopted by Government was totally opaque and devoid of any democratic consultation. Our efforts to discover why this EMP90 land was included in the Freeport project, and this only at the second submission, have all been rebuffed. Specifically, the Freeport (personally, through its chair, Ms Nora Senior, CBE) refused to give any explanation. Repeated FOI requests to the relevant public authorities have also been refused on grounds including ‘commercial confidentiality’. **NWLDC and the Freeport Board must both recognise that this hardly complies with due process.**

51. It should be noted that East Midlands Airport, as owner of part of the EMP90 site, had apparently embarked on a “land-banking” exercise many years ago and together with SEGRO (who it seems has now secured options on the rest of the site), and both of whom are now coincidentally partners in the Freeport project, had been jointly actively promoting the land for development as early as 2020. It is therefore manifestly incorrect for any party to suggest that the Freeport is now the basis for a wish to develop. That commercial intention has been evident for many years, and it is our submission that the Freeport is now simply being used as a “cloak” to ease applications for development. **NWLDC must accept that these actions by EMA/Segro/Freeport, if accepted, will severely undermine the integrity of the planning process in the event that an approval is granted.**

52. It is equally manifestly incorrect to suggest that the designation process in any way considered the impact upon the locality of the EMP90 land, specifically Diseworth. Again, FOI requests have shown no such consideration and further, despite the Minister for Levelling Up (Dehanna Davison) claiming in February 2023 that *“local authorities have been closely involved at every stage of the process ensuring the interests and voices of local people have been represented throughout,”* it appears that the only “close involvement,” in this context, has been the leaders of the relevant local authorities confirming that they think the Freeport concept is a good idea. Consequently, such a statement appears to be at best misinformed, and at worst, untrue. **NWLDC cannot be seen to be party to such actions.**

53. In introducing its proposals to the Local Plan Committee in Nov '23, a NWLDC planning officer recognised "*the potential for very significant adverse impacts*" on Diseworth should strategic B8 development be permitted on the site. In these circumstances, no planning authority, acting reasonably, could allow impacts of such severity to be outweighed by Central Government diktat promulgated after consultation, not with communities likely to be "*severely affected,*" but only with commercial partners whose sole motive is profit.

Whilst we endorse the comments and issues cited in paras. 6.6 to 6.8, NWLDC must take account of the above 4 paras. Further, there should also be recognition that any proposed site must fully comply with all elements of the Local Plan, including Policy Ec2(2) which must be retained in the Draft Local Plan.

54. **Para. 6.9.** This para. recognises the fact that Manchester Airport Group [MAG]/East Midlands Airport [EMA] have recently submitted an EIA Scoping request [Ref. 24/00072/EAS] for warehousing [B8, B2 and C1] on the northern half of the EMP90 site, pending a full planning application. The full para. is reproduced below for ease of reference:-

"Faced with these significant concerns [see [our] para. 49 and paras. 6.6. to 6.8] and uncertainties, we have not yet reached a firm position on whether an allocation in this location is justified. Reflecting this, we have identified land to the south of the airport as a Potential Location for Strategic Distribution at this stage. With feedback from this consultation and further information as outlined above, we will make a decision on whether or not an allocation is justified at the next stage of the plan's preparation". **Having expressed significant concerns about EMP90 land being developed for Freeport purposes how can NWLDC possibly now propose it as a Strategic Distribution site and still retain credibility? These are weasel words that won't do. We understand the NWLDC concerns and urge that they stand firm in support of those – very proper - concerns.**

55. The MAG/EMA application looks to develop some 125,000sqm of warehousing on a part of the EMAGIC Freeport [EMP90] site. NWLDC calculate [Para 5.1. and Table 3 - see our paras. 39 - 40] that the requirement for office space/warehousing in the entire region for the next 15 years is 125,000 sqm. Para. 5.2 lists the 6 sites within the region that are considered best suited to provide this requirement [75% of which are within a mile radius of the EMP90 site] and which provide a total of 127,710 sqms of floor space – a small over-supply. **NWLDC must therefore recognise that the requirement for any further B2/C1 industrial floorspace on the EMP90 site is totally unnecessary.**

56. As is demonstrated in [our] para 55 above, as the EMP90 400,000sqm site would only be required for B8 sheds. NWLDC have resolved their own dilemma. Clearly, to cover the entire site with 9k+ sqm B8 warehousing would be a heinous blight on the landscape, create a massive over-supply and render any planning approval impossible – with, or without Freeport designation. We, and many others, have consistently argued that the destruction of this piece of local countryside is unnecessary, unwarranted and wrong. Whilst we have, to date, adopted a neutral view on the Freeport per se, we have said from the outset that the EMP90 site is neither suitable, nor required. NWLDC have now proved it. **NWLDC must recognise their own logic and take the appropriate decision – to reject both the MAG/EMA application and any Sego/Freeport application, when submitted.**

57. Para. 6.10. advises that, in the event that the Freeport site is developed, the western boundary will be moved east, away from the village of Diseworth, in mitigation. This is not an acceptable solution. It will do little, if anything, to preserve the heritage and landscape adjacent to Diseworth and it will do nothing to limit or mitigate 24-hour continuous noise pollution, light pollution and air pollution visited on both Diseworth and Long Whatton. In any event, given para. 6.9. [see our para. 54] above, this proposal should become academic. [see also our comments at paras. 20 to 22]. **NWLDC must recognise their own logic and so must disallow this Freeport site. It does not comply with current LP requirements and can neither be successfully mitigated, nor sustainably developed.**

10. Environment.

58. Policy En1. In general terms we support the principles enshrined in this Section but note that both IW1 and EMP90, if allowed, will fall woefully short of any capability of showing a biodiversity net gain of 10%. Rather, they will produce a massive degradation of biodiversity in the area - which no amount of mitigation will be able to restore. In net zero and biodiversity terms it makes no strategic sense to destroy something in one location and attempt to mitigate it in another, the primary casualty will still suffer death by a thousand cuts. A far more sound policy would be to protect first and to mitigate second. **We therefore call on NWLDC to adopt a policy of utilising brownfield sites as a first priority and to only even consider greenfield desecration once all brownfield potential has been exhausted.**

Declaration

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

We 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.

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

Jim Snee

For Protect Diseworth

13th March 2024

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From: [REDACTED]
To: [PLANNING POLICY](#)
Cc: [REDACTED]
Subject: EXTERNAL: Draft Local Plan Consultation Response - The Strategic Land Group
Date: 13 March 2024 14:47:36
Attachments: [image001.jpg](#)
[Publication Consultation Response Form FINAL.pdf](#)
[NWL-S171-004b - Consultation Response - March 2024 - Final.pdf](#)
[NWL-S171-003c -Development Prospectus - March 2024.pdf](#)

Hello,

Please find attached The Strategic Land Group's response to the Draft Local Plan public consultation.

To further inform this response, I have also attached our Development Statement for Land off Redburrow Lane Packington.

We would be grateful if you could please confirm receipt of this response.

Many thanks,
Michael Shaw
Land and Planning Assistant



[REDACTED]

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The Strategic Land Group Limited is registered in England and Wales with number 06732112 and has its registered office at York House, 20 York Street, Manchester, England, M2 3BB



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Michael	
Last Name	Shaw	
Job Title (where relevant)	Land and Planning Assistant	
Organisation (where relevant)	The Strategic Land Group on behalf of Keith William Goodwin and Sandra Elizabeth Goodwin	
House/Property Number or Name	██████████	
Street	██████████	
Town/Village	██████████	
Postcode	██████	
Telephone	██████████ ██████████	
Email address	██	

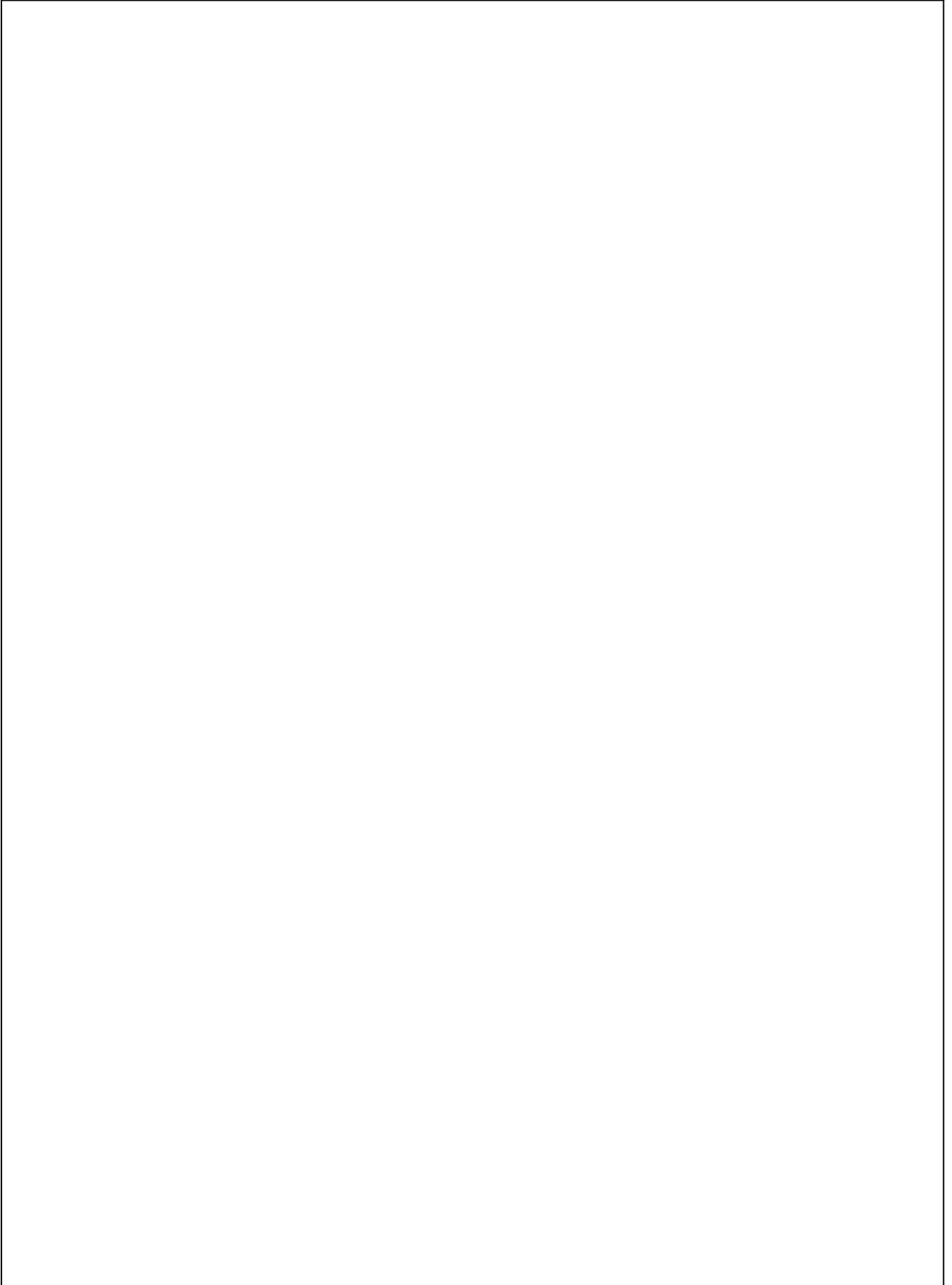
PART B – Your Representation

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

1. To which consultation document does this representation relate?	<input checked="" type="checkbox"/>	Proposed policies
	<input checked="" type="checkbox"/>	Proposed housing and employment allocations
	<input type="checkbox"/>	Proposed Limits to Development Review

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

Please see PDF titled '*NWL-S171-004b - Consultation Response - March 2024 – Final*', submitted alongside this form via email.



Declaration

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

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

Signed:



Date: 13th March 2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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



Response to Draft Consultation Documents

Land off Redburrow
Lane, Packington

March 2024

Strategic
Land Group

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Contact

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1. Introduction

- 1.1 This consultation response has been prepared by The Strategic Land Group Limited ('SLG') on behalf of the owners of 'Land off Normanton Road' (referred to by the council as 'Land West of Redburrow Lane') in Packington.
- 1.2 This statement sets out our responses to North West Leicestershire District Council's ('NWLDC') Draft Local Plan public consultation, running from 5th February to 17th March 2024. This response considers the three key consultation documents: Proposed Housing and Employment Allocations for Consultation,¹ Proposed Policies for Consultation,² and Proposed Limits to Development for Consultation.³
- 1.3 The Strategic Land Group is a land promotion company specialising in residential developments across the whole of England. This response has been prepared on behalf of SLG by Michael Shaw and approved by Paul Smith.

¹ North West Leicestershire District Council (2024). *Draft North West Leicestershire Local Plan 2020-2040: Proposed Housing and Employment Allocations for Consultation*. Available at: https://www.nwleics.gov.uk/pages/local_plan_review (Accessed 26th February 2024).

² North West Leicestershire District Council (2024). *Draft North West Leicestershire Local Plan 2020-2040: Proposed Policies for Consultation*. Available at: https://www.nwleics.gov.uk/pages/local_plan_review (Accessed 26th February 2024).

³ North West Leicestershire District Council (2024). *Draft North West Leicestershire Local Plan 2020-2040: Proposed Limits to Development for Consultation*. Available at: https://www.nwleics.gov.uk/pages/local_plan_review (Accessed 26th February 2024).

2. Draft Policies

2.1 In this section we respond to the policies set out in the Proposed Policies for Consultation document ('the proposed policies document'), published in January 2024. We have not commented on all the policies set out in the document but have answered those most likely to influence the soundness of the new Local Plan.

Policy S1 - Future Housing and Economic Development Needs (Strategic Policy)

2.2 We agree with the council's observation in paragraph 4.8 of the proposed policies document that the only appropriate starting point for calculating North West Leicestershire's housing requirement is through the government's standard method,⁴ as set out in Chapter 5 of the National Planning Policy Framework ('Framework').⁵ This figure is also referred to as Local Housing Need. Additionally, as is confirmed in the Leicester & Leicestershire Housing & Economic Needs Assessment (2022),⁶ there are no exceptional circumstances to justify an alternative approach.

2.3 We agree that Leicester City's unmet housing need must be taken into account in establishing a housing requirement for NWLDC, as set out in the Leicester & Leicestershire Housing & Economic Needs Assessment⁷ and agreed upon by North West Leicestershire and the other Leicestershire local authorities in the Leicester & Leicestershire Statement of Common Ground (SoCG).⁸

⁴ Turley (2023). *The standard method of assessing housing need*. Available at: https://static.turley.co.uk/media/pdf/2023-03/gds0717_-_revised_standard_method_analysis_mar2023_0.pdf (Accessed 26th February 2024).

⁵ Department for Levelling Up, Housing and Communities (2023). *National Planning Policy Framework*. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> (Accessed 26th February 2024).

⁶ Icenii Projects Limited (2022). *Leicester & Leicestershire Housing & Economic Needs Assessment: Final Report*. Available at: <https://www.lstrategicgrowthplan.org.uk/wp-content/uploads/2022/07/Final-HENA-Report-June-22.pdf> (Accessed 26th February 2024).

⁷ Ibid.

⁸ Leicester & Leicestershire Authorities. Leicestershire County Council (2022). *Statement of Common Ground relating to Housing and Employment Land Needs*. Available at: <https://www.lstrategicgrowthplan.org.uk/latest-updates/publication-of-statement-of-common-ground-relating-to-housing-and-employment-land-needs/> (Accessed 26th February 2024).

2.4 However, we note that Leicester City's unmet need is only being reflected for the period up to 2036, whilst North West Leicestershire's new local plan period runs to 2040. Such is the magnitude of Leicester's shortfall, as acknowledged in the SoCG,⁹ there is no reason to believe the City will be in a position to meet its housing need beyond 2036. North West Leicestershire's housing requirement of 686 dwellings each year should therefore be increased to take that additional four year period into account.

Policy H1 – Housing Strategy (Strategic Policy)

2.5 Any figure used for the housing supply flexibility allowance should factor in the likelihood of shortages appearing in the housing land supply, and should be based on existing evidence around established lapse rates for housing planning applications and other factors which may prevent the delivery of new homes.

2.6 The policies document proposes a flexibility allowance of 10% for the new Local Plan. This is close to the North West Leicestershire Local Plan's ('the adopted plan') flexibility allowance figure of approximately 9%.¹⁰

2.7 Although, to date, the existing Local Plan has delivered on its objectives, delivery rates for new homes tend to peak early on in the plan period as applications are submitted on newly allocated sites. This is evident in North West Leicestershire, as the authority has delivered noticeably fewer homes between 2018/2019-2022/2023 (3,030) than it did between 2011/2012-2017/2018 (4,440). The same pattern is likely to be repeated for the new Plan. The adopted 9% flexibility allowance may therefore prove to be insufficient for the Plan period as a whole.

2.8 In addition, as we explain in paragraphs to 3.6 to 3.39, the make-up of the proposed housing land supply for the new Plan-period is subject to a higher-

⁹ Ibid.

¹⁰ North West Leicestershire District Council (2017). *North West Leicestershire Local Plan: Paragraph 7.24*. Available at: https://www.nwleics.gov.uk/pages/local_plan (Accessed 26th February 2024).

than-normal degree of delivery risk. Unless the choice of allocated sites is changed to reduce the risk profile of the sites, a higher flexibility allowance will be required.

2.9 Overall, therefore, we believe the new Local Plan should provide a 20% flexibility allowance, which would require the delivery of a further 1,139 new homes.

2.10 A report to the Communities Secretary and to the Minister of Housing and Planning, produced by the Local Plan Experts Group (LPEG) in 2016 states:

...local plans should be required not only to demonstrate a five year land supply but also focus on ensuring a more effective supply of developable land for the medium to long term (over the whole plan period), plus make provision for, and provide a mechanism for the release of, developable Reserve Sites equivalent to 20% of their housing requirement.¹¹

2.11 This report was based on a Call for Evidence which received a large number of responses and was examined by experts in both land and planning, making its recommendations the most relevant and authoritative on the topic of effective plan-making.

2.12 Therefore, we believe the 10% flexibility allowance proposed for the new Local Plan provides an inadequate contingency to ensure the housing requirement is met. Rather, we agree with LPEG that 20% of the housing requirement must be the absolute minimum flexibility allowance which should be included in the new Local Plan.

¹¹ Local Plans Expert Group (2016). *Report to the Communities Secretary and to the Minister of Housing and Planning*. Available at: <https://www.gov.uk/government/publications/local-plans-expert-group-report-to-the-secretary-of-state> (Accessed 26th February 2024).

3. Draft Housing Allocations

3.1 In this section we respond to the policies set out in the Proposed Housing and Employment Allocations for Consultation document ('the proposed allocations document'), published in January 2024. We have not commented on the employment section of the document, instead focussing on the housing allocations most likely to influence the soundness of the new Local Plan.

Housing Allocations

- 3.2 Taking into account completions and commitments to date, the plan is aiming to deliver 5,693 new dwellings. Although the new allocations will apparently deliver 6,676 homes (including 1,900 homes at Isley Woodhouse)¹², as the report to the Local Plan Committee from January 2024¹³ explains, this includes 1,200 homes at Money Hill which are to be re-allocated and are therefore already counted as committed development. Adjusting for that, the net number of new homes allocated is actually 5,476 – a shortfall of 217 against the plan target.
- 3.3 We also have concerns about the suitability and deliverability of a number of the sites proposed for allocation, which are set out in detail below.
- 3.4 To ensure the Plan is sound, and can effectively deliver, additional sites should be allocated sufficient to deliver at least 217 homes plus any extra dwellings which are needed as a result of the deletion or amendment of other sites which are currently proposed for allocation and any extra dwellings which are needed as a consequence of increasing the flexibility allowance.

¹² North West Leicestershire District Council (2024). *Draft North West Leicestershire Local Plan 2020-2040: Proposed Housing and Employment Allocations for Consultation*. Available at: https://www.nwleics.gov.uk/pages/local_plan_review (Accessed 26th February 2024).

¹³ *Allocations Committee Report, 17th January 2024*. Available at: <https://minutes-1.nwleics.gov.uk/ieListDocuments.aspx?CId=344&MId=2549> (Accessed 26th February 2024).

3.5 Whilst NWLDC's preferred approach may well be to have a larger amount of development in the Principal Town, the distribution of housing should be informed by the availability of land. As paragraph 69 of the National Planning Policy Framework (NPPF) notes, the availability of land should be the starting point for judgements about the distribution of new homes:

*Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. **From this**, planning policies should identify a sufficient supply and mix of sites (our emphasis).*

3.6 Notwithstanding NWLDC's preferred distribution of development, we agree with the assessment in the January Local Plan Committee report that there are particular constraints that mean delivering further dwellings from the Principal Town is unlikely to be possible. We also note that the Key Service Centres are already planned to deliver significantly more than their targeted share of housing growth, and that the challenges of commencing delivery which are inherently part of a New Settlement make it an unlikely source for additional delivery. The unavoidable conclusion, therefore, is that the bulk of the 271-home shortfall will need to be delivered in the Sustainable Villages.

Land at Broom Leys Farm, Broom Leys Road, Coalville

3.7 This site was only added as a draft housing allocation on 17th January 2024, having been considered unsuitable for allocation just 2 months previously in the report to the November 2023 Local Plan committee.¹⁴ There has been no change in circumstances to indicate that this site is now suitable for development.

¹⁴ North West Leicestershire District Council Local Plan Committee (2023). *New Local Plan - Proposed Housing and Employment Allocations Committee Report, 15th November 2023*. Available at: <https://minutes-1.nwleics.gov.uk/ieListDocuments.aspx?CId=344&MId=2548> (Accessed 26th February 2024).

3.8 The land at Broom Leys Farm is also located in an Area of Separation (Policy En5) in the adopted plan.¹⁵ According to the Area of Separation Review (2019), the site:

*...forms an important part of the retained physical gap and separation between the urban area of Coalville west of the A511 and the suburban development of Broom Leys Road/Greenhill to the south and east...[,] makes a notable contribution to the landscape setting of the Broom Leys Road area of Coalville...[and] makes a notable contribution to the open character of the undeveloped land to the south of the disused mineral railway and up to the edge of the development on Broom Leys Road.*¹⁶

3.9 The Coalville Urban Area Site Assessment acknowledges that, regardless of the contribution of any individual part of the Area of Separation:

The [Area of Separation Review] recommends that such areas be retained so as to prevent the erosion of the Area of Separation as a whole.

3.10 Officers recognised all this in their November committee report, noting that “*development would be likely to have a significant effect on the open character of this part of the AoS*” and concluding that the site was not suitable for development.

3.11 By January, without any further evidence being produced, that position had apparently changed and the site was proposed for allocation. The decision to allocate the site for development was justified with the observation that “*In the absence of any other alternative site at this stage, it is considered that*

¹⁵ North West Leicestershire District Council (2017). *North West Leicestershire Local Plan*. Available at: https://www.nwleics.gov.uk/pages/local_plan (Accessed 26th February 2024).

¹⁶ The Landscape Partnership (2019). *Area of Separation Study: Coalville Urban Area*. Available at: https://www.nwleics.gov.uk/pages/local_plan_review_evidence_base (Accessed 26th February 2024).

*the site should be allocated.*¹⁷ The language used reveals the unsuitability of the choice, but it is also an unnecessary one. There are viable alternative sites to be considered outside of the Coalville Urban Area. If there are insufficient suitable sites to deliver the proposed distribution of development, then the distribution of development should be changed rather than unsuitable sites being allocated for development.

Broad Location West Whitwick

3.12 The council confirms that the sites which make up this broad location in West Whitwick are in different ownerships and will require co-operation between the various landowners, which has not yet been agreed.¹⁸

3.13 According to the housing and economic land availability assessment section of the Planning Practice Guidance:

*A site can be considered available for development, when, on the best information available (confirmed by the call for sites and information from land owners and legal searches where appropriate), there is confidence that there are no legal or ownership impediments to development.*¹⁹

3.14 A significant ownership impediment to the availability of this site is the lack of landowner agreement to jointly develop this broad location. As co-operation is essential,²⁰ without which most of the land becomes unfeasible, this is a central issue to the site's allocation.

¹⁷ North West Leicestershire District Council Local Plan Committee (2024). *New Local Plan - Proposed Housing and Employment Allocations Committee Report, 17th January 2024*. Available at: <https://minutes-1.nwleics.gov.uk/ieListDocuments.aspx?CId=344&Mid=2549> (Accessed 26th February 2024).

¹⁸ North West Leicestershire District Council (2024). *Draft North West Leicestershire Local Plan 2020-2040: Proposed Housing and Employment Allocations for Consultation, Paragraph 4.36*. Available at: https://www.nwleics.gov.uk/pages/local_plan_review (Accessed 26th February 2024).

¹⁹ Department for Levelling Up, Housing and Communities and Ministry of Housing, Communities & Local Government (2014). *Housing and Economic Land Availability Assessment: Paragraph: 019 Reference ID: 3-019-20190722*. Available at: <https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment> (Accessed 26th February 2024).

²⁰ North West Leicestershire District Council (2024). *Draft North West Leicestershire Local Plan 2020-2040: Proposed Housing and Employment Allocations for Consultation, Paragraph 4.36*. Available at: https://www.nwleics.gov.uk/pages/local_plan_review (Accessed 26th February 2024).

- 3.15 For the same reason, this site cannot be defined as deliverable as per the NPPF as *“sites for housing should be available now.”*²¹ This site is not.
- 3.16 To be considered “developable,” the NPPF requires that a site must have *“a reasonable prospect that they will be available.”* Again, this is not the case. There is no “reasonable prospect” that the site will be available – just a hope.
- 3.17 As NWLDC observe, *“there is no guarantee that it will be possible to bring forward the Broad Location in its entirety.”*²² Therefore, this allocation is at significant risk of failing to deliver the contribution of 500 homes towards the housing requirement. Alternative or additional sites must be considered for allocation elsewhere in North West Leicestershire.

Coalville Town Centre Regeneration

- 3.18 The proposed allocations document sets out that 200 homes will be delivered on as yet undetermined sites in the town centre of Coalville. Only 28 homes have been identified to contribute towards this figure of 200 new homes so far, at Needham’s Walk mixed-use leisure development.²³
- 3.19 Without specific sites having been identified, this element of supply is, in effect, a windfall allowance. Paragraph 72 of NPPF explains that a windfall component to housing supply is only appropriate when there is *“compelling evidence that they will provide a reliable source of supply.”*
- 3.20 There is currently no evidence that this number of homes can be delivered. That is, perhaps, why the original proposed allocations from November 2023 included no such allowance. As officers recognised in January, *“more work*

²¹ Department for Levelling Up, Housing and Communities (2023). *National Planning Policy Framework (page 69)*. Available at: <https://www.gov.uk/government/publications/national-planning-policy-framework--2> (Accessed 26th February 2024).

²² North West Leicestershire District Council Local Plan Committee (2024). *New Local Plan - Proposed Housing and Employment Allocations Committee Report, 17th January 2024, paragraph 5.11*. Available at: <https://minutes-1.nwleics.gov.uk/ieListDocuments.aspx?CId=344&MId=2549> (Accessed 26th February 2024).

²³ Planning Application Reference: 22/00819/FULM

will need to be undertaken to establish exact numbers and also which specific sites should be identified.”

- 3.21 Without that robust evidence, this source of supply should be removed from the Plan.

Land at Isley Woodhouse

- 3.22 The new settlement of Isley Woodhouse is allocated in the new local plan, with a total capacity of 4,500 homes. According to the proposed allocations document,²⁴ Isley Woodhouse is set to deliver 1,900 homes by the end of the plan period. There is no live planning application for any of the homes, services, or facilities that this new settlement would supply, and there is unlikely to be until at least the anticipated adoption of the new Local Plan in October 2026.²⁵
- 3.23 According to Start to Finish,²⁶ a report by planning consultant Lichfields, schemes of this size on average do not deliver the first home until 8.4 years after validation of the planning application. This means this site's first completion will likely be in early 2035. As the average annual build out rate for a site of this size is around 137 dwellings per annum, not all of the anticipated 1,900 dwellings can be expected to deliver within the plan period.
- 3.24 Isley Woodhouse is the first addition of a new settlement in North West Leicestershire. This will be a complicated process, with a high probability of delays. The timescale for delivery set out above may therefore even prove to be optimistic.

²⁴ North West Leicestershire District Council (2024). *Draft North West Leicestershire Local Plan 2020-2040: Proposed Housing and Employment Allocations for Consultation*. Available at: https://www.nwleics.gov.uk/pages/local_plan_review (Accessed 26th February 2024).

²⁵ North West Leicestershire District Council (2024). *Local Development Scheme 2023-2026*. Available at: https://www.nwleics.gov.uk/pages/local_development_scheme (Accessed 26th February 2024).

²⁶ Lichfields (2020). *Start to Finish: Second Edition*. Available at: <https://lichfields.uk/content/insights/start-to-finish> (Accessed 26th February 2024).

- 3.25 A practical parallel can be drawn from the nearby Leicestershire local authority of Harborough and its two proposed Strategic Development Areas (SDAs) of Lutterworth East and Scraftoft North which were both allocated in the Harborough Local Plan adopted in April 2019.
- 3.26 The County Council-owned Lutterworth East was expected to deliver 2,750 new homes. Planning permission was forecast to be granted in the summer of 2019, with the first homes being occupied in 2023. However, planning permission was not granted until May 2022, and there has yet to be any development activity on site. At best, the first home is unlikely to be occupied before 2026.
- 3.27 Scraftoft North was expected to deliver 1,200 new homes. An outline application for the site, submitted in 2019, has yet to be determined. The council expected delivery of new homes to start in 2026, but based on the application being approved in 2022. It is therefore unlikely that any new homes will be completed before 2028.
- 3.28 In both cases there are no doubt specific circumstances which account for those delays. But the nature of large-scale developments such as this is that there is always something that leads to delays.
- 3.29 The new settlement of Isley Woodhouse is demonstrably unlikely to deliver 1,900 in the plan period, and additional or alternative sites elsewhere in North West Leicestershire should be allocated for new homes.

Former Hermitage Leisure Centre, Silver Street, Whitwick

- 3.30 To our knowledge, there has been no consultation with Sport England about the appropriateness of re-developing this site for new homes. Without compensatory provision, it is highly likely that they will object to the proposal, highlighting the site's unsuitability for development.

3.31 An alternative or additional site which does not remove sports provision should therefore be identified elsewhere in North West Leicestershire.

Land South of Normanton Road, Packington

3.32 Only one of the nine sites considered in Packington received a draft allocation in the proposed allocations document: Land South of Normanton Road, Packington (Housing Code: P4), expected to deliver 18 new homes.

3.33 We have doubts as to whether 18 homes can actually be accommodated on the site. Given its small size, it is unclear how the requisite 10% net gain in biodiversity can be achieved without reducing the number of homes to delivered.

3.34 That is particularly important as we believe that 18 homes is already too few for a settlement of Packington's size across the whole of the plan period.

3.35 As of 2021, Packington had approximately 360 households.²⁷ The addition of 18 new homes via the draft allocation would grow the number of households in Packington by approximately 5% - equivalent to around 0.33% per annum over the plan period as a whole. By comparison, when comparing the new Local Plan's housing requirement figure of 12,456 with the total number of households across the borough (44,971²⁸), the overall level of housing growth expected across the borough as a whole equates to 27.6%, an annual growth rate of 1.84% across the plan period.

3.36 Packington is also anomalous within the 17 settlements in the Sustainable Village tier. Despite being ranked 6th for sustainability in the Settlement Study²⁹, Packington is only expected to deliver 18 new homes – fewer than any other Sustainable Village with a proposed housing allocation in the draft Local Plan. Indeed, Ravenstone (50 homes), Oakthorpe (47), Heather (37)

²⁷ Office for National Statistics (2024). *Census 2021*. Available at: <https://www.ons.gov.uk/census> (Accessed 26th February 2024).

²⁸ *ibid*

²⁹ North West Leicestershire District Council (2021) *Settlement Study*. Available at: https://www.nwleics.gov.uk/pages/local_plan_review_evidence_base (Accessed 26th February 2024).

and Appleby Magna (32) are all expected to deliver more new homes than Packington despite being less sustainable.

- 3.37 Therefore, we consider that Packington can and should deliver more new homes. As this site is only able to deliver a small number of homes (and we consider 18 homes to be an over-estimate of its capacity) we do not consider it to be a suitable allocation. That is especially true given the availability of other, equally if not more suitable, sites in Packington which could deliver a larger number of homes, and more proportionate growth for a settlement of this sustainability.

Summary

- 3.38 Based on the above assessment of the new local plan's draft housing distribution, several sites in the Principal Town will fall away, in addition to a significantly reduced delivery figure for the new settlement of Isley Woodhouse.
- 3.39 This means around 2,181 of the 6,676 homes to be delivered through allocated sites are either unsuitable or at a material risk of failing to deliver. Those sites which are unsuitable for development should be deleted from the draft Local Plan and replaced with suitable sites, even if that results in the distribution of new homes being revisited. NWLDC should also give serious consideration to removing those sites where delivery is at significant risk and replacing them with lower risks sites. Alternatively, or in addition to those changes, to reflect the high-risk profile of such a large proportion of the housing supply NWLDC should also increase the flexibility allowance to 20% (for the reasons we explain at paragraphs 2.9 to 2.12).

4. Land West of Redburrow Lane, Packington

4.1 SLG are working with the owners of an area of land to the south of Normanton Road / West of Redburrow Lane ('the subject site'), shown edged in red at figure 4.1 and known the council as site P7. It comprises one land title, amounting to c. 2.02 hectares. We consider it to be suitable for residential development.

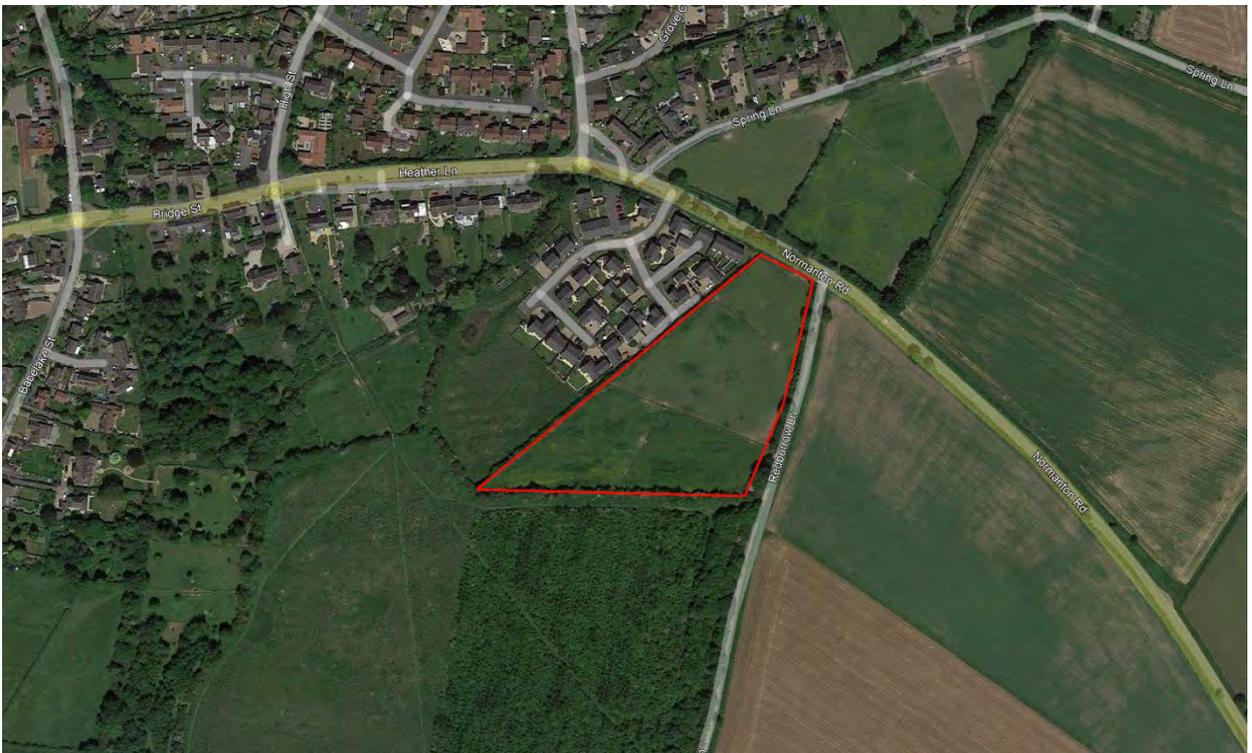


Figure 4.1: Site Boundary

4.2 It is always our intention to work closely with local authorities to ensure that the sites we are promoting deliver on their objectives as well as ours, and that we can deliver high-quality schemes. Indeed, local councillors have often complemented us on the quality of our proposals. In reference to one of our planning applications, a planning committee member noted " *You have been very careful and done your homework about delivering good quality*

housing, which this committee is dedicated to doing." Similarly, a local councillor has commented about one of our projects that *"It's nice to see a developer come forward with such a quality proposal. I think this project has got some real legs in making a proper small community."*

4.3 Our first step was to submit details of the site to the council in March 2023, followed by a discussion with the council's Planning Policy Team on 19th April 2023.

4.4 Those submissions noted that the site is currently a Countryside designation, bordering the proposed Limits to Development in the new local plan. The site lies in a sustainable location for housing, located close to Packington CofE Primary School Recreation Ground (700m) and Packington Memorial Hall (740m).

4.5 Vehicular access is being considered via a simple T-junction on Normanton Road. This would provide for a visibility splay in both directions which is appropriate for the 30mph speed limit.

4.6 Our initial assessment confirms that there are no technical constraints which would prevent development of the site. This has been set out in a Development Statement submitted to the council.

Site Assessment

4.7 The subject site was assessed by the council in preparation for this consultation (Housing Code: P7). The assessment is positive, with the council raising only one concern relating to townscape, landscape, and visual sensitivity:

It is likely development of the site will have an impact on sensitive landscape and/or townscape characteristics, and it is possible that it cannot be mitigated to an acceptable level.

Development of the front part of the site, in line with the development to the west, would have less of an impact than development of the whole site which would project further into the countryside to the south. However, the site as promoted would encroach significantly into the countryside to the south.³⁰

- 4.8 We agree that the appropriate limits to development for the site are in line with the existing extent of built form on the adjoining Century Drive development. We have not, as NWLDC state, been promoting a larger part of the site. This would appear to be due to a misinterpretation of the concept plan submitted to NWLDC.
- 4.9 There are, of course, different interpretations of “development.” This could be taken to mean simply build form – the homes and associated roads – and exclude green infrastructure, like open space, attenuation ponds and wildlife planting. At the other extreme, it is possible to interpret “development” as everything associated with the site – including green infrastructure. We have attempted to discuss this with officers to clarify their interpretation, but unfortunately without success.
- 4.10 In an effort to resolve this confusion, we have therefore prepared two new concept drawings reflecting those two interpretations.³¹ These drawings, which can be found at Appendix A, illustrate how the development of the site would not encroach upon the countryside to the south. We would be content to continue promoting the site on the basis of either of those proposals or, indeed, any alternative approach that the council felt appropriate.
- 4.11 Option 1 keeps the build line for homes and roads in line with the rear of properties on Century Drive, with the land beyond opened up to public access as open space, including the proposed drainage pond and wildlife planting to ensure a 10% net gain in biodiversity can be delivered within the

³⁰ Ibid.

³¹ Ibid.

boundary of the site. This approach would allow around 35 new homes to be delivered on the site.

4.12 Option 2 also keeps the extent of development in line with the rear of properties on Century Drive, but leaves the land beyond in its current use as grazing paddock. The necessary open space, attenuation and wildlife planting would be delivered within the northern area containing the homes. This results in a reduced quantum of open space, but to a level that is still appropriate given the scale of the development. Around 30 new homes could be delivered in this way.

4.13 We therefore believe that the Site Assessment should be updated to reflect that we are not promoting the southern-most part of the site for housing development. As a result, there are therefore no reasons why the site could not be allocated for housing development.

4.14 Furthermore, given our previous comments at paragraphs 3.34 to 3.37 regarding the appropriate level of growth for Packington, we believe this site should be allocated in place of the currently proposed allocation site in Packington south of Normanton Road (known as site P4).

5. Summary

5.1 Our comments on the emerging Local Plan can be summarised as follows:

5.1.1 The proposed housing requirement is too low as it does not take into account need in Leicester City beyond 2036.

5.1.2 The higher-than-normal risk profile of the proposed housing supply combined with the tendency for housing delivery rates to peak early in the plan period indicates that a 20% flexibility allowance is appropriate.

5.1.3 The proposed distribution of homes across the borough is inappropriate having regard to the availability of sites. It results in development in unsuitable, less sustainable locations in an effort to achieve the desired distribution of development.

5.1.4 In particular, the level of growth proposed for the village of Packington is too low given its size and sustainability.

5.1.5 A number of the proposed allocations are unlikely to be deliverable and should be removed.

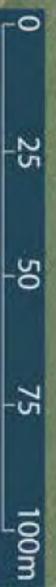
5.1.6 A number of the proposed allocations are unsuitable for development and should be removed.

5.1.7 The council's assessment of the land at Redburrow Lane (known as site P7) contains a factual error. There are no impediments to the site's development, and it should be allocated.

Appendix A – Amended Site Plans



Option 1





RETAINED GRAZING LAND

ATTENUATION

LAP

BUILD ZONE

BUILD ZONE

B/Z

Option 2





Strategic Land Group



Land off Redburrow Lane, Packington

A sustainable choice for new
homes in Packington

March 2024

Strategic
Land Group



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Introduction

This section explains the purpose of the document, and the site to which it relates.

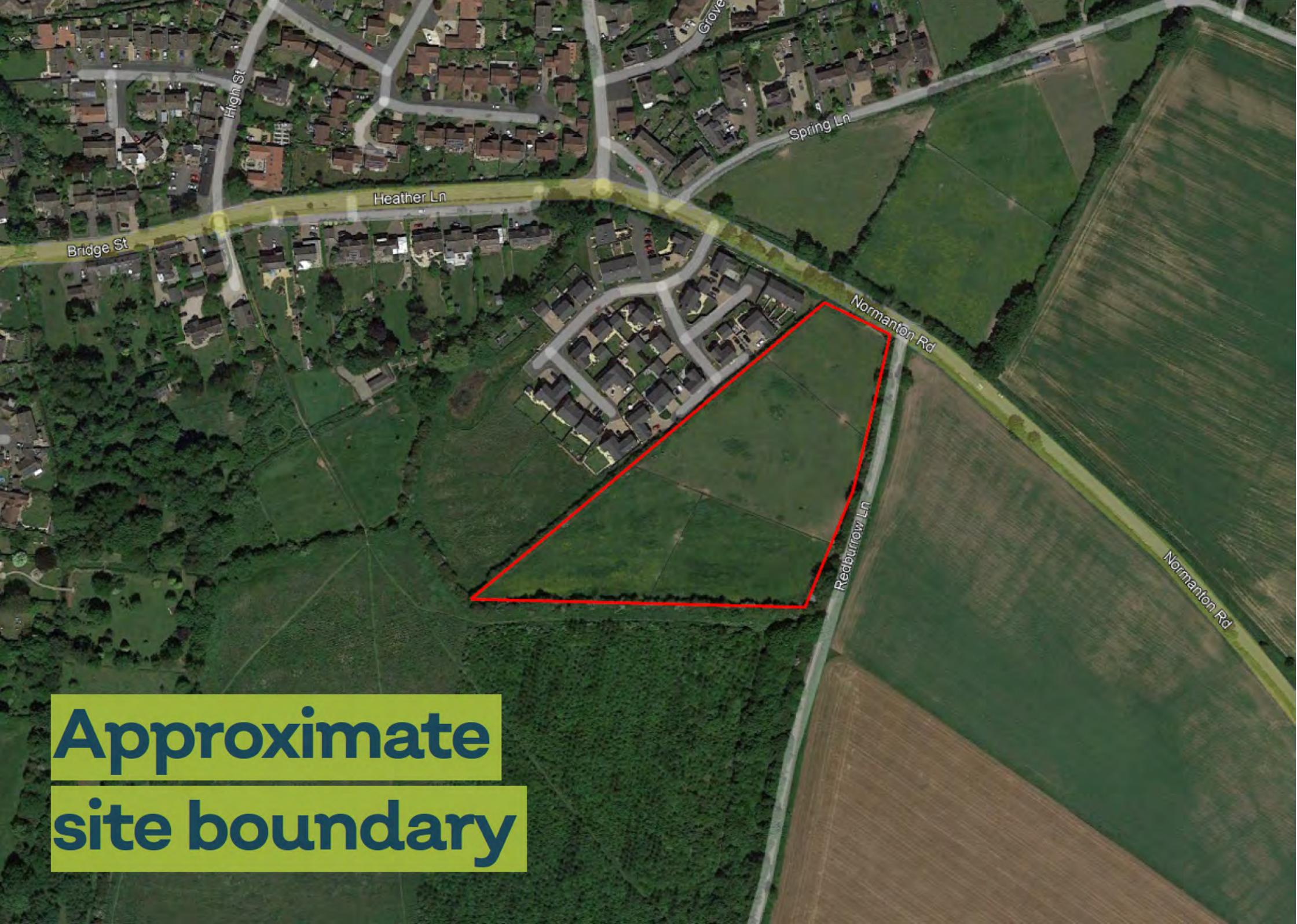
The land adjoining Normanton Road in Packington is being promoted for housing development by The Strategic Land Group, a company with a track record of promoting strategic sites through the planning system before selling to a developer.

The site is capable of providing a range of attractive family homes benefiting from the highest standards of design and layout. It could deliver between 30 and 35 new homes and new areas of public open space.

This Development Statement presents a thorough analysis of the site context and the technical considerations for developing it. A range of technical assessments have been used as the basis for identifying constraints and opportunities in order to develop an illustrative master plan that compliments the characteristics and valued aspects of the site and the surrounding area.



**View west
across the site**



**Approximate
site boundary**

Site and Surroundings

Site

The site is located to the south of Normanton Road in Packington close to the junction with Redburrow Lane. It totals approximately 2.02 hectares and is shown edged in red on the plan on the previous page.

Post and rail fencing divides the greenfield site into four separate paddocks which are used for grazing ponies. All of the site's external boundaries are marked by existing hedgerows.

Access is currently taken in the south-eastern corner through a field gate onto Redburrow Lane.

Generally flat, the site rises up slightly towards the southern boundary.

Surroundings

Packington is identified as a Sustainable Village in the most recently adopted Local Plan for North West Leicestershire. As such, it represents a suitable location for new development.

The site relates well to the existing built form of the village, with the western boundary of the site adjoining a new build development completed by Peveril Homes around three years ago.

The northern and eastern site boundaries adjoin existing adopted highway, while the southern boundary is marked by a substantial area of woodland. This results in the site feeling well contained.



The view north across the site from the existing access



New build homes on Century Drive adjacent to the site's western boundary

A photograph of a rural landscape. In the background, a large, dark-roofed house with several chimneys is partially obscured by a dense line of trees and bushes. In the foreground, there is a green field with a wooden fence running across it. The sky is clear and blue. The bottom half of the image is overlaid with a dark blue gradient.

Technical Considerations

This section summarises the contents of this document and considers the suitability of the site for residential development.

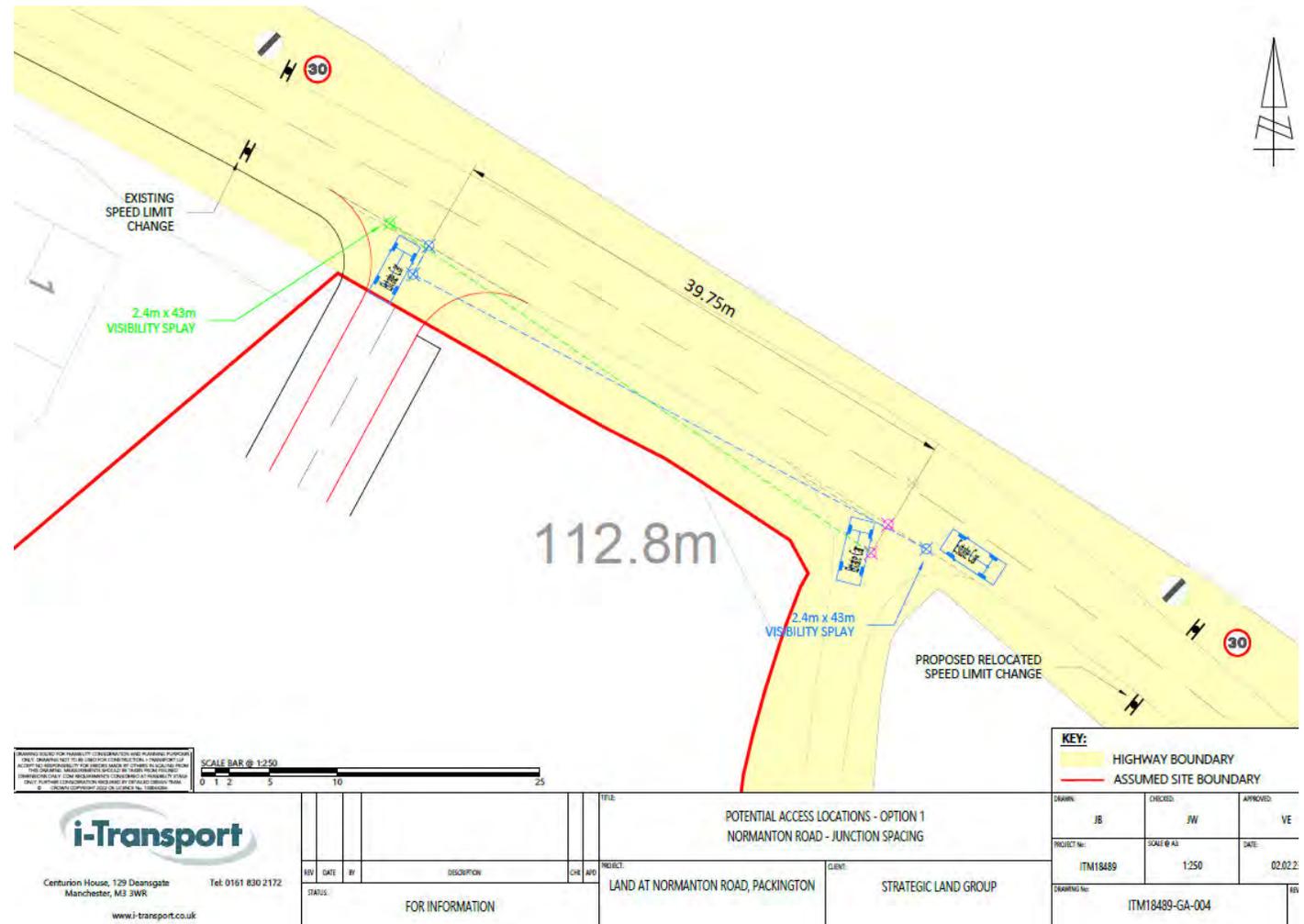
Highways and accessibility

Access to the site has been considered by iTransport taking into account the requirements of the Leicestershire Highway Design Guide. Their proposed design is shown on the plan on the next page.

The preferred solution is to take vehicular access on to Normanton Road via a simple T-junction. This would provide for a visibility splay of 2.4m x 43m in both directions, appropriate for a 30mph speed limit. The existing 30mph zone would be extended to the east beyond the site's boundary.

Locating the access in this location maximises the separation between existing junction at Century Drive and Redburrow Lane. Analysis by iTransport shows the visibility splay would not be obstructed by a vehicle waiting at the Redburrow Lane junction, and vice versa, as required by the Highway Design Guide.

There are no particular capacity constraints to the local highway network although this would need to be demonstrated in detail within a Transport Assessment to accompany any planning application, with



Proposed access design prepared by iTransport

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mitigation measures proposed where needed.

Pedestrian access would be delivered through a new footway connection between the site access and Normanton Road which will tie into the existing footway at Century Drive. Based on the existing level of footway provision on Normanton Road and the scale of development proposed, it is considered that a single footway on the southern side of the road would be sufficient.

As expected for a Sustainable Village, Packington provides a good range of services facilities. Packington CofE Primary School (650m), Daybreak Services General Store (760m), the Bull & Lion Pub (320m), Recreation Ground (700m) and Packington Memorial Hall (740m) are all within a comfortable walking distance.

For journeys further afield, a bus stop is located 320m away by the Bull & Lion. This is served by the hourly 19 service, providing access to Ashby-de-la-Zouch (in 8 minutes), Measham (5 minutes) and even Burton (1 hour 4 minutes). Secondary schools and sixth form college are located in nearby Ashby

Cycle journeys have the ability to replace car trips for journeys of up to 8km, which can be comfortably cycled by most people in half an hour. Although there are no designated cycle routes in or near Packington it is possible to easily reach Ashby-de-la-Zouch, Measham, Coalville and Overseal using the road network.

All of the land required to form the vehicular and pedestrian access falls within the site boundary or the current limits of the adopted highway with no third party land being required.

There is therefore no reason in highways terms why the site could not be developed

Ecology

As a result of the grazed nature of the land, it is dominated by improved grassland, which offers no cover for wildlife and is of low ecological value. There was not considered to be any suitable habitat for Great Crested Newts while a survey in 2016 found no evidence of badger activity.

The majority of the ecological value of the site is represented by the hedgerows

and trees along the perimeter. Although a survey in 2016 found the hedgerows to be species rich, it concluded that they did not be classed as "important" under the Hedgerow Regulations. Despite this report being somewhat dated, there is no reason to suspect the position has changed.

A small section of hedgerow would need to be removed to provide access to the site, but the vast majority would be retained and reinforced. In addition, new tree and hedgerow planting within the proposed development will help to deliver a net gain in biodiversity as well as contributing to the wider area's green space network.

These features will all be accommodated in the masterplan as part of a new landscaping scheme incorporating a range of native species and creating a variety of new habitats. This will include designing the site's surface water drainage system so as to provide new aquatic and semi-aquatic habitats. Through measures like this, any development would look to achieve a 10% net gain in biodiversity value.

The River Mease, which is both a Site of Special Scientific Interest (SSSI) and a

Special Area of Conservation (SAC), lies around 300m beyond the site's western-most point. The site is sufficiently far removed from the river not to have any direct impact upon it. The nutrient neutrality implications are considered in the "Flood Risk and Drainage" section of this document.

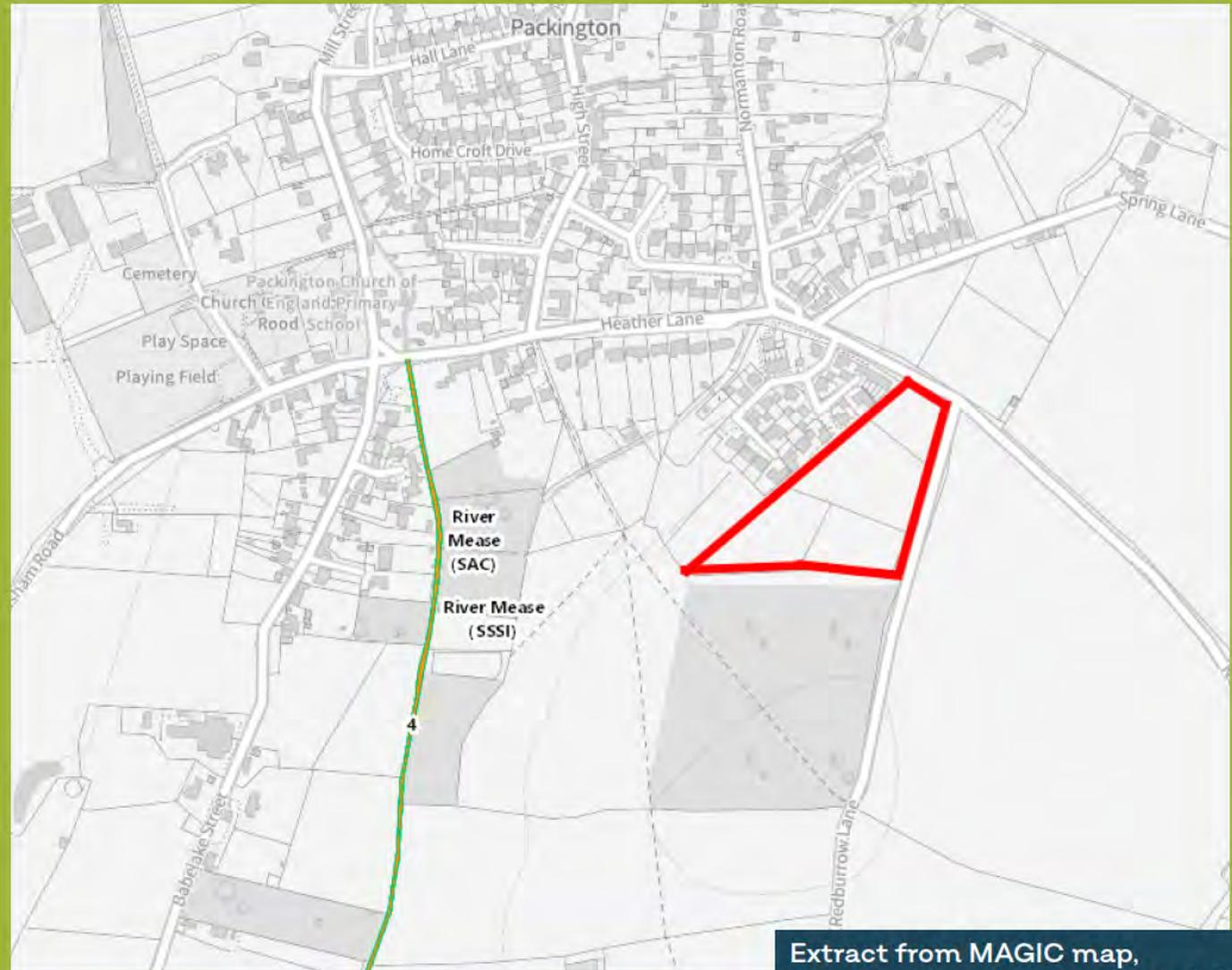
There is therefore no reason in ecological terms why the site could not be developed.

Flood Risk and Drainage

The Environment Agency's flood map for planning confirms that the site falls within Flood Zone 1, and is therefore considered suitable for residential development.

Any development would incorporate a sustainable drainage system ('SuDS'). This would be designed to limit surface water flows to the greenfield run-off rate plus an allowance for climate change, so as not to increase the risk of flooding either on the site or elsewhere.

As development would increase the impermeable area of the site, it is likely that storm water will need attenuating as part of any scheme. That could be done by way of a



Extract from MAGIC map, showing site edged in red and the River Mease SSSI and SAC.

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storage pond in the south-western corner of the site, which could be designed in such a way as to also provide ecological benefits.

From the storage pond, surface water would be discharged in accordance with the following SuDS hierarchy:

1. Into the ground (via infiltration).
2. Into a watercourse.
3. Into a surface water sewer.
4. Into a combined sewer.

Infiltration may be a technically acceptable solution subject to further investigations of ground conditions. While nearby watercourses and surface water sewers may also provide a potential point of discharge.

Further investigation is required to identify the exact point of discharge for surface water drainage. However, it is clear that the site can be satisfactorily drained.

In common with much of North West Leicestershire, the site falls within the catchment of the River Mease. Based on current advice from Natural England, any new housing development within the catchment will have to show that it is nutrient neutral,



Extract from the Environment Agency's Flood Map for Planning, showing site edged in red and the nearby areas of flood risk.

and won't increase the amount of phosphate pollution entering the river. Severn Trent Water are progressing plans to improve the wastewater treatment works in Packington and Measham which should address this issue. Those works are due to be completed by 2027.

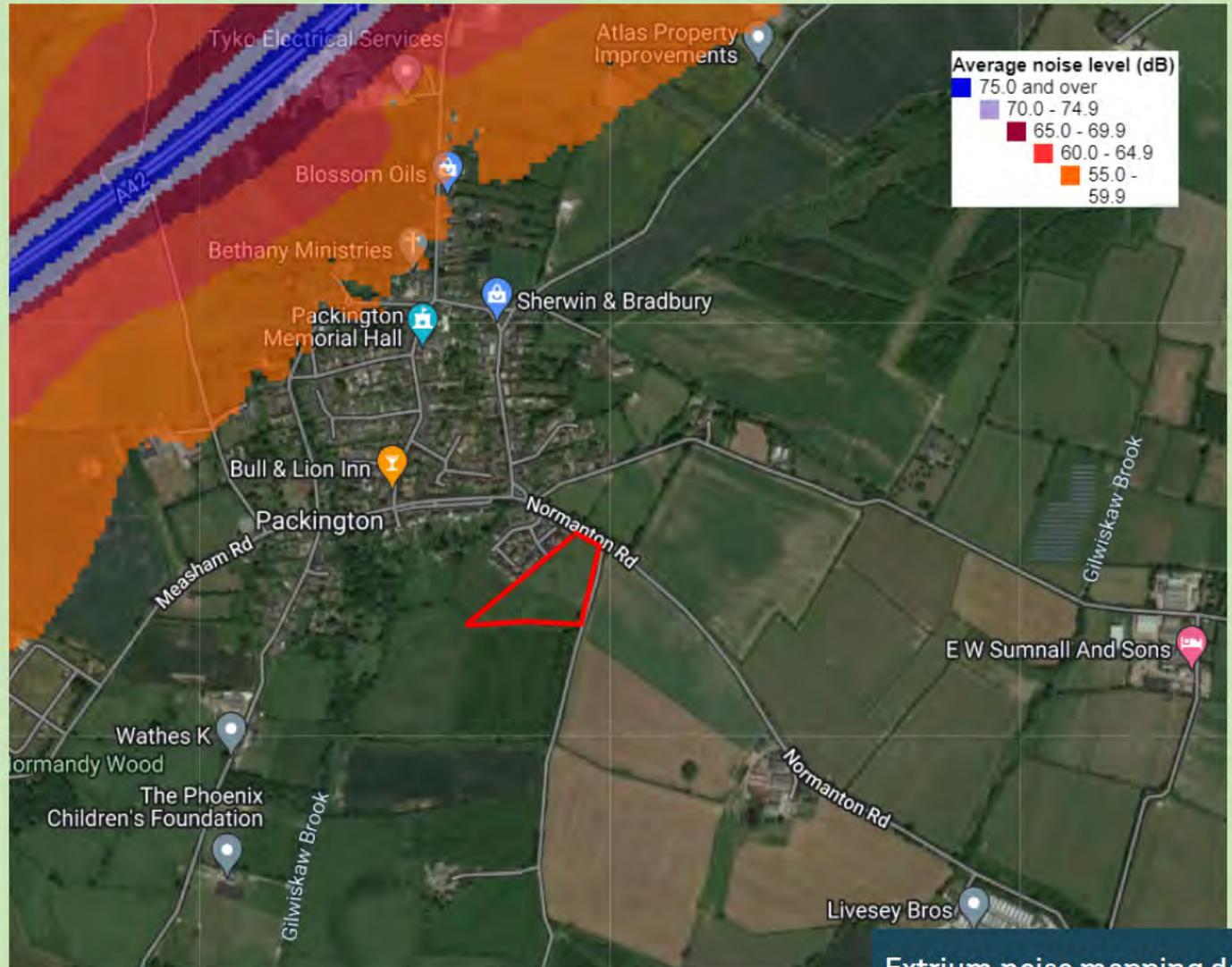
The site could also be brought forward more quickly if appropriate mitigation were delivered, perhaps through a new Developer Contribution Scheme.

There are therefore no flood risk or drainage reasons why the site could not be developed.

Ground Conditions

The site is greenfield and has not previously been developed. It is not known to be subject to any contamination that would preclude development.

According to the British Geological Survey, there is no information on the Surface Geology of the site. Three forms of Bedrock Geology are present, Pennine Lower Coal Measures Formation - Mudstone, siltstone and sandstone; Moira Formation - Breccia; and Tarporley Siltstone Formation - Siltstone,



Extrium noise mapping data, showing the site edge in red.

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mudstone and sandstone. None of these present concerns for the site's deliverability.

Initial analysis of historic mapping does not suggest there has been previous usage of the site which would significantly affect the ground conditions.

Although more investigation will be required, ground conditions are unlikely to be an impediment to the site's development.

Noise and Air Quality

Although Extrium's Noise and Air Quality Viewer shows noise levels to the north of Packington to be very high, it also confirms that no part of this site acts as a noise hotspot, as identified by DEFRA.

Although a noise assessment will be required as part of any planning application, it is not considered that this is an issue which would prevent development.

The nearest Air Quality Management Area ("Mountsorrel AQMA") is approximately 9km away from the site.

Therefore, Noise and Air Quality considerations should not impede development of the site.

Heritage and Archaeology

There are no known heritage assets within the site boundary which would impact on its development potential.

Trial trenching undertaken in relation to the adjacent Peveril Homes development identified no archaeological features pre-dating the medieval ridge and furrow. This suggests the area remained relatively undisturbed prior to that date, and lay outside the Saxon and medieval village core.

There are five listed buildings within 500m of the site, although none would be affected by the development. Some of the closest heritage assets, such as the Grade II buildings on Babelake Street, are already set within a residential area from which the development of this site will not be visible. Additionally, Packington House to the north benefits from significant screening from vegetation and trees ensuring its setting was not impacted.

There are no scheduled monuments, world heritage sites or registered battlefields within 500m of the site.

Thus, there are no heritage considerations which would undermine development of this site.

Landscape Impacts

The site is an unremarkable field located on the edge of the village and has an urban fringe character. It is well contained by roads and hedgerows to the north and east, and woodland and topography to the south. There are therefore few long range views of the site which would be affected.

The site is not covered by any specific landscape designation.

Landscape and visual impacts should not, therefore, be an impediment to the site's development.

Services and Utilities

All necessary services and utilities are located within close proximity to the site's boundary.

There is no utilities infrastructure crossing the site which would impact upon its deliverability.



Existing site frontage on Normanton Road



The western site boundary with new build homes beyond



The land rises at the southern boundary, providing a sense of enclosure



Century Drive, adjacent to the site's western boundary



Design Proposals

This section explains how the site context was analysed and an initial concept plan for the site developed.

The two layouts shown on the next page outline how the site could be developed in a way that maximises the site's opportunities to create a high quality development.

Option 1 allows for 35 new homes to be delivered and utilises the south of the site for open space, drainage and wildlife planting.

Option 2 allows for 30 new homes to be delivered and provides the necessary open space, attenuation and wildlife planting within the northern area containing the homes.

We would be content to promote the site on the basis of whichever of those proposals the council finds most appropriate.

The design will take into account the new National Design Guide and National Model Design Code as well as local design policies.

Access and Layout

The vehicular access point will be located in the north-western corner of the site. This is located in a position that provides appropriate visibility and is a suitable

distance from the nearby junctions.

A primary, tree-lined road will run through the site, with narrower access roads branching from it where required.

Alongside the primary access road will be a footway which will connect into the existing adopted footpath close to the junction between Normanton Road and Century Drive.

Parking will be provided in a variety of ways to avoid the street scene becoming overly dominated by cars, and will include electric vehicle charging points.

Residential Layout

A variety of types and sizes of homes - including affordable homes and properties suitable for older people - will be provided as part of the development. The housing layout will be at its densest close to the existing built form on Century Drive with a lower density on the eastern fringes to mark the transition to the countryside.

Homes will be positioned to front onto streets providing active frontages. They will

also overlook the proposed new areas of open space providing natural surveillance.

Green and Blue Infrastructure

The urban fringe location of the site means that landscaping will be put at the heart of the layout design.

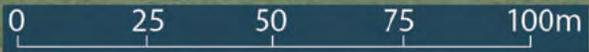
Existing trees and hedgerows will be retained as far as possible within generous green corridors, with the number of punctuations required for the road network kept to a minimum.

A small, arrival open space will be located next to the site access, helping to sign-post the site's green, landscape-heavy feel.

Options 1 and 2 both provide an area of open space, attenuation pond (designed so as to maximise ecological value), informal open space and - if required - an equipped play area. For Option 1, the southern parcel will be used for additional habitat creation ensuring the development overall delivers a 10% net gain in biodiversity value.



Option 1





RETAINED GRAZING LAND

ATTENUATION

LAP

BUILD ZONE

BUILD ZONE

B/Z

Option 2



Development

Benefits

- A range of types, sizes and tenures of new homes.
- Policy compliant affordable housing provision.
- Retention of existing trees and hedgerows.
- Electric vehicle charging points.
- Landscape buffer to south of the site.
- Potential provision of a new play area.
- 10% net gain in biodiversity value.
- No unacceptable impact on the highway network.
- Well integrated with existing settlement form.
- Close to existing services and facilities.
- Drainage network designed around SuDS principles.



**View south west
across the site**



Conclusion

This section summarises the contents of this document and considers the suitability of the site for residential development.

The land adjacent to Normanton Road provides an opportunity to address the need for housing in both North West Leicestershire generally and Packington specifically.

It is apparent that the housing needs of the borough cannot be met from previously developed land alone - some greenfield sites in sustainable locations will be needed to ensure housing needs are met.

A review of the technical considerations affecting the site confirms that it is suitable for development, and that a development would be achievable. There are no technical impediments to the site being developed.

Existing services and facilities are easily accessible from the site and it is well integrated with the existing settlement form. Its development would not have a detrimental impact on the existing highway network and could enhance active travel opportunities. There is no risk of flooding and the site can be adequately drained, whilst it will also be possible to make appropriate service connections.

Although any development of a greenfield site will result in a change in character, this site is well contained and the proposed development would not have an unacceptable impact on the landscape. The site is not currently of any particular ecological value with development offering the opportunity for a net gain in biodiversity.

The site is being promoted by The Strategic Land Group who have an established track record of delivering sites of this nature. It is therefore available for development.

The concept plan demonstrates that the site can accommodate between 30 and 35 new homes, including affordable housing. It provides for new areas of public open space, and the retention of key features such as trees and hedgerows.

The provision of high quality homes would boost housing supply, improve housing affordability and choice, generate jobs at the construction stage and increase spending in the local economy across the lifetime of the development.

Overall, the site is a sustainable location for the development of between 30 and 35 high-quality homes. It would provide an attractive, sustainable living environment, integrate well with the existing settlement and contribute to meeting the borough's identified housing needs.

The site is suitable for development, the development would be achievable and the site is available for development.

It represents a logical, sustainable choice for delivering a high-quality development that can make a meaningful contribution to housing need in Packington.

The Strategic Land Group
Centurion House
129 Deansgate
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M3 3WR

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Strategic
Land Group





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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Richard	
Last Name	Brackenbury	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
Street	██████████	
Town/Village	██████████	
Postcode	██████████	
Telephone	██████████	
Email address	██	

PART B – Your Representation

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

1. To which consultation document does this representation relate? Specifically IW1 and Emp90	x	Proposed policies
	x	Proposed housing and employment allocations
		Proposed Limits to Development Review

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

General

This submission primarily relates to the village of Diseworth.

Whilst I am a member of the "Protect Diseworth" team and support the detailed separate submission made by it, this document sets out my own additional submissions.

First, I fundamentally challenge the basis upon which this consultation has taken place in relation to which Diseworth faces an existential threat from two applications, a new settlement on 750 acres of agricultural land a few hundred metres to the west (Isley Woodhouse – "IW1") and secondly, a new Freeport-backed industrial site immediately abutting the village to the east (Freeport Land - "Emp90.") Either one could critically damage the nature of this conservation village, together, they would destroy it.

In the few weeks prior to this consultation, Diseworth faced:

- a scoping application in relation to IW1,
- a scoping application in relation to Emp90,
- a consultation and then a substantive application in relation to a solar farm for land immediately to the east of Emp90,
- a further application for solar panels subsequent to the last item,
- a widely trailed (by it – informed likely by end March 24) substantive application due from East Midlands Airport ("EMA") on part of Emp90
- the prospective owner of the rest of Emp90 ("SEGRO") apparently having applied to DLUHC for permission to use an expedited form of planning process.

All of this was in addition to a neighbourhood plan being promoted by the PC for the village

during the relevant period.

I suggest that this sequential activity is because of liaison between the various parties, the net effect being intended to create "planning fatigue" and the dissipation of resources with which the village might be defended.

This is the context in which the publication of the draft local plan ("DLP") was published less than 48 hours prior to a council "drop in" session in this village. Whilst the session was advertised online, no attempt was made to inform villagers in any way other than via those who were statutory consultees or individuals who had asked to be informed. Conversely, NWLDC thinks the issue of refuse bins is serious enough to circulate households in hard copy and with unbelievable irony, has this week distributed leaflets encouraging "working together to make our environment better." The disparity is obvious and, in my view, shows NWLDC's attitude to where it actually wants serious engagement.

Further, despite a working background which involved analysis of documents, I freely admit that I have found it almost impossible to tie in proposed policies with the allocations that affect my village. Taking the seriousness of the situation for Diseworth on the one hand and the complexity of the response process (itself based upon hundreds of pages of documents without relevant signposting) on the other, the situation is fundamentally unfair. I submit any substantive decision taken subsequent to this process will be fundamentally flawed.

As a second general point, I suggest that it is entirely wrong for the two projects above to be treated in isolation. If both are allowed to proceed, the cumulative effects are horrendous. Yet, I see no reference to this issue in the documents other than an attempt to justify IW1 because of the Freeport. It should be foremost in the minds of all relevant parties and decisions taken accordingly.

Finally, this submission should be deemed to include the comments I made in a letter dated 13 March 22. It bears on the same issues. A copy will be attached to the email forwarding this.

Isley Woodhouse (IW1 – para 4.101 et seq allocation document)

I oppose this allocation.

I submit that the consultation process, particularly in the context of this item, is little more than window-dressing.

NWLDC has already described the site as the “only viable site.” Its draft allocation document makes it clear that it intends this project to go ahead and has further said that a substantive application for the new settlement is anticipated prior to the conclusion of the local plan process on the basis that the emerging local plan will have reached such a stage to allow such application to succeed. Of itself, that statement suggests that the applicant(s) has been given grounds for confidence by NWLDC.

In relation to Diseworth, the DLP IW1 project:

- predicates the whole basis for building the town on mere assertions and statistics which, at best, are highly questionable.
- nowhere seriously addresses the perennial flooding problem for this village which exists even without the concreting of 750 acres of currently agricultural land.
- ignores the loss of those 750 acres at a time of reduced national food security.
- ignores the environmental damage caused by loss of habitat consequent upon destruction of miles of ancient hedging.
- glosses over the lack of transport infrastructure and the near certainty of the Diseworth/Long Whatton and Belton roads becoming major “rat runs.”
- ignores the nonsense of siting the new settlement in an entirely inappropriate situation next to two major nuisance creators (racetrack and EMA)
- ignores the damage to the village’s historic conservation status.
- ignores NWLDC’s own policies in relation to health and wellbeing.
- ignores the essential rurality of the area

A few specific examples irrationality,

4.104 the “co-location argument” is based solely on wishful thinking promulgated by the Freeport and its partners for political purposes - without evidence. The Freeport (see below) was initially promoting the “creation of high quality jobs.....turbo-charging the drive to net zero.” Now it wants “strategic warehousing” on its land. Workers for that purpose are primarily employed through agencies and are paid an average of just over £11 an hour. The disconnect is obvious.

4.107 although short, I suggest this is the key paragraph. Not only are the figures that NWLDC claims for housing requirements dubious, but there is also little rational explanation as to why other less damaging alternatives were dismissed. As shown, the reality is that two “promoters”

decided to join with obvious commercial advantage whilst at the same time apparently solving NWLDC's apparent problem. It does not.

4.109 the box beneath this paragraph stands little scrutiny and amounts to a "wish list" supported by no substantive evidence as to how the document's ambitions might be achieved.

4.111 recognises "journeys by car will be a significant component of all transport movements..." Quite apart from the obvious environmental consequences of this, it is impossible to reconcile such a statement with NWLDC's declaration of a "climate emergency" in 2019.

4.112 recognises the need for major infrastructure but refers to it "*being funded by the development itself [with it] having to be phased across the lifetime of the development.*" I challenge NWLDC to prove how it will plan and enforce a coherent strategy rather than simply permit the development, take the council tax and then sit back and allow public services and infrastructure to decay even further in this area.

4.116 (mitigation of noise from the adjoining racetrack) shows how the proposal is riddled with thinking based on hope and expectation rather than substance.

Potential Locations for Strategic Distribution (Section 6 Site Allocations Document – Freeport and EMP 90)

I oppose the possibility of this allocation.

In relation to the specifics:

6.3. the designation is a matter of fact but see below. The issue should be disregarded.

6.4 as preliminary point, the “pressure to develop the site quickly,” is obvious but should be resisted for the reasons which follow. Attempts to develop this site have been made in the past but have not succeeded. Without repeating the reasons here, they are obviously relevant as this issue progresses.

6.5 is disputed. Leaving aside the principle of whether Freeports are a good idea and whether they create new jobs or merely displace existing, there is no disclosed reason why a similar site (which would not have had these planning constraints) could not have been added into the Freeport project (see further below)

6.6 agreed. No planning assessment or indeed any other consultation took place. Further I agree that the acceptability or otherwise is matter for this plan to consider. That consideration should be short and negative.

6.7/8 agreed as a summary of the issues although I emphasise a few below. The position was put even more starkly by a planning officer at the November 23 Local Plan Committee of NWLDC when she referred to the “*potential for very significant adverse impacts*” likely to be caused by such a proposal.

6.10 NWLDC accepts that unacceptable impacts are likely consequences but then only reduces the site by a small amount. On any view (for the bullet pointed reasons below) that reduction is wholly inadequate.

Reasons for not allocating the site.

NWLDC has itself in many respects already identified several key issues, but I emphasise the proposal:

- will destroy the village nature of Diseworth, a conservation and heritage village.
- has not addressed a huge highways issue, noting that it is a matter of public record that several road projects in the region have been “mothballed” due to lack of funding.
- will hugely exacerbate a perennial flooding issue.
- is situated on entirely the wrong site, sloping down towards the village – obtrusive in every respect.
- is far too close to this village. According to EMA and the Freeport, the site will be used to develop “strategic warehousing” on the land. Conversely, even the BPF (the property

developers trade association) has said that such developments should be *"located away from residential development where there is no unacceptable impact on residential amenity to allow for 24 hour working."* Why they persist in this situation can only be speculated upon. (Document attached)

- if proceeded with, despite the BPF's recommendations, the proposal will lead to continuing, and probably actionable nuisance in relation to light, noise and air pollution. (Note that there has been a single problem with EMA's ground lights, a problem it admits, in February 2024. That, of itself, has caused considerable discomfort to affected villagers. It takes no imagination to see how this single issue will be magnified in relation to light, and further noise from lorry engines, reversing beepers and a/c units, all with the attendant air pollution)
- will lead to the destruction of 250 acres of productive agricultural land which could produce enough wheat to feed a small town, and this at a time food of insecurity.
- will hugely exacerbate parking problems in the village, already in existence with airport staff and passengers.
- lead to destruction of habitat.
- pays no attention to the cumulative effects of this and the proposed new settlement.
- demonstrates the vacuity of the idea of the Freeport will "turbo-charge the drive towards net zero."

The Freeport designation

It is relevant that SEGRO and EMA (now "partners" in the Freeport project) were promoting what is now the Emp90 land some years before the gestation of the Freeport project. A significant part of that land was, and remains, owned by EMA. Nevertheless, attempts to take that development forward at that time failed. It seems that then, as now, NWLDC accepted that the site should not be developed for industrial usage because of the issues listed above, and would not be considering doing so now but for the issue of the Freeport designation.

The designation is obviously referred to in the consultation document. Equally, it has been referred to as a "material consideration" for planning purposes. My submission is that it should be totally disregarded.

It is a matter of record that the original Freeport proposal, which did not include the EMP90 land, was initially rejected by HMG. It was a second proposal, including the land, which was accepted. The first that anyone knew of this was when a public announcement was made in February 2022 saying that the designation had occurred.

There has been obfuscation and blank refusal by the relevant parties to explain why the EMP90 land was subsequently included and the extent to which, if at all, consideration was given to the potential effects on Diseworth. There *has* been a vague reference to "additionality," a term which

would appear to have little meaning in this context, but nothing more.

By way of example:

- In an email dated 15 May 2023 to the chair of the Freeport board (Nora Senior CBE) I asked why the land next to our village had been included. She referred me to my FOI request to the Treasury and said she "would leave it to those authorities to consider."
- Those FOI requests to government departments (including the Treasury) were then refused on grounds of commercial confidentiality.
- I am part of a neighbourhood group ("Protect Diseworth") and in that role asked for the opportunity for PD to address the Freeport Board. That request was refused.
- An open invitation to visit the village, to see the situation at first hand, was extended to the Freeport Board. Save for an acknowledgement, the invitation was ignored.
- Our MP wrote made representations that the land should be excluded from the Freeport project. In refusing that request, in a letter dated 15 Feb 2023, Dehenna Davison MP (then Minister for Levelling up) nevertheless claimed *"local authorities have been closely involved at every stage of the process, ensuring the interests and voices of local people have been represented throughout."*

I raised an FOI request to find out which voices had in fact been listened to. This produced only general statements of support from leaders of local councils as to the project generally.

Conclusion

In short, it is evident that not only has there been no consideration given to the planning consequences for the village of Diseworth, but there has also been a refusal to provide any coherent information whatsoever beyond senior members of the Freeport project and its financial partners simply announcing their intentions in the most general terms. It seems that if the opaque and clearly commercially driven designation is given any weight, then that could allow a development to succeed which had been attempted, but failed, several years ago merely due to the "cover" of the Freeport.

As a matter of natural justice and fundamental human rights, that cannot be right. It is simply wrong to allow a political and financial decision taken at a Whitehall desk to justify what amounts to a "land grab," resonant of the acts of an autocratic and undemocratic government. No planning authority, acting reasonably, could allow such conduct to override the planning process. No allocation should be made.

Declaration

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

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

Signed:



Date: 13 March 2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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



13/3/22

NWLDC Planning

(By email only)

Dear Sir,

Response to Consultation on NWLDC Local Plan Amendment.

This letter incorporates the objections set out in the standard letter attached (RB1”) which I am aware has been used by a number of people in this village. It relates to the Isley Walton/New Town proposals and those for the Industrial Land South of the A453.

What follows is an expression of my honestly held opinion. It does not purport to be an argued legal position at this stage.

Consultation

- My general point is that the process is being followed simply to give legitimacy to decisions which have already been made. Some evidence to support this view is already to hand. More may follow. If such an opinion is shown to be correct, the whole process is subject to challenge.
- The consultation document is opaque and understandable only to planning professionals. A layperson may practically be able to access information on a given topic but only when she/he has a specific aim. It self-evidently and a long and complex document. That aim will only be known when elements of the document already have been accessed by such a professional. That position is of course circular and, in my opinion, that opacity is deliberate in an attempt to hide oppressive proposals.
- Officers of NWLDC publicly said on 14.2.22 that a planning application was anticipated by the end of the year in relation to the Isley Walton/housing land. I know at least part has already been transferred to the prospective developers. Despite protestations that “nothing was decided,” it beggars belief to think national developers would make such an investment without the assurance the developments would go ahead. If any were needed, I suggest this is evidence of a “done deal” in principle, accepting details would still have to be worked out.
- In the same meeting, only as an aside, the officers said “it is only fair that you should know that SEGRO are promoting the (employment land.)” In my opinion, this was a completely disingenuous comment – at best. Only two weeks later, the Designation of the relevant land as part of the tax-free area of the Freeport was publicly announced. It is explicitly proposed for industrial purposes. It is now apparent that the inclusion had been planned for months.

Not to disclose this fact in the context of a meeting, the purpose of which was consultation, shows the complete lack of transparency in the process and a lack of good faith – particularly vital in public law matters. It reinforces my opinion that the process is a sham.

- As a more general point, I am a new resident of this village. Had I known of what is now clearly likely to happen, I would not have purchased a property here. Although the plans have clearly been in train for years, no reference to them appears anywhere in documents (i.e. local searches etc) accessed by prospective purchasers in the conveyancing process. This is wrong and oppressive. It is no answer to say that “these are only proposals” for the reasons set out elsewhere in this letter.

The Specific Proposals

- I refer again to “RB1.” That sets out my initial views. Some extra points follow
- No reasonable public authority could act in this way in taking the Industrial B8/development together with the adjacent “New Town.” The juxtaposition of the two “proposals” is oppressive, akin to the behaviour of an autocratic state. There is a potential breach of ECHR in this conduct
- The inclusion of the Industrial Land in the *Local Plan* is unjustified.
 - a) Documentary evidence exists that in June 21, that the airport had no intention of developing the land for its purposes. This is further evidenced by the fact it was not included in the original Freeport proposal and has only relatively recently been included.
 - b) Consequently, IF NWLDC’s position is truly independent for planning purposes, then there can be no reason for it to include this land in the amended Local Plan
 - c) If, as seems likely, the inclusion is simply as a result of the Radcliffe Power Station having to be kept online for longer than planned, my opinion is that EMA/ SEGRO are using the situation to “slip in” the land into the Freeport. At most, the power station will only remain open for a few years longer but this grade3 agricultural land will be lost forever.

I fundamentally oppose the proposals and challenge the process being used.

Yours faithfully,



Richard Brackenbury

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

Local Plan Review. Consultation Response

Name Richard Brackenbury

Address [REDACTED]

Dear Sirs,

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

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

My objections are based on the following:-

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Yours Faithfully,



5. Final Recommendations

This report has evidenced the need for an improved method to estimate future I&L land demand. It is clear that demand within the sector has been much higher than supply for most of the last decade which has resulted in extremely low availability and exponential rental growth as occupiers compete for limited available stock. In order for the sector to grow to its full potential and generate the jobs and investment the national economy needs, the planning system has to better estimate future land demand. It is recommended that the Savills and St. Modwen 'suppressed demand' methodology is incorporated within the NPPG to help inform Local Plans.

The evidence within this report also supports a number of previous BPF recommendations outlined in its Employment Land Manifesto (July 21)⁴⁷ as discussed below.



Recommendation 1 of the Employment Land Manifesto

Introduce a Presumption in Favour of Logistics Development within the NPPG when precise criteria are met, such as:

- **Easy access and proximity to the strategic highway network.**
- **Ability to provide effective access by non-private car to suit shift working patterns.**
- **Located away from residential development/where there is no unacceptable impact on residential amenity to allow for uninterrupted 24 hour working.**
- **Capable of accommodating large scale buildings in terms of both footprint and height.**
- **Sites which suit the future occupier's needs.**

The Local Plan process is too slow to respond to significant market changing events, such as the COVID-induced acceleration in the growth of e-commerce. As evidenced in the 'An Economic Powerhouse' chapter, the planning system has failed to provide a sufficient level of I&L land to meet demand. This has resulted in the national I&L market becoming supply-constrained for the last seven years, as signalled by availability dropping below the equilibrium threshold of 8%, and high rental growth at twice the rate of inflation.



Recommendation 2 of the Employment Land Manifesto

Ensuring Local Plans allocate logistics sites in the right locations to respond to a broad range of market needs.

The optimal location for I&L occupiers allows them to be close to their suppliers as well as their end customers. For this reason, access to the strategic road network is critical, as it reduces transportation time, costs, and carbon emissions. The strategic road network also allows a site to expand their catchment of intermodal freight facilities, which are critical nodes within logistics networks. An optimal logistics site is also in easy reach of a workforce with a range of skills, and is close to worker amenities. It also requires good availability of utilities, services, and broadband. A dialogue between Distribution Network Operators (DNOs) and Planning Authorities should be encouraged to ensure power is supplied in locations where I&L development is being planned. Employment allocations should be in locations that allow I&L operators to work 24/7 without impediments.

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Response to North West Leicestershire Local Plan Consultation
Date: 13 March 2024 15:21:12

Dear Sir or Madam,

We appreciate the opportunity to respond as part of the consultation on the draft North West Leicestershire Plan (2020 – 2040). Our response is regarding site P5 in Packington and the proposed housing allocation and extensions to the Limits to development put forward for the village.

Our site P5 is incorrectly listed in the SHELAA & Site Assessment as having a total area available for development of 0.4 hectares and estimated capacity of 12 houses. The area is closer to 0.24 hectares, and so it has not been judged correctly on its true development potential. Any proposed development would be on a significantly smaller scale, 3 or 4 houses and have much less impact on the rural setting and character of Spring Lane than assumed in the assessment. This should be factored in its consideration. We would also contest the remarks from the Site Assessment that the site occupies a prominent location on the approach to the village from the East. Spring Lane provides access to a small amount of residential traffic to the east finishing at Sumnalls Farm, it is a subsidiary road. All through traffic access to the village is from Normanton road from which P5 is completely screened. The recent Century Drive development has been far more intrusive for traffic approaching from the East if applying the same criteria. All business and farm traffic to and from Sumnall's Farm also use access via Normanton road.

Reading the framework as set out in the draft Proposed Housing and Employment Allocations, only major sites (10 houses or more) are considered. While we understand the need to work with large sites to meet the required commitments for future housing capacity and ensure viable schemes are brought to market. We do not think it is the only approach to take in the case of "Sustainable Villages". Here small sites offer the low impact, sustainable development needed to preserve the rural nature of these villages. It is small sites, which give the best opportunity to local builders and deliver housing of a scale, type and quality that meet the needs of villages like Packington. Speaking with other residents within the community it is clear they share our opinion. In paragraph 3.3 of the plan there is a clear reference to the contribution small sites make to the delivery of housing across the borough (approx. 10%) and this is likely to continue but sites like ours outside of the limits to development are essentially ignored in the current allocation framework.

If our site was listed correctly as 0.24 hectares, it would be discounted from the allocation proposal purely based on its size. The site is low-grade agricultural land and not large enough to be of any commercial use, but as recorded in the SHELAA it has been promoted by an agent on behalf of a local house builder who believes it does make sense as a building opportunity. Any proposal would be tailored to the specific needs of the community. Given the framework as set out our site will never be considered for housing allocation in any future review and therefore has almost no chance of being granted planning permission. We don't think this makes sense for a small viable site that borders the limits to development. In our opinion there is a need to allow appropriate small scale development that fall outside of the current allocations process.

We also believe there is a case for our land being included in the limits to development naturally given the proposed changes to the limits LtD/Pac/01 caused by the recent construction of two very large houses to the North of the site. Our site P5 is already adjacent to the western boundary of the limit of development, the new development has extended the built up area of the village and with this new back drop it is no longer the same rural site it was previously. Given this transformative backdrop, we advocate for the thoughtful integration of our land into the proposed limits to development to accurately reflect the evolving character of Packington. We also make the case that the field is in between pockets of development on Spring Lane in the form of large, detached houses and represents "in fill" rather than an extension to the built up development into the countryside. As such, it would be unlikely to have any detriment to the setting or landscape.

We have no objection to the site P4 that has been put forward for allocation but we do believe that 18 houses is an ambitious target given the total area available for development and if achieved this development may not be in keeping with the character of the village. We would argue that Packington could and should have further land allocated for housing over a 20-year period to meet local needs. It would be useful to understand if there are any specific guidelines that dictate the amount of expansion deemed appropriate for sustainable villages over this

time frame as we were unable to find this in the draft plan.

In conclusion, we urge a reconsideration of the assessment for site P5 in Packington, emphasizing its true size of 0.24hectares and the potential for a smaller, low-impact development of 3 or 4 houses. Small sites play a crucial role in sustaining village character and supporting the local economy differing from the focus on major developments in the draft proposal. Our site's exclusion from future housing allocation reviews based on its size and recent developments on its surroundings necessitates a thoughtful reevaluation. We appreciate your attention to these points in ensuring a fair and sustainable approach to the plan.

Best Regards

A large black rectangular redaction box covering the signature and name of the sender.

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan Response
Date: 13 March 2024 15:21:15

From: Geoff Sewell

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

NW Leicestershire Draft Local Plan Consultation Response Policies

Houses in Multiple Occupation and Draft Policy H8 – Houses in Multiple occupation in Kegworth

It is vital that the local plan incorporates restrictions on HMOs in the village of Kegworth. There should be a balance between HMOs housing mostly students and other residential properties. It seems that the village has too many HMOs and the numbers are increasing due to the very profitable practice of renting to students.

There are several consequences from this imbalance:

Local, especially young Kegworth residents find it very difficult to acquire properties in the village because they are competing with wealthy landlords.

Student HMOs are exempt from paying Council tax which greatly reduces the Parish precept income even though they receive all the benefits. The shortfall inevitably falls on to the residents who do pay Council Tax.

Too many HMOs means that housing areas suffer from a lack of community spirit and insufficient use of local facilities such as buses and shops making them less sustainable. The main problem with HMOs concerns car parking. Kegworth has a problem anyway with parking but this is increasingly exacerbated by the increasing numbers of HMOs. Many students have cars even though planning suggest they should all get on a bike judging by the number of cycle sheds included in applications. Few students choose to cycle mainly because how dangerous and busy the road to the University has become with Side Ley and Station Road now an established rat run.

The requirement suggested of one off road parking space per occupant would be welcomed. It is odd that this is in the Local Plan when LCC Highways wave through a number of new HMOs where this is being blatantly abused. High Street rarely has any parking spaces but converting the Methodist Chapel into 9 apartments with potentially 9 cars and no parking spaces was fine with Highways. 13 Dragwell, a derelict ancient house was given permission for a 6 bed HMO even though there are no parking spaces. Highways argument to justify this was ludicrous. 1/3 Station Road situated on a dangerous crossroads is proposing 11 occupants with limited parking. LCC Highways seems to consist of 1 person with a rubber stamp. A trip to Kegworth might be useful.

A licencing scheme would show how many HMOs there are in Kegworth and there could perhaps be an annual fee with regular re-applications required.

As part of the licencing scheme, it should be possible to restrict too many HMOs in any one

area of the village. A drive up to the top end of Pritchard Drive would show the benefit of this proposal.

Proposed Housing and Employment Allocations (D2)

Land north of Derby Road (A6), Kegworth (EMP73(part))

Land North of Remembrance Way (A453, Kegworth (EMP73 (part))

I object to these proposals due to the excessive development already in place or proposed near the village. There should be a reasonable balance between development and countryside to preserve the individual nature of the area. Near to Kegworth we have the Airport, Segro development, Ratcliffe on Soar site to be redeveloped, 2 warehouses in the Lockington/Shardlow area with planning permission before the avalanche of warehouses expected due to the freeport.

There are also concerns about building on flood risk areas leading to increased chance of flooding of local properties.

Increasing numbers of lorries etc will cause further problems on the local roads which are regularly congested now. Any small incident immediately causes severe problems near the Junction 24 island and surrounding roads with a large increase in vehicles leaving the A453 to seek an alternative route along Station Road and Whatton Road through the village.

East Midlands Airport: Public Safety Zones (Draft Policy EC10)

It makes no sense to reduce the size of the safety zone, presumably proposed so new developments will not have that as a consideration.

The Airport continues to increase in activity, which will speed up with the proposed freeport.

Proposed existing Employment Areas Draft Policy (EC5) – Computer Centre site, Kegworth

It has been suggested that this site could be used for leisure or retail purposes rather than another warehouse and that seems reasonable to me

Town Centre Topic Paper/Policy Paper Appendix A, Policy Maps

Rather than reducing the size of the Village Centre, I think it should be extended to include Dragwell, High Street etc to preserve the old parts of the village.

[REDACTED]

12th March 2024

Dear Sir or Madam,

Re: North West Leicestershire District Council Draft Local Plan Consultation

I am writing in response to the consultation on the draft North West Leicestershire Plan (2020 – 2040). My response is regarding site P5 in Packington and the proposed housing allocation and extensions to the limits to development allocated to the village.

Our site, P5, is incorrectly listed in the SHELAA & Site Assessment as having a total area available for development of 0.4 hectares and estimated capacity of 12 houses. The area is closer to 0.24 hectares, and so it has not been judged correctly on its true development potential. Any proposed development would be on a significantly smaller scale, 3 or 4 houses and have much less impact on the rural setting and character of Spring Lane than assumed in the assessment. We feel this should be taken into consideration.

Reading the framework as set out in the draft Proposed Housing and Employment Allocations, only major sites (10 houses or more) have been considered. While we understand that the council has to put forward larger sites to help fill its housebuilding quota, we do not think it is the only approach to take in the case of “Sustainable Villages”. In this case small sites offer the low impact, sustainable development needed to preserve the rural nature of these villages. Small sites which are not of interest to larger developers are also much more likely to employ local workers and have a positive impact for the local economy. We are concerned that our site may have been discounted purely on its size.

The site is low-grade agricultural land and not large enough to be of any commercial use. Any proposal would be tailored to the specific needs of the community.

Given the framework as set out our site will also never be considered for housing allocation in any future review and therefore have almost no chance of being granted planning permission. We don't think this makes sense for a small viable site that borders the limits to development. We also believe there is a case for our land being included in the limits to development naturally given the proposed changes to the limits LtD/Pac/01 caused by the recent construction of three very large houses to the North of the site.

Our site P5 is already adjacent to the western boundary of the limit of development, The new development has extended the 'built up' area of the village and with this new back drop it is no longer the same rural site it was previously. Given this transformative backdrop, we advocate for the thoughtful integration of our land into the proposed limits to development to accurately reflect the evolving character of Packington.

In conclusion, we ask for a reconsideration of the assessment for site P5 in Packington, emphasizing its true size of 0.24hectares and the potential for a smaller, low-impact development of 3 or 4 houses. Small sites play a crucial role in sustaining village character and supporting the local economy. Our site's exclusion from future housing allocation reviews based on its size and recent developments on its surroundings necessitates a thoughtful

reevaluation. We appreciate your attention to these points in ensuring a fair and sustainable approach to the plan.

Yours sincerely

Lucy Bates

[Redacted signature line]

[Redacted signature line]

[Redacted signature line]



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Joanna	
Last Name	Ellershaw	
Job Title (where relevant)	Senior Planning Officer	
Organisation (where relevant)	Harborough District Council	
House/Property Number or Name	[REDACTED]	
Street	[REDACTED]	
Town/Village	[REDACTED]	
Postcode	[REDACTED]	
Telephone	[REDACTED]	
Email address	[REDACTED]	

PART B – Your Representation

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

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

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

Section 6 Potential Locations for Strategic Distribution

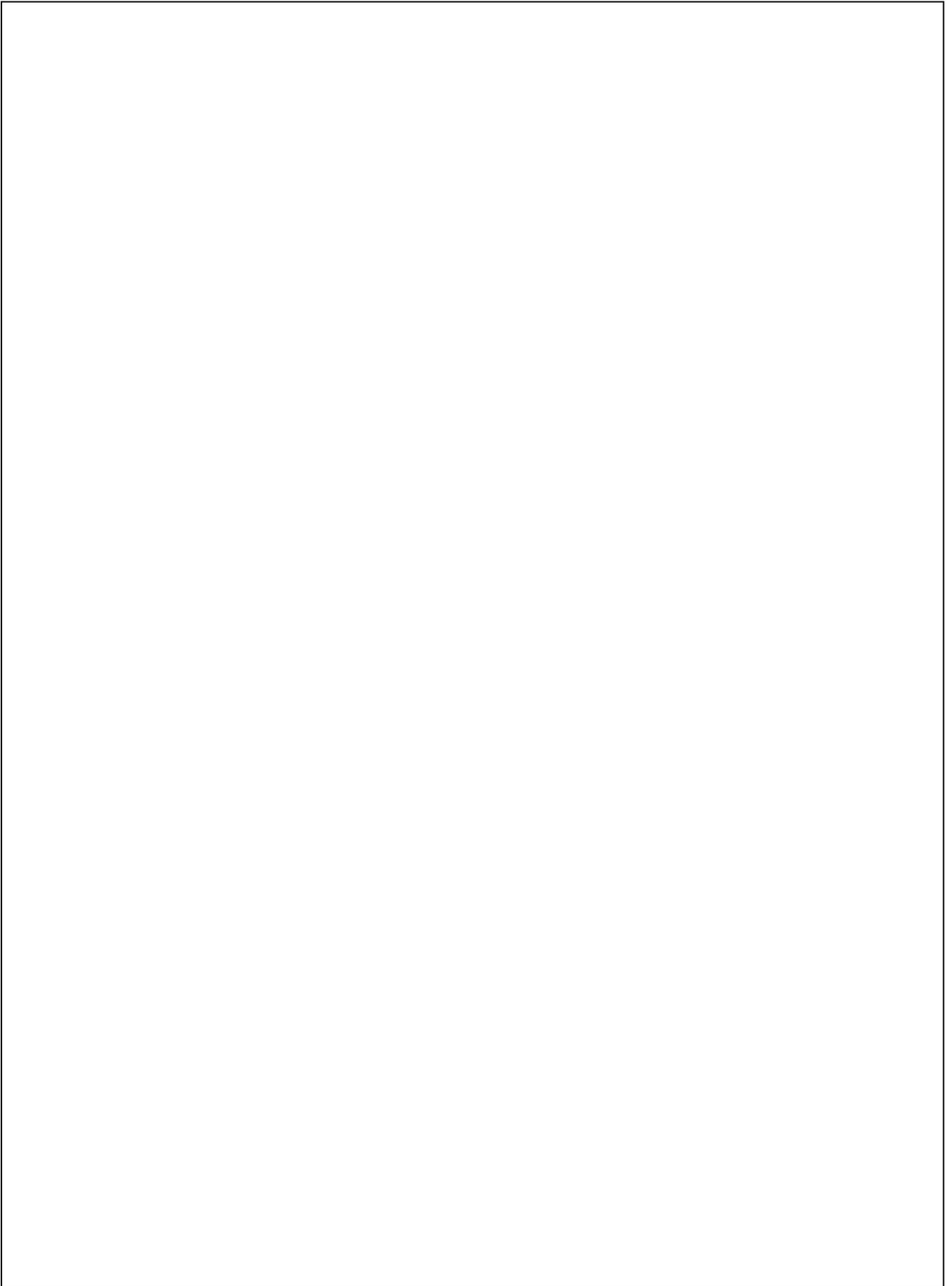
Use this box to set out your response.

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

Officer Comments

Harborough District Council welcomes acknowledgement of the continued joint working on strategic warehousing matters in Leicester & Leicestershire, and the reference to the Warehousing & Logistics in Leicester & Leicestershire: Managing growth and change (April 2021) and the follow-on study commissioned to advise on how best to distribute the future need.

We note that the latter study will be a relevant consideration in the selection of sites, to meet future need apportioned to Area's of Opportunity within or impacting your district by the forthcoming evidence study. We look forward to continued joint working and co-operation with NWLDC, in accordance with the W&L Statement of Common (202x) to which both are authorities are party.



Declaration

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

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

Signed: J Ellershaw

Date: 13 March 2023

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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

From: 
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Re: Local Plan Consultation
Date: 13 March 2024 18:18:15

Hi

Thanks for getting back to me, we live on school lane so our main concern is the plan to build on the field at the bottom of our road.

Kind regards Lisa White

Sent from my iPhone

On 13 Mar 2024, at 17:07, PLANNING POLICY
<PLANNING.POLICY@nwleicestershire.gov.uk> wrote:

Hi there

I appreciate there is a lot of information on our website. The following document contains the *proposed* housing allocations across the district.

https://www.nwleics.gov.uk/files/documents/proposed_housing_and_employment_allocations/Reg%2018%20%28Site%20Allocations%29%20Consultation_final.pdf

If you are having difficulty with the online form, you can send comments to planning.policy@nwleicestershire.gov.uk – it would be helpful if you could tell us which site your comments relate to.

Kind regards,

<image001.png>

Joanne Althorpe

Principal Planning Policy Officer

Planning Policy and Land Charges Team

01530 454767 | joanne.althorpe@nwleicestershire.gov.uk | www.nwleics.gov.uk

<image002.png>



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

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Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	MR	
First Name	CHRISTOPHER	
Last Name	PEAT	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name		
Street		
Town/Village		
Postcode		
Telephone		
Email address		

PART B – Your Representation

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

1. To which consultation document does this representation relate? ISLEY/ WOODHOUSE (IWI) FREEPORT (EMP 90)	Proposed policies
	Proposed housing and employment allocations
	Proposed Limits to Development Review

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

Use this box to set out your response.

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

ISLEY WOODHOUSE (IWI)

I STRONGLY OBJECT TO THE PROPOSED DEVELOPMENT REASONS LISTED AS FOLLOWS:-

- ① THE DEVELOPMENT WILL COMPLETELY DESTROY 750 ACRES OF NATURAL UNDEVELOPED AGRICULTURAL LAND. THE FUNDAMENTAL AIM OF GREEN BELT LAND IS TO PREVENT URBAN SPRAWL. NWLDC HAS A DUTY TO MAINTAIN AND PROTECT THESE AREAS.
- ② THE DEVELOPMENT WILL ADD HUGELY TO THE ALREADY PROBLEMATIC FLOODING ISSUES FOR ISKENORTH.
- ③ MASSIVE INCREASE IN AIR, NOISE AND LIGHT POLLUTION AND POTENTIAL FOR MASSIVE INCREASING TRAFFIC MOVEMENTS FOR THE VILLAGE.
- ④ ROAD INFRASTRUCTURE CANNOT cope.

⑤ TOO MANY / CONSERVATION VILLAGES SUCH AS DEBENWORTH ARE BEING STRANGLERED BY MASSIVE DEVELOPMENTS WHEN BETTER ALTERNATIVE SITES COULD BE USED.

I DO NOT SUPPORT THIS NEW TOWN DEVELOPMENT

FREEPORT (EMP 90)

I STRONGLY OBJECT TO THE PROPOSED FREEPORT REASONS LISTED BELOW! -

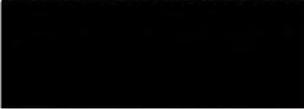
1. THE LOCAL PLAN CONFIRMS THAT THE PROPOSED SITE OF THE FREEPORT IS UNACCEPTABLE.
2. THE CONSERVATION VILLAGE OF DEBENWORTH WOULD BE LOST FOREVER + INSTEAD WOULD BECOME PART OF A LOGISTICS PARK.
3. THE GREEN LINES OF THE VILLAGE WILL BE DESTROYED AND THE IMPACT OF DEVELOPMENT ON AIR, NOISE + LIGHT POLLUTION WILL BE UNBEARABLE.
4. NO AMOUNT OF STRATEGIC PLANNING FOR SURFACE WATER WOULD BE SUFFICIENT TO STOP WATER FLOODING THE VILLAGE.
5. ROAD INFRASTRUCTURE NOT CAPABLE OF ADDITIONAL TRAFFIC. CONSIDERABLE / FURTHER TRAFFIC THROUGH THE VILLAGE UNACCEPTABLE.
6. HOW CAN A BNG OF 10% BE ACHIEVED? HOW COULD THE HABITATS FOR WILDLIFE BE LEFT IN A MEASURABLE / BETTER STATE THAN THEY WERE BEFORE THE DEVELOPMENT.

- ⑦ THE SECRECY AND RELATIVELY ANONYMITY SURROUNDING FREEPORTS PROMOTE MONEY LAUNDERING AND TAX EVASION; DRUGS, HUMAN TRAFFICKING + COUNTERFEIT GOODS.
 - ⑧ FREEPORTS DO NOT CREATE REAL NEW OPPORTUNITIES IN FACT FREEPORTS IN THE UK WERE ABANDONED IN 2012 BY DAVID CAMERON BECAUSE THEY DID NOT WORK
 - ⑨ NWLDC WOULD LOSE OUT FROM BUSINESS RATE CUTS IN FREEPORTS.
 - ⑩ FREEPORTS SIMPLY ENCOURAGE EXISTING DOMESTIC BUSINESSES TO RELOCATE TO TAKE ADVANTAGE OF LOWER COSTS BUT WITH NO OVERALL GROWTH IN ECONOMIC ACTIVITY.
- THIS DEVELOPMENT CANNOT COME AT THE EXPENSE OF THE LIVES ON SMALL COMMUNITIES THAT WILL NOT BENEFIT FROM BEING ATTACHED TO IT. NWLDC HAS A DUTY TO PROTECT US AT ALL COSTS AND TO NOT INCLUDE THE EMPRO SITE FOR POTENTIAL DEVELOPMENT.

Declaration

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

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

Signed: 

Date: 12 March 2024

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PART B – Your Representation

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

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

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

Use this box to set out your response.

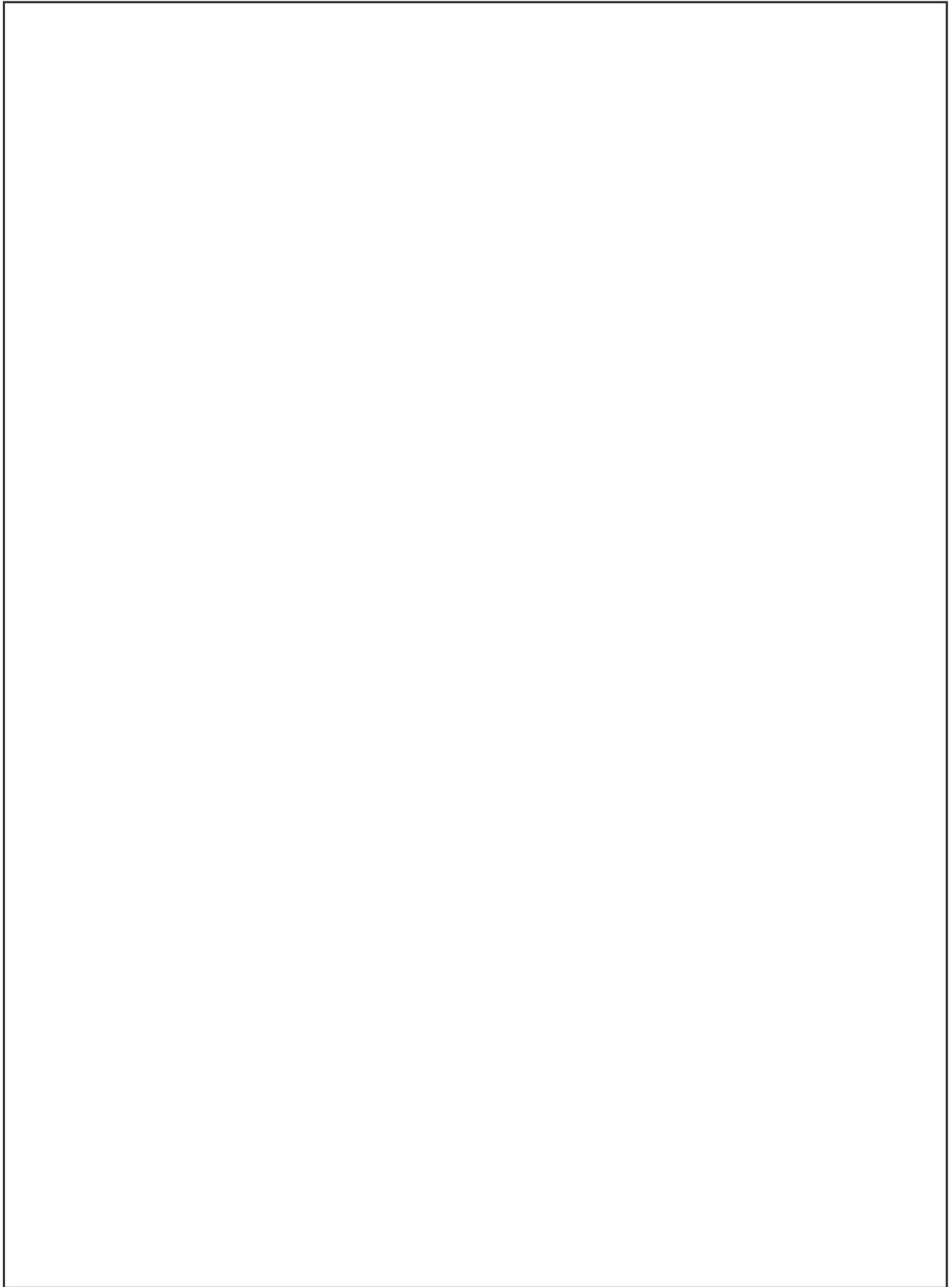
(Continue on a separate sheet /expand box if necessary)

The proposed extension to the Limits to Development for Belton village embraces a site where there is proposed development of agricultural buildings. Indeed the rationale offered for the revision of the Limits of Development is because development of the site is proposed.

In respect of the existing adopted Local Plan 2017 the proposed development sits outside of the Limits to Development. Outline planning permission was granted in 2020 for conversion of the agricultural buildings which included certain restrictive criteria in respect of number of properties, height, footprint, finish and style of the proposed development, such that the agricultural 'feel' would be retained. There have been a number of variations to the proposed development submitted to the Council but thus far little progress with commencing the conversions has taken place.

If the Council permit the revision to the Limit to Development the 'status' of the parcel of land would change. It would no longer be an agricultural conversion outside the Limits to Development and subject to restrictive criteria. It would be residential land. Of course it would still require planning approval, but the criteria applied to any proposal would be far less restrictive.

I would ask the Council not to revise the Limits to Development as defined by the purple broken line on the Belton Village Plan so as to ensure that any development on said parcel of land is limited to agricultural conversion, so as to retain the agricultural perspective.



Declaration

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

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

Signed:



Date: 13th March 2024

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

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan 2017 - Limits to Development
Date: 14 March 2024 15:14:04

Dear Sir/Madam,

We write in respect of the line of the Limit to Development for the village of Belton, as defined in the Local Plan 2017. The delineation of this line came to our attention when we were looking at the consultation documentation available to the public in respect of the review of the 2017 Local Plan.

We have lived at [REDACTED] since 2006. Our concern is specifically about the line of the Limit to Development that is shown immediately behind our property and the properties numbered 21 to 29 Church Street. **[Personal Sensitive Information Redacted]**

When these properties were built in the early 1990's the Limit to Residential Development dissected the rear gardens of 21 - 29 Church Street. It ran from the rear boundary of the gardens on Thompson Ave through to the eastern edge of the garage (now demolished) of 29 Church Street, ending at the farm track known as Whatton Lane.

It therefore came as quite a shock to see that on the Limit to Development Plan for Belton, submitted as part of the review of the Local Plan 2017, a completely different line is shown as the 'existing line' at the rear of our property. The plan shows the 'existing Limit to Development' running along the rear boundary fence line of the properties 21 to 29 Church Street.

We have conducted research and established that the Limit to Development as we believed it to be, i.e. dissecting our rear garden, is shown as such in the 1991 - 2006 Local Plan and remained as such until the production of the 2017 Local Plan. The 2017 Local Plan shows the Limit to Development following a very different line. The issue being the 2017 version of the Local Plan is now being used as the definitive plan from which revisions can be drawn or proposed.

We can categorically state that we were never informed or consulted about the change to the Limit to Development for Belton that forms the existing 2017 Local Plan. As owners of a property directly affected by the change we should have been informed, in the same way that we would be informed about an application for planning consent adjacent to our property. Had we have been informed we would have objected strongly to the Limit to Development being relocated to the rear boundary fence line. Also, if we had been informed, we would have told you that there is a restrictive covenant contained with our and our neighbours property deeds that states that no building or buildings shall be erected on defined parts of the land. The defined parts are referenced in the Title Plans to each property. By moving the Limit to Development you, the planning authority, have given the impression that the restricted land is developable, whereas it is not. It should therefore not have been included within the Limit to Development either in the production of the 2017 Local Plan or indeed be considered a given in this current review.

The current consultation taking place on the review to the 2017 Local Plan should be brought to the attention of all residents in the district, in writing by letter, and not allowed to be reliant on social media, open days or residents accessing the District Council website to seek out information. This review has been taking place for some time. We only became aware of the review a few days ago and by pure chance. A third party had posted an item on social media. Had we not seen that post, we would have been unaware of the 2017

Local Plan review.

We would ask that the District Council demonstrate to us the powers and methodologies that were used to inform and consult residents on the production of the 2017 Local Plan, specifically the revisions to the Limit of Development that affected our property. Why weren't we consulted directly? And it begs the question, were the revisions we have described above lawful?

Yours faithfully

Christopher & Rosemary Groves





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

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	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Susan	
Last Name	Ward	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name		
Street		
Town/Village		
Postcode		
Telephone		
Email address		

PART B – Your Representation		
Please use a separate sheet for each policy, proposed allocation or specific change to the Limits to Development, you wish to respond to.		
1. To which consultation document does this representation relate?	<input type="checkbox"/>	Proposed policies
	<input checked="" type="checkbox"/>	Proposed housing and employment allocations
	<input type="checkbox"/>	Proposed Limits to Development Review

2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.
Use this box to set out your response.
(Continue on a separate sheet /expand box if necessary)
<p>EMP90 : We live right on the boundary to this proposed development. I have great concerns about this. This will rob the village of its status as a village.</p> <p>It will take away valuable farming land, birds and animals habitat will be lost. All of which is important, each playing an important roll. The laws which the farmers have to follow for the environment all gone out the window when the Government & Businesses bulldoze over the land.</p> <p>Air Quality. Our open space and air quality will all suffer and as we are in a dip it will hang over us like a permanent cloud of polluted air and dust. Fuel fumes from working vehicles, workers vehicles and the like all adding.</p> <p>Lighting pollution. No longer will our nights be dark as the night sky will be lit up with flood lights, street lights, vehicle lights. You only have to fly over the UK to see how it has changed drastically over the years, towns, villages, cities and industrial all merged and lighting up the sky so you can't separate them.</p> <p>Flooding: Where will all the water go that used to go into the ground until it reached saturation. What runs off the land now has effect on the village, the brook and further down stream to the next village and on to a main road which has flooded and has recently been the cause of traffic being diverted through the village which has its own floods to contend with the extra traffic causing tidal waves to their properties. I've watched the water coming off the proposed development streaming down the side lane between us and the land and that's without acres of concrete. Our garden is water logged now. so what effect will it have if this goes ahead.</p> <p>contd.....</p>

Draft North West Leicestershire Local Plan 2020-2040 Consultation (February - March 2024)

Noise. 24-7 Noise. Sleep disruption. Peace & quiet through the day will be replaced by endless noise from machinery, vehicles, buildings (metal clanking) people shouting. It will be intolerable and no respite. Just the smallest of changes to the sound around us is very noticeable. If we lived in a town this would all be normal to us and as its expected something you live with. But I've never lived in a town, I've always lived in the Countryside or a village and I choose to live in a village because there are no industrial units, warehouses or any of those sort of buildings.

Traffic. Traffic will definitely increase one way or the other. People either travelling to work in the new industrial development or people living in the new housing development will at some point come through the village be it to avoid the main roads if congested or to take a short cut. Then there will be people that are visiting, deliveries, collections. More air pollution, more wear and tear of poorly maintained roads. Children, horse riders, cyclists, pedestrians all at risk by the increase of traffic these developments will bring. Just trying to pull out of our street on to Lady Gate is hazardous when people coming through the village using it as a rat run speed through cut corners never giving a thought for concealed drives or roads. Last year when Download was on we very nearly had a head on collision with some lad cutting the corner and over taking at speed as he came into Lady Gate. Video footage was sent to the police and he was prosecuted.

The Wildlife. I'm not expert on this but these developments are going to have a huge impacted on their habits. Trees gone, hedges gone earth gone. Blossoms, flowers and fruit all playing their part for our birds animals and insects that dwell and feed from the land. All play a part using up the rain water they all have to drink.

A VILLAGE IS A HUMAN SETTLEMENT OF A SMALL SIZE WHICH IS TYPICALLY SITUATED IN A RURAL LOCATION. We will no longer be a village if joined to an Industrial Estate.

Therefore I am asking NWLDC not to include the EMP90 site for potential development.

POLICY IW1

Losing so much agricultural land surely this can't be a good thing, no it's not. How much has been lost over the years to new developments either housing or industrial, also roads and rail all taking away vital land. The knock on effect of this on our environment especially as we are always being told about Global warming/ climate change. Take away open fields and trees and replace it with houses and such a large scale of houses what effect will that have on the environment. Then say those houses each have two cars! That land that was once working with nature and cleaning the air and soaking up the water won't be there anymore to help.

Wildlife. Killing off the Wildlife. Laws passed so pesticides, poisons, guns, traps can't be used but bring in the builders and do it on mass is ok! I don't think so.

Draft North West Leicestershire Local Plan 2020-2040 Consultation (February - March 2024)

Flooding will increase as there's less ground to absorb it. Even if they include provisions in the plans for flooding this is no guarantee it will help or once plans passed they do it as I believe it is not the law and therefore a wasted exercise.

Air Pollution. Again this will be effected. Take away our green lungs and this will have an effect on our air quality.

Light pollution. With houses and streets comes lights, street lights on mass with the size of this development. We have recently had an example of this with the Airport when the had some lights renewed they were so bright they lit up the sky and some of the houses in our Village (Diseworth). I noticed them straight away as they were pointing towards us and the light reflected off our wardrobe which is white and lit up the bedroom. I did take pictures.

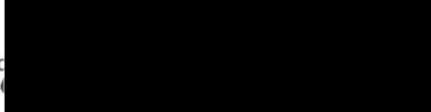
Traffic. Obviously this will increase along with all the potential problems that will bring. There's one way in and one way out of the proposed site which will all add to the traffic on a major road with heavy vehicle traffic combine that with the proposed Freeport development.

Therefore I do not support the new town development of Isley Woodhouse (Policy IW1).

Declaration

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

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

Signed: 

Date: 11th March 2024 .

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mrs/Mr	N/A
First Name	Angela/Paul	N/A
Last Name	Shephard	N/A
Job Title (where relevant)	N/A	N/A
Organisation (where relevant)	N/A	N/A
House/Property Number or Name	██████████	N/A
Street	██████████	N/A
Town/Village	██████████	N/A
Postcode	██████████	N/A
Telephone	██████████	N/A
Email address	████████████████████ ████████████████████	N/A

PART B – Your Representation

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

1. To which consultation document does this representation relate? NWLDC. Application No: - 23/01697/EAS [Isley Woodhouse]		Proposed policies
	X	Proposed housing and employment allocations
		Proposed Limits to Development Review

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

Dear Sir/Madam, RE: Application 23/1697/EAS

The proposed new housing settlement at Isley Woodhouse (Policy IW1) to the West of Diseworth.

We **strongly** object to the proposed development adjacent to Isley Walton on the following grounds:

NOISE

NWLDC are already aware of the noise and air quality issues associated with the proposed location, as stated in the North West Leicestershire Local Plan (March 2021), specifically noise.

There are regular noise issues associated with transport, particularly at East Midlands Airport, as well as events at Donington Park.

Aircraft and airport operations at East Midlands Airport result in extremely high levels of noise disturbance, particularly at night.

Motorsport (at Donington Park) is a very noisy activity with 'no noise limit' track days, now several per month.

There are in the region of 500 HGV movements to and from East Midlands Airport on a typical weekday (24/7 operation).

The A453 is an extremely busy road, with HGV's, Breedon quarry lorries, cars and high-speed motorbikes associated with Donington Park. Motorbike noise has increased substantially since the super bike shop opened at Donington Park. 50 mph A453 speed limit is completely ignored!!

The road is busy 24 hours a day with significant noise pollution.

Noise pollution remains and continues to worsen in this area, with the transport sector being the

cause. Aircraft and road traffic noise is the dominant source.

Exposure is above the EU's threshold of 55 decibels (dB) for daily exposure and 50 dB for night exposure. Isley Walton is regularly exposed to road traffic noise above 55 dB and aircraft noise above 65dB.

Please Note: Noise from road traffic alone is the second most harmful environmental stressor in Europe, behind air pollution, according to the World Health Organization (WHO). The harmful effects of noise arise mainly from the stress reaction it causes in the human body, which can also occur during sleep. These can potentially lead to premature death, cardiovascular disease, cognitive impairment, sleep disturbance, hypertension and, at the least, annoyance.

We have all the above especially regular sleep disturbances from East Midlands Airport and DHL Cargo West.

The nearby quarry at Breedon-on-the Hill has planned expansion of their quarry workings in this direction on the opposite side of A453. This causes blasts, dust, noise, and transport disruption.

AIR QUALITY

"There are five Air Quality Management Areas (AQMA) in the district".

Two of the above areas are main settlements within the NWLDC area, Castle Donington & Kegworth, unsurprisingly both are adjacent to East Midlands Airport. The development of Isley Woodhouse is undoubtedly located within an area likely to suffer from similar Air Quality Issues. In addition, the extensive developments associated with the East Midlands, Freeport have the potential to substantially increase noise and air pollution.

Aircraft arriving at East Midlands Airport on the Westerly flight path regularly fuel dump directly over the land designated for the new Isley Woodhouse development.

Air quality here at Isley Walton has deteriorated significantly over the last 36 months since DHL Cargo West was built and additional aircraft departing and arriving. There are days especially when the cloud is low the air is potent with jet engine fuel smell. It's truly awful.

During the Winter months when there is a need for aircraft de-icer to be used, the smell from the airport holding ponds directly adjacent to the proposed development is absolutely disgusting.

Toxic glycols pollute the air, there are days when we cannot venture outside/have any doors or windows open as the air stings our eyes and noses.



"There are five Air Quality Management Areas (AQMA) in the district".

The NWLDC Local Plan requires...

"To improve air quality in the 5 Air Quality Management Areas which are largely linked to transport related issues. In addition, need to ensure that new development is not itself detrimentally affected by noise and pollution".

"The NPPF advises that in meeting development needs planning should "prevent both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of noise pollution".

NWLDC and the applicant shall therefore demonstrate why the proposed site, which is already known to be unsuitable, has been selected for development. Specifically, the report should not just assess the Environmental issues of the proposed site but must demonstrate why this location has been chosen over other potential alternatives.

The report must also cover how the proposed development complies with NWLDC Local Plan Policies and Objectives such as...

Policy Ec4 – East Midlands Airport

Incorporates measures that will **reduce** the number of residents affected by noise because of the airport's operation, as well as the impact of noise on the wider landscape.

A development on this scale breaches all the above!

Objectives

Objective 1 - Promote the health and wellbeing of the district's population.

Objective 11 - Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance.

Objective 12 - Conserve and enhance the quality of the district's landscape character including the National Forest and Charnwood Forest and other valued landscapes.

Although the proposed development of Isley Woodhouse is located within the NWLDC Planning Area, there are several adjacent planning areas which potentially could have developments associated and/or justified by the establishment of the East Midlands Freeport (EMF).

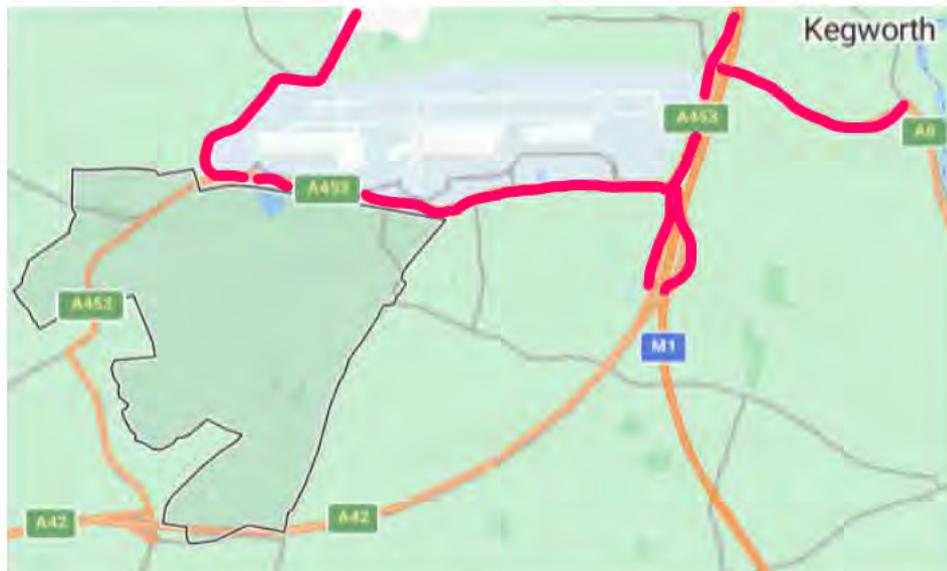
LIGHT POLLUTION

Isley Walton already suffers from significant light pollution from East Midlands Airport and DHL Cargo West which has worsened since their introduction of LED lighting leading to numerous complaints to Manchester Group (MAG). It is now at a record high. As measured by CRPE 2016 data, Isley Walton is already impacted by light pollution levels graded higher than E2 Rural designation.

TRAFFIC

With the current overdevelopment and associated heavy traffic from local businesses such as Donington Park, East Midlands Airport and Breedon Quarry already causing non insignificant peak time delays for residents, based on households generally having 2 cars, how would the area possibly cope with another 9,000+ cars seeking access and egress at these times.

We now have queuing traffic on the A453 everyday (increased pollution) between the hours of 7:00am-9:30am and 3.30pm-7:00pm along this section of road:



How can this possibly be a sensible solution to the inner-city housing shortage when it will have such a negative impact on the proposed area?

The A453, Walton Hill running through Isley Walton (particularly the Melbourne Road junction) will become even more of a death trap if this goes ahead. Even if a dual carriage way is proposed how much more disruption, noise, pollution will that create?

Race events and Download Festival that take place at Donington Park result in long delays and queues back to the M1 motorway; indeed, last year it took 4.5 hours to drive from Isley Walton to Kegworth during Download Festival. Imagine that with another 4,500 houses here, supporting around 9,000 cars. The roads here are not suitable for such a huge development; the main roads to the M1 and the A42, could not contain such vast quantities of traffic.

Unless all the inhabitants of the new housing development are employed within their living

location, they will need to travel to the site of their employment. In both instances, this would mean a substantial increase of vehicles and travelling. The location of the new town is an odd choice as it is at the far end of the County. People working in the city of Leicester would need to endure a fifty-minute commute from the site resulting in increasing pollution and congestion within the locality.

The HS2 rail line is due to run close to the area of proposed development. It will cause major disruption in its building. It will not stop for passengers, so will just cause extra noise and disruption as it passes through. Most unpleasant to live near to.

ISLEY WALTON VILLAGE - HERITAGE

Where does the name Isley Woodhouse come from? The Parish of Isley Walton have no wish that any part of Isley Walton be associated with this unwanted and unnecessary proposed development.

The proposed name 'Isley Woodhouse' is nonsensical name which should have no association or reference to the Parish of Isley Walton with its' strong heritage, including its association with the Worshipful Company of Bowyers who bequeathed housing here to the veterans returning from Agincourt? There is no mention of how Isley Walton would be shielded from this development-being sited on Walton Hill and **all** views would be destroyed.

Will residents be compensated for the huge devaluation in the value of property caused by this development?

No mention of the Manor House, All Saints Church (a knights Templar church) and the Toll House which are all Grade 2 listed and of historical importance. This seems extremely ill thought out with no real due diligence having been carried out.

Reliance on exponential figures is deeply flawed and should be null and void having been paid for by the landowner/developers who have no doubt never even visited the area.

The scale of the proposed development is absurdly large; 4,000+ houses would equate to a new population which is the same as the two market towns of Castle Donington and Kegworth and the villages of Breedon-on-the Hill, Belton, Diseworth and Long Whatton combined.

How are NWLDC proposing to ensure the accuracy and independence of the proposed assessment, given this is being prepared by the applicant and supported by specialists funded by the applicant? Not exactly fair and open, is it? Do you honestly believe Pegasus Group would produce a report containing any negatives in terms of the land and their desire to generate millions of pounds of profit....

ECOLOGY/FARMLAND

DESTRUCTION OF PRIME FARMLAND & ENVIRONMENT IMPACT Why when there are several brownfield sites available should vast amounts of farmland be eaten up by a development? Under government recommendations brownfield sites should be utilised first. We can only conclude this to be an easy option rather than the correct option.

The development would destroy 750 acres of agricultural land currently used by tenant farmers and miles of ancient hedges at a time when locally produced food in the UK is critical to the economy, health, and wellbeing of the country. A loss of prime agricultural land that currently produces 2,976 tonnes of wheat.

The local character of this area is undeniably rural small villages separated by farmed countryside, linked to larger market towns. This areas character will be lost entirely if this development proceeds at such a desperate profit-driven scale. 750 acres of farmland destroyed. It is inconceivable that the local parishes could lose such a vast natural amenity.

The site is outside the Limits of Development and is situated in designated countryside and at variance with LP Policy S3 in this regard [LP 5.25]. It is self-evident that the intrinsic character of local countryside will be permanently disfigured and lost. There is no mitigation available, the only consequence will be the destruction of countryside and landscape. This needs to be properly addressed in the EIA.

WILDLIFE

Wildlife around Isley Walton on the designated land for development has a very healthy population of brown hares, badgers, bats, and barn owls to name but a few that can be found in and around the village, how will they be protected from the proposed development? They won't!! When DHL Cargo West was developed the foxes, brown hares and badgers became roadkill. It was so sad to see it, over a period of several months when their homes and habitats were destroyed by a large corporate who has zero integrity when it comes to local wildlife and residents.

BIODIVERSITY NET GAINS

Biodiversity net gain (BNG) is mandatory from 12 February 2024.

In England, BNG is mandatory from 12 February 2024 under [Schedule 7A of the Town and Country Planning Act 1990 \(as inserted by Schedule 14 of the Environment Act 2021\)](#). Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

You must try to **avoid loss of habitat** when doing development work. Developers must deliver at least 10% BNG, either on-site or off-site, or as a last resort by buying statutory biodiversity credits.

How an earth can this development result in **more or better-quality habitat** and a reduction in carbon emissions when 750 acres of farmland and 7.5 miles of hedgerows will be destroyed? The answer is it absolutely cannot be achieved on the land identified for this development.

A new settlement near East Midlands Airport



- This proposal is a long-term development that will take more than 20 years to complete
- We have suggested some key principles to support the planning of the new village, including:
 - Ensuring builders follow specific design guidance
 - Focus on minimising carbon emissions
 - Making sustainable travel - walking cycling, public transport and the use of electric vehicles - a realistic option
- A masterplan for the development, providing a blueprint to guide the development, will be produced with the involvement of local people.
 - The masterplan will cover:
 - A mix of house sizes, tenures and types
 - Ensuring necessary infrastructure is planned and provided in a timely and coordinated way
 - Improvements in biodiversity
 - Future planning applications will need to comply with the masterplan.

FLOODING

2023 and year to date 2024 has seen record flooding events on the land off Moor Lane and on the Melbourne Road near to Church View House, an ongoing issue with frequent road closures as noted below (LCC – Lead Flood Authority).



FAO Adam Mellor
North West Leicestershire District Council

Date: 16/02/2024
My ref: 2024/07257/F
Your ref: 24/000725/AS
COUNCIL: Jack Hamilton
Phone: 0116 305 0601
Email: jack.hamilton@leics.gov.uk

Dear Adam Mellor

RE: REQUEST FOR ENVIRONMENTAL STATEMENT SCOPING OPINION – Land South of East Midlands Airport, Iley Woodhouse

Leicestershire County Council, in their role as Lead Local Flood Authority (LLFA) has been requested to provide input to the Environmental Statement (ES) scope for this future application site. The Council advises that the LLFA is not a statutory consultee in relation to Environmental Statements and as such we recommend advice is sought from the Environment Agency in this respect.

However, the Consultant acting on behalf of the developer has previously approached the LLFA and has been advised of existing flooding issues in the downstream catchment and the LLFA's intent to have Natural Flood Management implemented within the site boundary to safeguard the catchment against the existing flood risk and to address the future impacts of climate change. As such, it is imperative that the developer works with the LLFA to ensure a suitable scheme is proposed which provides the betterment required at the location.

Any application for this site will require a Flood Risk Assessment due to existing flood risk at the location, regardless of the need for a flooding/hydrology related chapter within the ES. The Council therefore offer the following advice:

Fluvial Flood Risk (from Ordinary Watercourses)
The Flood Map for Planning (Rivers and Sea) illustrates the flood zones, indicating the areas where land is susceptible to flooding from fluvial processes. The site entirely sits within flood zone 1, assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea.

Fluvial Surface Water Flood Risk
According to the EA map for Surface Water Flooding the vast majority of the site is at low risk of surface water flooding with small parts of the site at medium and high risk. These are predominately around existing waterbodies (ordinary watercourses, main river, ponds etc.)

Groundwater Flood Risk

It is recommended that a full and comprehensive ground investigation is carried out to understand the geology and hydrogeology on the site.

Further information about geology and groundwater can be obtained from the British Geological Survey at www.bgs.ac.uk

Further groundwater information and maps can be found at the following links:

British Geological Survey: Groundwater services
<http://www.bgs.ac.uk/groundwater/index.html>

British Geological Survey: Geotitles Ordnance
<http://maponline2.bgs.ac.uk/geotitles/home.html>

Environment Agency: What's in Your Backyard
<http://www.environment-agency.gov.uk/whatinyourbackyard.aspx>

Regulation of Activities on Watercourses

The ordinary watercourse running through the centre of the proposed site is classed as an ordinary watercourse. If you propose to do any work on, or near to, an ordinary watercourse (including bridges) you may need consent from Leicestershire County Council, in their role as Lead Local Flood Authority (LLFA), under the Land Drainage Act 1981. Further information on the types of works/structure which require consent together with a template application form can be found on our website under the section Regulation of activities on watercourses:
<https://www.leicestershire.gov.uk/environment-land-planning/flooding-and-bridges/flood-risk-management/>

If you are unsure if your works will require ordinary watercourse land drainage consent, or to discuss the consenting process, please contact us at flooding@leics.gov.uk

Leicestershire County Council opposes the culverting of watercourses; however we recognise there are situations where culverting may be necessary. In these cases open span bridges should be considered first as alternatives to culverts. Any applicants will be required to justify why a culvert is the only practicable option, and provide information to show that it will not have a detrimental effect on flood risk, water quality or wildlife.

Please refer to the County Council's Local Flood Risk Management Strategy Appendix document, at the above link, which contains the County Council's culverting policy (appendix 5).

To safeguard access to watercourses for future maintenance, inspection, and improvement works in the future, clear margins should be provided from the top of bank. A minimum clear margin of 3m should be provided from each top of bank for watercourses less than 2 metres in width, a minimum clear margin of 4.5m should be provided for watercourses 2 metres or greater in width.

Environment Agency

The National Planning Policy Framework (NPPF) is a key part of national policy to make the planning system less complex and more accessible, and to promote sustainable growth. The Environment Agency continue to play a key role working alongside other flood

management bodies in preventing inappropriate development in flood risk areas and reducing the causes and impacts of flooding, as a statutory consultee in the planning process.

For works upon or near to watercourses, under the terms of the Water Resources Act 1991 and the Land Drainage Byelaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 8 metres of the top of the bank of a watercourse, designated a 'Main River'. Further information can be found on the Environment Agency's Website – <https://www.gov.uk/government/organisations/environment-agency>
<http://www.environment-agency.gov.uk/whbydefault.aspx>

For further information relating to the catchment detailed in the above section Historic Flooding please refer to the Environment Agency's Catchment Data Explorer at <http://environment.data.gov.uk/catchment-planning/>

I trust the above details are useful. If you require any further advice, do not hesitate to contact the LLFA.

Kind Regards

Jack Hamilton
Technician
Flood Risk Management

The villages of Diseworth, Long Whatton and Breedon on the Hill; also, now flooding on a regular basis. The cause? Natural amounts of water with not enough land for it to naturally soak away in to. The situation will be made indescribably worse should this development go ahead in its present form.

Brooklet Farm and Diseworth residents also suffer the ill effects of East Midlands Airport surface water run off directly in to Diseworth Brook with multiple pollution/contamination events being investigated by the Environment Agency.

SUMMARY

Why on earth have you chosen this plot in the middle of beautiful countryside with diverse nature and wildlife, when you have other options with much less of an environmental impact.

We would strongly urge that the council reject these proposals, on both environmental, economic grounds and amongst numerous amounts of other reasons.

Why is a housing development (new Town) on this scale even being considered is unexplainable with the location next to/close by to East Midlands Airport, Donington Park racetrack plus Download Festival, SEGRO, Breedon Quarry..... A complete re-think on the development is essential.

Lazy planning to put the whole of NWLDC housing needs in one place, there must be a reason for this

The site has been chosen because the local farmer approached the council willing to sell the land. This is not how big planning projects should operate and the integrity of this land sale must be questioned.

The site is on undulating land visible for miles around. It is attractive rural land and provides a green buffer from the airport and industrialisation North of the airport. It should be preserved no matter what.

Isley Walton is an attractive historical tiny village that should not be encroached upon by such a large development.

Everybody in Isley Walton and surrounding areas, visitors and people passing through, benefit from the beautiful surrounding countryside and diverse nature that the area offers. Under this proposal this is going to be destroyed and filled with nothing more than a concrete LEGOLAND!

Years of disruption and noise, not only to the actual fields but to all access routes too. With the complete destruction of thousands of various wildlife and their habitats -, of which will not be protected at all from the development.

No thought has been given to the area impacted, the people who live here or the repercussions this build would cause for the area.

Other recent developments have had an impact on Isley Walton and Diseworth villages. The rail/freight interchange has generated a massive increase in HGV traffic and the development of the DHL and UPS air freight hubs at EMA has added to this. The residents of both villages endure unpleasant and increasing levels of noise from night flights at Europe's last unregulated airport. Additional developments will increase levels of congestion and pollution and continue the unwarranted destruction of our heritage. To conclude, the proposal flagrantly abuses NWLDC Local Plan which is totally unacceptable.

To permit this development to take place would be a betrayal of the people who trust in the authorities to make and uphold the policies giving us protection of our heritage and well-being. The development would have a devastating effect on the local community, the ecology, and the environment.

The proposal would be in variance of the defined limits which is unacceptable. The Local Plan states a need for 9,620 houses throughout the district between now and 2039. What is the rationale behind building nearly half of this total amount in one single location? This is even more nonsensical when considering the development of 860 houses in Castle Donington with a further 1,800 to follow. Furthermore, construction has begun on the development of 3,200 houses between Hathern and Loughborough. Building on the Isley Walton site would mean houses planned to be built over the coming 17 years throughout the district, would all be built within a five-mile radius!

The NPPF has a core principle that states planners should focus significant developments in areas which are or can be made sustainable. The proposed development cannot achieve this. Pollution and traffic congestion will ensue, and the carbon footprint will be unrecoverable. Building on farmland and countryside is not only undesirable, but also unsustainable.

The Local Plan asserts that new developments should not be affected by noise. Isley Walton development is adjacent to Castle Donington Racing Circuit and the EMA take-off and landing flight paths. The noise for the inhabitants of the new development would be exceedingly high and most unpleasant. We know!!!! EMA expansion is set to increase the already high noise levels impinging on the health and well-being of the residents. Traffic

A housing development at Isley Walton will generate an additional 10,000 residential vehicles as

well as the increased volume of service traffic. Loughborough will be the closest town to the site which will mean a huge increase of traffic passing through Diseworth resulting in a rat run access.

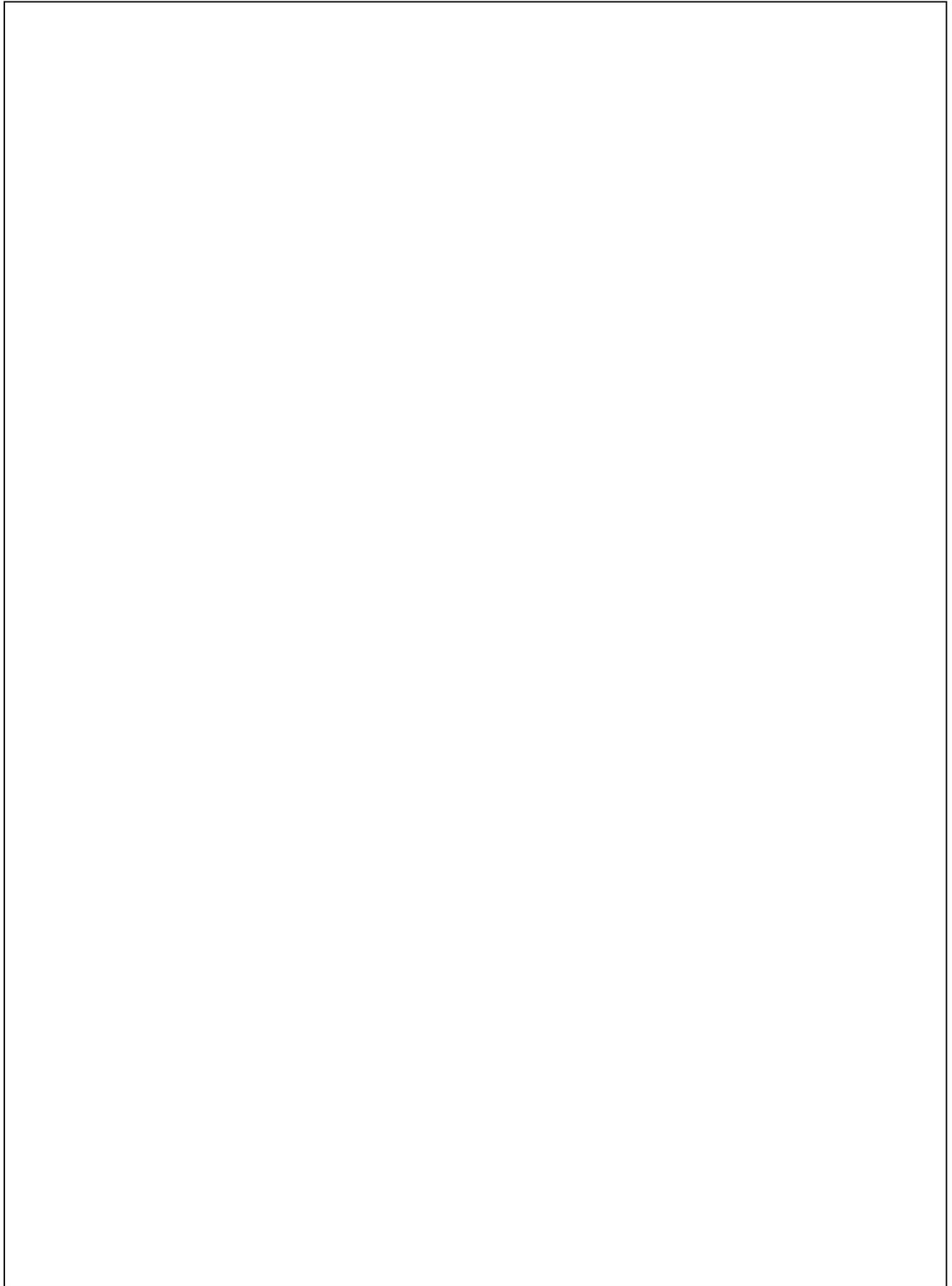
The EMA development does not comply with Planning Policy EC2 which states there should be "an immediate need for additional employment land". There is no evidence that there is an "immediate need". The Planning Policy also states the requirement of not being "detrimental to ... nearby residential properties". It's separated by a hedgerow!!!!

Should the development be approved (most likely already a 'done deal' with Pegasus Group), one less house will need to be constructed as [REDACTED] will be 'For Sale'.

Please acknowledge receipt of this objection.

Yours sincerely,

Angela and Paul Shephard



Declaration

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

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

Signed: 

Date: 13th March 2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mrs/Mr	N/A
First Name	Angela/Paul	N/A
Last Name	Shephard	N/A
Job Title (where relevant)	N/A	N/A
Organisation (where relevant)	N/A	N/A
House/Property Number or Name	██████████	N/A
Street	██████████	N/A
Town/Village	██████████	N/A
Postcode	██████████	N/A
Telephone	██████████	N/A
Email address	████████████████████ ████████████████████	N/A

PART B – Your Representation

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

1. To which consultation document does this representation relate? NWLDC. Application No: - 23/01697/EAS [Isley Woodhouse]		Proposed policies
	X	Proposed housing and employment allocations
		Proposed Limits to Development Review

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

Dear Sir/Madam, RE: Application 23/1697/EAS

The proposed new housing settlement at Isley Woodhouse (Policy IW1) to the West of Diseworth.

We **strongly** object to the proposed development adjacent to Isley Walton on the following grounds:

NOISE

NWLDC are already aware of the noise and air quality issues associated with the proposed location, as stated in the North West Leicestershire Local Plan (March 2021), specifically noise.

There are regular noise issues associated with transport, particularly at East Midlands Airport, as well as events at Donington Park.

Aircraft and airport operations at East Midlands Airport result in extremely high levels of noise disturbance, particularly at night.

Motorsport (at Donington Park) is a very noisy activity with 'no noise limit' track days, now several per month.

There are in the region of 500 HGV movements to and from East Midlands Airport on a typical weekday (24/7 operation).

The A453 is an extremely busy road, with HGV's, Breedon quarry lorries, cars and high-speed motorbikes associated with Donington Park. Motorbike noise has increased substantially since the super bike shop opened at Donington Park. 50 mph A453 speed limit is completely ignored!!

The road is busy 24 hours a day with significant noise pollution.

Noise pollution remains and continues to worsen in this area, with the transport sector being the

cause. Aircraft and road traffic noise is the dominant source.

Exposure is above the EU's threshold of 55 decibels (dB) for daily exposure and 50 dB for night exposure. Isley Walton is regularly exposed to road traffic noise above 55 dB and aircraft noise above 65dB.

Please Note: Noise from road traffic alone is the second most harmful environmental stressor in Europe, behind air pollution, according to the World Health Organization (WHO). The harmful effects of noise arise mainly from the stress reaction it causes in the human body, which can also occur during sleep. These can potentially lead to premature death, cardiovascular disease, cognitive impairment, sleep disturbance, hypertension and, at the least, annoyance.

We have all the above especially regular sleep disturbances from East Midlands Airport and DHL Cargo West.

The nearby quarry at Breedon-on-the Hill has planned expansion of their quarry workings in this direction on the opposite side of A453. This causes blasts, dust, noise, and transport disruption.

AIR QUALITY

"There are five Air Quality Management Areas (AQMA) in the district".

Two of the above areas are main settlements within the NWLDC area, Castle Donington & Kegworth, unsurprisingly both are adjacent to East Midlands Airport. The development of Isley Woodhouse is undoubtedly located within an area likely to suffer from similar Air Quality Issues. In addition, the extensive developments associated with the East Midlands, Freeport have the potential to substantially increase noise and air pollution.

Aircraft arriving at East Midlands Airport on the Westerly flight path regularly fuel dump directly over the land designated for the new Isley Woodhouse development.

Air quality here at Isley Walton has deteriorated significantly over the last 36 months since DHL Cargo West was built and additional aircraft departing and arriving. There are days especially when the cloud is low the air is potent with jet engine fuel smell. It's truly awful.

During the Winter months when there is a need for aircraft de-icer to be used, the smell from the airport holding ponds directly adjacent to the proposed development is absolutely disgusting.

Toxic glycols pollute the air, there are days when we cannot venture outside/have any doors or windows open as the air stings our eyes and noses.



"There are five Air Quality Management Areas (AQMA) in the district".

The NWLDC Local Plan requires...

"To improve air quality in the 5 Air Quality Management Areas which are largely linked to transport related issues. In addition, need to ensure that new development is not itself detrimentally affected by noise and pollution".

"The NPPF advises that in meeting development needs planning should "prevent both new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of noise pollution".

NWLDC and the applicant shall therefore demonstrate why the proposed site, which is already known to be unsuitable, has been selected for development. Specifically, the report should not just assess the Environmental issues of the proposed site but must demonstrate why this location has been chosen over other potential alternatives.

The report must also cover how the proposed development complies with NWLDC Local Plan Policies and Objectives such as...

Policy Ec4 – East Midlands Airport

Incorporates measures that will **reduce** the number of residents affected by noise because of the airport's operation, as well as the impact of noise on the wider landscape.

A development on this scale breaches all the above!

Objectives

Objective 1 - Promote the health and wellbeing of the district's population.

Objective 11 - Protect and enhance the natural environment including the district's biodiversity, geodiversity and water environment areas identified for their importance.

Objective 12 - Conserve and enhance the quality of the district's landscape character including the National Forest and Charnwood Forest and other valued landscapes.

Although the proposed development of Isley Woodhouse is located within the NWLDC Planning Area, there are several adjacent planning areas which potentially could have developments associated and/or justified by the establishment of the East Midlands Freeport (EMF).

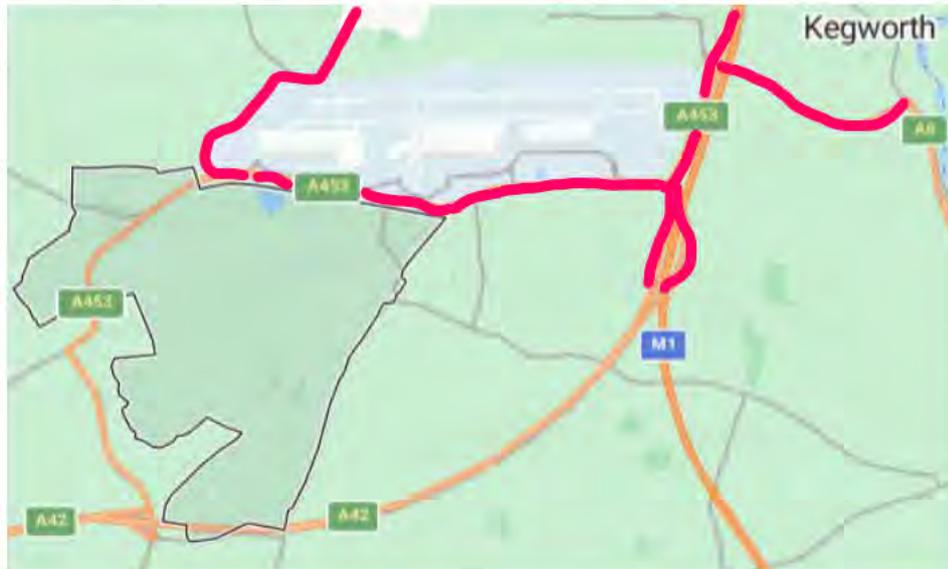
LIGHT POLLUTION

Isley Walton already suffers from significant light pollution from East Midlands Airport and DHL Cargo West which has worsened since their introduction of LED lighting leading to numerous complaints to Manchester Group (MAG). It is now at a record high. As measured by CRPE 2016 data, Isley Walton is already impacted by light pollution levels graded higher than E2 Rural designation.

TRAFFIC

With the current overdevelopment and associated heavy traffic from local businesses such as Donington Park, East Midlands Airport and Breedon Quarry already causing non insignificant peak time delays for residents, based on households generally having 2 cars, how would the area possibly cope with another 9,000+ cars seeking access and egress at these times.

We now have queuing traffic on the A453 everyday (increased pollution) between the hours of 7:00am-9:30am and 3.30pm-7:00pm along this section of road:



How can this possibly be a sensible solution to the inner-city housing shortage when it will have such a negative impact on the proposed area?

The A453, Walton Hill running through Isley Walton (particularly the Melbourne Road junction) will become even more of a death trap if this goes ahead. Even if a dual carriage way is proposed how much more disruption, noise, pollution will that create?

Race events and Download Festival that take place at Donington Park result in long delays and queues back to the M1 motorway; indeed, last year it took 4.5 hours to drive from Isley Walton to Kegworth during Download Festival. Imagine that with another 4,500 houses here, supporting around 9,000 cars. The roads here are not suitable for such a huge development; the main roads to the M1 and the A42, could not contain such vast quantities of traffic.

Unless all the inhabitants of the new housing development are employed within their living

location, they will need to travel to the site of their employment. In both instances, this would mean a substantial increase of vehicles and travelling. The location of the new town is an odd choice as it is at the far end of the County. People working in the city of Leicester would need to endure a fifty-minute commute from the site resulting in increasing pollution and congestion within the locality.

The HS2 rail line is due to run close to the area of proposed development. It will cause major disruption in its building. It will not stop for passengers, so will just cause extra noise and disruption as it passes through. Most unpleasant to live near to.

ISLEY WALTON VILLAGE - HERITAGE

Where does the name Isley Woodhouse come from? The Parish of Isley Walton have no wish that any part of Isley Walton be associated with this unwanted and unnecessary proposed development.

The proposed name 'Isley Woodhouse' is nonsensical name which should have no association or reference to the Parish of Isley Walton with its' strong heritage, including its association with the Worshipful Company of Bowyers who bequeathed housing here to the veterans returning from Agincourt? There is no mention of how Isley Walton would be shielded from this development-being sited on Walton Hill and **all** views would be destroyed.

Will residents be compensated for the huge devaluation in the value of property caused by this development?

No mention of the Manor House, All Saints Church (a knights Templar church) and the Toll House which are all Grade 2 listed and of historical importance. This seems extremely ill thought out with no real due diligence having been carried out.

Reliance on exponential figures is deeply flawed and should be null and void having been paid for by the landowner/developers who have no doubt never even visited the area.

The scale of the proposed development is absurdly large; 4,000+ houses would equate to a new population which is the same as the two market towns of Castle Donington and Kegworth and the villages of Breedon-on-the Hill, Belton, Diseworth and Long Whatton combined.

How are NWLDC proposing to ensure the accuracy and independence of the proposed assessment, given this is being prepared by the applicant and supported by specialists funded by the applicant? Not exactly fair and open, is it? Do you honestly believe Pegasus Group would produce a report containing any negatives in terms of the land and their desire to generate millions of pounds of profit....

ECOLOGY/FARMLAND

DESTRUCTION OF PRIME FARMLAND & ENVIRONMENT IMPACT Why when there are several brownfield sites available should vast amounts of farmland be eaten up by a development? Under government recommendations brownfield sites should be utilised first. We can only conclude this to be an easy option rather than the correct option.

The development would destroy 750 acres of agricultural land currently used by tenant farmers and miles of ancient hedges at a time when locally produced food in the UK is critical to the economy, health, and wellbeing of the country. A loss of prime agricultural land that currently produces 2,976 tonnes of wheat.

The local character of this area is undeniably rural small villages separated by farmed countryside, linked to larger market towns. This areas character will be lost entirely if this development proceeds at such a desperate profit-driven scale. 750 acres of farmland destroyed. It is inconceivable that the local parishes could lose such a vast natural amenity.

The site is outside the Limits of Development and is situated in designated countryside and at variance with LP Policy S3 in this regard [LP 5.25]. It is self-evident that the intrinsic character of local countryside will be permanently disfigured and lost. There is no mitigation available, the only consequence will be the destruction of countryside and landscape. This needs to be properly addressed in the EIA.

WILDLIFE

Wildlife around Isley Walton on the designated land for development has a very healthy population of brown hares, badgers, bats, and barn owls to name but a few that can be found in and around the village, how will they be protected from the proposed development? They won't!! When DHL Cargo West was developed the foxes, brown hares and badgers became roadkill. It was so sad to see it, over a period of several months when their homes and habitats were destroyed by a large corporate who has zero integrity when it comes to local wildlife and residents.

BIODIVERSITY NET GAINS

Biodiversity net gain (BNG) is mandatory from 12 February 2024.

In England, BNG is mandatory from 12 February 2024 under [Schedule 7A of the Town and Country Planning Act 1990 \(as inserted by Schedule 14 of the Environment Act 2021\)](#). Developers must deliver a BNG of 10%. This means a development will result in more or better quality natural habitat than there was before development.

You must try to **avoid loss of habitat** when doing development work. Developers must deliver at least 10% BNG, either on-site or off-site, or as a last resort by buying statutory biodiversity credits.

How an earth can this development result in **more or better-quality habitat** and a reduction in carbon emissions when 750 acres of farmland and 7.5 miles of hedgerows will be destroyed? The answer is it absolutely cannot be achieved on the land identified for this development.

A new settlement near East Midlands Airport



- This proposal is a long-term development that will take more than 20 years to complete
- We have suggested some key principles to support the planning of the new village, including:
 - Ensuring builders follow specific design guidance
 - Focus on minimising carbon emissions
 - Making sustainable travel - walking cycling, public transport and the use of electric vehicles - a realistic option
- A masterplan for the development, providing a blueprint to guide the development, will be produced with the involvement of local people.
 - The masterplan will cover:
 - A mix of house sizes, tenures and types
 - Ensuring necessary infrastructure is planned and provided in a timely and coordinated way
 - Improvements in biodiversity
 - Future planning applications will need to comply with the masterplan.

FLOODING

2023 and year to date 2024 has seen record flooding events on the land off Moor Lane and on the Melbourne Road near to Church View House, an ongoing issue with frequent road closures as noted below (LCC – Lead Flood Authority).



FAO Adam Mallor
North West Leicestershire District Council

Date: 18/02/2024
Ref: 2024/002/2024
Year ref: 24/08/2024
Contact: Jack Hartman
Phone: 0116 205 8001
Email: adam.mallor@leics.gov.uk

Dear Adam Mallor

RE: REQUEST FOR ENVIRONMENTAL STATEMENT SCOPING OPINION – Land South of East Midlands Airport, Lley Woodhouse

Leicestershire County Council, in their role as Lead Local Flood Authority (LLFA) has been requested to provide input to the Environmental Statement (ES) scoping for this future application site. The Council advises that the LLFA is not a statutory consultation in relation to Environmental Statements and so such we recommend advice is sought from the Environment Agency in this respect.

However, the Consultant acting on behalf of the developer has previously approached the LLFA and has been advised of existing flooding issues in the downstream catchment and the LLFA's intent to have Natural Flood Management implemented within the site boundary to safeguard the catchment against the existing flood risk and to address the future impacts of climate change. As such, it is imperative that the developer works with the LLFA to ensure a suitable scheme is proposed which provides the best return required at the location.

Any applications for this site will require a Flood Risk Assessment due to existing flood risk at the location, regardless of the need for a flooding/hydrology related chapter within the ES. The Council therefore offer the following advice:

Flood Risk from Ordinary Watercourses
The Flood Risk to Planning (FRiPS and Sg) returns the flood zones, indicating the areas where land is susceptible to flooding from natural processes. The site entirely sits within flood zone 1, classified as having a 1 in 100 or greater annual probability of river flooding (x1%) or a 1 in 200 or greater annual probability of flooding from the sea.

Flood (Surface Water) Flood Risk
According to the EA map for Surface Water, flooding the vast majority of the site is at low risk of surface water flooding with small parts of the site at medium or high risk. These are predominantly around existing waterbodies (ordinary watercourses, man made ponds etc.)

Groundwater Flood Risk
It is recommended that a full and comprehensive ground investigation is carried out to understand the geology and hydrogeology on the site.

Further information about geology and groundwater can be obtained from the British Geological Survey at www.bgs.ac.uk

Further groundwater information and maps can be found at the following links:
British Geological Survey: Groundwater scheme
<https://pubs.bgs.ac.uk/doi/10.1046/j.1467-8113.2002.00101.x>

British Geological Survey: Coalfield Orebans
<http://map.bgs.ac.uk/coalfield/0101.html>

Environment Agency: What's in Your Backyard
<http://193.50.253.200/epa/what-is-in-your-backyard/>

Regulation of Activities on Watercourses
The ordinary watercourse, crossing the site, the centre of the proposed site is classed as an ordinary watercourse. If you propose to do any work on, or near to, an ordinary watercourse (including crossing) you may need consent from Leicestershire County Council in their role as Lead Local Flood Authority (LLFA) under the Land Drainage Act 1991. Further information on the types of works which require consent together with a template application form can be found on our website under the section Regulation of activities on watercourses:
<https://www.leicestershire.gov.uk/environment-and-planning/flooding-and-drainage/land-drainage/>

If you are unsure if your works will require ordinary watercourse land drainage consent, or to discuss the consenting process, please contact us at flood@leics.gov.uk

Leicestershire County Council opposes the culverting of watercourses; however we recognise there are situations where it may be necessary. In these cases open span bridges should be considered first as an alternative to culverts. Any applicants will be required to justify why a culvert is the only practicable option, and provide information to show that it will not have a detrimental effect on flood risk, water quality, or wetland.

Please refer to the County Council's Local Flood Risk Management Strategy Appendix document, at the above link, which contains the County Council's culverting policy (Appendix 3).

To safeguard access to watercourses for maintenance, recreation, and improvement works in the future, clear margins should be provided from the top of banks. A minimum clear margin of 3m should be provided north each side of banks for watercourses less than 2 metres in width, a minimum clear margin of 4.5m should be provided for watercourses 2 metres or greater in width.

Environment Agency
The Flood Risk to Planning Policy Framework (FRiPF) is a key part of returns to make the planning system less complex and more accessible, and to promote sustainable growth. The Environment Agency continue to play a key role working alongside other flood

management bodies in preventing inappropriate development in flood risk areas and reducing the causes and impacts of flooding, as a statutory consultee in the planning process.

For works upon or near to watercourses, under the terms of the Water Resources Act 1991 and the Land Drainage Bylaws, the prior written consent of the Environment Agency is required for any proposed works or structures in, under, over or within 6 metres of the top of the bank of a watercourse, designated a 'Main River'. Further information can be found on the Environment Agency's Website – <https://www.gov.uk/government/organisations/environment-agency>
<https://www.environment-agency.gov.uk/info/about-us/>

For further information relating to the catchment detailed in the above section Historic Flooding, please refer to the Environment Agency's Catchment Data Explorer at <http://environment.data.gov.uk/catchment/index>

I trust the above details are useful. If you require any further advice, do not hesitate to contact the LLFA.

Kind Regards



Jack Hartman
Technician
Flood Risk Management

The villages of Diseworth, Long Whaddon and Breedon on the Hill; also, now flooding on a regular basis. The cause? Natural amounts of water with not enough land for it to naturally soak away in to. The situation will be made indescribably worse should this development go ahead in its present form.

Brooklet Farm and Diseworth residents also suffer the ill effects of East Midlands Airport surface water run off directly in to Diseworth Brook with multiple pollution/contamination events being investigated by the Environment Agency.

SUMMARY

Why on earth have you chosen this plot in the middle of beautiful countryside with diverse nature and wildlife, when you have other options with much less of an environmental impact.

We would strongly urge that the council reject these proposals, on both environmental, economic grounds and amongst numerous amounts of other reasons.

Why is a housing development (new Town) on this scale even being considered is unexplainable with the location next to/close by to East Midlands Airport, Donington Park racetrack plus Download Festival, SEGRO, Breedon Quarry..... A complete re-think on the development is essential. [Inappropriate comments redacted]

Lazy planning to put the whole of NWLDC housing needs in one place, there must be a reason for this

The site has been chosen because the local farmer approached the council willing to sell the land. This is not how big planning projects should operate and the integrity of this land sale must be questioned.

The site is on undulating land visible for miles around. It is attractive rural land and provides a green buffer from the airport and industrialisation North of the airport. It should be preserved no matter what.

Isley Walton is an attractive historical tiny village that should not be encroached upon by such a large development.

Everybody in Isley Walton and surrounding areas, visitors and people passing through, benefit from the beautiful surrounding countryside and diverse nature that the area offers. Under this proposal this is going to be destroyed and filled with nothing more than a concrete LEGOLAND!

Years of disruption and noise, not only to the actual fields but to all access routes too. With the complete destruction of thousands of various wildlife and their habitats -, of which will not be protected at all from the development.

No thought has been given to the area impacted, the people who live here or the repercussions this build would cause for the area.

Other recent developments have had an impact on Isley Walton and Diseworth villages. The rail/freight interchange has generated a massive increase in HGV traffic and the development of the DHL and UPS air freight hubs at EMA has added to this. The residents of both villages endure unpleasant and increasing levels of noise from night flights at Europe's last unregulated airport. Additional developments will increase levels of congestion and pollution and continue the unwarranted destruction of our heritage. To conclude, the proposal flagrantly abuses NWLDC Local Plan which is totally unacceptable.

To permit this development to take place would be a betrayal of the people who trust in the authorities to make and uphold the policies giving us protection of our heritage and well-being. The development would have a devastating effect on the local community, the ecology, and the environment.

The proposal would be in variance of the defined limits which is unacceptable. The Local Plan states a need for 9,620 houses throughout the district between now and 2039. What is the rationale behind building nearly half of this total amount in one single location? This is even more nonsensical when considering the development of 860 houses in Castle Donington with a further 1,800 to follow. Furthermore, construction has begun on the development of 3,200 houses between Hathern and Loughborough. Building on the Isley Walton site would mean houses planned to be built over the coming 17 years throughout the district, would all be built within a five-mile radius!

The NPPF has a core principle that states planners should focus significant developments in areas which are or can be made sustainable. The proposed development cannot achieve this. Pollution and traffic congestion will ensue, and the carbon footprint will be unrecoverable. Building on farmland and countryside is not only undesirable, but also unsustainable.

The Local Plan asserts that new developments should not be affected by noise. Isley Walton development is adjacent to Castle Donington Racing Circuit and the EMA take-off and landing flight paths. The noise for the inhabitants of the new development would be exceedingly high and most unpleasant. We know!!!! EMA expansion is set to increase the already high noise levels impinging on the health and well-being of the residents. Traffic

A housing development at Isley Walton will generate an additional 10,000 residential vehicles as

well as the increased volume of service traffic. Loughborough will be the closest town to the site which will mean a huge increase of traffic passing through Diseworth resulting in a rat run access.

The EMA development does not comply with Planning Policy EC2 which states there should be "an immediate need for additional employment land". There is no evidence that there is an "immediate need". The Planning Policy also states the requirement of not being "detrimental to ... nearby residential properties". It's separated by a hedgerow!!!!

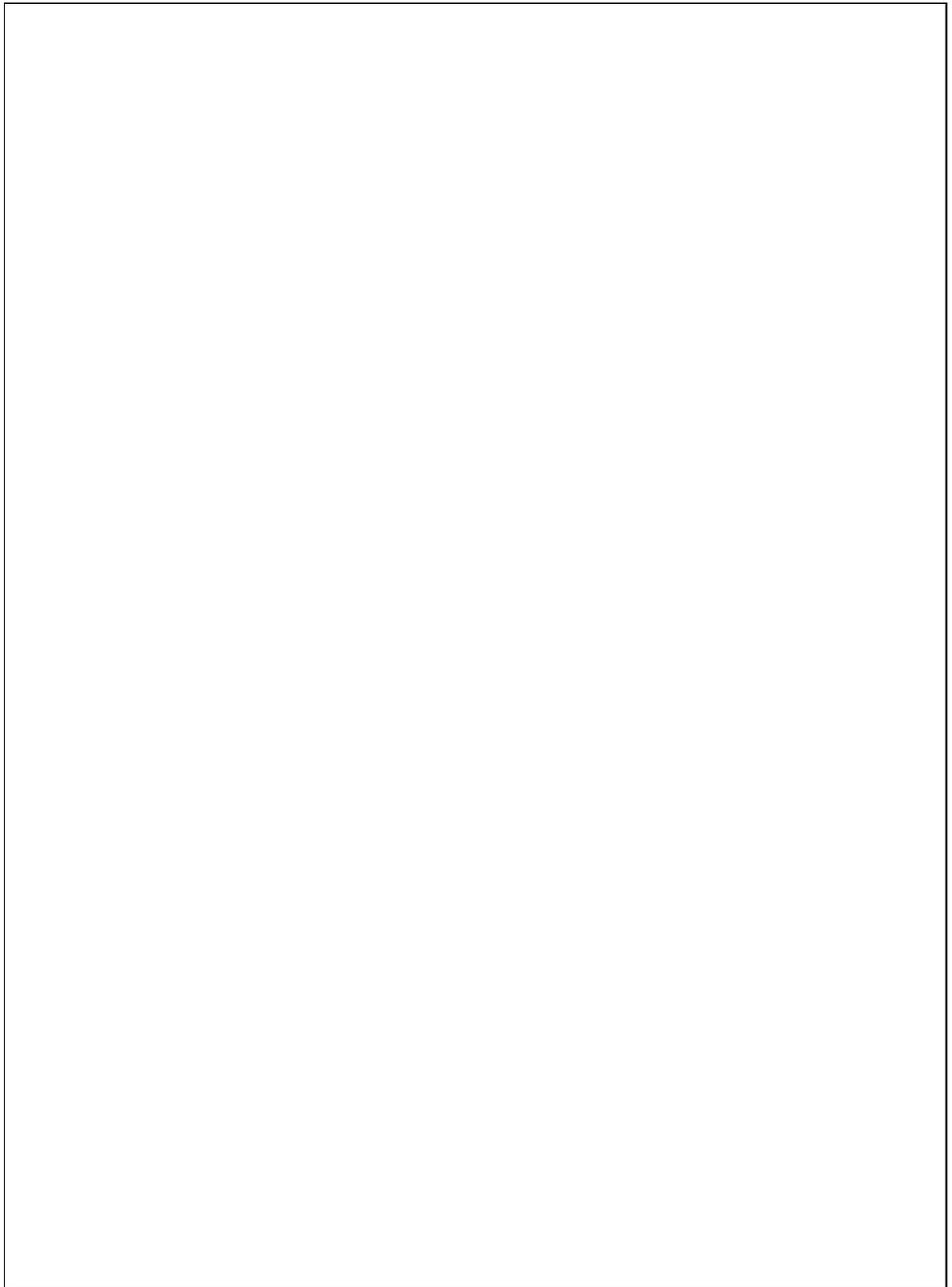
Should the development be approved (most likely already a 'done deal' with Pegasus Group), one less house will need to be constructed [REDACTED] will be 'For Sale'.

[Personal Sensitive Information redacted]

Please acknowledge receipt of this objection.

Yours sincerely,

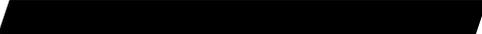
Angela and Paul Shephard



Declaration

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

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

Signed: 

Date: 13th March 2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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

PART B – Your Representation

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

1. To which consultation document does this representation relate? Proposed Housing and Employment Allocations [D2]		Proposed policies
	/	Proposed housing and employment allocations
		Proposed Limits to Development Review

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

Pages: 73 - 76
Paras: 5.11 - 5.20

Land North of Derby Road (A6), Kegworth (EMP73 (part))

Land North of Remembrance Way (A453), Kegworth (EMP73 (part))

I object to the employment land allocations, above, as they are situated right at the entrance to Kegworth from the M1 J24 into the village of Kegworth.

Over 55% of the employment allocation falls within the enlarged Kegworth boundary. This land allocation is on green sites at the entrance to the village, and bearing in mind land to the SW of the village - the other side of the A6 - has already been allocated for housing, this will impact greatly on the setting of the village. The arrival into Kegworth will be a continuous sprawl of urban development from East Midlands Airport/Freeport, East Midlands Gateway, and development along the A50 and A453 into the adjoining Borough of Rushcliffe .

The identity of the village will be compromised:

Page 21 of Policy S4: 4.34 “The Local Plan has an important role to play by guiding development. Managing development in areas of countryside is fundamental to delivering the pattern of development as set out in our settlement hierarchy. **The countryside also has an important role in providing the landscape setting to our**

settlements which contributes to their identity. The landscape of the countryside varies in character and appearance across the district. It is important that account is taken of these differences in considering development proposals in the countryside.”

The rapid development of land in the Borough of Rushcliffe, which borders the Kegworth Parish boundary is offering a 265-hectare site at the Ratcliffe-on-Soar Power Station site, and once fully occupied the redeveloped site claims the creation of between 7,000 and 8,000 jobs. The Fairham site North of Ratcliffe-on-Soar is providing an additional employment space. This would provide more than enough employment land for the immediate area. The proposed allocation EMP73 will therefore sprawl across boundaries and in effect be urban ribbon development.

The already stretched highway network would be further compromised, when a small accident anywhere around the J24 area already causes traffic chaos in nearby villages and on other main routes. The access to this proposed employment site will be opposite the new housing sites in Kegworth on the opposite side of Derby Road (former A6). The view from the new housing will be compromised by urban development, the air quality, already poor due to the proximity of EMA, the SEGRO site and the M1 would be further reduced, which represents reduction in the well-being of residents. The Derby Road access would present issues for road safety, parking and flow of traffic. Turning of HGVs from Sideley at the Refresco factory already cause problems as the lorries travel through a residential area of the village and have to turn sharp right at the traffic lights onto Derby Road. This would have further impact due to traffic volume.

The land north of Remembrance Way is on flood zone 3 and both sites spread across the Trent Valley Washlands and partly on the Lockington Marshes. Even with flood mitigation this could send flood waters towards the low lying areas of Kegworth village, and the changing climate has seen more adverse weather and flooding in the area. The access to the northern site, underneath the A453 could be flooded on a regular basis.

Also of note: underneath this land is the **Derwent Valley viaduct**, which provides 200ml/d of drinking water from N. Derbyshire to Hallgates Service Reservoir near Leicester. This viaduct which is over 100 year old would need to be fully protected from intense ground-works near its route.

PROPOSED HOUSING ALLOCATIONS:

Local Service Centre page 42

Policy H3d - Land south of Ashby Road, Kegworth (about 110 dwellings) 4.66.

- Land adjoining 90 Ashby Road, Kegworth (110 dwellings) (application reference 16/00394/REMM)
- Adjacent to Computer Centre and J24, Packington Hill, Kegworth (141 dwellings) (application references 19/1757/REMM and 19/00878/REMM) •

As the land above has already been approved for housing it would be beneficial to see in the Local Plan that this land will be a sustainable and an integrated part of Kegworth.

- That it will benefit all age groups in this development with homes suited to the elderly and those who need care, ie bungalows. There is a lack of such housing and provision in Kegworth (Local Plan Policies H4 and H11).
- That there will be sports pitches allocated as in the original plans, allotments, cycling and walking links, and play areas.
- That there will be a mix of housing, including affordable homes and provision for first time buyers.

Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth

I object to this land being ear-marked for 'employment', ie, another warehouse. This brownfield site between Pritchard Drive and the new housing allocation land would be an ideal opportunity to provide a supermarket and/or convenience store, and amenities, ie, leisure/community. It would contribute to the well-being of new residents, help to integrate the community, and enhance the Local Service Centre of Kegworth. The current centre of Kegworth would be too far to walk with young children, and for the elderly. This represents a 'need' for this new development.

Isley Woodhouse (Policy IW1) Pages 62 - 66

I have a strong objection to the positioning of this new town of more than 4,000 dwellings. The position of this new town is too close to the airport and Donington Park racetrack, this will greatly impact upon residents with noise, air and light pollution. It is too close to the conservation village of Diseworth affecting amenity and the rural setting of the village. This will be detrimental to the well-being of residents, and take away the identity of the village:

Page 21 of Policy S4: 4.34 “The Local Plan has an important role to play by guiding development. Managing development in areas of countryside is fundamental to delivering the pattern of development as set out in our settlement hierarchy. **The countryside also has an important role in providing the landscape setting to our settlements which contributes to their identity.** The landscape of the countryside varies in character and appearance across the district. It is important that account is taken of these differences in considering development proposals in the countryside.”

7.5 miles of hedgerows would be destroyed. In the Current Local Plan adopted in March 2021 - Page 20 “Objectives”, “Objective 11 states - Protect and enhance the natural environment including the district’s biodiversity, geodiversity...”; national biodiversity net gain requirements as a minimum would not be achievable by destroyed ancient hedgerows.

Flood risk to nearby villages would be increased if green land is built over to both sides of Diseworth. Flooding has increased dramatically in recent years and is not likely to decrease with climate changes bringing heavier rain and stormy weather in milder winters.

Page: 29-30 Policy AP2 Amenity

This proposal is to use good quality agricultural land Freeport Employment land proposal - (EMP90) to the east of Diseworth

I object to this employment land proposal as I think it is too close to the conservation village of Diseworth and will in effect swallow up the village into an employment site.

An already stretched transport network will not sustain another busy employment area right opposite the airport.

The pollution from this site will compromise the health and well-being of Diseworth residents - air quality, noise and light pollution.

Flooding issues would occur as per objection before on Policy IW1:

“Flood risk to nearby villages would be increased if green land is built over to both sides of Diseworth. Flooding has increased dramatically in recent years and is not likely to decrease with climate changes bringing heavier rain and stormy weather in milder winters.”

The biodiversity loss could not be maintained - see objection Policy IW1:

“In the Current Local Plan adopted in March 2021 - Page 20 “Objectives”, “Objective 11 states - Protect and enhance the natural environment including the district’s biodiversity, geodiversity...”

Buffers and screening will not protect the conservation of Diseworth from this development.

The imposition of yet more Freeport development in an already over-developed employment area is not acceptable.

Declaration

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

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

Signed: Carol Ann Sewell

Date: March 2024

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	Personal Details	Agent's Details (if applicable)
Title	CLLR	
First Name	CAROL	
Last Name	SEWELL	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
Street	██████████	
Town/Village	██████████	
Postcode	██████	
Telephone	██████████	
Email address	██	

PART B – Your Representation

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

1. To which consultation document does this representation relate?		Proposed policies
PROPOSED LIMITS TO DEVELOPMENT REVIEW (D3)		Proposed housing and employment allocations
<p>Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth</p> <p>Town Centre Topic Paper / Policy Paper Appendix A, 'Policy Maps'</p> <p>East Midlands Airport: Public Safety Zones (Draft Policy Ec10)</p>	/	Proposed Limits to Development Review

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

Proposed Limits to Development Review [D3]

I support the LtD/K/01 Refresco and LtD/K/02 New Brickyard Lane changes.

I am opposed to the limit of Development area to include the EMP73 proposed development land, and note the area north of the A453 is not included although this is to be accessed from Derby Road (former A6) and is in effect a continuous urban development entering the neighbouring parish boundary of Lockington cum Hemington, which will account for loss of green-space at the entrance to Kegworth and effectively be urban sprawl from the SEGRO site, Airport/Freeport and development along the A453 in the Borough of Rushcliffe.

Town Centre Topic Paper / Policy Paper Appendix A, 'Policy Maps'

I object to reducing the existing village centre boundary, and would prefer this to become larger to include former shops/businesses on High Street, should they ever be required to revert back from residential use to service the growing population of Kegworth, and the library.

I would like to see the centre boundary extended to include the commercial property at 3A Dragwell and the Doctor's Surgery. The shop at 3A Dragwell has operated as a shop/commercial property for circa 200+ years and requires protection from reverting to a domestic property if it is to become vacant.*

I would like to see the Parish Council Office at 1 London Road being included in this boundary.

Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth

I object to this land being ear-marked for 'employment', ie another warehouse. This brownfield site between Pritchard Drive and the new housing allocation land would be an ideal opportunity to provide a supermarket and/or convenience store, and amenities, ie, leisure/community. It would contribute to the well-being of new residents, help to integrate the community, and enhance the Local Service Centre of Kegworth. The current centre of Kegworth would be too far to walk with young children, and for the elderly. This represents a 'need' for this new development.

*It is crucial to maintain brownfield sites within the village boundary to create a vibrant mix and prevent the village becoming a 'dormitory village'.

East Midlands Airport: Public Safety Zones (Draft Policy Ec10)

I am not in favour of the reduction of this safety zone. I remember the horrific air crash in Kegworth in 1989 and would support the maintaining of the current safety zone. This would give villagers confidence that further building won't be erected beneath the zone and allay fears of another disaster. The M1 will become busier, which is right beneath the flight path and this will become inevitably busier as will the Airport when the Freeport and other employment areas expand.

Declaration

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

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

Signed: Carol Ann Sewell

Date: March 2024

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House/Property Number or Name	█	
Street	██████████	
Town/Village	██████████	
Postcode	███	
Telephone	██████████	
Email address	██	

PART B – Your Representation

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

<p>1. To which consultation document does this representation relate?</p> <p>Houses in Multiple Occupation and Draft Policy H8 - Houses in Multiple Occupation in Kegworth</p> <p>East Midlands Airport: Public Safety Zones (Draft Policy Ec10)</p> <p>Town Centre Topic Paper / Policy Paper Appendix A, 'Policy Maps'</p> <p>Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth</p>	<p>/</p>	<p>Proposed policies</p> <p>Proposed housing and employment allocations</p> <p>Proposed Limits to Development Review</p>
--	----------	--

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

Page 68:

Draft Policy H8: I Strongly support the introduction of this policy. It would be a welcome addition to help protect the village of Kegworth from a high level of HMOs, in particular student accommodation. Of note, these are not necessarily 'smaller' properties as indicated at 6.73, it also includes larger properties in the village. The estimate of HMOs in Kegworth at 14.0% I would judge to be an underestimate and an Additional Licensing Scheme which other areas have adopted would improve the accuracy of HMO data. This would be helpful to refer to in the planning process. A regular review of HMOs in Kegworth is necessary.

Car Parking Provision: I strongly support this section and the proposal at H8(c) for the provision of off-street parking of one space per occupant. This rule would be beneficial for self-contained apartments within Kegworth too, either in a separate policy or in an amendment to the Leicestershire Highway Design Guide.

It will be an advantage to protect residential properties not being sandwiched between two HMOs and a threshold created to prevent over-intensity of HMOs in areas of the village would be welcome.

When an HMO property is sold, then an additional policy that planning permission would be required for the property operate as an HMO should be introduced.

East Midlands Airport: Public Safety Zones (Draft Policy Ec10)

I oppose the reduction in size to this zone. I remember clearly the horrific air disaster in 1989, and the reduction of this zone will not give confidence to villagers who live in close proximity to the arrival/departure zone. Safeguarding of building directly beneath the current splay of the zone would be crucial to maintain and keep confidence high.

Air traffic movements are increasing all the time at the Airport and it will become far busier when the Freeport is up and running, as will the M1, which also needs protection from possible accidents involving aircraft.

Town Centre Topic Paper / Policy Paper Appendix A,

'Policy Maps'

I do not support a reduction in size of the 'town' centre boundary. A rapidly growing village would benefit from a larger town centre boundary which extends up the High Street to include former shops/restaurants, to give support should these ever revert back to retail, and the Library.

The boundary should include the shop on Dragwell, and the Doctor's Surgery; and the Parish Council Office on 1 London Road (former shop) opposite the north end of the Market Place.

Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth

I would not support this to remain as 'Employment' and would like to see this area earmarked for retail, leisure and community use.

Declaration

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

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

Signed: Carol Ann Sewell

Date: March 2024

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	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		Tim
Last Name		Coleby
Job Title (where relevant)		Senior Associate
Organisation (where relevant)	Barwood Development Securities Ltd.	Stantec UK Ltd.
House/Property Number or Name		█
Street		██████████
Town/Village		██████████
Postcode		██████
Telephone		██████████
Email address		████████████████████

PART B – Your Representation

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

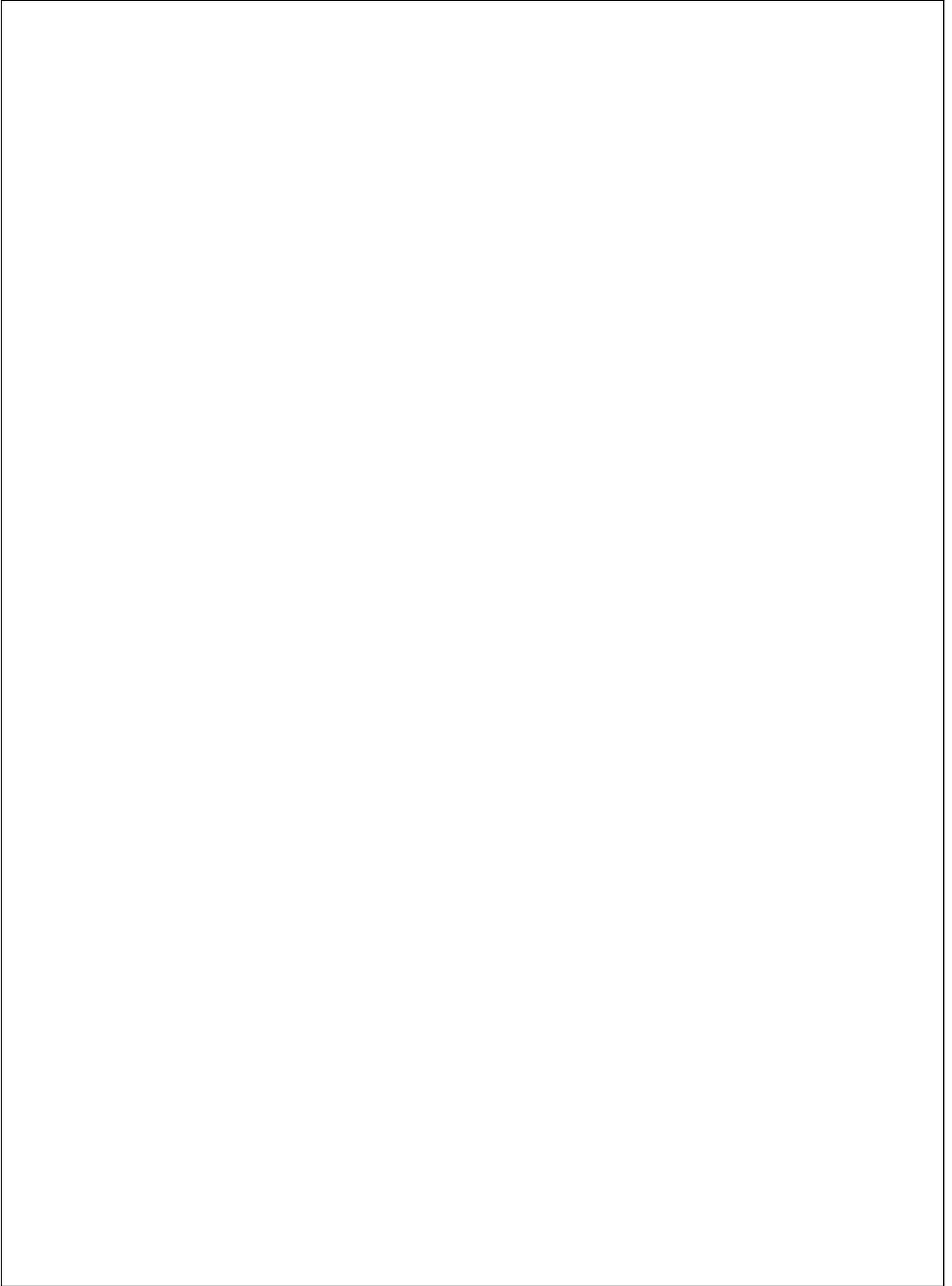
1. To which consultation document does this representation relate?		Proposed policies
	X	Proposed housing and employment allocations
		Proposed Limits to Development Review

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

Use this box to set out your response.

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

See separate report. Our submission is made in support of the proposed allocation for housing of Broom Leys Farm, Coalville.



Declaration

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

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

Signed:



Date: 14th March 2024.

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Response to North West Leicestershire Local Plan (2020-2040) Regulation 18 Consultation

Broom Leys Farm, Coalville (Site Ref: C46)

On behalf of **Barwood Development Securities Ltd**

BARWOOD
LAND

Project Ref: 332611333 | Date: March 2024

Registered Office: Buckingham Court Kingsmead Business Park, London Road, High Wycombe, Buckinghamshire, HP11 1JU
Office Address: 100 Barbirolli Square, Manchester, M2 3AB
T: 0161 245 8900 E: manchester@stantec.com

Document Control Sheet

Project Name: Broom Leys Farm, Coalville
Project Ref: 332611333
Report Title: Response to NW Leicestershire Local Plan Regulation 18 Consultation
Date: March 2024

	Name	Position	Signature	Date
Prepared by:	Tim Coleby	Senior Associate	TC	March 2024
Reviewed by:	Bernard Greep	Director	BG	March 2024
Approved by:	Bernard Greep	Director	BG	March 2024
For and on behalf of Stantec UK Limited				

Revision	Date	Description	Prepared	Reviewed	Approved

This report has been prepared by Stantec UK Limited ('Stantec') on behalf of its client to whom this report is addressed ('Client') in connection with the project described in this report and takes into account the Client's particular instructions and requirements. This report was prepared in accordance with the professional services appointment under which Stantec was appointed by its Client. This report is not intended for and should not be relied on by any third party (i.e. parties other than the Client). Stantec accepts no duty or responsibility (including in negligence) to any party other than the Client and disclaims all liability of any nature whatsoever to any such party in respect of this report.



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APPENDIX A: Broom Leys Farm Vision Document

1 Introduction

1.1 Purpose of this Submission

- 1.1.1 Stantec UK Ltd is appointed by Barwood Development Securities Ltd ('Barwood Land') to submit a response to the North West Leicestershire Local Plan (2020-2040) Regulation 18 Consultation.
- 1.1.2 Formed in 2009, Barwood Land has grown to be one of the UK's leading land promotion businesses, with an impressive track record of success throughout the country in promoting land with development potential and securing planning permission accordingly.
- 1.1.3 Our client controls 14.16 hectares of land at Broom Leys Farm, Coalville, which is proposed to be allocated for residential development of around 266 dwellings. We support this allocation and we show within our response how the Council's draft requirements for the development of the site are wholly consistent with Barwood Land's Vision Document, which is attached as Appendix A. The Vision Document contains a detailed analysis of the site's constraints and opportunities and describes our client's conceptual design proposals for the site.
- 1.1.4 Before commenting on the details of the proposed allocation, we provide a brief overview of the Broom Leys Farm site.

1.2 Broom Leys Farm, Coalville

- 1.2.1 Broom Leys Farm lies to the east of the A511 Stephenson Way and north of Broom Leys Road. It is bounded to the north by a footpath running along a former mineral railway. To the east, the site is bounded by Coalville Community Hospital and Sharpley Avenue recreation ground. A public right of way (O6) crosses the western part of the site.
- 1.2.2 The site is sustainably located close to Coalville town centre and other key services, including schools, a health centre, shops and both formal and informal recreation facilities. Public transport availability is excellent, with regular, frequent bus services running along Broom Leys Road, and there are also extensive opportunities for active travel (walking and cycling) in the form of pedestrian links and cycleways within and adjoining the site.
- 1.2.3 Barwood Land's vision for Broom Leys Farm, as described in the attached Vision Document, is as follows:

'To integrate an attractive residential development into the surrounding fabric of Coalville. This character led scheme – distinct from Whitwick – proposes to harness the best of the site, being sustainably located and visually contained.'
- 1.2.4 The Vision Document also shows that the site is suitable for sustainable residential development, which is achievable and deliverable. The document explains:
 - why the site is ideal for residential use, in view of its sustainable location, its close relationship with the approved Leicestershire County Council highway infrastructure improvements for the A511 growth corridor (due to commence in 2025/26) and its opportunities for environmental improvements in the form of significant additional landscape buffers and community open spaces;
 - that there are no technical or environmental constraints to the proposed development which cannot be overcome through careful design; and

- how Barwood Land’s illustrative masterplan will evolve in discussion with the local community and other stakeholders to ensure that the site delivers not only a high quality, distinctive development but significant social, economic and environmental benefits for Coalville as a whole.

2 Proposed Housing and Employment Allocations

2.1 Introduction

2.1.1 Within this section, we provide our response in support of the proposed housing allocation at Broom Leys Farm, Coalville.

2.2 Broom Leys Farm, Coalville

2.2.1 We fully support the allocation of this site which is described as follows in the consultation document titled 'Proposed Housing and Employment Allocations':

- (1) *'Broom Leys Farm, Broom Leys Road, Coalville (C46), as shown on the Policies Map, is allocated for:*
 - (a) *Around 266 homes*
 - (b) *Provision of affordable housing in accordance with draft Policy H5*
 - (c) *Provision of self-build and custom housebuilding in accordance with draft Policy H7*
 - (d) *Areas of public open space*
 - (e) *Surface water drainage provision (SuDS).*

- (2) *Development of this site will be subject to the following requirements:*
 - (a) *Provision of a safe and suitable access from Broom Leys Road and/or the A511;*
 - (b) *Provision of active travel pedestrian and cycle routes through the site including a link to the former mineral railway line which adjoins the northern boundary of the site;*
 - (c) *Retention and enhancement of the existing public right of way (O6);*
 - (d) *Retention and enhancement of existing hedgerows and trees within the site and along the boundary of site with Stephenson Way (other than in the event that access from the A511 is required) and the former mineral railway;*
 - (e) *Provision of public open space along the northern, western and north-eastern boundaries of the site;*
 - (f) *Achievement of biodiversity net gain in accordance with national requirements;*
 - (g) *Provision of tree planting and landscaping in accordance with draft Policy En3 (The National Forest);*
 - (h) *A design which respects the amenity of adjoining residential properties on Broom Leys Road and Coalville Community Hospital; and*
 - (i) *Any necessary Section 106 financial contributions, including towards primary and secondary education, healthcare, the North West Leicestershire Cycling and Walking Infrastructure Plan, offsite highways and public transport improvements.'*

2.2.2 The consultation document 'Proposed Housing and Employment Allocations' also states as follows in respect of the proposed allocation:

'This site forms part of an Area of Separation between Coalville and Whitwick in the adopted Local Plan. Having assessed all the available sites in the Coalville Urban Area, we have concluded that it will be necessary to allocate land in the Area of Separation to ensure we can meet our future housing need.'

We commissioned an Area of Separation Study in 2019 which split the Area of Separation into units and assessed whether those units made a primary, secondary or incidental contribution to the Area of Separation. Whilst some units were identified as making an incidental contribution, none of these were suitable for housing development. The Study concluded that Broom Leys Farm makes a secondary contribution to the Area of Separation.

Because of the site's location adjacent to the remainder of the Area of Separation, the provision of open space in the northern, western and north-eastern parts of the site will help maintain a sense of openness when viewed from the footpath adjoining the northern boundary of the site.

The site was the subject of a planning application for up to 250 dwellings submitted in 2014 (14/00808/OUTM). The application was never determined. At that time, the local highways authority did not raise an objection to a proposed access from the A511 or an additional access on Broom Leys Road. This suggests a similar access strategy may be suitable, although it would be necessary to have regard to up-to-date traffic data.'

2.2.3 We support all of the provisions of the proposed allocation as set out above and we confirm that all of the Council's draft requirements for the development of the site can be satisfied, as we describe in section 2.3 below.

2.2.4 We also wish to highlight that the allocation of this site in the manner proposed accords with national policy in respect of sustainable development, having regard to the site's characteristics and the social, economic and environmental benefits that it can deliver. In this context, we note that the Council's own Sustainability Appraisal concludes as follows in respect of the site:

'This is one of the best scoring sites in terms of SA and is well located for access to services and facilities. The site is located within the Area of Separation but is identified as making a secondary contribution. A previous planning application was not determined, but was not objected to in highway terms, although this would need to be considered in the light of more up to date information. It is understood that the landowner is willing to make the site available for development, although there is no confirmed developer interest at this time. The Area of Separation study suggests that this site should be retained as such, although it also notes that development would have limited impact upon the rest of the Area of Separation.'

2.2.5 In respect of the Area of Separation ('AoS'), it is clear from the above that the Council accepts that the site can be developed with limited impact on the rest of the AoS, and this finding is supported by Barwood Land's Vision Document which concludes that:

- *'the site is very well contained and enclosed by existing buildings, uses and natural features; it has very little functional or visual connection with the more open landscape to the north;*
- *development of the site as we propose would not result in coalescence between Coalville and Whitwick, nor would it harm the separate character or identity of those two settlements; and*
- *the site does not therefore make any significant contribution to the role, function or character of the Area of Separation, the boundary of which should be re-drawn to exclude the site.'*

- 2.2.6 The removal of the site from the AoS is also consistent with the comments of the Planning Inspector who conducted the Examination of the Council's adopted Local Plan and who concluded that *'there is scope for reconsideration of the detailed boundaries and land uses of the AoSs, in the event that it becomes necessary, at any time in the future, for the Plan to be reviewed in the light of increased development needs'*.
- 2.2.7 The allocation is further supported by Barwood Land's Vision Document, which concludes that the site is well suited to residential development in view of:
- *'its highly sustainable location close to Coalville town centre with its wide range of employment, retail, community and leisure facilities;*
 - *its high degree of accessibility to those facilities on foot, by cycle and by public transport;*
 - *its ability to provide appropriate access to and from Broom Leys Road and Stephenson Way and through the site, thereby resulting in improved highway conditions and complementing Midlands Connect/Leicestershire County Council's proposed improvements to the nearby junction of those two roads;*
 - *the excellent fit between our proposed masterplan and the Midlands Connect/Leicestershire County Council programme of enhancements to the A511 corridor as a whole, which will significantly improve the suitability, sustainability and attractiveness of the corridor for growth and investment;*
 - *the absence of environmental or technical constraints to development of the site, in the form of landscape, ecology, heritage and drainage considerations; and*
 - *the positive contribution it can make to meeting housing needs whilst also delivering a high quality residential environment, retaining important natural features, enhancing them with new National Forest planting and enabling greater public access to the site's network of open spaces.'*
- 2.2.8 Barwood Land, the appointed development partner for the delivery of the site, has an excellent track record in delivering successful residential developments across the region. The site is therefore available and suitable for residential development, which is achievable within the early part of the forthcoming Local Plan period.
- 2.2.9 Allocation of this site also helps to support the Council's proposed overall strategy which seeks to concentrate a significant proportion (35%) of all new housing development in the district's Principal Town of Coalville, which has the district's largest population and the greatest concentration of jobs, shops, services and facilities. This strategy also accords with national planning policy in the NPPF to meet housing needs whilst at the same time promoting the most sustainable forms of development in the most sustainable locations.
- 2.2.10 Having regard to the Council's overall strategy described above, the critical importance of allocating Broom Leys Farm for housing development is further underlined by the fact that the Housing and Employment Allocations consultation document currently shows a shortfall in allocations of some 300 dwellings in Coalville, such that further sites within or adjoining the town will have to be identified and allocated before the emerging Local Plan can be formally submitted for examination.

2.3 Detailed Site Requirements

- 2.3.1 Barwood Land's proposed form of development can meet all of the Council's draft detailed requirements for the site, namely those already set out in full in paragraph 2.2.1 above. The attached Vision Document, including the illustrative masterplan shown on page 23, demonstrates that:
- provision can be made for around 290 dwellings in total, with affordable housing in accordance with draft Policy H5 and self-build or custom housebuilding in accordance with draft Policy H7;

- public open space can be located along the northern, north-eastern and western boundaries of the site, thereby maintaining a sense of openness when viewed from the footpath adjoining the site's northern boundary;
- sustainable surface water drainage (SuDS) can be accommodated within the site;
- safe and suitable access can be provided from Broom Leys Road and/or the A511;
- active travel pedestrian and cycle routes can be provided through the site, with a link provided to the former railway line adjoining the site's northern boundary;
- the existing public right of way O6 can be retained and enhanced;
- biodiversity net gain in accordance with national requirements can be secured;
- significant additional tree planting and landscaping can be provided, in accordance with draft Policy En3 (The National Forest);
- suitable design and layout features can ensure that the amenities of adjoining residential properties and the Coalville Community Hospital are fully respected; and
- subject to being CIL compliant, appropriate financial contributions can be secured, by means of a Section 106 planning obligation, towards improvements to provision of education, healthcare, walking and cycling, off-site highways and public transport.

2.4 Conclusion

- 2.4.1 For all of the reasons described above, on behalf of Barwood Land, we fully support the proposed housing allocation of Broom Leys Farm and we confirm that the Council's draft detailed requirements for development of the site can be met and indeed they are consistent with our client's vision and conceptual design proposals as set out in the attached Vision Document.

Appendix A Broom Leys Farm Vision Document (submitted under separate cover)



Vision Document

Land at Broom Leys Farm, Coalville

Prepared by BHB Architects on behalf of Barwood Land
October 2020

BARWOOD
LAND

Prepared for Barwood Land
by Brownhill Hayward Brown Ltd.

Document Title : Land at Broom Leys Farm, Coalville,
Vision Document

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THE VISION...

'To integrate an attractive residential development into the surrounding fabric of Coalville. This character led scheme – distinct from Whitwick – proposes to harness the best of the site being sustainably located and visually contained.'





Site Location Plan

PLANNING CONTEXT

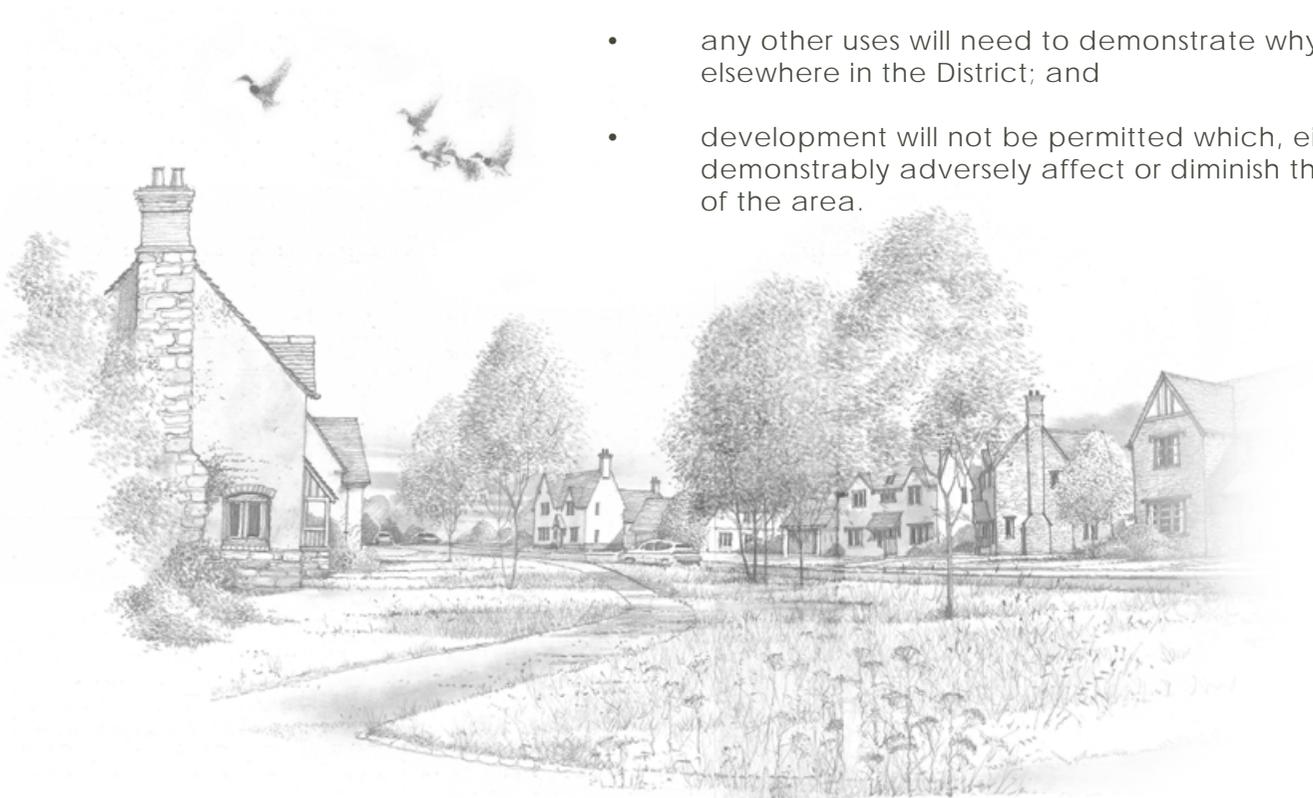
This Vision Document has been prepared to support the promotion of this site by Barwood Land and has regard to the following planning context:

- The Council's 2019 Strategic Housing and Employment Land Availability Assessment (SHELAA) found that the site was potentially suitable, available and achievable for housing development; and
- The SHELAA is shortly to be updated by the Council, in order to inform a Substantial Review of its adopted Local Plan in 2021.

ADOPTED LOCAL PLAN 2017

The site is shown in the adopted Local Plan within the Limits to Development and at the very southern end of a much larger Area of Separation between Coalville and Whitwick, to which Policy En5 applies, allowing development only for agriculture, forestry, nature conservation and leisure/sport/recreation and stating that:

- any other uses will need to demonstrate why they cannot be accommodated elsewhere in the District; and
- development will not be permitted which, either individually or cumulatively, would demonstrably adversely affect or diminish the present open, undeveloped character of the area.



SITE ANALYSIS AND OPPORTUNITIES

Landscape and Visual Context

Designatory Context

In terms of statutory and non-statutory protection, the site is not covered by any landscape designation that would suggest an increased sensitivity to change, or designation that would inherently prohibit development. For example, the site is not within an AONB or National Park, nor is it within any of the Areas of Particularly Attractive Countryside (APAC) defined in the Local Plan.

The site is however located within the defined Area of Separation (AoS) protected by Policy EN5 which extends between Whitwick and Coalville. The AoS is not a landscape designation and does not seek to protect land of particular landscape quality or value. Such designations are a spatial planning tool principally concerned with maintaining the separate character and identity of separate settlements.

Settlement Context

In general terms, the site is located within the central confines of the settlement of Coalville, to the east of the town centre, and on the northern edge of the suburb known as Greenhill. The site forms part of the Broom Leys Farm land holding, and is contained to the north by the now disused railway, to the south by residential properties along Broom Leys Road, to the west by the A511 and to the east the Coalville Community Hospital. The site is accessed from Broom Leys Road, where a break in the residential frontage provides access to the farm and the PRoW network. This area is shown on **Photograph A**.

The Site therefore has a good and close relationship with the existing settlement, and with noise from surrounding uses (particularly the A511 and Broom Leys Road) feels particularly semi-urban in character in many places, although the further north and central within the site, the less this urban influence pervades. The site is therefore very much 'hemmed in' and well contained by the existing settlement, and there is very little functional or visual connection with the more open landscape to the north.

The surrounding land uses and facilities – which includes the Broom Leys Primary School (to the south-east), the Coalville Community Hospital (immediately to the east) and the Coalville Rugby Football Club to the north – ensures there is a vibrancy to the local area, with which the site feels intrinsically connected.



Photograph A - The break in residential frontage to Broom Leys Road providing access



Image A - Aerial Photo of the Site



Photograph B - View from PRoW on former railway, across the site, towards Broom Leys Road



Photograph C - View from near Broom Leys farmhouse towards the A511



Photograph D - Area of brownfield land near to the farm complex

Site Character and Visual Context

The site comprises agricultural land which is currently set aside for the grazing of horses. There are three principal areas of the site in character terms – the large expanse of agricultural fields to the east, which are separated by post and rail fencing, the central ‘triangle’ of land between the two main north-south hedgerows, and the western triangle, adjacent to the A511. These areas are separated by two mature hedgerows (with hedgerow trees), which offer visual diversity and biodiversity corridors connecting the southern parts of the site with the heavily vegetated former railway line to the north.

There is a permanently wet area broadly central within the site, which is demarcated by the darker areas on **Image A** (shopage 6). This area appears permanently wet, and is therefore likely to be a spring rather than seasonal flooding.

The site boundaries vary, with the northern boundary formed of a belt of woodland some 10-15m wide (and occasionally wider), which is consistent with the disused railway line. This feature provides a prominent physical barrier with the land to the north, and even in winter conditions – due to the depth of planting – forms a visual barrier as well. There is a PRoW and cycle route which runs along this feature, and good views are available across the site towards the farm complex and the existing settlement edge. **Photograph B** shows a typical view from the PRoW.

The western boundary to the A511 comprises a tree belt/hedgerow which provides good visual containment from the west (as **Photograph C** shows). The noise of the road can still be heard, given there is no specific noise mitigation along this boundary, and only a single line of trees/hedgerow.

The southern boundary follows the back gardens to the properties along Broom Leys Road, whilst the eastern boundary is open to the Hospital, and more enclosed to the north-west where the woodland along the former railway line extends south-eastwards.

Whilst the site is predominantly grazing land, there are areas of land of brownfield character in proximity to the farmhouse, as shown by **Photograph D**.

In a visual sense, the site is well contained, having dense vegetated boundaries on two sides (north and west), and built development on the other two (south and east). This restricts visibility from many of the surrounding areas, however

there will be views from the PRoW which runs north-south through the site and the route along the disused railway line along the northern boundary. Development within the site would be visible from these routes, however largely in the context of existing settlement or built form, or other detractors (such as the road).

Longer range views are not readily available due to the prevailing landform and surrounding settlement, although as discussed subsequently there are some potential views from higher ground to the east. The background documents, including evidence based documents (reviewed below), confirm that there are no particularly sensitive views within or across the site.

THE LANDSCAPE RESOURCE

Published Landscape Character Assessment

The landscape character context is relatively complex, with a large number of assessments relevant to the site. At a National level the site is located within the Area 73 Charnwood Character Area. These assessments tend to be too high level to accurately portray local character, therefore the more detailed assessments are reviewed below.

At a County level the site borders the Coalfield and Charnwood Forest landscape character areas, with the majority of the site within the Coalfield LCA. Upon review it is also the case that the site much more closely represents the Coalfield LCA. The 'Distinctive Features' and 'Main Issues' of this LCA are provided below:

The Coalfield LCA 'Distinctive Features'

- "gently undulating landform
- effects of past and present coal and clay working
- relatively dense settlement pattern of former mining towns and villages
- mixed farmland with generally low woodland cover
- most of area within the National Forest
- distinctive landscape character around Coleorton"

The Coalfield LCA 'Main Issues'

- "further loss of trees and hedges
- poor hedgerow management
- open character of much of the area means that most new development is conspicuous
- lack of or poor quality restoration of mineral workings"



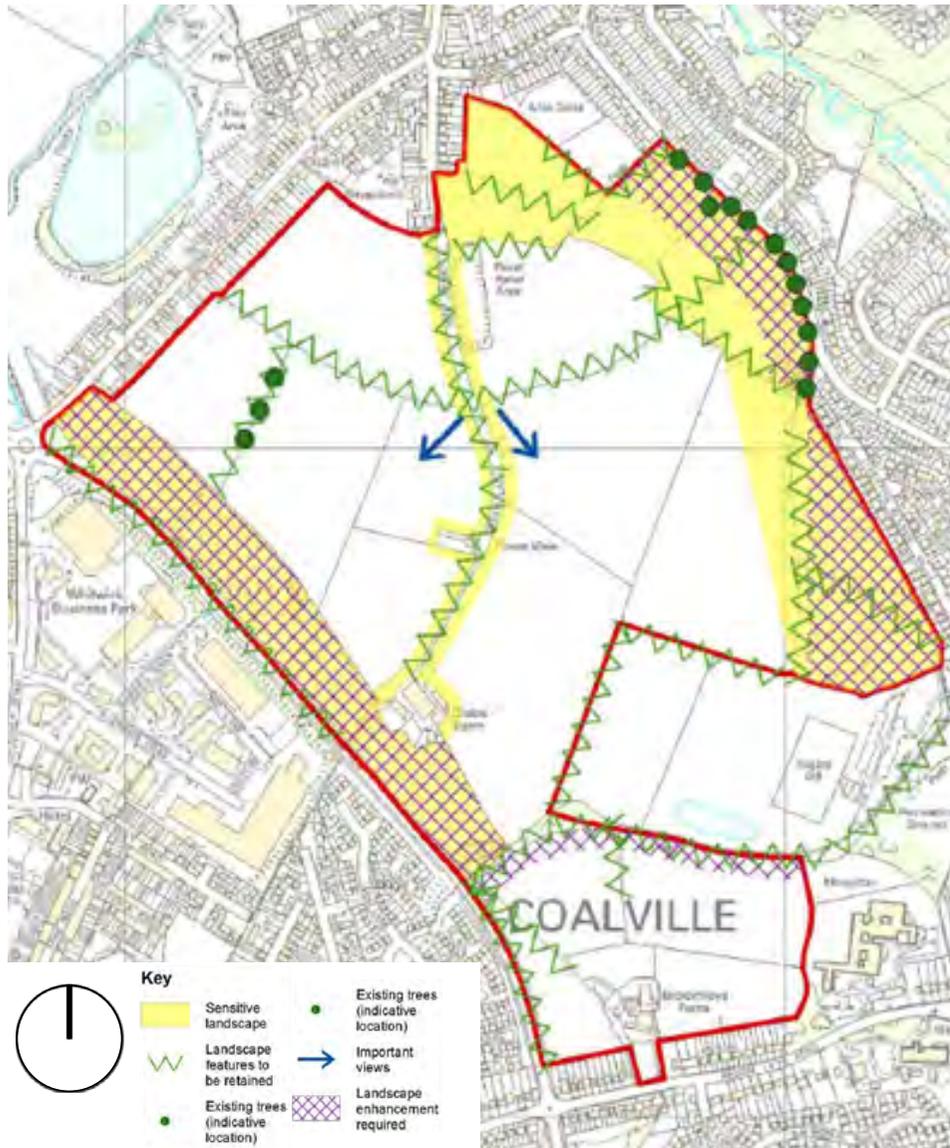


Image B - Extract from Settlement Fringe Assessment

The site is only largely consistent with the key characteristics, being farmland with occasional woodland cover, and with gently undulating topography. There is no evidence of historic coal or clay mining, although the former railway line is likely to have served these industries. The settlement influence is also a characteristic feature.

There are no further, more detailed, character assessments covering the site; however it is considered as part of the Settlement Fringe Assessment which provides an Evidence Base for the adopted Local Plan as part of a larger land parcel extending north into the AoS. The site is described under the 'Urban Fringe 3' area, which concludes in relation to the site:

"Development should avoid the highest land on the northern edge of the fringe and retain wooded features such as along the dismantled railway. Land on this southern fringe could be accommodated with less alteration to the character as the existing woodland would provide some screening."

Furthermore, the area of Urban Fringe containing the site is appraised as part of Area 1 'Fringe between Hermitage Road, Broom Leys Road and Whitwick (Hall Lane)'. This undertook a spatial appraisal, and assessed the parcels in terms of whether parts of them were particularly sensitive, or whether there were any key views or vegetation that should be retained. It also considered potential mitigation were development proposed here.

As shown on **Image B**, whilst the site's central hedgerows and the vegetation along the former railway line were identified as worthy of retention, there were no particularly sensitive areas or key views in proximity or covering the site. Some landscape enhancement was identified along the south of the railway line, and the proposed masterplan allows for this.

In terms of the potential to mitigate proposed development within this parcel, the appraisal concludes in respect of the site that:

"Development on land to the south of the railway would be relatively easy to integrate without altering the character of the land or sense of separation."

Finally, the eastern parts of the site fall within the Charnwood Forest, and specifically within the 'Area 6: Thringstone/Markfield Quarries and Settlement' character area. The proportion of the site within this LCA is very small, and upon review of the Key Characteristics and Management Recommendations, they are largely relevant to the area to the east, rather than the part of the site that falls within this LCA.

In summary, the landscape character context confirms that the site and local context isn't particularly sensitive, despite being within the designated Area of Separation (not completely surprising given this is a spatial tool rather than a landscape quality designation). Furthermore, existing evidence base studies confirm that development could be easily accommodated here without undue harm to landscape character if appropriate mitigation is pursued and incorporated into development designs.

The National Forest

The National Forest covers 52,000 hectares of the Midlands and includes parts of Derbyshire, Leicestershire and Staffordshire. It was established in the 1990s to transform the landscape and link two ancient woodlands - Charnwood Forest on its eastern fringe and Needwood Forest to its west. At December 2014 there was some 20% woodland cover, but the aim is to increase cover to about a third of all the land within the National Forest boundary. The site falls within the National Forest, and is protected under policy EN3 as a result.

The policy is far reaching, and rather generic in its content, but does specify a number of requirements for new development. Of relevance to the site is Policy EN3 (2) which states:

"(2) New developments within the National Forest will contribute towards the creation of the forest by including provision of tree planting and other landscape areas within them and /or elsewhere within the National Forest in accordance with National Forest Planting Guidelines in place at the time an application is determined. Landscaping will generally involve resilient woodland planting, but can also include the creation and management of other appropriate habitats, open space provision associated with woodland and the provision of new recreational facilities. Landscaping does not just include woodland planting and the appropriate mix of landscaping features will depend upon the setting and the opportunities that the site presents."

The aspirations of this policy have been considered in the Illustrative Masterplan, particularly through the new area of woodland in the site's north-eastern corner, and other areas of open space and retained vegetation corridors.



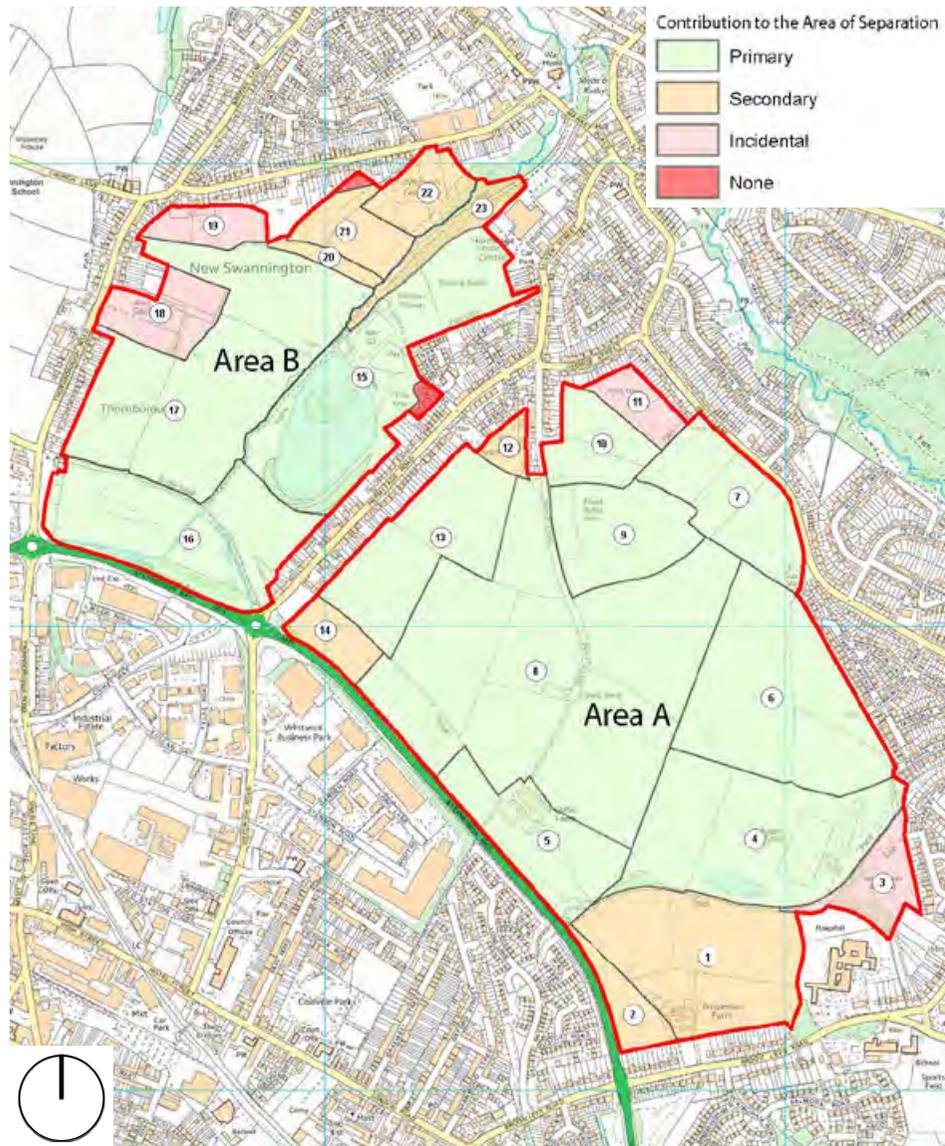


Image C - Extract from Figure 12 of the AoS Study

The Area of Separation

The site is located within the AoS as protected by Policy EN5. The context for these areas is defined concisely within the supporting text as follows, but the key text in relation to the acceptability of development in the Coalville-Whitwick AoS is covered under points (1) and (2):

“(1) Land between Coalville and Whitwick, as identified on the Policies Map, is designated as an Area of Separation where only agricultural, forestry, nature conservation, leisure and sport and recreation uses will be allowed. Any other proposed uses will need to demonstrate why they cannot be accommodated elsewhere within the district.

(2) Development will not be permitted which, either individually or cumulatively, would demonstrably adversely affect or diminish the present open and undeveloped character of the area.”

The Inspectors Report of the Examination in Public of the North West Leicestershire Local Plan covered the Area of Separation (AoS) and suggested that a reconsideration of both the detailed boundaries and land uses of the AoS was appropriate. As a result, The Landscape Partnership were commissioned by the LPA to undertake the ‘Area of Separation Study’ in 2019. This study sought to appraise the AoSs and consider the role and functionality of coherent areas of common character within them. Specifically, the study evaluated how land units contribute to the AoS by:

- maintaining the openness of the land,
- protecting the identity and distinctiveness of the settlements and
- preventing coalescence.

The site formed part of Study Area A. Within this, the site was defined as units 1 and 2, although part of the site (refer to Figure 12 of the study) was erroneously included as part of the Hospital. The findings of the study are also illustrated on Figure 12, an extract of which is provided on **Image C**. The green colouring represents areas which are Primary contributors to the AoS, orange areas are Secondary contributors, with the Pink and Red being Incidental and None respectively. Units 1 and 2 are both defined as Secondary as shown.

Whilst the study didn't suggest either land units 1 or 2 should be removed from the AoS, a number of important observations were made in defining the units as Secondary contributors to the AoS

- The units are generally self-contained, and have little or no physical or perceptual connection to the wider AoS to the north;
- The units have no connection to Whitwick, and therefore only serve to protect the open setting of Coalville, rather than preventing any sense of coalescence between the two conurbations; a key part of the reason for the AoS designation; and
- Whilst there are views available from the former railway line south towards Broom Leys Road, there are very few, if any, views from the public realm along Broom Leys road, limiting the extent to which the units are perceptually functioning as an AoS as experienced from this direction.

Photographs E, F and G show some comparative views across the northern part of the AoS and the southern part (which contains the site). These clearly show that whilst the northern parts are very open and expansive, with only distant views of settlement areas, the southern part is far more visually contained, and related to the settlement edge when considered as a whole.

There are a number of other observations which are questionable within the assessment, such as the lack of identification of detracting brownfield land (on the border of unit 1), and the peri-urban visual influence of the farm complex, which also appears to contain areas of vehicle maintenance and storage. **Photographs H and I** (opposite) illustrate this context.

Paragraph 5 (i) concludes in respect of units 1 and 2 as follows (emphasis added):

"i. Unit 1 makes an important contribution to the southern part of the AoS. However, this separation is essentially between different parts of the settlement of Coalville, including that fronting Broom Leys Road, A511 and Coalville Community Hospital rather than separating Coalville from Whitwick. The dense vegetation north of the cycleway screens the unit from the majority of the AoS to the north and from any direct connections with Whitwick. Unit 2 is a relatively small area and is visually contained by vegetation but there is a functional link with Unit 1 being part of the same farm. Built development within Units 1 and 2 is likely to have a significant effect on the open character of this part of the AoS and the contribution the land makes to the undeveloped edge of Coalville and most notably as perceived from



Photograph E - View across the northern AoS from Hall Lane looking South-West



Photograph F - View from Green Lane looking North-East



Photograph G - View from PRoW looking South-East across unit 1 and 2 boundary



Photograph H - Hardstanding in Unit 2



Photograph I - View of Broom Leys Farm complex from the disused railway line



Photograph J - View from Warren Hills towards the AoS. The site is identified as red (largely not visible) and the wider AoS in blue

the recreational route to the north. However, development would have a relatively limited effect on the remainder of the AoS to the north due to the level topography and intervening vegetation in Units 3, 4 and 5."

Whilst there is a suggestion that the units play an important role in the context of the AoS, it is very clear that when considering the AoS as a whole – which has as one of its primary purposes the avoidance of coalescence between Whitwick and Coalville – units 1 and 2 do not perform particularly well. In addition, the prominent feature of the disused railway line provides an excellent long-term defensible boundary to protect the remainder of the AoS from development which would undermine this primary purpose.

Areas such as AoS designations also play a role in providing separation within more distant views. One such view in relation to the site is from Warren Hills, an area of high ground to the east. From here, the site plays little or no contribution to settlement separation, either in the context of Coalville alone, or Whitwick or Coalville together. **Photograph J** demonstrates this, with the site and wider AoS identified.

With the Settlement Fringe Assessment concluding that development would be “relatively easy to integrate without altering the character of the land or sense of separation”, there is demonstrable evidence to suggest that developing the site would have only limited impact upon both the settlement or landscape character of the locale.

This analysis of the AoS in summary concludes that this designation boundary should be revised to exclude this site (or units 1 and 2) to more accurately reflect its purpose and strengthen the Policy itself.

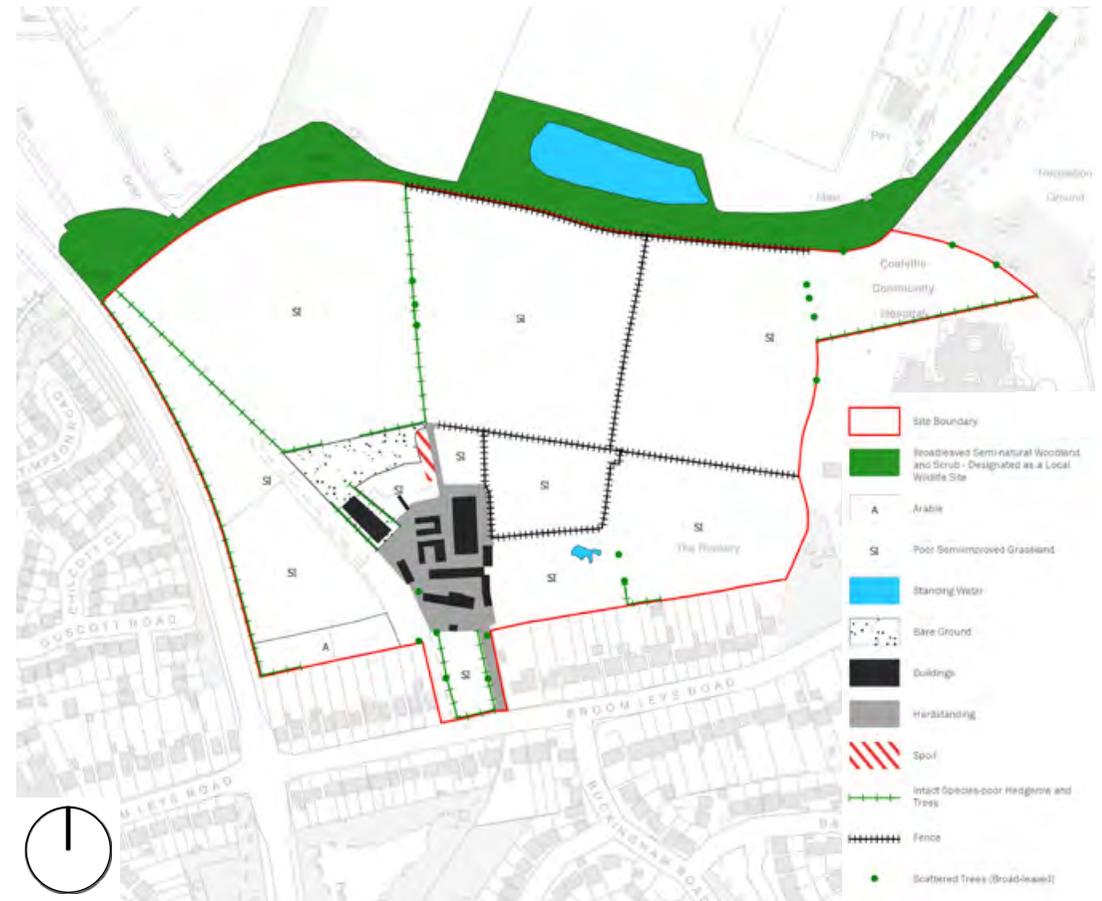
Addressing the key conflict with the AoS as detailed within the study, it would be possible, with careful masterplanning as undertaken in the preparation of the Illustrative Masterplan, to retain a sense of open character on the new settlement edge of Coalville. This would be through the provision of open space along the disused railway line, and generous open space on the higher ground in the north-east of the site, near the hospital and new woodland.

There would of course be some loss of openness were the site to be developed (as there would be with any development of greenfield land) but the overall pattern of settlement, and the more sensitive landscapes and views within the AoS and immediately surrounding the site, would be protected, assuming the principles set out in this document and illustrated on the masterplan were adopted.

ECOLOGY

There are several nationally designated sites including Sites of Special Scientific Interest (SSSI) and National Nature Reserves (NNRs) present within 5 km of the site, the closest being Coalville Meadow Charnwood SSSI, located approximately 0.8 km north east and Holly Rock Fields SSSI, located approximately 1.8 km east. All nationally designated sites within 5 km are separated from the Site by roads and residential properties, such that development at the Site is unlikely to have a direct significant impact on these designated sites. Development at the Site will potentially lead to increased recreational pressure on these designated sites, although this pressure is unlikely to be significant owing to the existing urban development with the area and that management of some of these sites is already in place to limit recreational pressure. There are no internationally designated sites within 10 km of the Site.

Running parallel to the northern boundary is Coalville Rugby Club Hedge and Pond Local Wildlife Site (LWS) which is an area of woodland and scrub which has developed along a disused rail line. A large pond is also present within this LWS, located approximately 50 m north of the Site boundary. There are records from this pond of common amphibian species such as sooth newt but no records of great crested newts. This LWS could be safeguarded from development through the implementation of a suitable buffer zone separating the development from this LWS. This buffer zone can then be planted with trees and scrub to further strengthen the integrity of the LWS.



Within the site itself are two trees, a mature ash on the eastern boundary and a mature oak to the south which are designated as LWS's. These LWS's could easily be safeguarded from development through the retention of the trees and adoption of appropriate root protections zones.

The Site itself comprises horse grazed pasture fields which support poor semi-improved grassland of limited ecological value, although they may support ground nesting farmland bird species such as skylarks. Some of the field parcels are bounded by hedgerows that are themselves a priority habitat and that contain a number of trees with bat roost potential. The hedgerows are also likely to support an assemblage of common and widespread breeding birds as well as a small assemblage of foraging and roosting bats. These hedgerows also form important links from the Site to the wider area, including the Coalville Rugby Club Hedge and Pond LWS. A small spring fed pond is present at the south of the Site, this contained clear but very shallow water (c. 100 mm deep). Aquatic plants were present suggesting it is a permanent water feature.

At the south west of the Site is the Broom Leys Farm complex which comprises a number of old farm building as well as more modern steel framed buildings and barns. The older farm buildings have previously been identified as supporting roosting bats, although no significant roost (such as a maternity roost) was recorded. These building are also likely to support breeding birds such as swallows.

A landscape and ecology led approach to masterplanning will enable the majority of the hedgerows and trees to be retained with additional planting of hedgerows and planting up of any gaps within the existing hedgerow network also undertaken. The spring fed pond is also to be retained and enhanced so it forms a more ecologically valuable pond. The buildings which support roosting bats are to be retained and renovated allowing them to continue to provide roosting opportunities for bats.

A suite of ecological surveys will be undertaken to determine the presence/absence and ecological value of the protected and/or notable species on the Site such that appropriate mitigation measures can be incorporated into the site design to safeguard any population of these species if present.

Given the above it is considered that there are no 'in principle' ecological constraints to development on this Site. Indeed, opportunities for any protected species potentially present, with the possible exception of ground nesting farmland birds, could be significantly enhanced in the long-term through the appropriate design of the future development proposals.



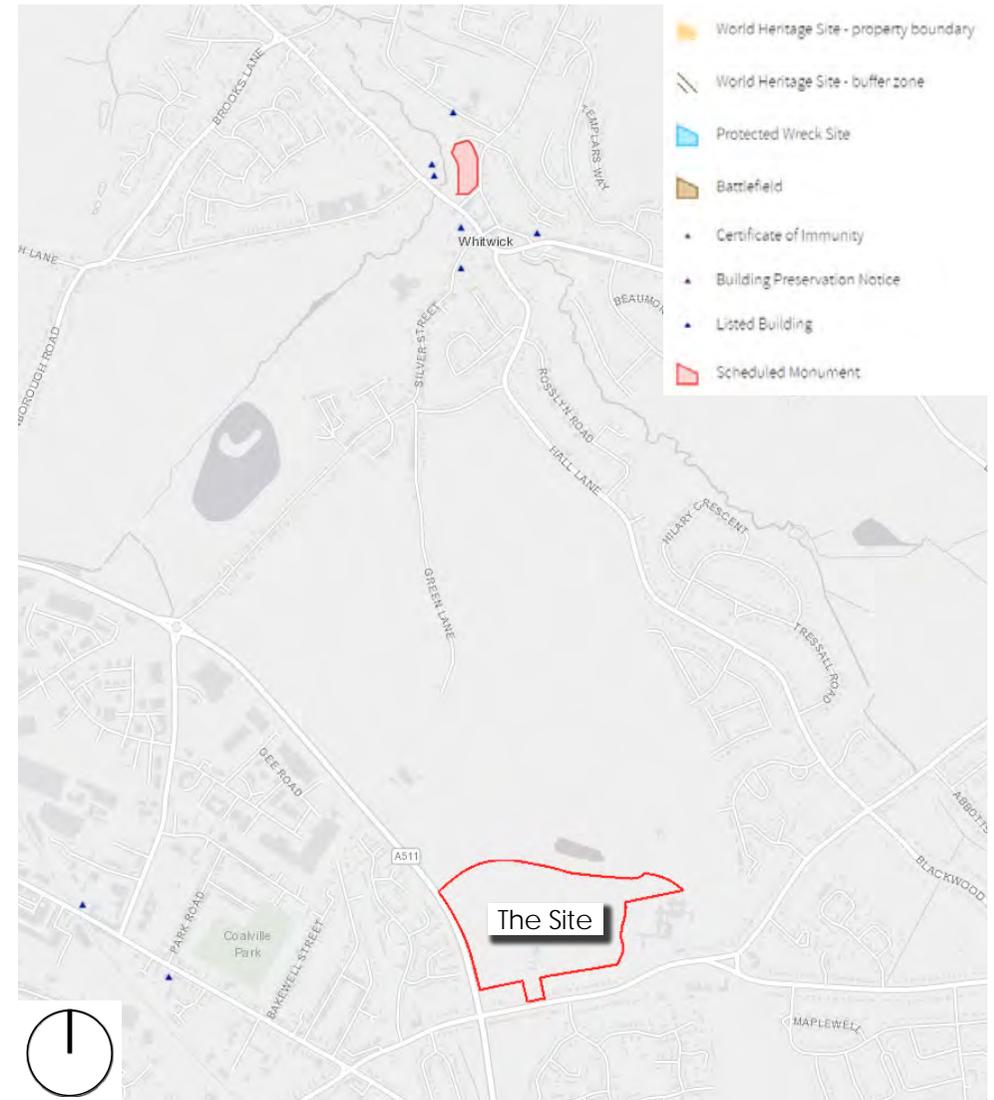
HERITAGE

Consultation of the National Heritage List (NHL) curated by Historic England has confirmed that the site does not contain any designated heritage assets and as such, is not constrained by any nationally important heritage assets within its boundaries.

Beyond its boundaries, the closest designated heritage assets comprise the Grade II listed Christ Church (1074360), c.775m to the west which is located to the immediate south east of the south eastern extent of the Coalville Conservation Area. Both of these assets are separated from the site by: late 19th / early 20th century housing on the eastern side of the town; the line of the former Charnwood Forest Branch railway, now mostly built over; an area of late 20th century housing on the site of the former memorial ground and Stephenson Way also of the same date and which forms the western site boundary. As such, the site forms no part of the setting of either the listed building or the conservation area, due to its separation from the site and the form of the eastern side of the town that fully encloses its central heritage assets and which defines their setting.

More widely, there are designated heritage assets recorded by the NHL at Whitwick, 1.5km to the north and at Agar Nook 1.5km to the east. In both these areas dense modern housing between the location of the assets and the site, when combined with the distance means that the site forms no part of the setting of any of the designated heritage assets within these settlements, such that changes within it would have no effect on their significance.

With regard to non-designated heritage assets, the conservation area appraisal for Coalville does not identify any locally listed buildings within or adjacent to the site. The site has previously been subject to both an archaeological desk-based assessment and a partial geophysical survey.



Plan B - Heritage Assets in proximity of the Site

The desk-based assessment identified no non-designated heritage assets within the site and concluded that the site has low archaeological potential. This was borne out by the results of the geophysical survey which identified: a single ditch of unknown date; land drains: the remains of ploughed out ridge and furrow, which can still be seen in the fields to the east, north and west and confirmed that the site had been used to dump mining waste.

Historic mapping identifies that the site has been in agricultural use from at least the mid-19th century, and that the northern boundary of the site is the alignment of a former mineral railway that joined with the Charnwood branch line to the west. Historically the farm was known as Constable Lane Farm, and the track or footpath to its immediate west is on the line of the historic parish boundary. By the 1920's the farm and the land have changed names to 'Broom Leys' and the housing that forms the southern site boundary had been constructed. Over time former field boundaries have been removed within the site as evidenced by the historic mapping and geophysical survey. The western boundary of the site was created in the late 20th century.

In conclusion the development of the site would cause no harm to any designated heritage asset. Work undertaken to date within the site has confirmed that within the area covered by the geophysical survey, which accounts for just over half of the site, there is no archaeological potential. It is anticipated that the remainder of the site, based on the current evidence is equally of low or no potential. On this basis, the site's development would accord with historic environment legislation and both national and local planning policy, and there is no reason, in terms of archaeology and heritage, why it should not be allocated in the emerging North West Leicestershire Local Plan.



TRANSPORT ASSESSMENT

Vehicular Site Access

To access the site, it is likely that two points of access will be required in accordance with the Leicestershire Highway Design Guide. It is suggested that one access will be provided from Broom Leys Road with a second access from the A511 Stephenson Way.

The Broom Leys Road access will take the form of a priority ghost island right turn junction and will be located to the south of Broom Leys Farm. An initial desktop review established that sufficient land is available on Broom Leys Road, and between the site boundary and Broom Leys Farm, to provide a 7.3m wide access road with 2m footways on both sides.

The second access will be located on the A511 Stephenson Way, north of the extents of improvements to the Broom Leys Road signalised crossroads (discussed later in this section). There is potential to provide a link road through the application site to connect this access with the Broom Leys Road access. This would remove a significant number of vehicles from the constrained Broom Leys Road signalised crossroads, thereby reducing queuing and delay which is currently experienced by drivers. This link road and access onto the A511 Stephenson Way would not only provide a high quality and high capacity access to serve the application site but will also provide substantial betterment to the existing local road network.

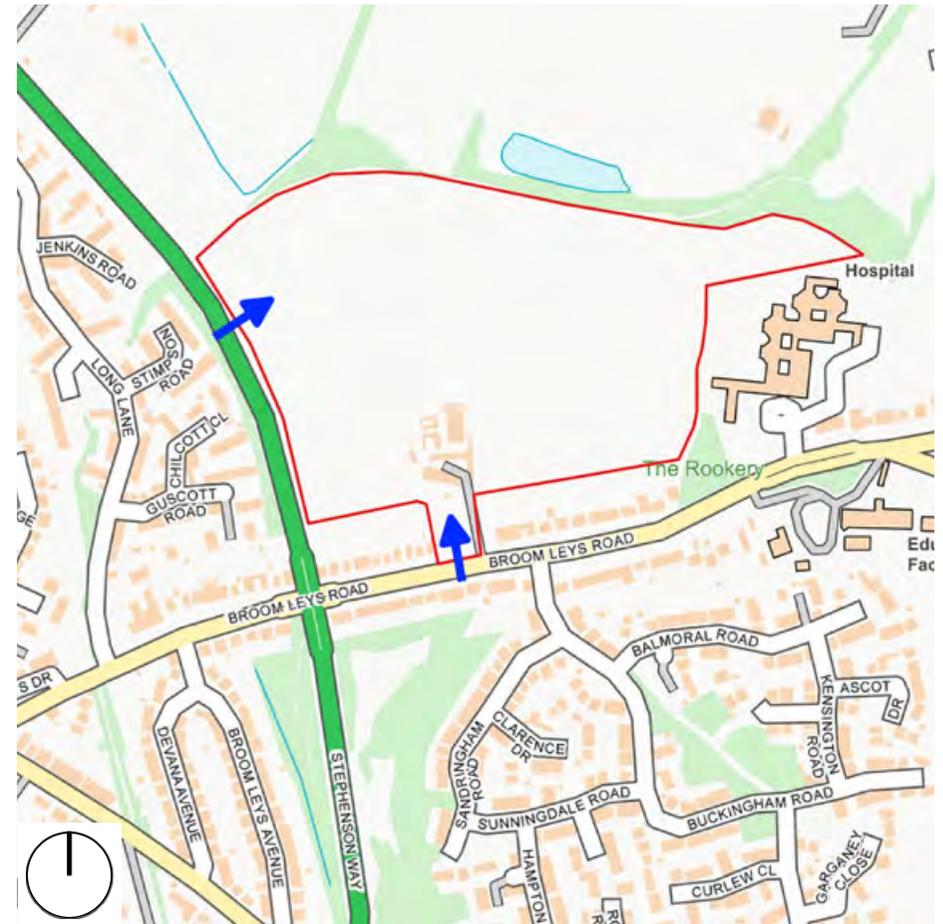
The approximate locations of these vehicular access points are presented in **Plan C**.

Sustainable Connectivity

Provision of a high-quality sustainable travel network will be vital to ensure residents of the development travel sustainably and achieve a modal shift away from the car to more sustainable modes like cycling, walking and public transport. The application site benefits from excellent connections to existing sustainable travel networks, which will be complimented by a permeable internal network of footways and cycle routes within the site.

The Public Right of Way (PRoW) running through the site will be preserved and incorporated into the development proposals, maintaining access to the north and towards the footway along the northern boundary and bridge over the A511 Stephenson Way. Cycling and walking connections through the site will maximise the opportunities for new and existing residents in the local area to access the new areas of open space which are proposed.

Table A shows the journey time by walk and cycle to a number of key destinations.



Plan C - Location of potential Site Access points

Destination	Walk	Cycle
Coalville Town Centre	15 minutes	5 minutes
Town Centre employment area	20 minutes	6 minutes
Broom Leys Primary School	5 minutes	2 minutes
Newbridge High School	15 minutes	5 minutes
Broom Leys Surgery	5 minutes	2 minutes

Table A - the journey time by walk and cycle to a number of key destinations

Cycling

For shorter journeys, cycling offers a cheap, sustainable and healthy alternative to using the car. **Plan D** shows a 5km cycling distance from the site, demonstrating that all of Coalville, Whitwick and part of Ibstock are within a 5km catchment.

The site is well located in terms of access to local and national cycle routes. The Coalville Cycle Network comprises five signposted routes through Coalville; four of which can be accessed within 600m of the site. Routes 2 and 3 run along the site boundary, on Broom Leys Road and the A511 respectively, whilst Route 5 is located opposite the proposed Broom Leys Road access where it runs south through Greenhill and connects with Route 1 on Bardon Road. Additionally, National Cycle Network Route 52 runs north to south through Coalville on Whitwick Road, connecting with Coalville Cycle Routes 1, 3 and 4. These routes are shown on **Plan E**.

Walking

For journeys up to 2km, walking provides an appropriate alternative to the car for residents seeking to access the local amenities in Coalville town centre and the nearby suburbs. **Plan F** shows a 2km walking catchment and the range of amenities within the majority of Coalville that lie within this catchment. Local amenities include schools, supermarkets and GP surgeries, the main employment area and Coalville town centre with its retail and leisure facilities.

Footways on Broom Leys Road and the A511 Stephenson Way form part of a cohesive local pedestrian network which includes appropriate crossing points and signage to key destinations. A number of PRoWs are located close to the site (as shown in **Plan G**) including a public footpath through the application site from Broom Leys Road to the northwest boundary. A footpath is located immediately north of the site boundary, connecting Sharpley Avenue in the east to Long Lane in the west, via a footbridge across the A511 Stephenson Way.

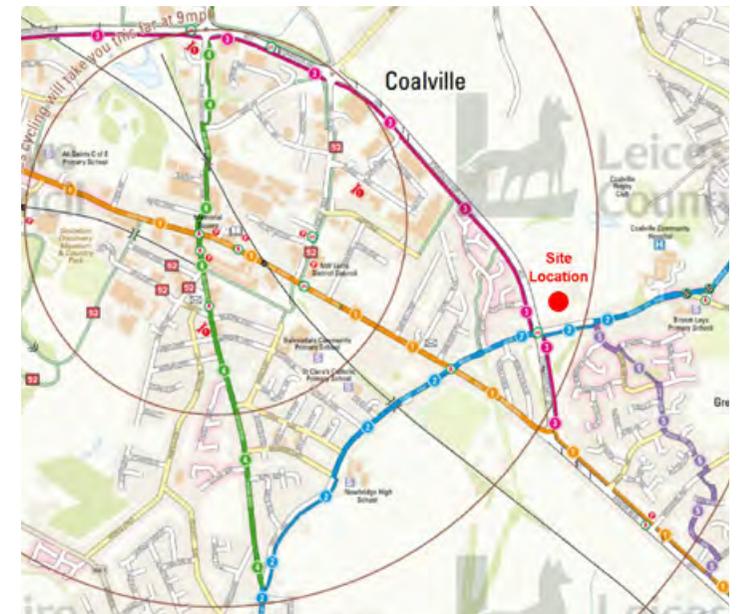
Bus Facilities

The closest bus stops to the site are located on Broom Leys Road, adjacent to the proposed vehicular access. These stops are served by the circular Arriva 11/11A bus from and to Coalville Memorial Square, via Agar Nook, with a half hourly frequency all day Monday to Saturday. These stops currently comprise of a flag and pole, although there are opportunities to improve the stops to cater for any additional demand.

The link road between Broom Leys Road and the A511 Stephenson Way could offer opportunities to route bus services through the site, subject to discussions with bus operators and the highway authority.



Plan D - Cycling Accessibility



Plan E - Cycle Routes

SURROUNDING ROAD NETWORK

The local road network is shown in **Plan H**.

A511 Stephenson Way

The A511 Stephenson Way forms the sites western boundary and is a key route between Ashby-de-le-Zouch and the A42 in the northwest and the M1 to the southeast. The single carriageway A511 is subject to a 50mph speed limit, reducing to 40mph on the approach to A511 Stephenson Way/ Broom Leys Road signalised crossroads. A good quality off-carriageway footway and cycle path (part of Local Route 3) runs alongside the carriageway on the western side.

A package of highway improvements is proposed along the A511 to deliver increased capacity at key congested junctions and unlock further housing and employment growth in the Coalville area. These improvements will enhance the sustainability and attractiveness of the A511 corridor for investment and growth.

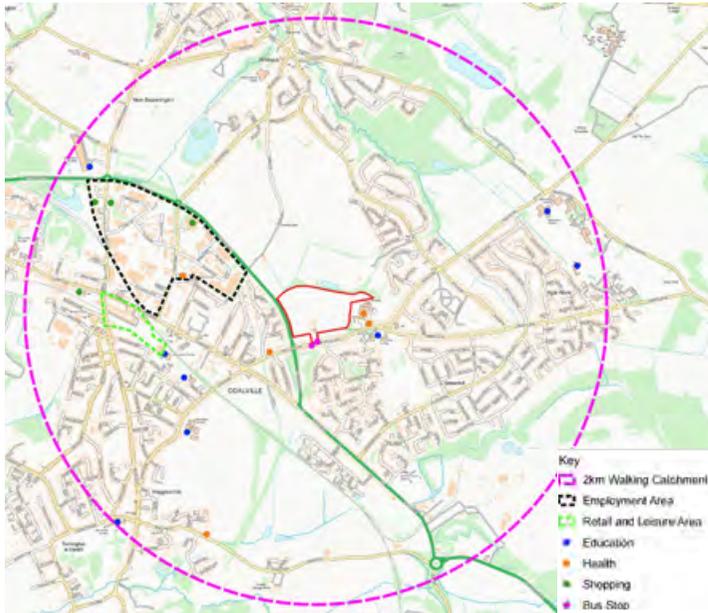
The A511 Growth Corridor Scheme was one of several projects in the region submitted by Midlands Connect to the government for funding in July 2019. Funding was agreed in September 2019 and the scheme has an estimated completion date of 2025. Included in this package are improvements to the A511 Stephenson Way/ Broom Leys Road junction to provide two ahead lanes for traffic travelling on the A511 approaches. This will reduce queueing and delay across the junction and thus reduce pollution within the Air Quality Management Area (AQMA) within which the junction is located.

Broom Leys Road

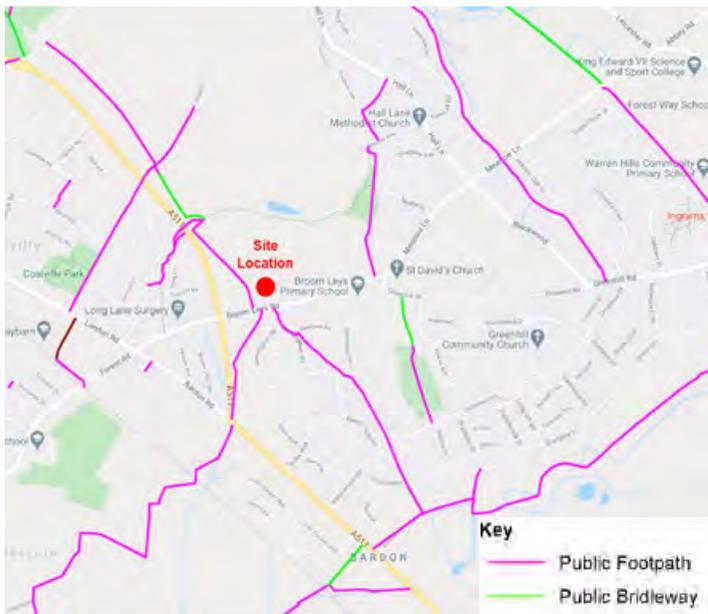
Located to the south of the site boundary, Broom Leys Road is a local link road, subject to a 30mph speed limit, which connects the residential suburbs of Agar Nook, in the east, and Hugglescote, in the southwest. Broom Leys Road is a 6.8m wide single carriageway with good quality 2m wide footways on both sides, separated from the carriageway by grass verges.

Bardon Road

To the southwest of the site, the A511 Stephenson Way connects with Bardon Road at a three-arm roundabout. Bardon Road provides access southwards to the Bardon Hill industrial area and the proposed South East Coalville Sustainable Urban Extension; which includes a new link road through the site between Bardon Road and Beveridge Lane. Improvements are proposed at the A511 Stephenson Way/ Bardon Road roundabout, as part of the A511 Growth Corridor Scheme, which involves upgrading the existing roundabout to allow for a new southern arm to connect to the Bardon Link Road.



Plan F - Walking Accessibility



Plan G - Public Rights of Way

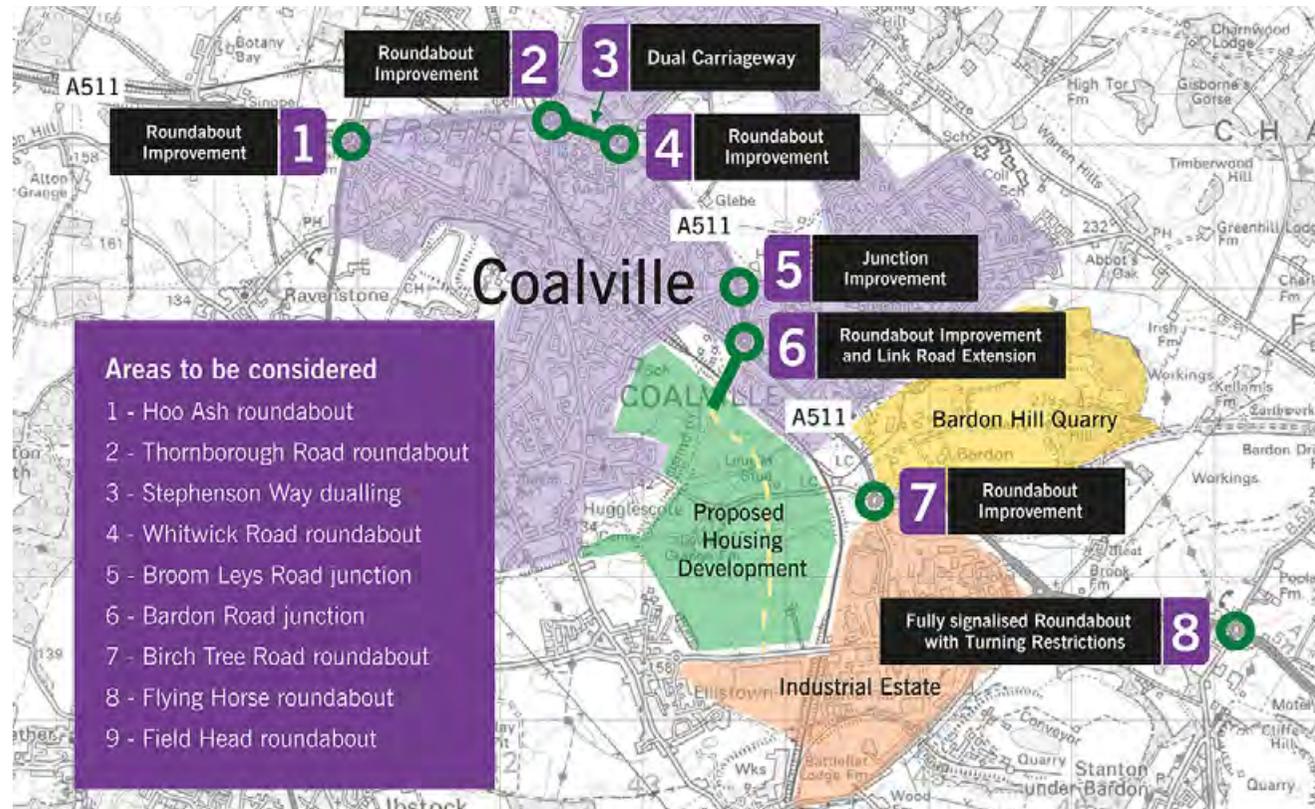
Summary

The development is very well located in terms of access to the existing local cycling, walking and highway networks. The walking isochrone plan demonstrates that a range of retail, education and health facilities are present within 2km as well as well as a large employment area to the northwest. Cycling opportunities are plentiful, with a number of local cycle routes close to the site which provide access to the entirety of Coalville, Whitwick and as far west as Ibstock within a 5km catchment. The bus stops immediately south of the site on Broom Leys Road provide a frequent and convenient link between the site, Coalville town centre and its suburbs.

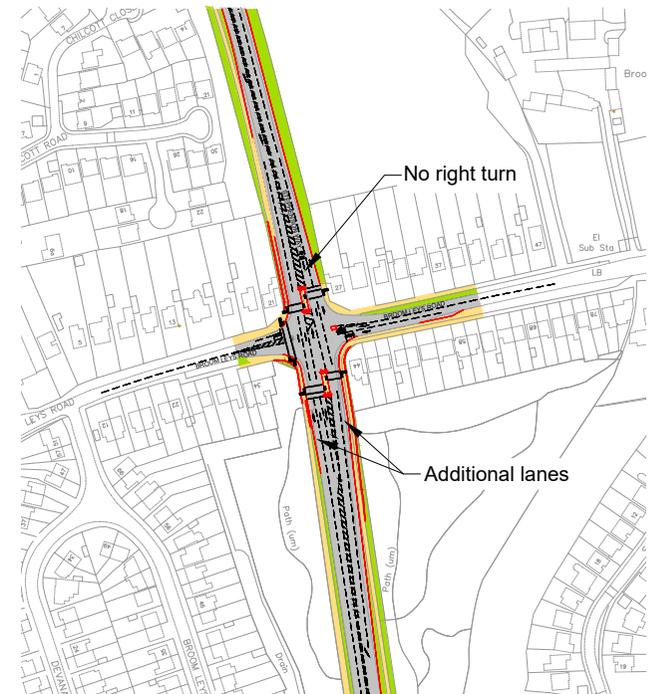
The site will be accessed via two points of access, which would not only be of high quality and high capacity but will also provide substantial betterment to the existing local road network; a network that is well connected to neighbouring settlements and which will be subject to a suite of planned highway improvements under the A511 Growth Corridor Scheme which will enhance the attractiveness and sustainability of the corridor and help unlock land for new housing and employment growth.



Plan H - Local Highway Network



Plan I - Planned improvements to Highways network in vicinity of Site



Plan J - Planned junction improvements



Development Response

In light of the analysis carried out within this document, the appraisal within the various evidence based documents, and the requirements of the published landscape character assessment and the National Forest policy, the Illustrative Masterplan addresses the identified constraints relating to the Site in the following ways:

- The provision of public open space along the site's northern boundary with the disused railway line, which would provide landscape enhancement, and retaining the two north-south hedgerows in large part, addresses the findings of the Settlement Fringe Assessment;
- The woodland planting in the north-eastern corner of the site not only provides a valuable biodiversity asset, but provides planting in accordance with the requirements of the National Forest;
- This woodland, and retention of the dominant field pattern, the PRow network and retention/enhancement of the vegetation along the disused railway line would also help achieve the recommendations within the Settlement Fringe Assessment; and
- The scale, layout, massing and provisions of the development help address some of the Main Issues set out in the LCA.



Plan L - Illustrative Masterplan

CONCLUSION

This Vision Document has been prepared to accompany a revised Call for Sites submission and to inform the Council's forthcoming Strategic Housing and Employment Land Availability Assessment (SHELAA) 2020, which will itself form a key part of the evidence base for the Substantial Review of the North West Leicestershire Local Plan in 2021.

Having assessed the site's constraints and opportunities in this Vision Document and proposed a masterplan design response accordingly, we have shown) in this Vision Document that:

by reference to the Council's own, up-to-date Area of Separation Study 2019 and supplemented by our own assessment and photographs:

- o the site is very well contained and enclosed by existing buildings, uses and natural features;
- o it has very little functional or visual connection with the more open landscape to the north;
- o development of the site as we propose would not result in coalescence between Coalville and Whitwick, nor would it harm the separate character or identity of those two settlements; and
- o the site does not therefore make any significant contribution to the role, function or character of the Area of Separation, the boundary of which should be re-drawn to exclude the site.

The site is highly suitable for allocation for housing development of up to 290 dwellings, in the form shown by our masterplan, in view of:

- o its highly sustainable location close to Coalville town centre with its wide range of employment, retail, community and leisure facilities;
- o its high degree of accessibility to those facilities on foot, by cycle and by public transport;
- o its ability to provide appropriate access to and from Broom Leys Road and Stephenson Way and through the site, thereby resulting in improved highway conditions and complementing Midlands Connect/Leicestershire County Council's proposed improvements to the nearby junction of those two roads
- o the excellent fit between our proposed masterplan and the Midlands Connect/Leicestershire County Council programme of enhancements to the A511 corridor as a whole, which will significantly improve the suitability, sustainability and attractiveness of the corridor for growth and investment;
- o the absence of environmental or technical constraints to development of the site, in the form of landscape, ecology, heritage and drainage considerations; and
- o the positive contribution it can make to meeting housing needs whilst also delivering a high quality residential environment, retaining important natural features, enhancing them with new National Forest planting and enabling greater public access to the site's network of open spaces.

The site is now controlled and promoted by Barwood Land which has an excellent track record in delivering successful housing developments across the region. It is therefore suitable, available and achievable for residential development in the earliest part of the forthcoming Local Plan period.

BARWOOD LAND

Formed in 2009 Barwood Land has grown to be one of the UK's leading land promotion businesses with an impressive track record of success. We identify, secure and promote land with future development potential adding value throughout the planning process.

We work very closely with landowners and partners, combining our strategic experienced approach in planning with significant analysis and insights on key policy and political factors. Our results are firmly focused on delivering value, quality and maximised returns.

Barwood Land operates across the length and breadth of the country; our active portfolio currently comprises of over 4,000 acres across more than 50 projects at various stages of the promotion process. Some examples of recent projects are set out on the following page.

In October 2017 Barwood Land, together with its sister business, Barwood Homes, completed a corporate restructuring led by the management team and the business now has a funding stream in excess of £100M available to deploy on land acquisition/ promotion and where appropriate, infrastructure delivery.



Barwood Strategic Land | Examples of Recent Projects



Norwood Farm, Northampton

Project: a 260 acre site forming part of a major allocation. Barwood submitted an outline planning application in 2016 just nine months after entering into a joint promotion agreement with the landowners and a resolution to grant planning permission subject to a S.106 Agreement has now been achieved.

Proposal: 1,900 homes plus local centre, primary school, parks and green links. Features: mixed use; urban extension to large town; new strategic relief road splits site in two; phased delivery.



Wharf Farm, Rugby

Project: a 40 acre site that forms part of a wider urban extension granted consent in 2014. In 2015, Barwood Land entered into an agreement with the landowners and a hybrid planning application was submitted in January 2016 with permission in July 2017.

Proposal: 380 homes, local centre and infrastructure, including water balancing area and public open space. Features: edge of settlement; part of wider masterplan; gateway site.



Woolwell, Plymouth

Project: long-term partner of strategic site now allocated in emerging Local Plan. A planning application was submitted in December 2019 and registered in January.

Proposal: 2,000 homes, local centre, school, sports pitches and park. Features: greenfield; edge of settlement; two authorities; sensitive landscape context near National Park; complex infrastructure and phasing; gateway to National Park.



The Asps, Warwick

Project: A 140 acre site secured in 2013 which has been successfully promoted to secure planning consent in 2016. Barwood Land is currently taking forward a Reserved Matters planning application for an initial phase of development.

Proposal: 900 new homes, 500 space park & ride facility, a new primary school and local centre. Features: greenfield edge of settlement, delivery of key strategic infrastructure, sensitive historic landscape, phased delivery.

Barwood Strategic Land | Examples of Recent Projects



Winneycroft, Gloucester

Project: A 50 acre site which has been successfully promoted through the Cheltenham Gloucester Tewkesbury Joint Core Strategy through to emerging allocation, at which point a planning application was submitted for 420 dwellings in late 2014. Planning Permission was granted at appeal in December 2015.

Proposal: 420 new homes, 2.1 Hectares of public open space, an amenity bund, ecological areas and suds provision.

Unparalleled Experience

In addition to the limited selection shown here, Barwood Land has had recent planning successes for:-

- 2,500 dwellings at Barwell
- 107 dwellings at Kineton
- 495 dwellings at Banbury
- 135 dwellings at Coalville
- 250 dwellings at Burton upon Trent
- 70 dwellings at Tackley
- 380 dwellings at Rugby
- 166 dwellings at Didcot
- 170 dwellings at Sileby
- 1,000 dwellings at Tamworth

Most of these sites have either been sold or are in the process of being marketed.

In addition to these projects, planning applications or appeals are due to be lodged on sites at Redditch, Thornbury, Earl Shilton, Nottingham, Melton Mowbray, Shepshed and Sileby – together these sites are forecast to deliver over 5,000 dwellings.

Barwood Land has also secured several longer-term opportunities which are being promoted through the relevant Local Plan processes. You will appreciate, therefore, that Barwood Land is very active in the land promotion field; the Barwood team possesses an unparalleled level of experience and specialist knowledge in strategic land promotion



JAMIE GIBBINS
Managing Director

Jamie has been the instrumental figure behind the creation, growth and success of the Homes and Land businesses. His business acumen, vision and record in delivering planning approvals and high quality developments is exceptional, equating to tens of thousands of plots over his career across the Midlands and south of England.

Jamie is a qualified surveyor with over 25 years experience in the residential development industry and joined Barwood in June 2009 from Taylor Wimpey Strategic Developments where he was Director of the hugely successful Strategic Land Business.

SAM DORRIAN
Land and Operations Director

Sam graduated with an honours degree in Real Estate Management from Oxford Brookes University from where he was recruited by Taylor Wimpey to join their Strategic Developments division. Having 'cut his teeth' in the discipline of strategic land as a graduate, Sam rapidly progressed within the company securing a number of land deals and planning consents before joining Barwood in 2011.

At Barwood Sam's role includes the acquisition of new land opportunities, management of projects through the planning system, landowner liaison, land disposals and investor relations. Sam has overseen the completion of a number of projects from identifying the planning opportunity through to obtaining planning consent and selling the land.





JAMES CAUSER

Land Director

James joined Barwood as Land Director in 2015 following 10 years with Taylor Wimpey Strategic Land, where he was the Regional Strategic Land Director for its South West Division. Prior to that James worked as a land agent within Knight Frank's residential development team.

James is focussed on securing new business opportunities in quality locations and delivering valuable planning consents. He has developed extensive strategic land expertise dealing with a huge variety of projects ranging from edge of village sites for under 25 homes to new settlements of over 6,000 homes. James is a straightforward operator who is skilled at maximising value, resolving complex problems and delivering planning consents whether the land is held in a single ownership or multi-party consortium arrangements.

CHRIS CHIVERTON

Land Director

Chris joined Barwood in 2018 as Land Director for the newly established South West region. Prior to joining Barwood Chris held several senior land, planning and technical roles within strategic land companies and also regional and national house builders. Chris has also spent time as a development consultant and as a land agent with Savills.

Chris' primary focus is on the expansion of Barwood Land's presence within South West by adding to its existing portfolio of land under promotion. Having over twenty years' experience in the industry gives Chris an exceptional understanding and knowledge of identifying, acquiring and promoting strategic land opportunities from large consortium arrangements to smaller higher value edge of settlement sites. The experience Chris has gained working within the house building sector means he always has an eye on delivery and value engineering throughout the lifecycle of a project.





BETH ENTWISTLE

Senior Strategic Planning Manager

Beth joined Barwood in March 2014 and is a qualified town planner.

Prior to this Beth was a Planning Manager at Taylor Wimpey, where she was responsible for overseeing the promotion of sites within its strategic land portfolio. Beth has realised planning permissions for a number of large-scale and high-profile development schemes across the UK.

JULIE MORGAN

Strategic Land and Planning Manager

Julie is a Chartered Town Planner and Urban Designer and joined Barwood Land in March 2019 having previously held senior roles with both Miller Homes and Severn Trent.

Julie has a wealth of experience in managing Strategic Land portfolios, promoting sites and securing permissions successfully across the Midlands region and adds valuable planning expertise to the Barwood team.

Julie has served as a member of RTPI General Assembly, and is an appointed Design Council Built Environment Expert, advising on national Design Review Panels for major development schemes proposed in the UK.





REBECCA MITCHELL

Planning Director

Rebecca joined Barwood in September 2012 and is a qualified town planner.

Prior to this Rebecca was a Planning Manager at The Co-operative Estates, where she was responsible for overseeing the promotion of sites within its non-trading land and property portfolios and has realised planning permissions for a number of large-scale and high-profile development schemes across the UK.

Prior to this, Rebecca was employed by Nathaniel Lichfield and Partners, a leading UK planning consultancy.

KEVIN FREEGARD

Financial Controller

Kevin joined Barwood in January 2014 from Micros Systems, a NASDAQ listed company, where he held the role of Financial Controller for the Hospitality Division.

He is a qualified accountant and a member of the Chartered Institute of Management Accountants.

At Barwood, Kevin is responsible for all finance support for Barwood's strategic land businesses, and for financial planning and cash-flow forecasting across the group.





SAM WILKINSON
Strategic Land Executive

Sam joined our team from Shoosmiths LLP where he was a general practice property solicitor for 4 years after qualification. He has represented various clients during their development transactions, acquisition and disposals and therefore brings valuable experience to the team.



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North West Leicestershire

Local Plan:

Draft Local Plan

Public Consultation

Land off Measham Road,
Appleby Magna

Prepared by Fisher German LLP on behalf of
Richborough



Project Title:

Land off Measham Road, Appleby Magna

Contact Details:

The Estates Office

Norman Court

Ashby de la Zouch

LE65 2UZ

01 Introduction

1.1 These representations have been prepared on behalf of Richborough in respect of their land interests at Measham Road, Appleby Magna, as illustrated on Figure 1 below. Richborough are a respected promoter who have a strong track record for developing high quality, new residential schemes across the country.

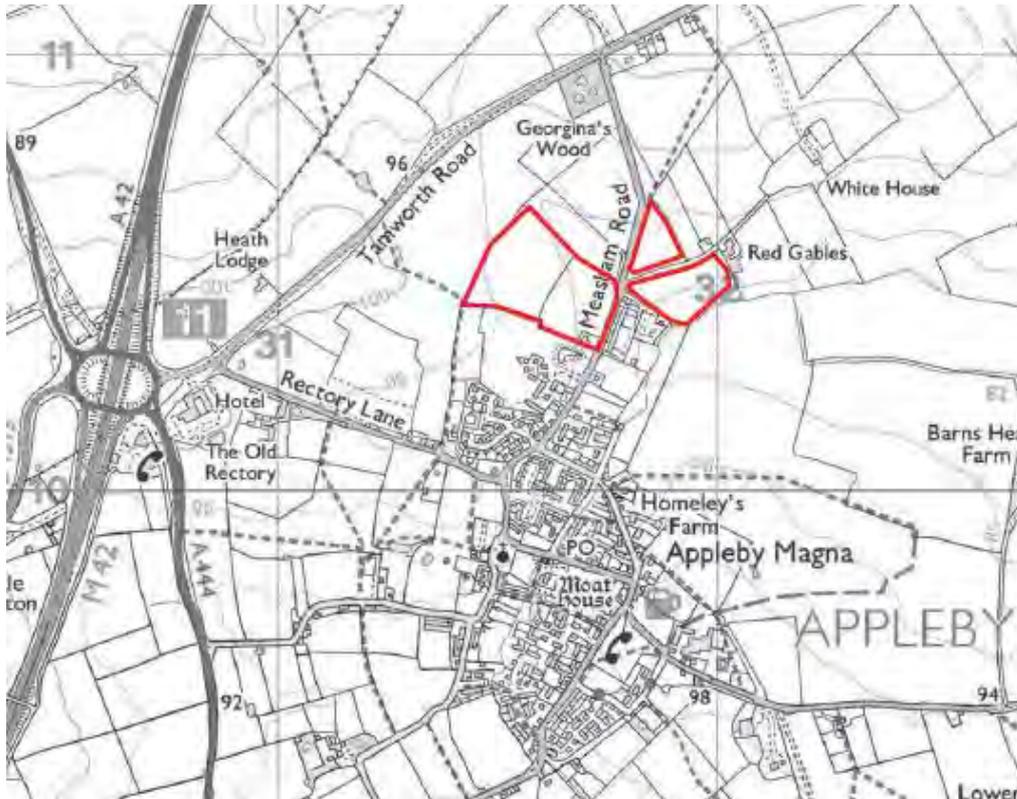


Figure 1: Site Location Plan

1.2 On the 19th December 2023, the Government published updates to the NPPF. The transitional arrangements which support the updated Framework confirm at Paragraph 230 that the policies within the updated Framework (December 2023) will apply where Plan's reach Regulation 19 after the 19th March 2024. This means that this Plan will be considered under the provisions of the new NPPF (and potentially any successor document).

1.3 For ease of reference these representations follow the order of the policies in the Consultation Documents. Where we have not commented we have no specific comments at this stage.

02 Representations

Proposed Policies For Consultation - Document

Draft Policy S1- Future Development Needs (Strategic Policy)

- 2.1 Richborough notes and supports the Council's approach and the Council's constructive engagement with the Leicester and Leicestershire Statement of Common Ground (SoCG), taking positive steps to ensure that housing needs across the housing market area (HMA) are met in full in accordance with Paragraph 62 of the NPPF. The increase in housing need both responds positively to employment growth opportunities associated with East Midlands Gateway, Freeport and East Midlands Airport and ensuring that Leicester City's unmet needs are met.
- 2.2 Regardless, whilst there is support for the pragmatic approach adopted in respect of the SoCG, that in itself does not absolve North West Leicestershire from thorough consideration if there are reasons to uplift their housing requirement, considered independently from the SoCG, which is a separate need. The PPG (Housing and Economic Needs Assessment Chapter) states that *"the government is committed to ensuring that more homes are built and supports ambitious authorities who want to plan for growth. The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area"*¹. It continues "there will be circumstances where it is appropriate to consider whether actual housing need is higher than the standard method indicates". Importantly, the calculation of a robust housing requirement should be undertaken in isolation and in advance of any consideration of the ability of such need to be met within an area, this should be its own secondary process, to ensure discussions relating to housing need are not predetermined on the basis of supply, albeit clearly this is relevant when establishing the housing requirement for the Plan.
- 2.3 Paragraph 10 provides a list of situations wherein an increase from base Local Housing Need may be justified, albeit this list is not exhaustive. The examples provided include situations where previous assessments of need (such as a recently-produced Strategic Housing Market Assessment) are significantly greater than the outcome from the standard method.
- 2.4 The 2022 Leicester & Leicestershire Housing & Economic Needs Assessment (HENA) demonstrates that affordable housing need in the district equates to 382 affordable dwellings of all tenures per annum. This

¹ Paragraph: 010 Reference ID: 2a-010-20201216

is a significant quantum and would in isolation represent clear and compelling justification for the housing requirement to be increased. Whilst this might not be to a level which meets this affordable need in full (and given there remains unknowns in relation to the preferred affordable housing policy thus impossible to calculate theoretical delivery across the spatial hierarchy presently anyway), may at least begin to ameliorate this significant shortfall.

- 2.5 Again, logically such consideration needs to be undertaken in isolation from consideration of Leicester City's unmet need, as when such need is ported through the SoCG, that must include facets such as affordable housing need also. Thus, it cannot be the position that districts meet Leicester City's market need only and use the corresponding affordable delivery to meet only their own needs, as clearly that will leave a significant shortfall when considering the HMA as a whole.
- 2.6 Considering the above, it is considered that there is a justification for North West Leicestershire to increase its housing requirement to assist in meeting its affordable needs, prior to including the SoCG associated increase from Leicester City. This is a position advocated within the PPG. Finally in accordance with the PPG, this exercise needs to be done entirely independently of any consideration of actual supply, that is a secondary step.
- 2.7 Finally, the NPPF is clear at Paragraph 22 that where a Plan includes strategic policies, this should look ahead for a minimum of 15 years from adoption (i.e. not just the Plan period covering a period of 15 years, but 15 clear years post adoption). This is due to a need to "anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure". The wording adopted by the NPPF is clear and unequivocal, that the 15 year period is expressed specifically as a minimum, which indicates it should be exceeded only. The NPPF could have used more flexible language, but this requirement which has been present in all iterations of the Framework since 2018 is clear this is a minimum threshold. Indeed the NPPF did use more flexible language, however the change from the 2012 NPPF in 2018 was to remove more flexible terminology, with the 2012 document stating that Local Plans should be "be drawn up over an appropriate time scale, preferably a 15-year time horizon". This change should therefore be considered as deliberate sign of intent of what is expected by the NPPF in respect of a sound plan period, and to be sufficiently consistent with National Policy (Paragraph 35d).
- 2.8 The proposed Plan period is to 2040, with a current estimated adoption in 2026 in the most recent LDS. This provides only a 14-year Plan period post adoption, before factoring any potential delays prior to submission or at examination. Officers will be aware that the Charnwood Local Plan is already in its third

year of examination, thus highlighting the potential scope for delay. Given this requirement is a matter of clear soundness, and given there is already insufficient Plan period from the currently best assumed adoption, the Plan period should be extended until 2041/42 at the minimum.

Draft Policy S2 – Settlement Hierarchy (Strategic Policy)

- 2.9 The Settlement Hierarchy is considered to be inconsistent and we consider should be further amended to reflect the relationship of settlements with existing and proposed employment. This point is particularly pertinent when regard is had for the Council's proposed strategy of delivering a new free standing settlement to support employment growth at East Midlands Gateway, but other strategic employment sites are not afforded similar support in respect of aligning jobs and residential growth in a way which maximises opportunities for synergy and sustainable opportunities.
- 2.10 Appleby Magna is located in close proximity to extensive employment opportunities being developed at Mercia Park. Mercia Park is expected to create approximately 3,000 new jobs in the early years of the Plan period. Appleby Magna is the closest sustainable settlement to this strategic development, and thus is optimally located for future workers of Mercia Park. Whilst proximity to employment is afforded some weight in the settlement hierarchy, a somewhat contradictory approach has been adopted having regard for strategic developments such as Mercia Park (MP), which has had minimal impact in residential growth options, and the approach adopted at Leicestershire International Gateway (LIG) which has been used to justify a new settlement. Whilst we acknowledge LIG is a larger and more strategically important site than MP, the planning justification that aligning residential development close to areas creating new jobs is soundly based is equally applicable, albeit we acknowledge the scale of residential growth will need to be commensurate.
- 2.11 It is considered therefore that sustainable settlements such as Appleby Magna should be recognised for their location inherently close to such strategically important employment locations and latent ability to grow and provide accommodation close to such locations, enabling more sustainable modes of transport and encouraging a modal shift from long distance, singly occupancy commuting. Paragraph 109 of the Framework sets out that the planning system should manage patterns of growth. Significant development should be *"focused on locations which are or can be made sustainable"*.



Figure 2: Appleby Magna Vision Document Page 4 extract (previously submitted)

- 2.12 Appleby Magna is identified in the proposed settlement hierarchy as a ‘Sustainable Village’, the fourth tier of settlements on the Spatial Hierarchy. This position, however, does not reflect its location as the closest sustainable settlement to Mercia Park. Appleby Magna lies less than a mile east of Mercia Park, adjacent to junction 11 of the A42/M42. New homes at Appleby Magna would support the services and facilities of the settlement itself as well as ensuring new homes are located within close proximity of jobs easily accessed by sustainable travel opportunities. The delivery of homes in settlements within the ‘Sustainable Villages’ would also ensure market choice in the delivery of homes across the authority.
- 2.13 Proportionate developments in sustainable locations such as Appleby Magna will not only contribute to the wider employment and economic strategies, but will also contribute positively to meeting the district’s housing requirements in the initial years of the Plan period.
- 2.14 Having regard to the proximity of Appleby Magna to Mercia Park, and the services and facilities which already exist within the settlement, it is considered that Appleby Magna’s role within the Spatial Hierarchy should reflect these factors. It’s unique location as the closest sustainable settlement to Mercia Park

should be recognised and thus the role it can play in delivering new homes realised, in essence in a manner no different to that being adopted in respect of the proposed new settlement.

- 2.15 New homes in Appleby Magna would likely serve a different market to new housing delivery in larger urban centres like Coalville and Ashby, and can deliver more quickly than that proposed at the new settlement, thus ensuring a range of housing is provided for the differing markets that will continue to arise from the economic developments planned within the district. Owing to its proximity to the Mercia Park, Appleby Magna will be attractive to those moving into the area to fill jobs provided at Mercia Park, and also those who already reside in North West Leicestershire and may want to move closer to their new jobs.
- 2.16 Without sufficient housing growth, the existing residents of Appleby Magna may find themselves priced out of the local housing market due to increasing house prices and rent arising from increased demand to live close to the Mercia Park. It is noted that Appleby Magna has an aging population of 24.5%. This is well above the North West Leicestershire average of 20%. This aging population will reduce the level of housing stock becoming available for younger people, likely raising house prices and forcing them out of the village, having a knock-on effect on the overall sustainability of the settlement. e.g. surplus school spaces over time. Furthermore, Appleby Magna has one of the lowest levels of social rent accommodation in North West Leicestershire, with only 11% of properties being for social rent. These factors point to further house growth being necessary in the village to ensure a suitable range of housing stock is available and to ensure sufficient affordable housing is available.
- 2.17 North West Leicestershire's Local Housing Needs Assessment - Report 3 (June 2020) confirms that Appleby Magna has an annual net affordable need of 1 dwelling per annum. This equates to a net need up to 2039 of 22 dwellings. Notwithstanding the potential for an exception site, this will require allocations or sites delivering circa 73 dwellings, assuming 30% affordable housing.
- 2.18 North West Leicestershire's Local Housing Needs Assessment - Report 2 (June 2020) sets out that the housing need for Appleby Magna, based on demographic, policy-off need, is likely to be in the region of 113-134 dwellings up to 2039, which would require further allocations and permissions to satisfy in its own right. When regard is had for policy-on interventions, such as ensuring the working population is suitably located having regard for strategic employment growth and the impacts of migration associated with significant employment growth in the locality, demand in Appleby Magna is likely to be far in excess of that. It is considered vital therefore that the Council ensure that Appleby Magna is treated similarly to other settlements in close proximity to strategic employment growth, such as those within the

Leicestershire Internal Gateway (LIG), responding positively to increased housing needs and this should be reflected either within the Spatial Hierarchy or distribution of housing, preferably both for effectiveness and clarity.

- 2.19 As demonstrated by the Council's Settlement Study (2021) Appleby Magna contains a range of services and facilities and is thus considered to be a sustainable settlement entirely capable of serving an increase in population. Access to Mercia Park however is insufficiently weighted within the evidence document. As such the spatial role of Appleby Magna is unlikely to be commensurate with the need for housing in that locality. This approach therefore requires further refinement to ensure sustainable settlements located within an area of strategic regional importance are recognised for the vitally important role they can play in both meeting housing needs and ensuring new jobs have the requisite local labour force, without an over-reliance on long distance commuting. It is noted that North West Leicestershire is a net importer of labour, and without sufficient housing growth in settlements close to core job opportunities across the District, not just the LIG, this is a trend that is likely to continue and potentially worsen.
- 2.20 To be effective and justified we consider the settlement hierarchy should be amended to respond consistently in relation to access to employment opportunities, otherwise the identification of the new settlement has no real justification. If not, the Plan's approach is not logically coherent or justified.

Draft Policy H1 – Housing Strategy (Strategic Policy)

- 2.21 This policy contains a number of broad principles in relation to the annual housing requirement, overall housing requirement and approach to affordable housing. The Plan confirms an ambition to deliver the housing requirement plus 10% contingency.
- 2.22 It is difficult to comment on the appropriate level of contingency as we are firmly of the belief that this should be entirely interrelated with the spatial strategy adopted. Clearly if there is a strong reliance of delivery on un-commenced strategic sites, or other similarly difficult sites, for example reliant on infrastructure provision, remediation, etc, then risk of non-delivery increases, logically the level of contingency should increase. Whilst we would always advocate for a balanced strategy with a range of site typologies, we would generally assert a strategy consisting of a larger number, smaller sites, is generally 'safer' than a strategy which is highly reliant on a smaller number strategic sites.
- 2.23 Moreover, we note that the Council's currently proposed approach is to apply a 10% contingency only to the remaining supply, not the housing requirement as a whole. This means the contingency proposed

decreases to only 8.25% when considering the Plan's needs as a whole. This approach induces unnecessarily additional risk as it decreases the proposed contingency, the Council should instead be seeking to adopt contingency as per the housing requirement as a whole.

2.24 Recent changes to the NPPF (paragraph 76) which essentially removes the application of Paragraph 11 for the 5-years post adoption of the Plan where that adopted plan identified at least a five year supply of specific, deliverable sites at the time that its examination concluded. Having regard for both the implications of this new protection and the need for a satisfactory supply to be demonstrated, our anticipation is land supply will be examined far more stringently at Local Plan Examination to confirm this position. This protection should motivate the Council to ensure its land supply is robust as possible at Regulation 19 and Examination, to ensure it can benefit from the protections afforded by Paragraph 76. In that context the greater the level of contingency, the more likely it is that a Plan will be found sound as the risks in that 5-year period of non-delivery will be mitigated.

2.25 In the above context, whilst we reserve the right to comment fully, we consider a contingency of 20% to be applied across the housing requirement as a whole is likely to be beneficial and provide assurances to the Inspectorate that the Plan will be deliverable and not lead to shortfalls in the first 5-years. We believe that the removal of the threat of plan by appeal in the following 5-years following adoption should be viewed as significant comfort and help justify a higher level of contingency, particularly sites which will be deliverable in the first 5 years. In that context, and as discussed later in these representations, our client's land interests are capable of coming forward despite being within the River Mease Catchment due to deliverable on-site mitigation. As such, should the Council want to be confident in its position, sites such as our client's land interests are considered highly beneficial in demonstrating a supply.

Draft Policy H7 – Self-build and Custom Housebuilding

2.26 Any policy which advocates for a percentage of plots to be delivered on regular housing sites is not supported. Firstly, we do not see how there can be any evidential justification for creation of the threshold wherein self-build plots will be required. Ultimately any number adopted by any policy, proposed to be 30 in this case, will be largely arbitrary, essentially creating a hinderance to some sites, whilst not to others, with no real justification as to why, i.e. becomes a requirement for a scheme of 30 dwellings, but not 29, thus in marginal cases encouraging a lower number of units to be delivered to avoid the complications with such a policy.

2.27 There are issues with providing self-build plots within standard open market sites in terms of achieving a comprehensive design and issues with who is responsible for installing utilities (and to what point).

There is also the risk that plots will sit undeveloped for long periods of time if they are not sold. Whilst the Policy indicates a period of 12-months for marketing, after which they can revert to standard build housing, presumably this would require new planning permissions which come with their own cost and time implications.

- 2.28 Housebuilders have confirmed to us that they build at pace and with set routes through sites and thus it is incredibly difficult and impractical to bring independent builders or other organisations onto an operational building site safely. In reality, such requirements may impede development unnecessarily, adding to developer burden without even delivering additional housing units. It is not our understanding or experience that many budding self-builders wish to buy a serviced plot within or adjacent to a modern housing estate. Our experience is for the most part that they are instead looking for more bespoke opportunities.
- 2.29 While some housebuilders provide a custom build option as part of their product, this cannot be expected across all sites and the entire sector as it is simply not within the business model of many housebuilders. Such requirements could therefore dissuade housebuilders from operating within the District and delay development whilst requirements are negotiated.
- 2.30 Whilst we appreciate the pressure of Council to fulfil the requirements of the Self-build and Custom Housebuilding Act (2015), we simply do not accept that this solution is in the interest of the majority of would be self-builders, nor housebuilders, who are actively hindered through no real fault of their own, with the end result being the delivery of no-additional dwellings, as the provision simply eats into supply which would be built out by a housebuilder anyway. Moreover, we do not consider the need as demonstrated at Table 1 relates to the number of plots likely delivered through the operation of this policy which has not been quantified (which it would need to do both justify the % of plots chosen and the number of units of the threshold). Our preference therefore is for an approach similar to that advocated in the rest of the policy, which seems like a compromise most readily available to meet the needs of self-builders without undue imposition on housebuilders, whilst also actively increasing supply, confirmed to be an aim of the Government in respect of its approach to self-build.

Draft Policy En2 – River Mease Special Area of Conservation (Strategic Policy)

- 2.31 We have no objection to this policy and understand the statutory instruments which underpin the necessity for this approach. However, given the limitations of the application of this policy, site specific requirements and the wider legislative background, it is apparent that additional weight should be

afforded to schemes which can be delivered prior to any work in creating capacity, or without use of any capacity that is available. Offsite works cannot be controlled or guaranteed, and could lead to delivery problems if there are delays in creation of additional headroom. In this context, our client's proposals which can deliver an on-site solution should be considered favourably both due to the assurances on delivery and it preserves capacity for schemes in locations where on-site solutions are not feasible.

Proposed Housing and Employment Consultation Document

Draft Housing Allocation - Land at Old End, Appleby Magna (Ap15) and 40 Measham Road, Appleby Magna (Ap17)

- 2.32 The Proposed Housing and Employment Consultation Document and supporting Draft Policies Maps Document illustrate that the Council intend to allocate a single site in Appleby Magna, consisting of two sites, AP16 and AP17.
- 2.33 Our view, as set out in these representations, is that Appleby Magna is capable of delivering additional dwellings, and is spatially logical to do so to align new housing with jobs created at neighbouring Mercia Park. Moreover, as set out below, we have significant concerns in relation to the assumed delivery rates at the new settlement, which will likely require more housing sites to be found throughout the District. In that circumstance, we believe that the site currently selected by the Council, **and** our Client's land interests, could logically both be allocated. However, in the case of an either/or, we have concerns which suggest our client's land interests are favoured when the two are compared.
- 2.34 The evidence supporting the allocation of housing sites does not consider the River Mease Catchment and nutrient neutrality, particularly the ability of sites to be delivered with on-site solutions which do not require the creation of capacity off-site or utilisation of said capacity. Given the nature of the constraint, which is currently precluding any development within the catchment, the ability to deliver ahead of the creation of capacity and not utilise created capacity should be afforded significant weight. Within the catchment, this is a relevant criterion and the Plan should consider critically this ahead of any Regulation 19 version. This issue is so critical within the catchment we believe it should form an inherent part of the site selection process, rather than relying solely on Policy EN2 and links within the site specific policy.
- 2.35 On a similar note, there is now a requirement to deliver 10% BNG. This should be delivered on site where possible, and where not can be delivered through off-site provision or the purchase of credits. Whilst we note that the draft allocation site was a former Local Wildlife Site, but due to a deterioration in quality the designation no longer applies, that is not to say the site will not score highly in BNG terms. It is not clear

therefore whether there is sufficient room on the site for the proposals to deliver the necessary BNG improvements, or whether the scheme can fund the necessary credits.

- 2.36 With regards to access, the policy and site proforma are not clear whether the site is to utilise a single point of access (through AP15 and the existing access) or whether multiple points of access are proposed having regard for the land ownerships. For the latter, we are not clear whether a suitable access can be delivered without conflict with Steeple View Lane opposite, as well as the access to the north which serves the Scout hut and the rear of the properties to the north. The Council will need to be assured that a workable solution is available for the whole site, secured through an appropriate agreement, to ensure no issues of ransom which may effect delivery.
- 2.37 In a similar vein, whilst forming a single allocation, it is not clear whether it will be delivered in such a way, given the different land ownerships, and it may be delivered as essentially two individual neighbouring schemes.
- 2.38 The site is cited to be part brownfield, which whilst may be technically true, gives an impression of utilising non-useful land, however the brownfield element appears to consist of a substantial single dwelling. Whilst there is an opportunity to intensify the use, there is a net loss of an attractive dwelling which is not considered to be a benefit given the associated material and energy losses with the demolition and rebuild.
- 2.39 The site is located adjacent to the Conservation Area. The field immediately adjacent (AP15) formed part of planning application 14/00595/OUT which confirmed the principle of the four large dwellings built adjacent to Measham Road as can be seen on the approved site Plan below (2990-01).



Figure 3: 14/00595/OUT Layout Plan Extract

- 2.40 When this application was approved, the fourth condition of the development was that *"The area coloured light green and annotated as 'Pony Paddock' on Drawing No. 2990-01 Revision A (Proposed Site Plan) shall be used solely as a paddock for agricultural use or the keeping of horses only and no part of the four dwellings or their associated development shall be erected within this area"*. The stated reason for the need for this condition is that it is *"in the interests of the character and visual amenities of the area"*.
- 2.41 The Committee Report confirmed that the proposed scheme would not have an unacceptable impact on the neighbouring dwellings on Old End, which whilst not listed are important non-listed buildings within Ashby Magna's Conservation Area. This is a point of note within the Planning Statement which supported application 14/00595/OUT, which states at paragraph 5.17 that *"from within the Conservation Area (Old End), the visible part of the site, the proposed paddock, would not have significant impact on the historic character. In fact the site at present is overgrown and unkempt, so the re-use and formalisation as a Pony Paddock would enhance the appearance of the site and therefore result in a positive impact in terms of heritage and conservation"*. It is not however clear that the same conclusion can be definitively reached in respect of housing, and it is not clear whether an agreement exists between the landowners to enable a suitable design which would not have unacceptable impacts on this part of the Conservation Area through the provision of suitable public open space or BNG provision.

2.42 The Council needs to be confident that the allocated quantum of dwellings can be broadly delivered on site, having regard for:

- The land ownerships of the site.
- The site access/es as well as access through the site
- Delivery of on site BNG (or be viable to provide offsite)
- The ability to deliver a workable solution in terms of nutrient neutrality (or be marked down compared to alternatives which can deliver this due to inherent issues of deliverability)
- Impact on heritage assets
- Flood Risk and Drainage (having regard for the brook that runs east of the site)

2.43 We are concerned that when the above matters are taken into account the site may prove unable to deliver the 32 dwellings allocated or may be unviable due to the issues above effecting land take and off-site requirements.

2.44 Whilst we believe the allocation of both sites is feasible and could be appropriate, the provision of onsite nutrient neutrality should be afforded significant weight in the context of sites within the River Mease catchment. Sites such as that promoted by our client which can deliver without the need for headroom creation (nor utilisation of capacity once/if created) should be viewed as preferable to those which cannot deliver such benefits, subject to not being outweighed by other matters which we do not believe is applicable here. In this instance, due to the uncertainties set out above, we consider the allocation of our clients land is preferable, due to the assurances which can be provided, and demonstrated through evidence, in relation to matters such as BNG and nutrient neutrality.

New Settlement (Isley Woodhouse) (IW1)

2.45 The key new allocation is the identification of Isley Woodhouse, which is a significant strategic allocation located south of East Midlands Airport. The Allocation is for a total of 4,500 new dwellings, with circa 1,900 dwellings considered deliverable within the Plan Period. We have no objection to the identification of a strategic site, and as set out earlier within representations the alignment of homes and jobs is an eminently sensible planning solution. We do however have concerns with the quantum of dwellings assumed deliverable by the Council within the Plan period.

2.46 Whilst the Council may point to the delivery of the strategic allocations in Ashby (Money Hill) and Coalville (South East Coalville) (paragraph 4.102 of the Proposed Housing and Employment Allocations Document), we consider this to be somewhat of a false equivalency in respect of the site typology.

Moreover, when regard is had for the actual time for the sites referenced above to be delivered, it points to a less optimistic position.

- 2.47 Whilst we agree that those allocations are strategic in nature, and of a broadly similar scale to that approved at Isley Woodhouse, as a matter of principle it is always going to be more difficult to deliver new settlement, as opposed to what in essence equates to a sustainable urban extension (Money Hill and SE Coalville), as there will be existing infrastructure to serve new residents in initial phases of development, including utilities, education, etc. In this context, the complexities of planning a new free standing settlement are always likely to take more time in planning and site preparatory stages than SUEs.
- 2.48 Turning to the two examples and their respective development times, notwithstanding these are considered easier sites to deliver due to their existing relationship with a major host settlement. South East Coalville was first partially allocated in the Local Plan 1991-2006 (adopted 2002), with planning applications submitted in the years 2012, 2013 and 2014 for different parts of the site. However construction was only commenced in 2018/19, some 16 years post adoption of the Plan. In the 22 years since adoption, there have been only 670 completions (Proposed Housing and Employment Allocations Document Appendix 1). Whilst the Council may now be able to point to increasing delivery, which will clearly benefit the emerging Plan through commitments, this does not change the fact that development took significant time to commence, which is our primary concern in relation to the assumptions made in this Plan.
- 2.49 Turning to Money Hill, Ashby, this was adopted in the extent Local Plan, now as amended by the Partial Review, but in principle first allocated in November 2017. In the 7 years since there has been only 162 completions (Proposed Housing and Employment Allocations Document Appendix 1). There was an expectation in the Local Plan that the full allocation of 2,050 homes were to be delivered within the Plan period – to 2031, some 7 years away from now. To deliver this would require 266 units per annum delivery for the remainder of the Plan period but given only 66 units are under construction currently this does not seem deliverable. Examination document Ex19 Housing Trajectory, which was a trajectory submitted as part of the Examination of the Local Plan considered that Money Hill would have at this point delivered circa 560 homes. Therefore, whilst the Council does have some experience with similar, albeit not directly comparable sites, that does not in itself provide the assurances necessary that the delivery rates assumed are deliverable. It is clear in both cases that there has been significant lead in for development to be brought forward and this has been underappreciated by the Council.

2.50 Whilst there is not a trajectory available with assumed lead in times or annual delivery, utilising the proposed 2040 Plan period end date (which may need to be extended to accord with Paragraph 22 of the NPPF which requires a 15-year period post adoption which would appear somewhat optimistic given it would need to be adopted within 2 years), the necessary build out rates based on commencement year would be as follows.

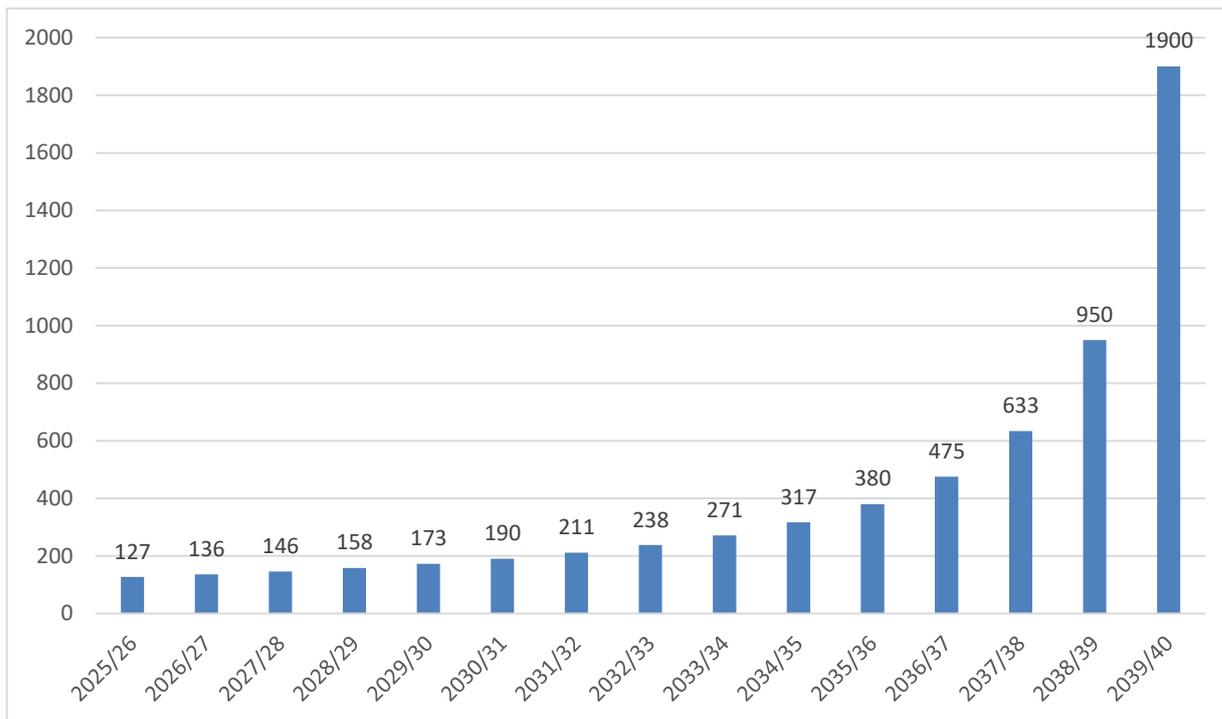


Figure 4: Annual Build Out Rates by Commencement Year Necessary to Deliver Assumed Isley Woodhouse Allocation (1,900 dwellings)

2.51 As can be seen from the above, to deliver the Council's supply assumption of 1,900 dwellings is significantly more difficult the later in the Plan period delivery commences. From experience, and evidence such as the Letwin Review, Planning and Housing Delivery (Savills 2019) and Start to Finish: Second Edition (Lichfields 2020) indicate that for a site of this size, average delivery is likely to be in the region of 145-160 dwellings per annum.

2.52 The Planning and Housing Delivery (Savills 2019) report shows clearly at Page 2 that delivery of higher than that level, even for sites of this size, is rare (see below).

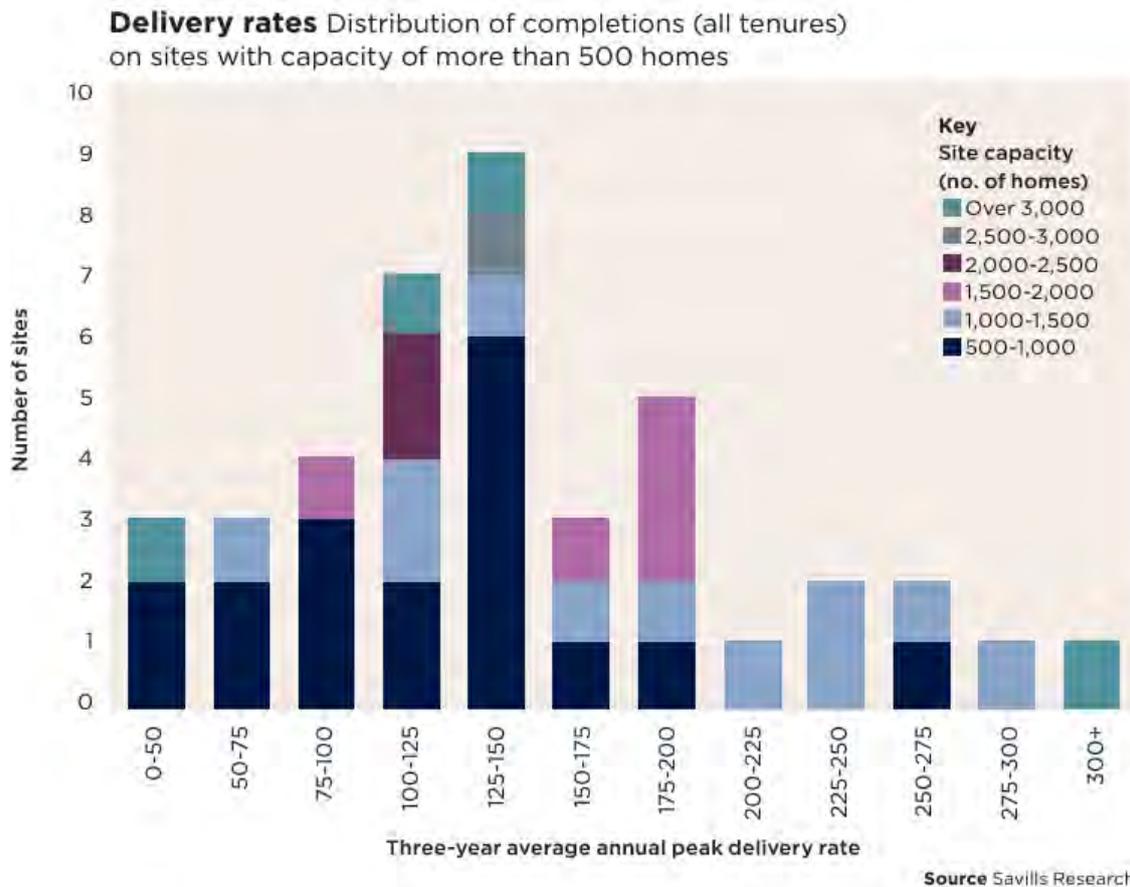


Figure 5: Planning and Housing Delivery Extract (Savills 2019)

(<https://pdf.euro.savills.co.uk/uk/spotlight-on/planning-and-housing-delivery—2019.pdf>)

2.53 It is noted that the above shows that whilst some sites delivered a higher quantum, peak average delivery was 125-150 dwellings per annum, similar to the 145-160 dpa as per the Start to Finish document. Having regard for Figure 4, to deliver the 1,900 dwellings would require delivery to commence 2028/29 at the latest for there to be a realistic opportunity of the site delivering this. Having regard for the history of other strategic sites in North West Leicestershire, this simply is not realistic, particularly given there is no planning application and no clear indication of what evidence is available to support the development of the site at this stage.

2.54 Your attention is also drawn to recent correspondence of the Bedford Local Plan Examination wherein inspections concluded recently strongly that the build out rates assumed by the Council on the two proposed strategic sites were wholly unrealistic and that they agreed with the Council that there was very little flexibility in the remainder of the Plan. The result being the Council now need to find additional sites to give the Inspector's some assurances that the housing requirements can reasonably be met.

- 2.55 The Inspector's letter of the 27 November 2023 sets out these fundamental concerns. Paragraph 53 states *"the delivery rate for larger sites is also naturally constrained by traditional factors that would exist regardless, such as master planning and arriving at an acceptable scheme, opening up, providing infrastructure, and resource availability. As such, attaching a high level of premium to delivery rates due to Corridor growth is not a justified approach. It is instead more logical to take a cautious attitude to this issue"*. Paragraph 54 continues *"Overall, I am not satisfied that the assumed build out rates for either Little Barford or Kempston Hardwick are based on justified assumptions that are soundly based. This is the case before factoring in the uncertainty around infrastructure delivery timings discussed above and is a view that only hardens once the two issues are considered alongside each other"*.
- 2.56 With regards for implications, paragraph 55 states *"As discussed above, the soundness of the spatial strategy (and therefore the Plan) is fundamentally linked to the deliverability of strategic infrastructure and the reasonableness of the assumptions on alignment with anticipated growth"*. It continues *"In addition, the assumed build out rates for the two new settlements on which so much of the Plan's growth relies upon are not based on justified assumptions"*.
- 2.57 Paragraph 56 states *"By the Council's own acceptance, the Plan has very little flexibility built in that may assist with managing either of these issues"*, concluding that *"From the evidence presented, I am not satisfied that housing needs after 2030 would be addressed as anticipated, leaving an overall gap in provision against assessed needs within the Borough across the entire plan period (including affordable housing)"*.
- 2.58 Taking all relevant factors into consideration, the Inspector's letter concludes at paragraph 57 and 58 that *"From the evidence presented, I am not satisfied that housing needs after 2030 would be addressed as anticipated, leaving an overall gap in provision against assessed needs within the Borough across the entire plan period (including affordable housing)... Taking the three issues of assumptions around infrastructure delivery, build out rates, and the reliance on a stepped trajectory together, I am unable to conclude that the Plan meets the tests of soundness at paragraph 35 of the NPPF"*.
- 2.59 Returning to Isley Woodhouse there is no planning application as yet and unless evidence can be provided otherwise, it is assumed matters remain at a relative stage of infancy. If the Council are to rely on any delivery in the Plan period then significant evidence would be required on matters such as infrastructure availability, highways impacts, service provision and phasing, site specific evidence, etc. At this stage it is not clear if there is anything yet available beyond the ARUP Leicestershire International Gateway: Potential Strategic Sites Infrastructure Study, which was a comparative exercise rather than

supporting evidence. The ARUP report in respect of the allocation concluded the following works will be necessary, albeit is not definitive of how much can be delivered in advance of works.

- Improvements to gas supply in the vicinity of the site, to alleviate capacity issues;
- The provision of a new primary electricity substation;
- Enhancement works to existing Wastewater Treatment Works;
- Provision of new onsite primary and secondary education provision;
- The provision of a new onsite GP surgery;
- Appropriate measures to mitigate flood risk;

2.60 There would also need to be significant highways works as it would be a clearly unacceptable position for this development to impact such critically important roads providing access to the airport, the M1 and employment associated with the East Midlands Gateway. Where development has the potential to impact the National Highway Network then National Highways need to be fully satisfied that there will not be any harm to the operation of the M1 and A42.

2.61 This necessary supporting evidence would be needed for any Regulation 19 publication, as it would not be appropriate or procedurally fair for evidence to be provided following. On the basis of the evidence published to date in respect of this Local Plan, there is not sufficient evidence to justify either the allocation or the contribution towards the housing supply. Strong evidence in relation to phasing and delivery is required to support any assumptions made in a housing trajectory in respect of site assumptions. Unless such evidence is already well advanced, it is difficult to see how this could be gained quickly and not impact the onward progression of the Local Plan.

2.62 Having regard for realistic assumptions on commencement and build out rates, a shortfall of dwellings is in our opinion inevitable. We assume as an absolute best case scenario the site could commence work in 2032 and delivery of units in 2034, leaving only 6 years of delivery in the plan Period. This is considered to be highly optimistic, and would leave a shortfall of circa 1300 dwellings (based on Years 1-2 starting at 50 dpa, Years 3-4 at 100 dpa, and Years 5-6 at 150 dpa with totalling 600 dwellings over the 6 year period) from this site alone. As noted, this is a very best case scenario, and we consider that in actual fact that no delivery is likely with in the Plan period, leaving a 1900 dwelling shortfall. Our client's land is however available to assist in mitigating such shortfalls whilst supporting employment growth at the other side of the District from East Midlands Gateway.

Land of Measham Road, Appleby Magna

- 2.63 Having regard for the above, we consider that there is a clear need to increase housing delivery in North West Leicestershire. Matters such as delivery of a stepped trajectory will not assist, as ultimately it is delivery over the Plan period that is the issue, not just issues of delivery in the beginning of the Plan period. Having regard for the likely shortfall our client's land would likely not be sufficient in itself to mitigate this, however could make a useful contribution. Importantly, due to the ability of the site to deliver an on-site nutrient neutrality solution, the site is not reliant on capacity being created at water treatment works and thus can make a useful contribution earlier in the Plan period, including the first 5-years which may still assist the Council in meeting its wider requirements and to ensure the Council can benefit from the protections of NPPF paragraph 76, which we assume most authorities will seek to engage.
- 2.64 We consider in this regard that our client's land interests to the north of the village (Figure 1) is optimally located to deliver housing growth in Appleby Magna. It relates well to existing services and facilities within Appleby Magna. A vision document has been created and appended to these representations, which include an illustrative masterplan to show how a high-quality development can be delivered on the site, as informed by technical evidence and environmental studies which have been undertaken to support the promotion of the site and demonstrate the lack of technical constraints to the site's development. Work undertaken to date includes ecology, landscape and visual, transport, design and flood risk and drainage.
- 2.65 It is noted that the Council's adopted landscape evidence (Landscape Sensitivity Study Part 2) assesses the site as part of a larger parcel of land to the north of the village (08APP-A). This sets out that parts of the 03APP-A parcel have a relationship with the Appleby Magna Conservation Area. The landscape sensitivity is however deemed to be affected by the scale of enclosure and presence of the M42 to the western edge of the parcel. This combined with the flat topography mean that the overall landscape sensitivity for residential development is Medium-Low. In terms of visual sensitivity, the parcel is acknowledged to provide some views of scenic quality towards the Conservation Area. There is however limited access across the parcel, constrained to minor roads and public right of ways. This, combined with the open and flat landscape resulted in the report concluding that the parcel had only a medium visual sensitivity in respect of residential development.
- 2.66 The promoted land has been assessed as part of the most recent SHELAA (2021), under reference Ap13 (Parcels A, B and C). The SHELAA assessment for the site acknowledges that the site is outside the current defined limits to development as set out on the adopted Local Plan's policies map. All parcels

are acknowledged to consist of Grade 2 agricultural land quality (natural England regional records), albeit this is true for many parcels in Appleby Magma. Part of Parcel b is acknowledged to be within a Coal Development Low Risk area. The site is also acknowledged to be located within the River Mease catchment area. In respect of highways, on the basis of an initial assessment it is confirmed that there is no known reason to preclude further consideration of the site on highways grounds, albeit more detailed assessments will be undertaken in the future. With regards to ecology, whilst the site has some potential for protected species, subject to further assessment and mitigation the site is considered acceptable.

2.67 In conclusion the SHELAA assessment considers the site as potentially suitable, subject to a redrawing of the limits to development and evidence to show the development would not unduly impact the River Mease. The site is acknowledged to be available, being promoted by a respected and experienced land promotor. There are no known viability issues and thus the site is considered potentially achievable. The capacity of the site is considered to be circa 180 dwellings, however as noted below parcels Ap13b and Ap13c are not promoted for residential built form, therefore the capacity of the proposed scheme (Ap13a is circa 70-85 dwellings).

2.68 The site is further assessed through the Sustainability Appraisal site assessment proformas. The site is acknowledged to score as an amber and green for all criteria, save for Townscape, Landscape and Visual Sensitivity which is scored a red for the assessments for Ap13b and Ap13c. However, these parcels form part of the site's open space strategy and thus will not lead to the landscape harms identified through the assessment. The landscape assessment for Ap13a scores an amber, which is similar to the assessment of Ap17 which forms part of the allocated site. When comparing all factors, the sites score relatively similarly, albeit we are not clear whether the allocated site can deliver the benefits of our client's site.

Criteria	Ap17 Assessment	Ap13a Assessment
Green Infrastructure	Amber	Amber
Townscape, Landscape and Visual Sensitivity	Amber	Amber
Historic and Cultural Assets	Green	Green
Land and Water Contamination	Green	Green
Environmental Quality	Green	Green
Ecology	Amber	Amber
Highway Safety	Amber	Amber

- 2.69 As a note it is not clear where the assessment of Ap15 is located, but it does not appear in the SA assessment document and thus the justification for its inclusion appears to be missing.
- 2.70 We again confirm that the site is being actively promoted by a respected land promotor who consider the site to be available and achievable. As set out preliminary work has been undertaken on a number of matters and these have been brought together in the Vision Document. Whilst your attention is drawn to this document, a summary of the conclusions reached on the basis of work undertaken to date are provided below. It is of particular note that on the basis of work undertaken to date, there are no issues which would preclude the allocation or subsequent development of the site.
- 2.71 An initial preliminary ecological assessment has been undertaken. This concludes that the ecological value of the site is limited due to its current agricultural use, which results in limited habitat and species diversity. The higher value habitat, the hedgerow and the stream are to be retained and enhanced through the proposals for the site. The illustrative proposals, inclusive of the green infrastructure strategy, results in a BIA score of 65% gain in habitat units and 44% gain in hedgerow units. These benefits are significant. The ecological assessment sets out that there is some scope for protected species, and this will be explored through further specific surveys and set out any necessary mitigation. Regard has been had for the River Mease SAC, with special regard in the site design to avoid direct habitat impacts, and further assessment will be undertaken regarding the indirect impacts from sewage to ensure any scheme delivered does not result in unacceptable impacts.
- 2.72 The site has also been considered by landscape experts. Whilst further work will be undertaken, the initial work completed sets out that the key characteristics of the site are the hedgerows and hedgerow trees found chiefly along the site's boundaries. These can be readily retained, enhanced and incorporated into the design proposals. In visual terms the site is perceived as settlement edge and there is limited inter-visibility with the wider countryside to the east and west. It is noted that the site sits lower than the recently completed Mulberry Homes scheme, as such future development would seem to 'nestle' into the existing settlement edge and enhancing the existing landscape fabric. The scheme will be supported by landscaping proposals which will reinforce the boundaries of the site and enhance the visual enclosure. Regard will however be had to retain the existing field pattern of hedgerows and small coverts, to maintain the character of the site.
- 2.73 In conclusion there is no reason to suggest that the site couldn't be developed in a manner without undermining the overall character of the host landscape character, given the site's settlement edge location, limited contribution to the host landscape and limited inter-visibility with the wider countryside.

As such, the site's development is not inherently reliant on the provision of landscaped mitigation measures. Such measures are however provided for arboricultural continuation, landscape amenity as well as ecological enhancements providing biodiversity net gains. Such provision is considered to provide betterment having regard for the Mulberry scheme to the south, which affords the settlement a relatively raw urban edge at its northern edge. Regard has also been had to maintain views to the church steeple of St Michael and All Angels church. The development of the site would not be seen as incongruous across the wider setting and can be delivered in accordance with current national and local landscape planning policies.

- 2.74 The site is not at significant flood risk and development can be made acceptable through usual on-site mitigation measures such as SuDS. The site can proceed without being subject to significant flood risk in accordance with the NPPF. Moreover, the development will not result in flood risks to the wider area subject to the usual management of surface water run off discharging from the site.
- 2.75 In terms of access, access to the proposed development is available from Measham Road through the provision of a priority T-junction. The access proposals will include the provision of a footway to the west of Measham Road to facilitate pedestrian access to/from the existing local facilities within Appleby Magna. The formalisation of the existing on-street parking is also proposed along Measham Road along the site frontage to enable more easy two-way movements in the vicinity of the site, resulting in significant betterment on the current position. Measham Road provides ready access to the M42 via Junction 11 and thus the wider highway network. The development proposed will generate modest level of vehicular trips and thus is unlikely to result in a material impact on the local highway network. A full transport assessment will be undertaken in due course to fully understand and assess any impacts on the highway network. A travel plan will also be undertaken to promote sustainable travel to and from the site. Whilst further work will be undertaken, it is evident on the basis of the work to date that safe and suitable access can be provided and the residual cumulative impacts would not be severe. The development therefore can be delivered in accordance with national policy requirements.
- 2.76 The site is within walking distance of services and facilities in the village, including a primary school and two public houses. An existing bus service passes the site and provides access to Measham and Atherstone. Further services such as supermarkets are located within Measham, only 2.5km from the site and are within easy cycling distance. As referred to within these representations, the site is located only 1.6km Mercia Park employment development, which when fully occupied has the capacity to deliver over 3,000 jobs to the area. As such spatially Appleby Magna is optimally located to deliver further

housing growth to help meet growing labour demand and reduce the distance future employees will need to travel to reach such new jobs.

2.77 An initial illustrative masterplan has been provided below and sets out an early indication as to how the site may be developed. The proposals will continue to be developed, informed by the continued collation of evidence. The masterplan shows the provision of significant new areas of public open space providing significant amenity and biodiversity benefits. The masterplan shows how the site can deliver 70-85 dwellings on Parcel A west of Measham Road, with the remaining parcels providing public open space and biodiversity net gains. In total 70% of the site could be provided as publicly accessible open space comprising a LEAP, natural areas of play for young children, outdoor gym or fitness trail, circular recreational walks, semi-natural green space with wildflower planting, community orchards, wildlife corridors, sustainable drainage, and a dedicated biodiversity offsetting and enhancement zone. Dwellings have been orientated to overlook open spaces, providing natural surveillance. A range of street designs have been provided which prioritise pedestrian movements, featuring street trees in accordance with latest government policy. A range of house types are provided, but with a bias towards 2-3 bedroom homes. It is also proposed that the scheme makes provision for 30% affordable housing.



Figure 6: Emerging Illustrative Masterplan

2.78 For the reasons set out in these representations, this site should be considered favourably as an allocation as part of the emerging North West Leicestershire Local Plan. We hope to work collaboratively with the Council to ensure the speedy development of the Local Plan and that a high-quality development can be brought forward in accordance with the above.



ELLISTOWN & BATTLEFLAT PARISH COUNCIL



11th March 2024

Dear Sir/Madam

Please find attached the response to the NWLDC Local Plan consultation, from Ellistown and Battleflat Parish Council.

Yours faithfully

K Hill

Karen Hill
Clerk
Ellistown & Battleflat Parish Council

Ellistown & Battleflat Parish Council Consultation on NWLDC Local Plan review

Reference A – Ellistown Housing Assessment Document

Reference B – Ellistown Employment site Assessment Document

Reference C – LCC Highways Traffic Safety report dated Oct 2019

This letter is a collective response from all the Parish Councillors and is in relation to:

Proposed Housing Allocation E7 and

Proposed Employment allocation EMP 24

There are many issues which we think need further clarification and or consultation.

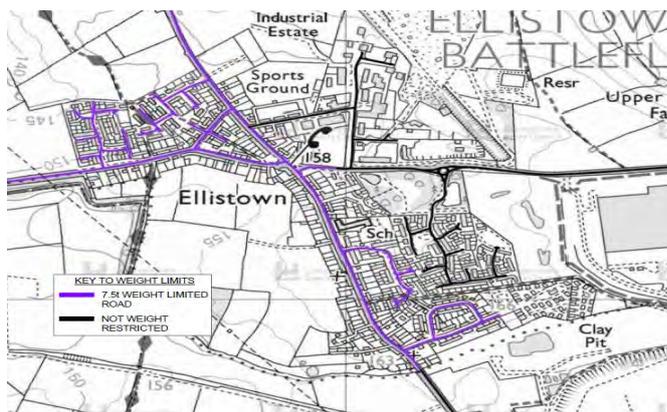
Highway Safety:

One of the major concerns for residents is highway safety as the double mini roundabout in the village centre is a recognised “pinch-point”. It is stated in Reference A and B that the capacity issues would need to be resolved at the double mini roundabout. The Parish Council cannot see how this can be addressed as there appears to be no land available to do any improvements.

The double mini-roundabout pinch-point issues were due to be addressed as part of the Mount Park Amazon development, but the 106 monies were instead allocated to the wider Coalville Strategic Traffic study as no solution to the pinch-point issues could be found.

Midland Road has been mentioned as a potential access point for both E7 and EMP24 by installing a roundabout.

Midland Road is part of the wider weight restriction network in the village and any HGVs being allowed to use Midland Road for access or egress to and from EMP24 would be totally unacceptable. The potential routing of additional HGV traffic through Ellistown could have an adverse effect on the amenity of those living in houses fronting Midland Road.



The Parish Council commissioned LCC Highways to conduct a Traffic Safety Report in Oct 2019 (attached as Reference C) to advise the Parish Council on possible solutions to address the many traffic safety issues. Paragraph 33 in the report highlights the traffic safety issues on Midland Road.

EMP 24 Visual Impact, Biodiversity and Land Use Efficiency:

The Parish Council are currently conducting a review of their Neighbourhood Plan and as part of this review they are looking to allocate the land at EMP24 and E7 as “an area of separation”. This is to maintain a distinct separation between Ellistown and Hugglescote.

All following quotes in italics are taken directly from **Reference B** and need to be addressed further as the Parish Council are concerned, they may be ignored.

The site is in the National Forest and is adjacent to a Local Wildlife Site which generates a significant negative score for SA12 (biodiversity and nature conservation). As a large greenfield site is also registers a significant negative score for SA14 (efficient land use).

The site is generally not well related to the built-up area of Ellistown, and development here would have a significant visual impact, interrupting the views westwards over fields towards the Sense Valley.

Development here would also reduce the actual and perceived separation between the discrete settlements of Ellistown and Hugglescote as currently experienced from Midland Road.

The Ellistown and Battleflat Neighbourhood Plan (2019) aims to focus new development within the existing built-up area. The development of this site would conflict with Policy S1 of the plan.

The allotments and recreation area to the south are more sensitive uses which would need to be fully considered in the layout and design of any development.

This greenfield site serves as a valuable visual and physical gap between Ellistown and Hugglescote and helps to maintain the two settlements’ separate identities.

EMP 24 Flooding

The land drains towards the river Sence and recent heavy rains have caused flooding in the bordering village of Hugglescote.

Following recent rain, the Cemetery and Station Road were yet again under water from flooding see the video links below:

Sunday 18 Feb 2024

<https://www.dropbox.com/scl/fi/oco833t8mdy9db5zqyvyq/Hugglescote-Cemetery-Flood-18-02-2024.mp4?rlkey=a88sq72nf6wlkvotudi11yu3t&dl=0>

Wednesday 21 Feb 2024

https://www.dropbox.com/scl/fi/17vtgrs4izddg8k6lpfw1/Hugglescote-Cemetery-Flood_21-02-2024.mp4?rlkey=edv759f38lyd35fntd8p0467s&dl=0

The problems seem to be either volume of water or blocked culverts behind Buildbase or maybe further up the line and /or balancing ponds in Ellistown.

Interestingly if the culverts cannot take the current volume of water development of EMP24 could make this situation worse unless managed.

E7 General concerns

All following quotes in italics are taken directly from **Reference A** and need to be addressed further as the Parish Council are concerned they may be ignored.

It is uncertain whether the site will provide the opportunity to improve the Green Infrastructure network.

The site may have an impact on sensitive landscape or townscape characteristics.

The site may have the potential to affect a heritage asset(s).

At the previous application, concern was raised over the potential risk to highway safety. Satisfactory capacity of the local road network, traffic speeds and junctions would need to be demonstrated as part of any application and assessed by the Highway Authority. There are localised capacity issues within Ellistown at the double mini roundabouts, which would need to be resolved as part of any new development.

Following a public meeting in Hugglescote to discuss the launch of the SHELAA I submitted questions to NWLDC Planning department - one of which is shown below:

What percentage of new housing is in the wards of Hugglescote (2 wards) and Ellistown?

The answer received is shown below in Italics.

The total number of dwellings projected to be built in the three wards (Hugglescote 2 wards and Ellistown) for the period 2011-31 is 2,755 dwellings. This equates to 28.6% of the Local Plan requirement set out above. However, it is projected that over the same period the number of dwellings that will be built is 12,250 and so the number of dwellings in the three wards equates to 22.5% of all dwellings in Northwest Leicestershire.

We think that these 3 small village settlements have taken more than their fair share of housing development.

COUNTY COUNCIL

OCTOBER 2019

**REPORT REGARDING PARISH COUNCILS CONCERNS OVER TRAFFIC IN THE
VILLAGE OF ELLISTOWN**

Purpose of Report

1. The purpose of this report is to advise on the outcome of investigations following the presentation of a traffic safety survey request from Ellistown & Battleflat Parish Council.

Concerns raised by Parish in the report Ellistown & Battleflat Traffic Safety Survey – Background information

The village conducted a Speed watch programme in August and September last year and a small number of volunteers checking traffic twice a day recorded over 400 vehicles exceeding the speed limit. The main areas of concern are: Beveridge Lane (Vehicles are travelling well in excess of the 30mph limit and we have had RTI's at the Rushby road roundabout) Leicester Road and Midland Road.

2. *The village is surrounded by B8 industrial development and the parish council are constantly monitoring HGV vehicles travelling through the village and disregarding the HGV weight restrictions. This is from all approaches into the village. Rushby Road constantly gets HGV vehicles entering the street looking for Pallex. Most often the vehicles get stuck and residents have to move their vehicles.*
3. *Pedestrian crossing on Whitehill Road. There have been several near misses reported when drivers appear to not see that it's a school crossing point. Also, vehicles park close to the crossing point obscuring everyone's view.*
4. *Like many old villages there is a lack of parking for residents' vehicles outside their houses. It is particularly bad at access / egress points which causes visibility issues for drivers trying to get out and some residents choose to park their vehicles on the footpaths. Issues to be reviewed at the following locations:*
 - *Sherwood Close - Residents park -vans and cars on the footway blocking them for pedestrians on the right as you leave Sherwood Close and obscuring a clear line of sight for drivers leaving Sherwood Close.*
 - *St Christopher's Road - Residents and visitors park on the corners of the junction blocking viewing for drivers exiting St Christopher's.*
 - *Leicester Road - There are very large grass verges along this road which could be turned into street parking and thereby alleviate the need to park on the road.*

- *Kendal Road - Residents park on the very wide footpath on the junction of Kendal and Ibstock road.*
5. *The footfall of pedestrians using the Beveridge Lane humpback bridge to get to and from the Amazon Distribution Centre has increased since it opened.*
 6. *A group of volunteers surveyed all the footpaths in the village and identified lots of slip, trip and fall hazards.*
 7. *The lining has not been refreshed on the double mini roundabout.*
 8. *Arriva and Roberts coaches regularly stop outside the entrance way to the Roberts Coaches yard/facility on Midland Road to change drivers or pick-up and drop-off drivers. In some cases, they park on the pavement.*

Parish solutions as contained in the report Ellistown & Battleflat Traffic Safety Survey

9. Speeding vehicles on approach to the village
Can measures be implemented to slow down the traffic. Surrounding villages all have physical traffic calming measures in place?
10. HGV's contravening the HGV ban through the village
There is insufficient signage directing traffic towards Pallex at the approaching roundabouts of the M1, A447 and A511. Some of the vehicles that flout the HGV ban appear to come via Ibstock and the A447. Need to cast the net wider regarding signage.
11. Pedestrian crossing opposite Ellistown Primary School on Whitehill Road
A controlled crossing point installed with appropriate lights to stop all traffic.
12. Parking issues throughout the village
Can the large grass verges on Leicester Road and the wide footpath on Kendal and Ibstock Road be turned into parking areas and thereby alleviate the need to park on the road?
13. Lack of pedestrian footpath over humpback bridge on Beveridge Lane
Like all humpback bridges it has limited space to install a footpath and maintain 2-way traffic flow. Can the traffic flow be reduced to single lane controlled by traffic lights?

Speeding vehicles on approach to the village

14. Ellistown has 4 entry and exit points to the village these are Beveridge Lane, Ibstock Road, Midland Road and Ellistown Terrace Road, all are very different in character but with the exception of Ellistown Terrace Road, have similar levels of speeding vehicles.

Beveridge Lane

15. On approach to the village, Beveridge Lane speed limit is 60mph which is the correct limit for the rural location. The speed limit is reduced prior to the roundabout with Rushby Road to 30mph. The roundabout significantly reduces speed on approach to the village.
16. A speed information survey was taken from 6th March to 14th March 2019 between Moore Road junction and the Rushby Road roundabout (survey location shown on Figure 1 below). This showed the following data within the 30mph speed limit:- (nb: 85th percentile speeds show the speed at which 85% of drivers are travelling at or below)

All traffic (Both directions)	Mean = 33.1mph	85 th % = 38.8mph
Eastbound	Mean = 34.0mph	85 th % = 39.6mph
Westbound	Mean = 32.1mph	85 th % = 37.8mph

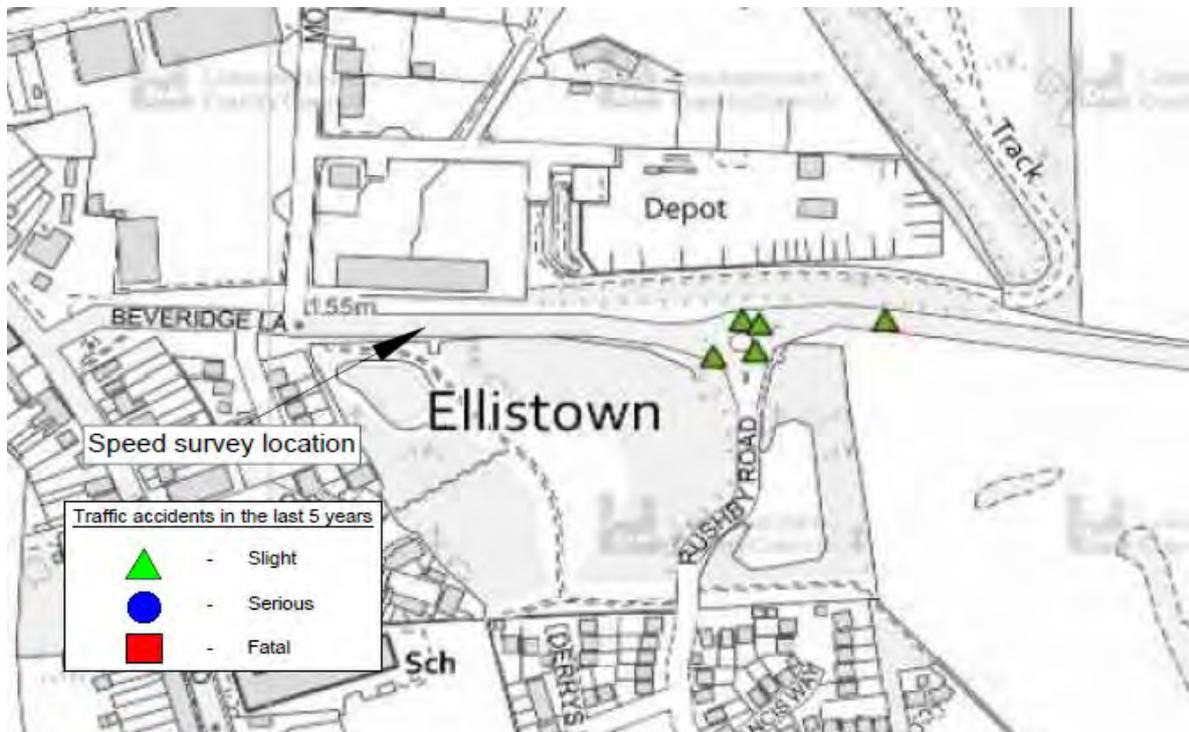


Figure 1 - Beveridge Lane accident data

17. Figure 1 above shows all personal accident data recorded by the Police on Beveridge Lane in the last 5 years.

18. There have been five slight injury collisions within the area of the Beveridge Lane/Rushby Road roundabout:
- Where a motorcycle collides with rear of vehicle in front on roundabout
 - Where a vehicle ignores road closed sign and collides with road worker
 - Where a driver turning right on roundabout collides with motorcycle overtaking on o/s
 - Where a vehicle fails to negotiate roundabout and collides with lamp post
 - Where a vehicle enters roundabout and collides with cycle.

Ibstock Road

19. On approach to the village, Ibstock Road speed limit is 40mph which is the correct limit for the location; acting as a “buffer between Ibstock and Ellistown. The speed limit is reduced to 30mph at the start of the urban environment. This is indicated by a gateway treatment which includes “dragons teeth” road markings and a 30mph roundel on the road.

20. A speed information survey was taken from 6th March to 14th March 2019 adjacent to the Vehicle Activated Sign on Ibstock Road (survey location shown on Figure 2 below). This showed the following data within the 30mph speed limit:- (nb: 85th percentile speeds show the speed at which 85% of drivers are travelling at or below)

All traffic (Both directions)	Mean = 30.0mph	85 th % = 34.8mph
Eastbound	Mean = 29.6mph	85 th % = 34.4mph
Westbound	Mean = 30.4mph	85 th % = 35.2mph

21. Figure 2 below shows all personal accident data recorded by the Police on Ibstock Road in the last 5 years.

22. There have been two slight injury collisions on Ibstock Road
- Where a vehicle dazzled by the sun collides with rear of vehicle waiting to travel ahead
 - Where a vehicle collides with rear of vehicle parked in carriageway

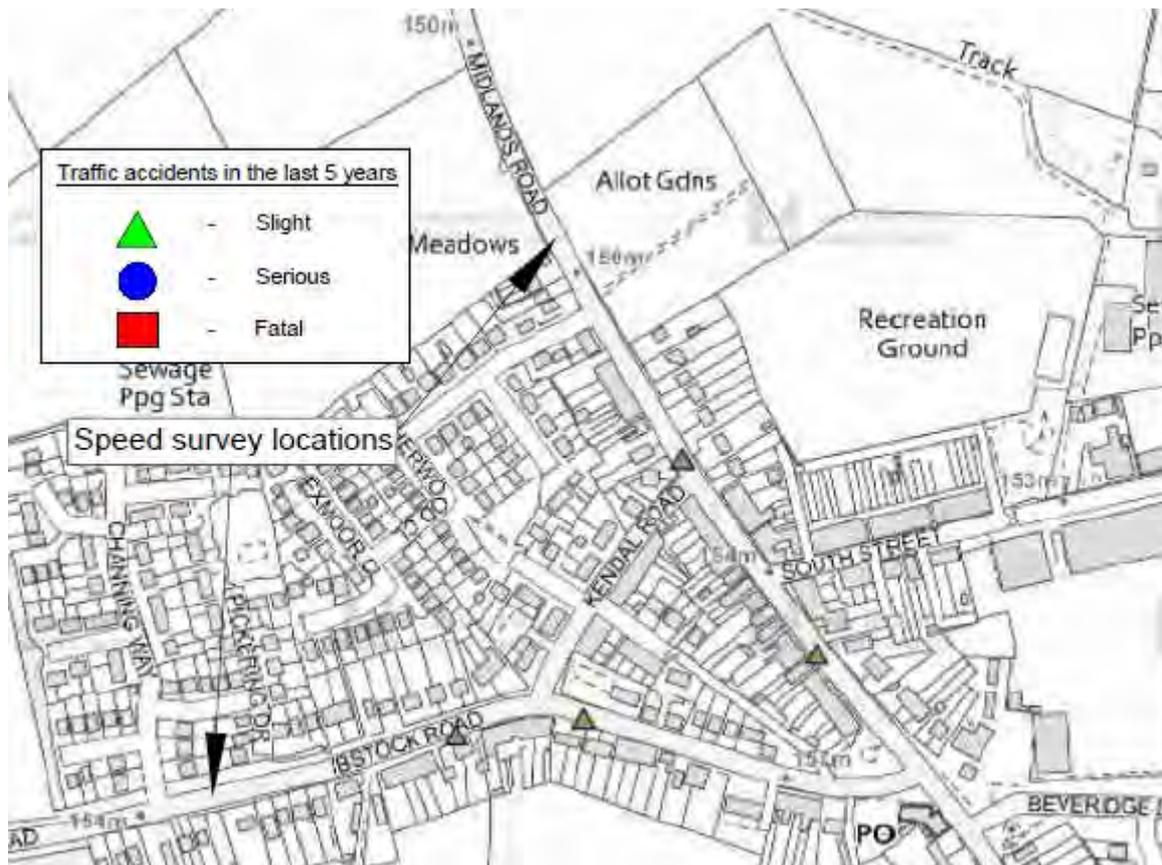


Figure 2 – Ibstock Road & Midland Road accident data

Midland Road

23. On approach to the village, Midland Road speed limit is 30mph which may not correct limit for the location. There is no distinction between the urban village environment of Ellistown and Hugglescote. The area between the two villages is semi-rural and not reflective of an urban environment usually associated with a 30mph speed limit.

24. A speed information survey was taken from 14th March to 25th March 2019 close to Sherwood Close junction (survey location shown on Figure 2 above). This showed the following data within the 30mph speed limit: - (nb: 85th percentile speeds show the speed at which 85% of drivers are travelling at or below)

All traffic (Both directions)	Mean = 35.4mph	85 th % = 40.3mph
Eastbound	Mean = 34.7mph	85 th % = 39.6mph
Westbound	Mean = 36.0mph	85 th % = 40.9mph

25. Figure 2 above shows all personal accident data recorded by the Police on Midland Road in the last 5 years.

26. There have been two slight injury collisions on Midland Road:

- Where a pedestrian crosses the road in front of vehicle, vehicle collides with pedestrian
- Where a speeding vehicle collides with vehicle travelling in opposite direction, speeding vehicle fails to stop

Ellistown Terrace Road / Whitehill Road

27. On approach to the village, Ellistown Terrace Road speed limit is 40mph.
28. A speed information survey was taken from 26nd February 2016 to the 29th February 2016 at near the junction of Clay Lane on Whitehill Road. This showed the following data within the 30mph speed limit: - (nb: 85th percentile speeds show the speed at which 85% of drivers are travelling at or below)

All traffic (Both directions)	Mean = 20.2mph	85 th % = 26.0mph
Northwest bound	Mean = 19.1mph	85 th % = 24.0mph
Southeast bound	Mean = 21.2mph	85 th % = 27.0mph



Figure 3 – Whitehill Road accident data

29. Figure 3 above shows all personal accident data recorded by the Police on Ellistown Terrace Road in the last 5 years.
30. There have been 1 serious and 2 slight injury collisions on Whitehill Road:

- 1 slight injury has no information supplied, the second injury collision a car hit a parked which leaves the carriageway
- The serious injury collision a vehicle collided with a stationary vehicle and a cyclist collided with the stopping vehicle

Speed Limit and Survey Assessment

Beveridge Lane

31. Whilst the speed of vehicles entering and leaving the village on Beveridge Lane are shown to be higher than anticipated, it is understandable in this location. There is very little to indicate to motorists that they are in an urban environment, there is an open grass area to the left as you enter the village and the local residential/industrial developments are screened by bushes and trees. The road also dips on both approaches from and to the village. Speeds will naturally slow as they approach the double mini-roundabouts of Whitehill Road. However, the current location of the 30mph speed limit zone does make a logical approach to managing speeds in the village.

Ibstock Road

32. The County Council appreciate the speed survey shows that the speed of vehicles entering the village on Ibstock Road are above the set limit of 30mph, they are however below the threshold used by the National Police Chiefs Council (NPCC) speed limit + 10% + 2, and thus show compliance.

Midland Road

33. The speed of vehicles entering and leaving the village on Midland Road are shown to be higher than anticipated. The speeds of vehicles may be high due to there being no distinction in the speed limit you enter or exit the village. If a scheme were to be introduced here the County Council would prefer to increase the speed limit between Ellistown and Hugglescote to create a buffer zone (likely to be 40mph) between the villages. This would then allow for the creation of a gateway effect at the entrances to both villages which has been shown to decrease the speed of vehicles, as drivers recognise the change in the environment.

Ellistown Terrace Road / Whitehill Road

34. The County Council speed survey shows that the speed of vehicles entering the village on Ellistown Terrace Road are below the set limit of 30mph and thus show compliance. For clarity, the road name changes from Ellistown Terrace Road to Whitehill Road as you enter the 30mph zone.

Speed Limit Enforcement

35. The County Council has no legal powers to take enforcement action against drivers who exceed the speed limit. Leicestershire Police are the only authority who can take action against motorist who drive above the speed limit.

Funding

36. The financial reality associated with public sector funding is that difficult decisions have been made regarding budgets. The County Council's current policy is to maintain the condition of our highway network and consider essential safety improvements only, with these being limited to areas with a proven casualty history higher than national average or higher than otherwise would be expected. As none of the above concerns or requests meet this criteria the County Council is unable to allocate funding for these locations.

Potential Traffic Calming Measures

37. Community Speed Watch is a scheme to help local residents reduce speeding traffic through their community. The scheme enables volunteers to work within their community to raise awareness of the dangers of speeding and to help control the problem locally and is a partnership initiative supported by the Leicester, Leicestershire and Rutland Road Safety Partnership (LLRSP). Further information on this initiative is available at <http://www.communityspeedwatch.org.uk/>
38. Leicestershire Police supported by Leicester, Leicestershire and Rutland Road Safety Partnership and the Local Authorities, is promoting a 'Bin Sticker' campaign across the force area as a reminder to drivers to keep to the posted speed limit. We can provide stickers to the parish to distribute to residents.
39. Village entry gateways whereby the village name plate and speed limit are located together on a "gate" to give motorists the visual impact that they are entering an urban environment. Associated lining including "dragons teeth" and speed limit roundels are also included. This type of scheme costs in the region of £3,000 to £5,000 each. The parish could purchase these direct and apply for permission to place on the highway. An example is given in Figure 4 below.



Figure 4 Village gateway signing

40. In order for the Parish Council to make an informed decision, we have considered the options for traffic calming measures on Midland Road and Whitehill Road. As a result of this assessment it is suggested that speed cushions would be the most appropriate option as they are the least intrusive and will not spoil or considerably change the look of the village.
41. Vertical traffic calming features would not be appropriate on Beveridge Lane or Ibstock Road due to high number of Heavy Goods Vehicles using this road to access the South Leicester Industrial Estate and Ibstock Brick.
42. In order to achieve the Parishes objectives consideration should be given to a minimum of 3 locations for the installation of speed cushions. The estimated cost for a pair of speed cushions is approximately £15,000. Therefore, the full cost of the scheme would be approximately £45,000. In addition, other costs would be incurred as part of the scheme including but not limited to Design Fees, Detailed Design Fees, Consultation and Traffic Management Costs.
43. Therefore, it is estimated that the cost of a potential scheme would be in excess of £60,000. There would also be additional costs for the maintenance of the asset and public liability would be required by the Parish for the life of the scheme. Costs would be confirmed following detailed design.

44. The Parish may want to consider Vehicle Activated Signs (VAS). A summary of the types of signs and their respective costs and is shown in Figure 5 below:

	Mains Powered – Permanent VAS	Solar Powered – Permanent VAS	Battery Powered “moveable” VAS (can be moved to different positions in the village according to requirements)
			
Cost if installed & managed by the Council	£10,000 - £15,000 all in dependent on sign and locations chose – also includes 10 years maintenance, insurance and running costs.	£10,000 - £15,000 all in dependent on sign and locations chose – also includes 10 years maintenance, insurance and running costs, so maybe slightly less as solar.	N/A
Cost if installed and managed by Parish	£2,000 - £6,000 for the sign, plus design, engineering solution, fees and ongoing maintenance (including public liability insurance) many need to install new column and arrange electrical connection with suppliers etc.	£2,000 - £6,000 for the sign, plus design, engineering solution, fees and ongoing maintenance (including public liability insurance) many need to install new column	£1,000 - £5,000 for sign and additional structural survey for lamp posts that you want to put it on.* The structural testing can costs anything for £50 – £1,000 dependent on the post, timescales etc. If you would like additional Council advice on locations and maintenance this would cost £500.

Figure 5 – VAS costings

45. It should also be noted that as these measures do not meet with our criteria for funding, any further works including officers’ time further to this report will need to be funded by the Parish.

Speeding Conclusion

46. The above data shows that the locations investigated do not meet current funding criteria and therefore the County Council could not allocate funding for measures in these locations. However, we do recognise the concerns of the

parish, and as such the County Council will support the parish to facilitate the provision of measures if it was able to provide necessary funding.

47. Should the Parish wish to fund measures in Ellistown & Battleflat options include appointing a consultant to act on the Parish's behalf to propose a scheme for approval or, appointing the Council to prepare a scheme which can then be consulted upon. The County Council can facilitate the appointment of a consultant if required. All costs would have to be met by the third-party including County Council resource.

HGV Vehicles within village

48. Heavy Goods Vehicles (HGV's) travelling on inappropriate roads is a concern shared by many communities across the County. However, it is important to note that many of the HGV movements within weight restricted areas are legitimate. Weight restrictions are put in place to prevent through movement of HGVs and not prevent access businesses and for deliveries within the restricted area. Ellistown will always have a number of HGV's travelling through the village to access businesses in the area.
49. Figure 6 below shows the Weight Restrictions around Ellistown. The County Council completed a HGV signage update on Beveridge Lane, which is not weight restricted, in September 2018. This signage clearly shows Rushby Road is a no through road and should not be entered by HGVs. HGV drivers do have a responsibility to plan their route before embarking on their journey. Unfortunately there is nothing the County Council can do to prevent drivers from deviating from the required route. Businesses also have a responsibility to ensure their drivers are briefed and educated on the recommended approach roads to their sites.



Figure 6 – Weight Restrictions, Ellistown area

50. The Department for Transport has issued guidance on reducing the amount of clutter on the highway network. It is important that the impact of new and additional signposting is taken into consideration when each request is made. Leicestershire is a rural county of great charm and there is a risk that a proliferation of signs can potentially reduce that appeal. Too many signposts spoil the look and feel of an area, and can confuse and distract motorists. The County Council cannot therefore introduce any signage directing traffic towards Pallex or any other business in the area.
51. Direction signs including industrial aspects and weight limits have been reviewed. The need to update various direction signs on the strategic road network (A and B class roads) has been identified. This is now being considered as part of a wider project that aims to declutter the highway network and ensure that information being given is relevant, concise and important.
52. Weight limit signs are all correctly positioned at each entrance to the weight limit zone. Repeater signs are not permitted under current regulations.
53. All businesses are contacted and reminded of their obligation to brief their drivers of the recommended approach roads and to plan their journey accordingly.
54. If the parish suspect that vehicles are travelling along roads within a restricted area in contravention of this restriction, we recommend that you contact the Police who are the only authority with the necessary powers to take action against such contraventions.

Pedestrian Crossing Request at Ellistown Primary School, Whitehill Road.

55. The existing pedestrian crossing outside Ellistown Primary School is situated on a raised table and built out between two parking bays. A School Keep Clear marking is also provided with tactile paving and bollard.
56. The school also has an advisory 20 miles per hour zone with school flashing lights that operates at school times. It also operates school patrol.
57. It has long been accepted national practice to assess the justification for a pedestrian crossing using a calculation involving both pedestrian and vehicle flows. This is known as 'PV²' and effectively evaluates the potential for conflict between vehicles and pedestrians. In 1995 with the introduction of Local Transport Note (LTN) 1/95 – "Assessment of Pedestrian Crossings" (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/330269/ltn-1-95_Assessment-Crossings.pdf) replaced the previous Advice Note TA10/80 "Design Considerations for Pelican and Zebra Crossings. However, most Local Authorities continued to use a modified version of PV² formula including additional enhanced criteria taking into consideration the types of pedestrians, the different types of vehicles, the vulnerability of pedestrians plus community links etc. as detailed in LTN 1/95.
58. Surveys were carried out on 7th March 2019 and produced a value of 0.263. This is lower than is necessary to upgrade the existing pedestrian crossing facility.
59. For a 'dropped' crossing we would be looking at a score of between 0.2 - 0.7, which is already in place. For a zebra crossing we would be looking at 0.7 - 0.9 and for a controlled puffin crossing we would be looking at 0.9 and above. As evidenced above there is no justification to upgrade the crossing facility at this location. Parking opposite the school is currently permitted in parking bays either side of the build out. To restrict parking in this vicinity would be possible but would then restrict parking for the residents.
60. All schools in Leicestershire County were invited to take place in the School Keep Clear project in May 2018. This project includes the County Council making the school keep clear markings mandatory and using a camera car to enforce and issue fines for parking. To date we have had no response from Ellistown Primary School. If the Parish Council wish for the school to take part in the project, then contact the school and ask them to contact us direct on the following email: SKCProject@leics.gov.uk. Visibility issues at this crossing would be improved if the School Keep Clear Markings were clear of vehicles.

Parking Issues – Various Locations

61. The County Council is not responsible for creating additional off-street parking. The grass verges at the Channing Way & Leicester Road junction serve as visibility displays.

62. The County Council would not recommend any parking area on the wide footpath on the junction of Kendal Road & Ibstock Road. Visibility would be compromised to vehicles using the junction. Also, pedestrian access to crossing the junction would be affected. As above, the County Council is not responsible for creating additional off-street parking.
63. Sherwood Close at its junction with Midland Road has a good accident record with no physical injury accidents recorded at this junction in the past 5 years. St Christopher's Road at its junction with Whitehill Road has a good accident record with only one slight physical injury accident recorded at this junction in the past 5 years. No details of the accident have been provided by the Police.
64. Residents affected by inconsiderate parking can apply for a Protective Entrance Marking (H Bar) which is an advisory road marking that denotes where there is an access that needs to be kept clear.
65. The implementation of Traffic Regulation Orders (TROs), which are required for waiting restrictions, can be extremely costly both in funding and staff time due to the statutory processes required in making a legal Order. Therefore we will only consider new waiting restrictions as part of a larger scheme where a major benefit for the whole community has been established. They are not generally considered in isolation as this would set an unsustainable precedent.
66. The County Council does not have any powers to deal with the issue of inconsiderate or footway parking, unless it is in contravention of waiting restrictions. However, it is important to note that even in the absence of any formal parking controls, it remains an offence under the Road Traffic Act 1988 for any person in charge of a vehicle to cause or permit that vehicle to stand on a road in such a manner that is considered to be dangerous, or that which causes an obstruction to the safe and effective use of the highway. Any such instances of this should be reported to the Police on their non-emergency number '101'

Lack of pedestrian footpath on humpback bridge, Beveridge Lane.

67. Figure 7 below shows the humpback bridge on Beveridge Lane. The bridge structure is owned and maintained by Network Rail.



Figure 7 – Beveridge Lane humpback bridge

68. A traffic & pedestrian count survey was taken over a 12 hour period (0700hrs to 1900hrs) on 7th March 2019 at the humpback bridge on Beveridge Lane. This showed the following data :-

Eastbound	18 Adults	4381 Vehicles
Westbound	14 Adults	4633 Vehicles
Total (Both Directions)	32 Adults	9014 Vehicles

69. There has been one slight injury collision on Beveridge Lane at the humpback bridge.

- Where a vehicle overtakes another vehicle on the brow of bridge and collides with another vehicle traveling in the other direction.

70. At present there is currently a footway surface that is available and used travelling along Beveridge Lane. This is dedicated stone surface and certainly does allow pedestrians to walk down the route. However, we do accept that it is not a footway suitable for all and would certainly struggle to accommodate all users such as pushchairs. However, we do feel that the footway is appropriate for walking and users are aware of the limitations.

71. Future developments in the area may result in improvements being made to the footway if they are necessary for sustainable development, as this area has been identified for development.

72. Upgrading this footway to a fully useable path would require a substantial level of funding. The pedestrian count survey shows a total usage of 32 pedestrians over a 12 hour period. Therefore installation of traffic lights is not realistic due to the high number of vehicles using this road and would cause considerable delays to motorists. The County Council would not be able to justify the

expenditure required given the small amount of pedestrians crossing the bridge on a daily basis.

Unsafe footpaths throughout the village

73. Footpaths are routinely inspected to identify any maintenance requirements, should the parish feel they have identified a trip hazard they should contact our Customer Service Centre (CSC) through cscparishes@leics.gov.uk with the areas of concern. The CSC will pass the concerns to our highways maintenance department to investigate further.

Double Mini roundabout lining refresh – Whitehill Road

74. The lining has been refreshed on the double mini roundabout.

Unsafe stopping & parking of coaches outside Roberts Coaches

75. As previously mentioned, the County Council does not have any powers to deal with the issue of inconsiderate parking, unless it is in contravention of waiting restrictions. Please contact the Police with any concerns.
76. There is good visibility in either direction from the Roberts Coaches entrance and therefore vehicles travelling on Midland Road have ample opportunity to react to any parked vehicles.
77. Parking restrictions at this location would require a TRO. As stated previously TROs, can be extremely costly both in funding and staff time due to the statutory processes required in making a legal Order. Therefore we will only consider new waiting restrictions as part of a larger scheme where a major benefit for the whole community has been established. They are not generally considered in isolation as this would set an unsustainable precedent.

Officers to Contact

Fiona Blockley – Traffic and Signals Team Manager, Environment and Transport



Stephen Burt – Technician, Traffic and Signals, Environment and Transport



ELLISTOWN – SITE ASSESSMENT

SETTLEMENT SUMMARY

Settlement Hierarchy

- Ellistown is a Sustainable Village in the adopted Local Plan.
- It is proposed to remain a Sustainable Village in the new Local Plan.

Key services and facilities

- Ellistown has a primary school (Ellistown Community Primary School). No capacity issues have been identified at present but further expansion of the school would be difficult due to site limitations. A potential shortfall in capacity of 7 places has been identified for the end of the period January 2025 to 2026.
- The closest secondary school is in Coalville (The Newbridge School). The Newbridge School is an 11-16 school. It is over capacity and the future growth in numbers is linked to the South East Coalville development. Expansion of the school is possible. The school can be accessed by the No 15 Bus Service with a bus stop approximately 600m to the south.
- Ellistown is served by several bus services, including the No 15 (Ravenstone – Ibstock, 30min – hourly), No 26 (Leicester- Coalville, hourly), No 125 (Castle Donington – Leicester, infrequent). The infrequent bus service No 159 (Coalville – Hinckley) ceased in February 2023.
- Ellistown has two local convenience stores (Londis and Sai Stores).
- Ellistown has a designated employment site within the settlement (South Leicester industrial Estate).

Other services and facilities

- The settlement also has a community centre at the primary school, a working men’s club, place of worship, formal recreation and informal recreation facilities. The closet GP surgery and pharmacy are located in Hugglescote.

Settlement Features

- **National Forest** - The settlement and surrounding area is in the National Forest.
- **Minerals Consultation Area (MCA) for Brick/Clay**– The southern part of the settlement has the potential for the potential presence of brick/clay resources and impacts E1 and E3.
- **Coal Development Risk Areas –**
 - The settlement and surrounding area have a low risk of unrecorded coal mining related hazards.
- **Leicestershire and South Derbyshire Coalfield Landscape Character Area (LCA)** – The settlement and surrounds is located within this LCA.
- **Ellistown and Battleflat Neighbourhood Plan** – This Neighbourhood Plan was made in July 2019.
- **Bardon Quarry Site of Special Scientific Interest (SSSI)** – Ellistown is located in the Impact Risk Zone for the Bardon Quarry SSSI.

STAGE 1 - SITE IDENTIFICATION

The 2021 SHELAA identifies four sites for housing in Ellistown. A further site (E9) was submitted and reported to Local Plan Committee in May 2021. However, the promoter confirmed it should be deleted prior to the final publication of the SHELAA.

Site Reference	Site Address
E1	Whitehill Road
E3	Off Whitehill Road
E7	Land between Midland Road and Leicester Road
E8	The Paddock near St Christophers Park

A Vision Document has been submitted with respect to site E7 and identifies a site capacity of between 150-200 homes. Therefore a figure of 180 homes has been used in this assessment.

STAGE 2 – SITE SIEVE

One site was sieved out at this stage, leaving three sites for further assessment.

Site Reference	Site Address	Reason for being sieved out
E8	The Paddock near St Christophers Park	Detailed planning permission

STAGE 3 - SUSTAINABILITY APPRAISAL

SA Ref	SA Objective	SA Summary
SA1	Improve the health and wellbeing of the District's population	++
SA2	Reduce inequalities and ensure fair and equal access and opportunities for all residents	-
SA3	Help create the conditions for communities to thrive	E1 and E3 score minor positive E7 scores minor negative
SA4	Provide good quality homes that meet local needs in terms of number, type and tenure in locations where it can deliver the greatest benefits and sustainable access to jobs	++
SA5	Support economic growth throughout the District	0
SA6	Enhance the vitality and viability of existing town centres and village centres	++
SA7	Provision of a diverse range of employment opportunities that match the skills and needs of local residents	+
SA8	Reduce the need to travel and increase numbers of people walking cycling or using the bus for their day-to-day needs	E1 and E3 score significant positive E7 scores minor positive
SA9	Reduce air, light and noise pollution to avoid damage to natural systems and protect human health	0
SA11	Ensure the District is resilient to climate change	0
SA12	Protect and enhance the District's biodiversity and protect areas identified for their nature conservation and geological importance.	--

SA13	Conserve and enhance the quality of the District's landscape and townscape character	E1 scores minor positive E3 and E7 score uncertain
SA14	Ensure land is used efficiently and effectively	E1 scores minor positive E3 and E7 score significant negative
SA15	Conserve and enhance the character, diversity and local distinctiveness of the District's built and historic heritage	0
SA16	Protect water resources and ensure they are used efficiently	0
SA17	Ensure the efficient use of natural resources, including reducing waste generation	E1 and E3 score uncertain E7 scores neutral

STAGE 4 – DETAILED SITE ASSESSMENT SUMMARY

E1 – Whitehill Road (0.46ha / about 11 dwellings)

Services & Facilities – In line with the parameters in the accompanying methodology all sites in Ellistown are within a good walking distance to employment, public transport, and informal and formal recreation. This site is also within a good walking distance to the local convenience store and the primary school. Like all sites in Ellistown, travel outside the settlement is required to access secondary education and GP and pharmacy services. The closest bus stops (regular service) are located on Whitehall Road, approximately 90 -215m from the site. These stops provide access to the frequent No 26 Service (Leicester to Coalville) as well as the more infrequent services.

Summary of SA

SA Objectives																
Health and Wellbeing	Inequalities	Community	Housing	Economy	Town/Village centres	Employment	Sustainable travel	Air, Light & Noise	Flooding	Biodiversity & Geodiversity	Landscape	Land-use efficiency	Historic Environment	Water & Soil	Waste	
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA11	SA12	SA13	SA14	SA15	SA16	SA17	
++	-	+	++	0	++	+	++	0	0	-	+	+	0	0	?	

All sites perform well against SA1, SA4 and SA6 and poorly against SA12. In terms of E1, due to its good proximity to all local services and public transport this site scores a minor positive against SA3 and a significant positive against SA8. A minor positive is recorded in terms of SA13 as the site is located within the settlement boundary and development would improve the appearance of the landscape/townscape. The site is located within a mineral safeguarding area and its impact is unknown when scored against SA17.

Key Planning Considerations –

- Development of the site would increase housing in the settlement by 1%.

- Open site (Grade 3 Agricultural Land) to the rear of residential properties that front onto Whitehill Road. It is located within the Limits to Development with landscaping and trees around the site perimeter. It would appear that this land has previously been used for the keeping of horses and livestock as well as the growing of vegetables. A LDC has been sought to establish the use of the land as incidental to the enjoyment of a dwelling house. However, information was insufficient to establish this.
- The site appears to be landlocked with no suitable access to the highway network and would be unacceptable to the Highway Authority.
- With respect to ecology, the site is considered acceptable with mitigation and undertaking of a bat survey.
- An area TPO encompasses a significant part of the site and would impact on site layout and capacity.
- Neighbourhood Plan –Site identified as an ‘Area of Environmental Interest’ in terms of hedgerows and trees. Proposals which are positive in biodiversity terms are encouraged.
- There is the potential for the presence of brick/clay across the site.
- The site is in a wider parcel of land (15ELL-A) deemed to have low landscape sensitivity and low visual sensitivity for housing (Landscape Sensitivity Study).

Deliverability/Developability – The site is being promoted by the landowner with no evidence of developer interest and can only be considered potentially available. There are also questions over the site’s suitability particularly relating to highway issues and relationship with the settlement and pattern of development.

E3 – Off Whitehill Road (3.3ha / about 62 dwellings)

Services & Facilities – In line with the parameters in the accompanying methodology all sites in Ellistown are within a good walking distance to employment, public transport, and informal and formal recreation. This site is also within a good walking distance to the local convenience store and the primary school. Like all sites in Ellistown, travel outside the settlement is required to access secondary education and GP and pharmacy services. The closest bus stops (regular service) are located on Whitehill Road, approximately 185 -300m from the site. These stops provide access to the frequent No 26 Service (Leicester to Coalville) as well as the more infrequent services.

Summary of SA

SA Objectives																
Health and Wellbeing	Inequalities	Community	Housing	Economy	Town/Village centres	Employment	Sustainable travel	Air, Light & Noise	Flooding	Biodiversity & Geodiversity	Landscape	Land-use efficiency	Historic Environment	Water & Soil	Waste	
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA11	SA12	SA13	SA14	SA15	SA16	SA17	
++	-	+	++	0	++	+	++	0	0	--	?	--	0	0	?	

All sites perform well against SA1, SA4 and SA6 and poorly against SA12. In terms of E3, due to its good proximity to all local services and public transport this site scores a minor positive against SA3 and a significant positive against SA8. The impact on landscape sensitive has been scored as uncertain (SA13)

with it being a greenfield site that is outside of the limits to development. A significant negative is scored against SA14 as this site is a greenfield that exceeds 1 hectare in size. The site is located within a mineral safeguarding area however its impact is unknown when scored against SA17.

Key Planning Considerations –

- Development of the site would increase housing in the settlement by 6%.
- An irregular shaped parcel of agricultural land (Grade 3 Agricultural) located adjacent to the Limits to Development with countryside to the west. Abuts Site E1.
- Part of site formed part of a larger site that was considered for the development of 345 dwellings and supporting infrastructure (14/01106/OUTM). This application was refused.
- There are local highway issues in terms of capacity at the double mini roundabout, which would need to be resolved as part of any new development. If these can be overcome no specific objections raised.
- Potential presence of badgers on site and for Great Crested Newts. Survey work and mitigation needed but no objection is raised.
- Neighbourhood Plan – Wesleyan Chape adjacent to site E3, is identified as a building of Local Heritage Interest and NP Policy expects its features to be conserved. This is a non-designated heritage asset and not nationally listed.
- Potential for the presence of brick/clay across the site.
- The site is in a wider parcel of land (15ELL-A) deemed to have low landscape sensitivity and low visual sensitivity for housing (Landscape sensitivity Study).

Deliverability/Developability – The site is promoted by the landowner with no evidence of developer interest and therefore considered potentially available. There are also questions over the site's suitability particularly in terms of highway issues and the relationship with the settlement and pattern of development.

E7 – Land between Midland Road and Leicester Road (9.59ha / about 180 dwellings)

Services & Facilities – In line with the parameters in the accompanying methodology all sites in Ellistown are within a good walking distance to employment, public transport, and informal and formal recreation. This site is also within a reasonable walking distance to the local convenience store and the primary school. Given the extent of the site, levels of accessibility will vary although all parts of the site are within good and reasonable walking distances for these services. Like all sites in Ellistown, travel outside the settlement is required to access secondary education and GP and pharmacy services. The closest bus stops (regular service) are located on Ibstock Road/Leicester Road and Midlands Road, approximately 200m to 425m from the site. These stops provide access to the frequent No 15 Service (Ibstock to Coalville) as well as the more infrequent services.

Summary of SA

SA Objectives															
Health and Wellbeing	Inequalities	Community	Housing	Economy	Town/Village centres	Employment	Sustainable travel	Air, Light & Noise	Flooding	Biodiversity & Geodiversity	Landscape	Land-use efficiency	Historic Environment	Water & Soil	Waste
SA1	SA2	SA3	SA4	SA5	SA6	SA7	SA8	SA9	SA11	SA12	SA13	SA14	SA15	SA16	SA17
++	-	-	++	0	++	+	+	0	0	-	?	-	0	0	0

All sites perform well against SA1, SA4 and SA6 and poorly against SA12. In terms of E7, it scores a minor negative against SA3 as it is reasonably located to some services (shop and school), whereas the other sites are well located to all services. The reasonable level of access to some services is also reflected in its minor positive score against SA8, although access to public transport is considered good. The impact on landscape sensitive is uncertain (SA13) with it being a greenfield site that is outside of the limits to development. A significant negative is scored against SA14 as this site is a greenfield and over 1 hectare in size.

Key Planning Considerations –

- Development of the site would increase housing in the settlement by 23%.
- Irregular shaped site comprising agricultural land (Grade 3) located between Midland Road (to the east) and Leicester Road (to the south). Relatively flat site in the east that dips down to the rear of Channing Way. Bounded by mature hedgerows and trees and a number of hedgerows also bisect the site. Public footpath crosses the site, north to south and overhead pylons cut across the western part of the site.
- Permission was sought for the development of this site for up to 185 dwellings (17/00181/OUTM). This application was withdrawn.
- Highways concerns have previously been raised in terms of local road capacity, traffic speeds and speed limits as well as localised capacity issues at the double mini roundabout which would need to be overcome. This would need a co-ordinated approach with Employment Site EMP24. Midland Road is subject to both national and 30mph speed limits and the provision of a suitable access would need to be demonstrated, along with connections to existing footpaths.
- Potential for the presence of badgers and BAP habitats and further survey work suggested. No objection raised and mitigation would be appropriate with the inclusion of hedgerow buffer zones.
- Neighbourhood Plan – No issues
- The southwest corner of the site encroaches into the Tip Site Consultation zone, requiring consultation with the Environment Agency.
- The site is in a wider parcel of land (15ELL-A) deemed to have low landscape sensitivity and low visual sensitivity for housing (Landscape Sensitivity Study).

Deliverability/Developability – The site is promoted by the owner (site promoter) with a house builder interest and its availability was confirmed in 2022. The site is also in a suitable location for housing development and there is a reasonable prospect it will be available and could potentially be developed

during the Local Plan period. However, there are questions over the site's suitability relating to the scale of development and highway issues.

STAGE 5 – OVERALL CONCLUSIONS

Having regard to the outcome of the SA, E1 scores the best of all the sites. Sites E3 and E7 do not score so well in terms of Land Efficiency (SA14), and Site E7 does not score so well in terms of SA3 (Community) and SA8 (Sustainable Travel). Generally, all sites have good access to public transport, employment and recreation. Sites E1 and E3 have better access to the local store and primary school. However, although E7 does not score so well in this respect it does still have reasonable access to these facilities.

Of the three sites assessed:

Site E1 is located within the Limits to Development. However, the site appears landlocked and highway objections have been raised. A TPO encompasses a significant part of the site and development would be at odds with the linear pattern of development.

Site E3 has potential local highway issues regards the capacity at the double mini roundabout, which would need to be addressed although no objections have been raised on technical grounds. However, the site is not well related to the existing built form and would extend the settlement back from the road further than the linear pattern of development.

Site E7 has potential for local highway issues regards the capacity at the double mini roundabout, which would need to be addressed although no objections have been raised on technical grounds. The scale of the site would allow a link road between Midlands Road and Leicester Road, which has been suggested as a means of addressing the highway concerns raised, although further work still needs to be undertaken on this matter.

However, it is a large greenfield site with significant development proposed and there are concerns over the scale of the development proposed and its impact on the wider area and its open character. It is however considered to have a better relationship with the pattern of development with reasonable access to local services. It is therefore suggested that a smaller development would be preferable, and the site area be reduced to comprise the most eastern field, that fronts onto Midlands Road.

Recommendations

Allocate **Land at Midland Road (E7)** for around 69 dwellings with a reduced site area of 2.75 hectares.

Site Information													
Housing Code		E1	Site Address				Whitehill Road, Ellistown		Settlement		ELLISTOWN		
Employment Code													
Nearest Settlement			Nearest Sustainable Settlement				Proposed Use		Housing				
Name			Ellistown		Name		Ellistown		Hectares		0.46		
Settlement Tier			Sustainable Villages		Settlement Tier		Sustainable Villages		Site Capacity*		Dwellings	11	
Relationship to Limits to Development?			Within		Distance from sustainable boundary		Within Boundary		Periods and Build Rates				
									0 - 5			6 - 10	11 - 20
									D			11	
									E				
Site of Special Scientific Interest?		No	Ancient Woodland?		No	Within Flood Zone 3b?		No	SHELAA		Suitable		
National Nature Reserve?		No	Historic Park or Garden?		No	EMA Public Safety Zone?		No	Assessment		Potentially Available		
Local Nature Reserve?		No	Scheduled Monument?		No	Existing Permission?		No			Not Currently Achievable		



Quantitative Assessment				
Services				
Local Services		Ibstock	Employment	South Leicester Industrial Estate, Ellistown
Convenience Store		Londis, Ellistown	Public Transport	Within 800m, 26 - Leicester to Coalville, Hourly
Primary School		Ellistown Community Primary	Formal Recreation	Within 1000m walking distance
Secondary School		The Newbridge School	Informal recreation	Within 800m walking distance
GP Surgery		Hugglescote Surgery	Pharmacy	Masons Chemists, Hugglescote
Constraints				
Rights of Way		None	Biodiversity and Geodiversity	None
Previously developed?		Part - 11%-15% - buildings and solar panels on part of site	Soil Resources	3
Flood risk		Flood Zone 1	Minerals Safeguarding	Brick Clay
Tree Preservation Order?		Part of site	Waste Safeguarded Sites	None

Qualitative Assessment

The site is located to the rear of residential properties to the west of Whitehill Road. The site borders the curtilage of residential properties to the east and there is open agricultural land (grade 3) to the south and west of the site. There is some vegetation and trees around the perimeter of the site.

Topic	Assessment	Notes
Green Infrastructure	It is uncertain whether the development would impact upon existing green infrastructure or whether the site would provide the opportunity to improve the Green Infrastructure Network.	Hedges and trees form the site boundaries and would need to be maintained and supplemented as part of any development to maintain the character and to assimilate development into a currently undeveloped and landscaped site. The site has a standalone character and does not form part of a wider green network. There is potential for additional planting and new open spaces together with retention of hedgerows and trees to enhance the green infrastructure.
Townscape, Landscape and Visual Sensitivity	Development of the site may have an impact on sensitive townscape or landscape characteristics, but it is possible that it could be mitigated to an acceptable level.	The site is a wedge shape parcel of land to the rear of existing housing. The site is an established defined plot, separated by the larger adjacent fields by the mature landscaping. The site is well related to the built development fronting onto the highway and subject to the retention of the landscaping could be developed without significant visual impact. The development would not respond to the linear form of the adjacent development, but this could be balanced by the limited visual impact beyond the site.
Historic and Cultural Assets	Development of the site is unlikely to affect any heritage assets.	No known assets affected.
Land and Water Contamination	The site is unlikely to be affected by land contamination or landfill. The site is unlikely to cause groundwater pollution.	No known assets.
Environmental Quality	The site is not close to sources of pollution or other environmental quality issues.	No known issues
Ecology	There are ecological issues that require further investigation such as a Phase 1 Survey.	LCC Ecology stated a bat survey would be needed up front as there is the potential for bat roosts in buildings. If bats are found mitigation would be needed. Site is considered acceptable with mitigation namely the retention of a 5m buffer zone along boundary hedge; not to be incorporated into garden boundaries but managed as part of open space, to ensure habitat continuity and retain connectivity.
Highway Safety	The site does not have access to the road network and/or impacts on the road network are unlikely to be mitigated to an acceptable level.	LCC Highway Authority stated the site does not appear to have a suitable access to the highway network, and therefore would be unacceptable to the Highway Authority.

Site Information										
Housing Code	E3	Site Address	Off Whitehill Road, Ellistown				Settlement	ELLISTOWN		
Employment Code										
Nearest Settlement		Nearest Sustainable Settlement			Proposed Use	Housing				
Name		Name			Hectares	3.3				
Ellistown		Ellistown			Site Capacity*	Dwellings	62			
Sustainable Villages		Sustainable Villages			Emp (m ²)					
Tier		Tier			Periods and Build Rates					
Relationship to Limits to Development?		Distance from sustainable boundary			Adjoining Boundary		D	62		
Adjoining		Adjoining Boundary			E					
Site of Special Scientific Interest?	No	Ancient Woodland?	No	Within Flood Zone 3b?	No	SHELAA Assessment		Potentially Suitable		
National Nature Reserve?	No	Historic Park or Garden?	No	EMA Public Safety Zone?	No			Potentially Available		
Local Nature Reserve?	No	Scheduled Monument?	No	Existing Permission?	No			Potentially Achievable		

Quantitative Assessment			
Services			
Local Services	Ibstock	Employment	South Leicester Industrial Estate, Ellistown
Convenience Store	Londis, Ellistown	Public Transport	Within 800m, 26 - Leicester to Coalville, Hourly
Primary School	Ellistown Community Primary	Formal Recreation	Within 1000m walking distance
Secondary School	The Newbridge School	Informal recreation	Within 800m walking distance
GP Surgery	Hugglescote Surgery	Pharmacy	Masons Chemists, Hugglescote
Constraints			
Rights of Way	None	Biodiversity and Geodiversity	None
Previously developed?	No	Soil Resources	3
Flood risk	Flood Zone 1	Minerals Safeguarding	Brick Clay
Tree Preservation Order?	Adjacent to site	Waste Safeguarded Sites	None

Qualitative Assessment

The site is a linear parcel of agricultural land running to the west of Whitehill Road from the rear of the former public house (The New Ellistown) in the north to the rear of Old School Close to the south. There is a triangular shaped field to the rear of Nos.26 to 90 Whitehill Road that is not included in this site boundary (SHELAA Site E1). There are residential dwellings to the east of the site that front onto Whitehill Road. To the south and east is agricultural land. The site is Grade 3 agricultural land.

Topic	Assessment	Notes
Green Infrastructure	It is uncertain whether the development would impact upon existing green infrastructure or whether the site would provide the opportunity to improve the Green Infrastructure Network.	Hedges and trees form some site boundaries and would need to be maintained and supplemented as part of any development to maintain the character and to assimilate development into a currently undeveloped and landscaped site. The site has a standalone character and does not form part of a wider green network. There is potential for additional planting and new open spaces together with retention of hedgerows and trees to enhance the green infrastructure.
Townscape, Landscape and Visual Sensitivity	Development of the site may have an impact on sensitive townscape or landscape characteristics, but it is possible that it could be mitigated to an acceptable level.	The site is a rectangular shape parcel of land to the rear of existing housing. The site runs parallel to E1 and is in agricultural use. The site is well related to the built development fronting onto the highway although there is countryside to the north and west. However, this part of Ellistown is characterised by linear development and although well related to the east, development of the site would not respond to the prevailing character. The visual impact would however be reduced by the housing to the east and south. Significant landscaping would be required along the exposed boundaries to integrate more successfully.
Historic and Cultural Assets	Development of the site is unlikely to affect any heritage assets.	No known assets affected.
Land and Water Contamination	The site is unlikely to be affected by land contamination or landfill. The site is unlikely to cause groundwater pollution.	No known issues.
Environmental Quality	The site is not close to sources of pollution or other environmental quality issues.	No known issues.
Ecology	There are ecological issues that require further investigation such as a Phase 1 Survey.	LCC Ecology state there are known Great Crested Newts in the ponds to the south, circa 150m away. A Great Crested Newt survey or entry into the Great Crested Newt District Level Licensing Scheme would be required. There is the potential for badgers to be on site. The site is of no particular habitat value therefore there would be opportunities for enhancement. Overall the site is considered acceptable with mitigation.
Highway Safety	The site has the potential for adequate access to the road network, and it is possible that impacts on the road network can be mitigated to an acceptable level.	The Highway Authority states there are localised capacity issues within Ellistown at the double mini roundabouts, which would need to be resolved as part of any new development. If this can be overcome, there are no apparent fundamental reasons for this site to be excluded from consideration at this stage. However, consideration in more detail as part of the usual Development Control process might lead to the site being viewed less favourably. Details to show a suitable access in accordance with the 6C's Design Guide would need to be demonstrated.

Site Information										
Housing Code	E7	Site Address	Land between Midland Road and Leicester Road, Ellistown				Settlement	ELLISTOWN		
Employment Code										
Nearest Settlement		Nearest Sustainable Settlement			Proposed Use	Housing				
Name		Name			Hectares	9.59				
Ellistown		Ellistown			Site Capacity*	Dwellings	180			
Sustainable Villages		Sustainable Villages			Emp (m ²)					
Tier		Tier			Periods and Build Rates					
Relationship to Limits to Development?		Distance from sustainable boundary			Adjoining Boundary					
Adjoining		Adjoining Boundary			D	180				
E										
Site of Special Scientific Interest?	No	Ancient Woodland?	No	Within Flood Zone 3b?	No	SHELAA Assessment		Potentially Suitable		
National Nature Reserve?	No	Historic Park or Garden?	No	EMA Public Safety Zone?	No			Available		
Local Nature Reserve?	No	Scheduled Monument?	No	Existing Permission?	No			Potentially Achievable		

Quantitative Assessment				
Services				
Local Services	Ibstock	Employment	South Leicester Industrial Estate, Ellistown	
Convenience Store	Londis, Ellistown	Public Transport	Within 800m, 26 - Leicester to Coalville, Hourly & 15 - Ibstock-Coalville-Ravenstone, every 30 mins	
Primary School	Ellistown Community Primary	Formal Recreation	Within 1000m walking distance	
Secondary School	The Newbridge School	Informal recreation	Within 800m walking distance	
GP Surgery	Hugglescote Surgery	Pharmacy	Masons Chemists, Hugglescote	
Constraints				
Rights of Way	PROW running N-S through site		Biodiversity and Geodiversity	None
Previously developed?	No		Soil Resources	3
Flood risk	Flood Zone 1		Minerals Safeguarding	None
Tree Preservation Order?	None		Waste Safeguarded Sites	None

Qualitative Assessment
<p>E4 - The site is a rectangular parcel of agricultural land to the west of Midland Road. The site is relatively flat and bound by mature hedgerows and trees. To the south of the site are existing residential dwellings, to the north and west is agricultural land. To the east, on the opposite side of Midland Road are allotments. There is a public footpath running along the western boundary. The site is grade 3 agricultural land.</p> <p>E5 - The site is agricultural land and is located to the north of Channing way and to the west of SHELAA site E4 and east of SHELAA site E6. To the south of the site are residential dwellings and to the north is agricultural land. The site is bound by mature hedgerows. A public footpath runs along the eastern side of the site and the site is grade 3 agricultural land.</p>

E6 - The site is agricultural land and is located to the north of Leicester Road. The site slopes downwards away from the road and is bound by mature hedgerows; there are also mature trees in places around the boundary of the site. To the east of the site is residential development and there is agricultural land to all other sides. SHELAA Site E5 adjoins the north east corner of the site. There is an overhead pylon that runs north to south diagonally across the centre of the site. The site is grade 3 agricultural land.

Topic	Assessment	Notes
Green Infrastructure	It is uncertain whether the site will provide the opportunity to improve the Green Infrastructure network.	Hedges form some site boundaries and would need to be maintained and supplemented as part of any development to maintain the character and to assimilate development into a currently undeveloped and landscaped site. There is no significant landscaping within the site. There is potential for additional planting and new open spaces together with retention of hedgerows and trees to enhance the green infrastructure.
Townscape, Landscape and Visual Sensitivity	The site may have an impact on sensitive landscape or townscape characteristics, but it is possible that it can be mitigated to an acceptable level.	E4 - The site would adjoin the residential estate to the south and south-west which forms the backdrop when viewed from the north. This estate forms part of the built-up settlement of Ellistown. Development of the site would materially change the character of the site but would be well related to the development to the south and south-west. Furthermore, when viewed from the south the existing estate would intervene. The site is therefore reasonably well related to the existing settlement. E5 - The site would adjoin the residential estate to the south and south-east which forms the backdrop when viewed from the north. This estate forms part of the built-up settlement of Ellistown. Development of the site would materially change the character of the site but would be well related to the development to the south and south-east. Furthermore, when viewed from the south the existing estate would intervene. The site is therefore reasonably well related to the existing settlement. E6 - The site would adjoin the residential estate to the east which forms the backdrop when viewed from the west. This estate forms part of the built-up settlement of Ellistown. Development of the site would materially change the character of the site but would be well related to the development to the east. Furthermore, when viewed from the east the existing estate would intervene. The site is therefore reasonably well related to the existing settlement.
Historic and Cultural Assets	The site may have the potential to affect a heritage asset(s), but it is possible that it can be mitigated to an acceptable level.	The site was subject of a planning application for residential development that was accompanied by a heritage impact assessment. This concluded there would be no harm to heritage assets. Although requiring further assessment specific to any subsequent application it is considered the site could potentially be developed without harm to heritage assets.
Land and Water Contamination	The site is unlikely to be affected by land contamination or landfill. The site is unlikely to cause groundwater pollution.	No known contamination.
Environmental Quality	The site is not close to sources of pollution or other environmental quality issues.	No known issues.
Ecology	There are ecological issues that require further investigation such as a Phase 1 Survey.	E4 - The hedgerows may be a potential BAP habitat. A hedgerow survey would be required, and the hedgerows should be retained with buffer zones. Overall, the site is considered acceptable with mitigation. E5 - There is the potential for badger to be on site. The hedgerow may be a potential BAP habitat. A badger survey and a hedgerow survey would be required. The hedgerows should be retained with a 5m buffer zone. Overall, the site is considered acceptable with mitigation. E6 - There is the potential for badger to be on site. The hedgerow may be a potential BAP habitat. A badger survey and a hedgerow survey would be required. The hedgerows should be retained with a buffer zone. Overall, the site is considered acceptable with mitigation.

Highway Safety	<p>The site has the potential for adequate access to the road network, and it is possible that impacts on the road network can be mitigated to an acceptable level.</p>	<p>The site does not have a current satisfactory vehicular access. At the previous application, concern was raised over the potential risk to highway safety. Satisfactory capacity of the local road network, traffic speeds and junctions would need to be demonstrated as part of any application and assessed by the Highway Authority.</p> <p>There are localised capacity issues within Ellistown at the double mini roundabouts, which would need to be resolved as part of any new development. If this can be overcome, there are no apparent fundamental reasons for this site to be excluded from consideration at this stage. However, consideration in more detail as part of the usual Development Control process might lead to the site being viewed less favourably.</p> <p>E4 - Midland Road is subject to both national and 30mph speed limits at the site frontage with the highway, details to show a suitable access in accordance with the 6C's Design Guide would need to be demonstrated. Connections with existing footpaths would need to be considered to specific proposals.</p> <p>E5 - The site also does not appear to have a connection to the highway. Details to show a suitable access in accordance with the 6C's Design Guide would need to be demonstrated.</p> <p>E6 - Details to show a suitable access in accordance with the 6C's Design Guide would need to be demonstrated.</p>
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**Canal &
River Trust**

Making life better by water

Planning Policy and Land Charges Team
North-West Leicestershire District
Council
PO Box 11051
Coalville
Leics.
LE67 0FW

Your Ref

Our Ref CRTR-POL-2024-41011

Thursday 14 March 2024

Dear North-West Leicestershire District Council,

Regulation 18 Consultation on the Draft North-West Leicestershire Local Plan (2020- 2040)

Thank you for your consultation on the above document.

We are the charity who look after and bring to life 2000 miles of canals & rivers. Our waterways contribute to the health and wellbeing of local communities and economies, creating attractive and connected places to live, work, volunteer and spend leisure time. These historic, natural and cultural assets form part of the strategic and local green-blue infrastructure network, linking urban and rural communities as well as habitats. By caring for our waterways and promoting their use we believe we can improve the wellbeing of our nation. The Canal & River Trust (the Trust) is a statutory consultee in the Development Management process, and as such we welcome the opportunity to input into planning policy related matters to ensure that our waterways are protected, safeguarded and enhanced within an appropriate policy framework.

The Trust's waterways within North-West Leicestershire comprise the Ashby Canal, the River Soar and the River Trent.

The Trust owns and operates the Ashby Canal in the south of the District as far as the current terminus of the Navigable canal just north of Snarestone. This stretch is approximately 2km in length and includes the 2430m Snarestone Tunnel which carries the canal beneath the village. Consent to extend the canal by a further 4.5km to a new terminus at Measham was granted to Leicestershire County Council via a Transport & Works Act Order in 2005. Through the Ashby Canal Trust the Canal & River Trust supports the aims of Leicestershire County Council and the Ashby Canal Association to restore the canal.

The Trust is operator and Navigation Authority for the River Soar which forms the eastern boundary of the District for about 10km around Kegworth and Ratcliffe on Soar and for about 6km of the Upper Trent along the northern boundary of the District north of Castle Donnington.

Inland waterways are acknowledged as significant green infrastructure, but they also function as blue infrastructure, serving as a catalyst for regeneration; a sustainable travel resource for commuting and leisure; a natural health service acting as blue gyms and supporting physical and healthy outdoor activity; an ecological and biodiversity resource; a tourism, cultural, sport, leisure and recreation resource; a heritage landscape; a contributor to water supply and transfer, drainage and flood management. The waterway network forms part of the historic environment, the character, cultural and social focus of North-West Leicestershire.

The river navigations operated by the Trust lie almost entirely on the boundary of the District and run predominantly through open countryside. The primary role of the River Trent and River Soar within North-West Leicestershire is as an important element of the Strategic Green/Blue Infrastructure network and as a valuable

Canal & River Trust Planning Team

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ecological resource and habitat. We consider that Draft Policy S4- Countryside and Draft Policy IF3- Green Infrastructure should provide adequate protection from inappropriate development proposals for these rivers.

The Ashby Canal is a valuable historic feature and although it is not designated as a conservation area, as part of a 200-year-old network, we consider that the existing canal should be acknowledged as a valuable non-designated heritage asset. The canal network is a prime example of a historic asset that is widely used, and a major aspect of its value is that it is both useable and accessible, for boaters and towpath users, as a piece of working heritage. Much of the form and character of the surrounding urban areas have historic links to the canal network, and the significant role it once played in bringing raw materials in and transporting finished goods out. The canal network is therefore an important feature in helping to understand how the area has grown and evolved over the last 200 years and as such it should be protected and enhanced wherever possible as an important element of the heritage of the area.

The potential benefits of restoring further sections of the former canal north of Snarestone and linking them to the existing canal network could be quite significant, not only in seeing the restoration of a historic feature which forms part of the industrial heritage of the area but also as a leisure and recreational resource which can be enjoyed by local communities and can attract visitors from elsewhere, thus playing a role in supporting the local tourist/visitor economy.

Draft Policy IF7- Ashby Canal closely reflects Policy IF6 of the current adopted Local Plan and supports restoration of the Ashby Canal beyond its current terminus. Support within the Local Plan for future restoration is an important element in ensuring that new development proposals do not risk making restoration more difficult to achieve or even preventing it altogether. We therefore consider that it is appropriate to maintain such protection in the draft Plan.

We note that the draft policy also highlights the importance of being able to provide appropriate canalside facilities in association with the restored canal and seeks to reduce the risk of development prejudicing such provision. The Trust supports this approach, which recognises that in order for a restored canal to fully realise its potential, suitable canalside facilities will also need to be developed in due course to support and encourage people to make use of it as a recreational resource.

Appropriate and sensitive associated development can help to enhance the role of the canal as a visitor attraction and a leisure and recreational resource and encourage more visitors to the area by making it an attractive environment for boaters choosing to travel along the canal network. Provision of suitable canalside facilities can encourage boaters to break their journey, whether for the day or to moor their boats for overnight stays, in order to use facilities and to visit other attractions in the locality; this can all contribute positively to the local economy as well as helping to create a favourable perception of the area for visitors.

More broadly, the Trust considers that the inland waterway network within the Plan area can play a role in supporting the aims of Draft Policy AP5- Health and Wellbeing. The Trust considers that the health and wellbeing of local communities is an important consideration, and new development should always be required to consider how it can help to maximise opportunities for people to pursue healthier and more active lifestyles. We believe that the waterway network can play a valuable role in encouraging people to be more active.

Waterways offer a real opportunity for supporting and promoting healthier lifestyles and helping to improve the physical and mental wellbeing of local communities by encouraging people to be more active, whether through leisure and recreation (including activities such as canoeing as well as walking or cycling along towpaths) or offering a more active travelling option that is a sustainable alternative to using private motor cars to access services and facilities. They provide a free-to-use resource that can benefit the whole community and can thus provide support to achieving the aims of Draft Policy AP5 (2) (c) and (d). We therefore suggest that the positive role that waterways can play could be specifically referenced either within the policy or its supporting text.

We hope that these comments are helpful. We are willing to continue to work with you, to meet and discuss any matters for clarity and to seek to work together towards a high-quality District that relates positively with the waterway network.

Please do not hesitate to contact me with any queries you may have.

Canal & River Trust Planning Team

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Yours sincerely,

Ian Dickinson MRTPI

Area Planner



<https://canalrivertrust.org.uk/specialist-teams/planning-and-design>

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Patron: H.R.H. The Prince of Wales. Canal & River Trust, a charitable company limited by guarantee registered in England and Wales with company number 7807276 and registered charity number 1146792, registered office address National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire CH65 4FW



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	Ms
First Name	Rupert	Caroline
Last Name	Young	Chave
Job Title (where relevant)	Development Director	Director
Organisation (where relevant)	Nurton Developments Ltd	Chave Planning Ltd
House/Property Number or Name	██████████	██████████
Street	██████████	██████████
Town/Village		████
Postcode		
Telephone	████	████
Email address		██████████
		██████████████████

PART B – Your Representation

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

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

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

Draft Policy S1- Future Development Needs (Strategic Policy)

Use this box to set out your response.

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

Nurton Developments Ltd (NDL) made representations to the North West Leicestershire (NWL) Local Plan Regulation 18 consultation in March 2022 to highlight that a proposal was emerging for a potential new settlement crossing the boundary between NWL and Hinckley & Bosworth (H&B). Although the bulk of the new settlement would lie within H&B, depending on the size and extent of the settlement, it could contribute significant housing within NWL (i.e. 2,000+ dwellings).

At this stage we cannot say with any certainty that housing would be delivered within the NWL boundary within the plan period to 2040, due to the NWL land being on the periphery of the potential development area. Therefore, we do not promote that the Local Plan for NWL makes provision for housing at the new settlement within the plan period. However, given the strategic and cross-boundary nature of the proposal, it is important that NWLDC gives consideration to it at this stage in terms of making a strategic policy to deal with future development needs.

Since making representations in 2022, NDL has developed the following work in liaison with officers at Hinckley & Bosworth Borough Council (HBBC):

- Baseline & Emerging Options document
- Biodiversity Appraisal
- Transport & Accessibility Appraisal

These documents (attached to these representations) examine the potential for a new settlement of up to 6,000 dwellings. However, recent discussions with officers at HBBC, NDL is now exploring options for up to 10,000 dwellings in order to support an innovative level of sustainability and self-sufficiency in terms of the settlement containing all of the facilities and

services necessary to meet day-to-day needs. Further work is being undertaken to explore the themes of social infrastructure and climate change and to progress a masterplan vision informed by further transport, heritage and landscape input. NDL will seek to keep the respective authorities updated of this emerging cross-boundary proposal as work progresses.

HBBC consulted on a Regulation 19 Local Plan in February 2022, which contained the following paragraph (4.60):

"In the preparation of the Local Plan, support for a new settlement in the borough to provide for future housing and economic growth has been established through public consultation. The Council is of a view that new settlements should be considered as a key direction for future long term managed strategic growth in the borough. Self-sustaining new settlements require significant planning to bring forward through the planning system so it is important that early consideration is given to the potential for new settlements to form part of the future spatial strategy of the borough. Work is continuing on reviewing options for new settlements and could form part of a future revision of the Local Plan or other development plan documents. The Borough Council will work with infrastructure providers, including highway and education authorities, from an early stage to ensure that new settlements are planned comprehensively with infrastructure needs in mind".

HBBC is now reviewing its Regulation 19 Local Plan and is scheduled to undertake further consultation this year, potentially bringing forward new settlement proposals within its plan period to 2041. Where such proposals require cross-boundary consideration, a lack of alignment of Local Plans between HBBC and NWLDC could delay or hamper the consideration of strategic infrastructure and hinder sustainable development. It is therefore important that adjoining authorities also make a commitment to give early consideration to the potential for new, possibly shared, settlements to form part of the future spatial strategy.

In order to anticipate and plan positively for future significant growth proposals, that could require cross-boundary co-operation and could prompt review of the Local Plan for NWL, NDL would suggest that Policy S1 contain a commitment to co-operate with adjoining authorities in considering cross-boundary proposals and to review the Local Plan as necessary to take into account proposals that become part of the strategy for the adjoining area. This would respond positively to paragraph 22 of the National Planning Policy Framework, which says that strategic policies should look ahead over a minimum 15 year period from adoption and that, where larger scale developments such as new settlements form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery.

NDL would welcome further discussion with NWLDC regarding this emerging proposal and the exciting opportunity presented to develop an exemplar new settlement. The proposals could bring forward major infrastructure improvements and demonstrate innovation in sustainability and tackling climate change.

In summary, NDL would suggest that Policy S1 is amended to contain a commitment to co-operate with adjoining authorities in considering cross-boundary proposals for growth and to review the Local Plan to take into account proposals that become part of the strategy for the adjoining area. It is suggested that an additional paragraph (6) is added to the policy as follows:

" In meeting future development needs beyond the plan period or that arise during the plan period through Local Plan strategies prepared for adjoining areas, the Council will co-operate with adjoining local planning authorities in considering cross-boundary proposals and the strategic infrastructure requirements associated with them, and will review the Local Plan for North West Leicestershire should a cross-boundary new settlement become part of the adopted Local Plan strategy for an adjoining local planning authority".

Declaration

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

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

Signed:

Date:

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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

PROPOSED NEW SETTLEMENT AT NORTON-JUXTA-TWYXCROSS

BASELINE AND EMERGING OPTIONS

LOCATION

Norton-Juxta-Twycross is a small village in Leicestershire, England.

It is well located, and falls within circa a 45 minute drive to central Leicester, circa a 40 minute drive to Derby and circa a 35 minute drive to central Birmingham.

The nearest train station is Atherstone station, a circa 13 minute drive away; however the closest station with regular connections to Birmingham is Tamworth which falls circa a 20 minute drive away.



KEY



Key Roads



Train Station location



LOCATION

Norton-Juxta-Twycross is a small village in Leicestershire, England. It sits between a number of larger villages; Twycross, Austrey, Appleby Magna and Parva and Snarestone.

It is located just off the A444 which is well connected to the M42.

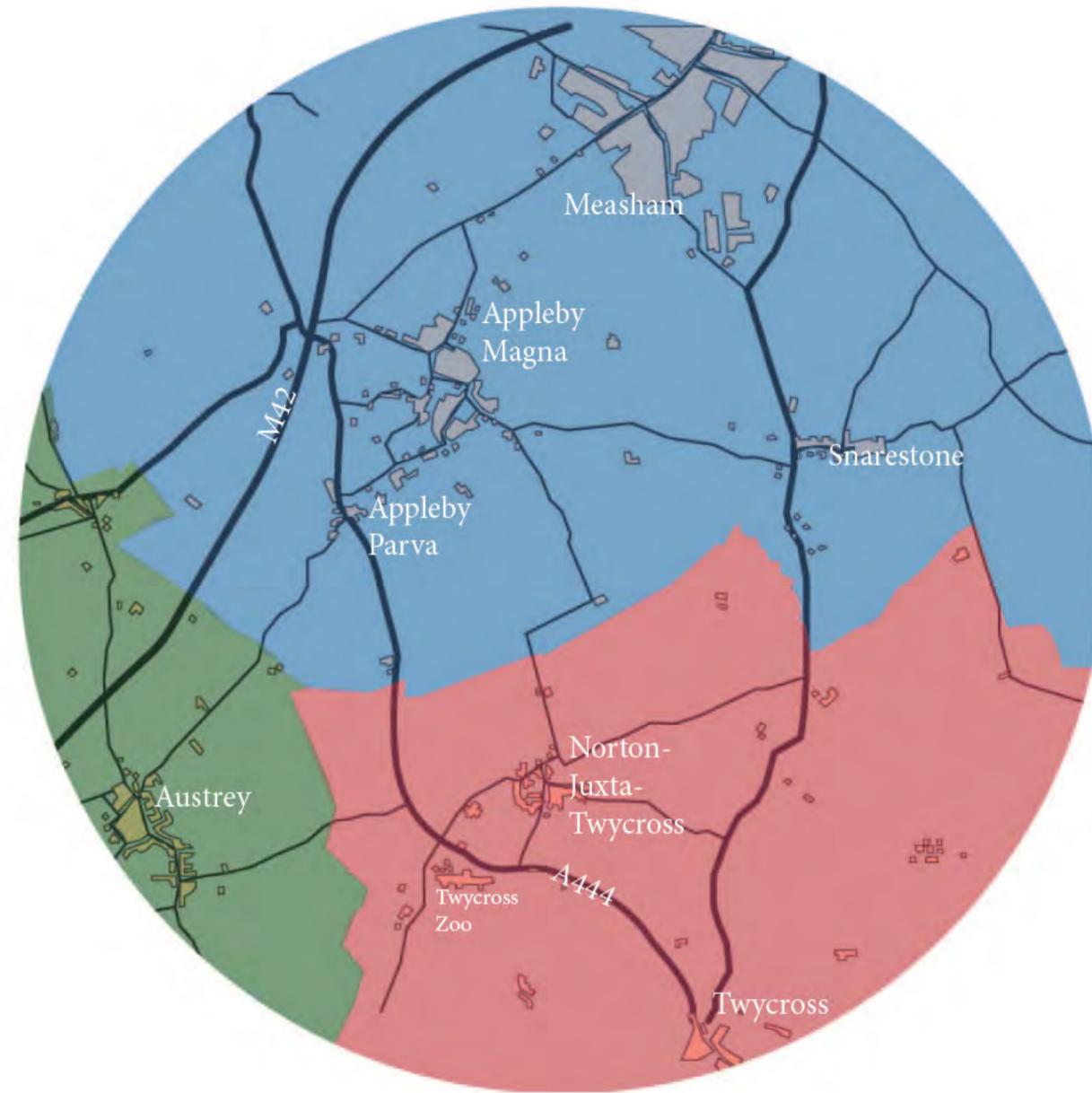
Twycross Zoo is a significant local attraction, located only 500 metres from Norton-Juxta-Twycross.



ADMINISTRATIVE BOUNDARIES

Three Government districts converge within the site area.

A new settlement would potentially be a cross-boundary proposal, requiring joint working with the local authorities.



KEY

- | | | | |
|---|------------------------------------|---|----------------------------------|
|  | North West Leicestershire District |  | Broad extent of development area |
|  | Hinckley and Bosworth District |  | North Warwickshire District |

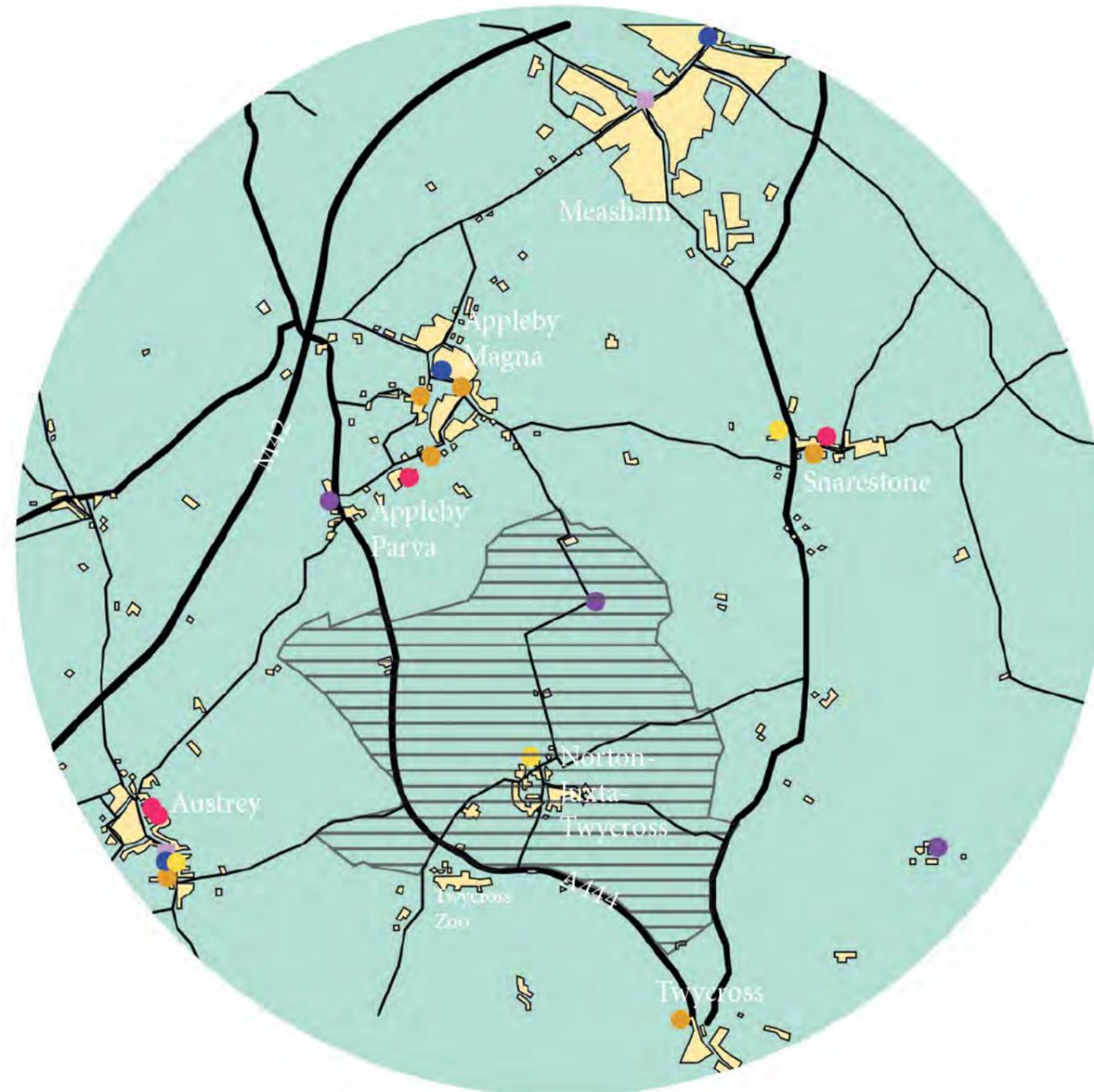


LOCAL FACILITIES

Local facilities in the area are sparse and spread out with the need to drive between villages. Currently, Austrey and Measham have the only local convenience store in the area, over 5 miles apart from each other.

Norton-Juxta-Twycross currently has no local facilities other than a church and village hall. There was a local pub, the Moores Arms that closed in 2008.

There is opportunity for any new development to improve the local facility provision for the area. New local provision of shops, doctors surgeries and hospitality would cease the need to drive to neighbouring towns and cities, improving active travel opportunities.



KEY



School



Hotel/Accommodation



Place of Religious Worship



Convenience Store



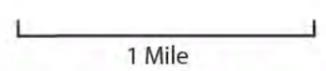
Post Office



Public House



Broad extent of development area

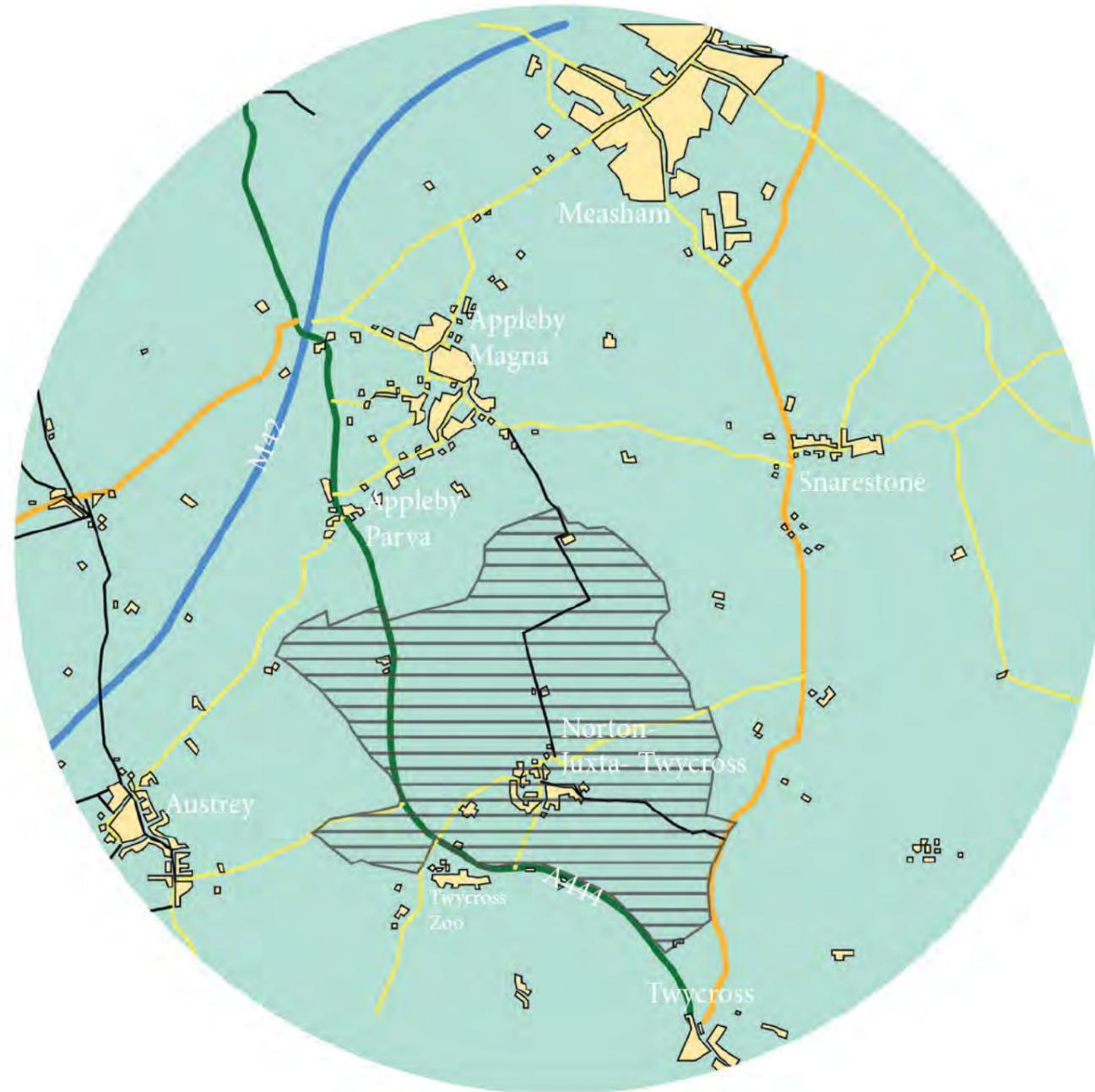


TRANSPORT NETWORK

The site is located on the locally strategic A444 corridor. This provides a key link between the towns of Burton on Trent / Swadlincote to the north west and Nuneaton to the south east. It connects to Strategic Road Network both north (A42 / M42 Junction 11) and to the south at the A5.

Currently public transport within the area is limited and the development offers significant opportunities to support and address this to serve both new development but also to increase accessibility for existing residents.

An outline Transport Strategy for the site is to be found in Appendix A to this document.



KEY

- | | | | | | |
|---|----------|---|---------|---|----------------------------------|
|  | Motorway |  | B Road |  | Non classified road |
|  | A Road |  | C Class |  | Broad extent of development area |

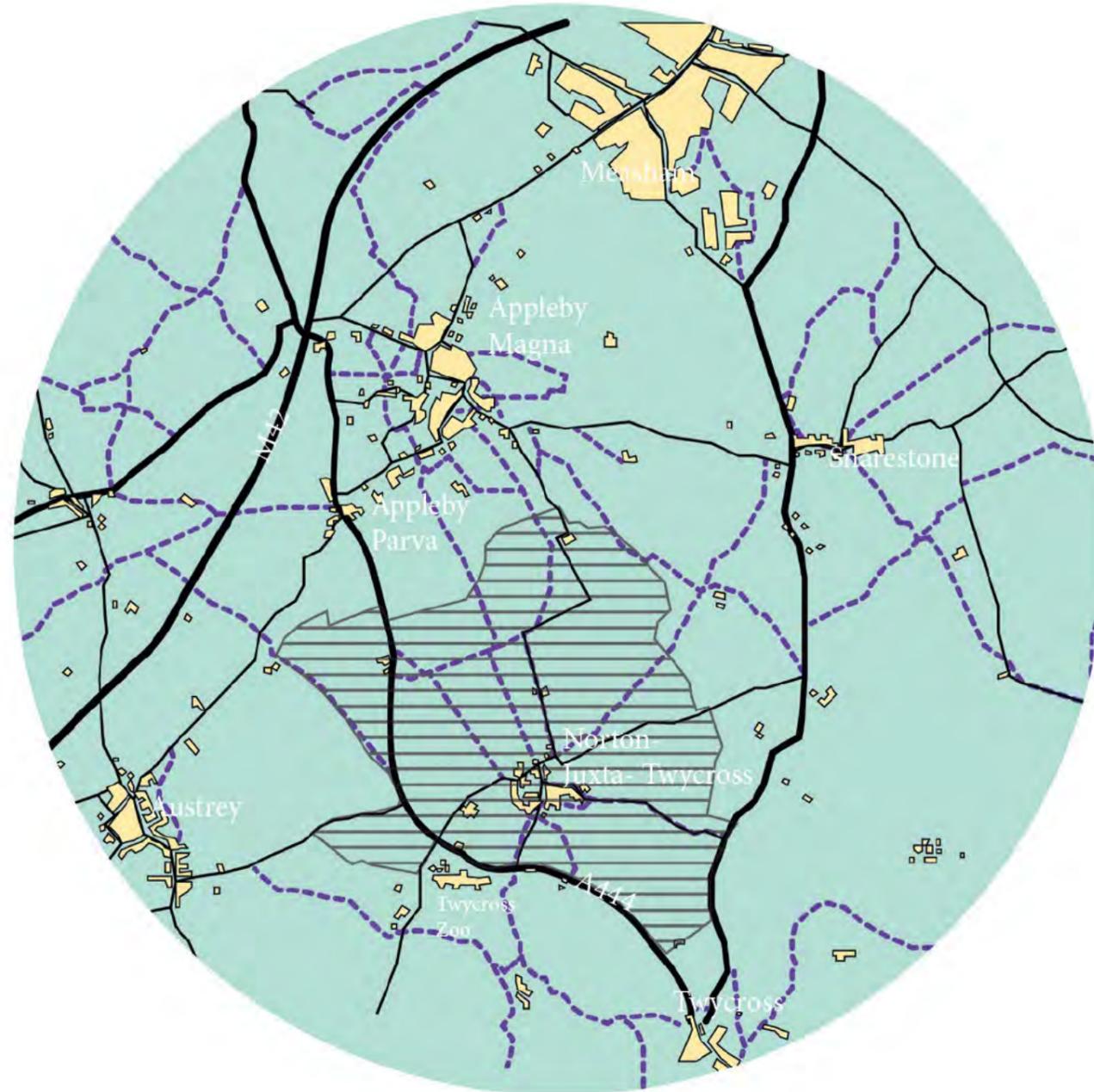
1 Mile



PUBLIC RIGHTS OF WAY

Public rights of way are well established in the area and provide good connections between villages.

This well-established network creates the opportunity for any new development to further connect public rights of way, focusing on sustainable travel and green active travel corridors connecting villages and facilities.



KEY

Public Right of Way

Broad extent of development area

1 Mile

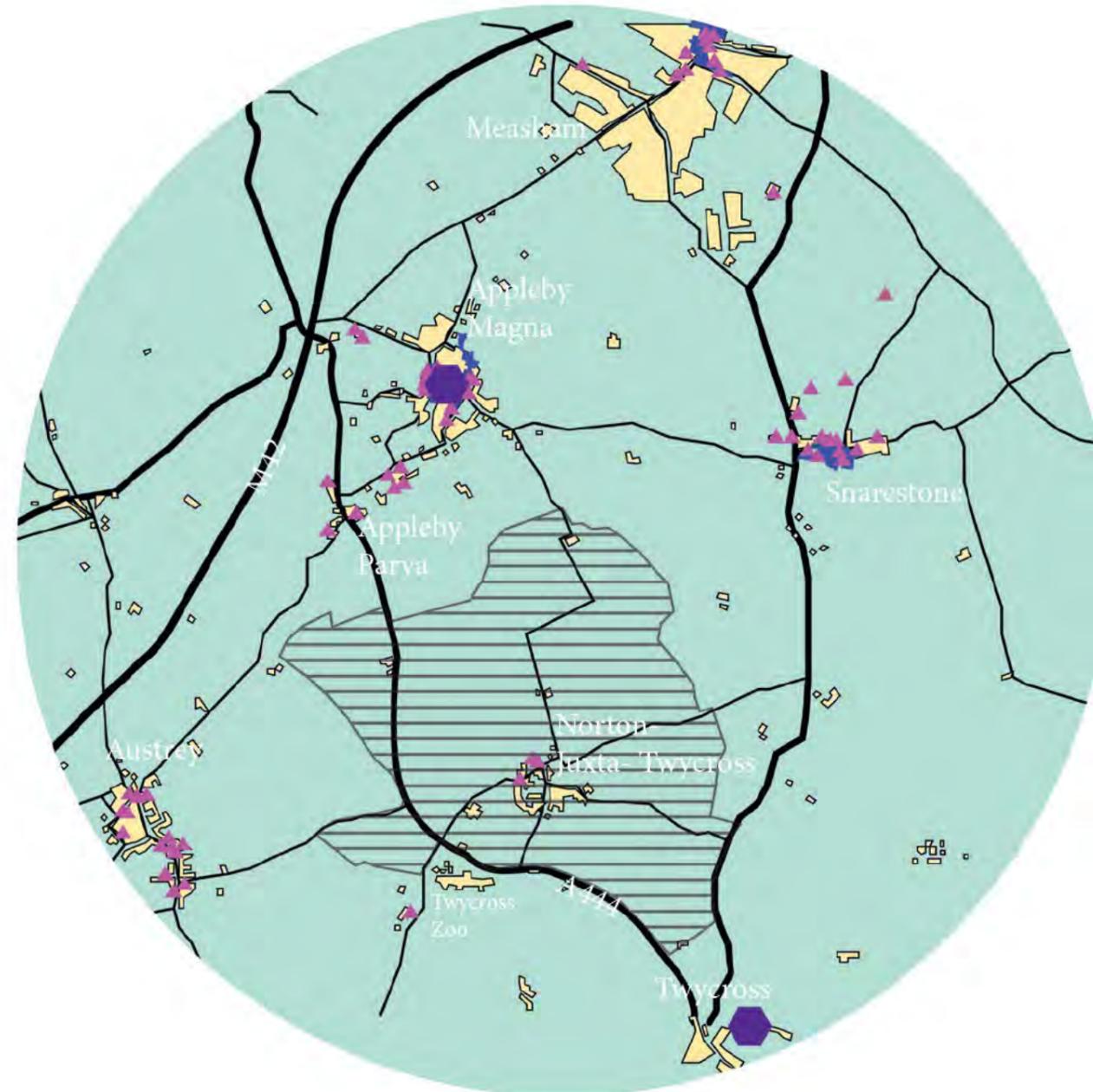
HERITAGE ASSETS

The area has ancient history as far back as the Neolithic period. The oldest existing buildings in the area date back to the 13th century.

There are two scheduled monuments in the area; the moated site, fish-ponds, formal garden and settlement earthworks east of St Michael's Church in Appleby Magna and the moated site and fish-ponds north-west of St James' Church in Twycross.

Listed Buildings are generally distributed around the centre of the villages. Of particular note at Norton-Juxta-Twycross is the grade II listed church of The Holy Trinity. Memorials and effigies in the churchyard are also listed, as is the former village pub, but the village does not have a conservation area.

The masterplanning of the new settlement will be informed by Landscape & Visual Impact Assessment and Heritage Assessment and will limit impact on the heritage assets by preserving key views and spaces that contribute to setting.



KEY



Scheduled Monument



Conservation Area



Listed Building



Broad extent of development area



VIEWS OF HOLY TRINITY CHURCH

The Holy Trinity is a significant feature of Norton-Juxta-Twycross. The church sits at the centre of Norton-Juxta-Twycross and is an important character feature and location marker.

Views of the church can be seen from Orton Lane, Shelford Lane, Cottage Lane and a section of Wood Lane.

Development should seek to maintain views of the church.

A. From point A. On the western approaching road there are views of the church. Point A is the furthest point the church can be seen on this road.

B. From point B there are wide and clear views of the church. This is the clearest view of the church and should be preserved.

C. From point C there are wide views of the church across an open meadowed area.

D. From point D there are straight views of the church from the approaching road.

E. Point E has a framed view of the church. The view is very direct and framed by hedging along the road on either side.

F. Point F is the furthest point on a road the church can be seen from. Only the spire of the church can be seen above hedging.



KEY

-  Key points of view that must be maintained
-  Secondary points of view that should be maintained where possible
-  Field of view from location
-  The Holy Trinity Church



LANDSCAPE CHARACTER

The Mease/Sence Lowlands are a gently rolling landscape centred around the rivers Mease, Sence and Anker. The area is rural with small nucleated villages, red brick farmsteads and occasional historic parkland and country houses.

Woodland is sparse and generally confined to copses and spinneys resulting in the area being mostly large, hedged fields.

Church spires are a prominent feature of the landscape, especially around Snarestone, from where it is possible to see seven church spires.

LANDSCAPE OPPORTUNITIES

-Conserve the quiet and rural open character. This includes views of historic church spires and the traditional red brick vernacular. Settlement patterns of small nucleated villages should be protected and the winding roads with wide grass verges that connect them.

-Protect and manage the areas, historic landscape features including ancient woodlands, the Ashby canal and Coventry canal and characteristic hedgerow boundaries.

-Protect the Rivers Mease, Sence and Anker with associated streams and tributaries. Protect and manage their wet woodlands and associated wetland habitats.

-Plan to accommodate pressure from the expansion of local towns and cities by designing a network of multi-functional green infrastructure. This should also provide links out into the wider countryside from towns and cities.

-Manage and restore habitats in accordance with biodiversity action plans and heritage conservation management plans.

-Manage arable cropping patterns to encourage rarer arable plants and farmland birds/mammals following management under environmental and countryside stewardship agreements.

-Enhance wildlife value along watercourses. Restore associated wetland habitats and grazing flood plains.

-Manage and conserve all ancient semi-natural and broadleaved woodland. This includes taking opportunities to increase woodland coverage where it enhances the woodland character and maintains wide views.

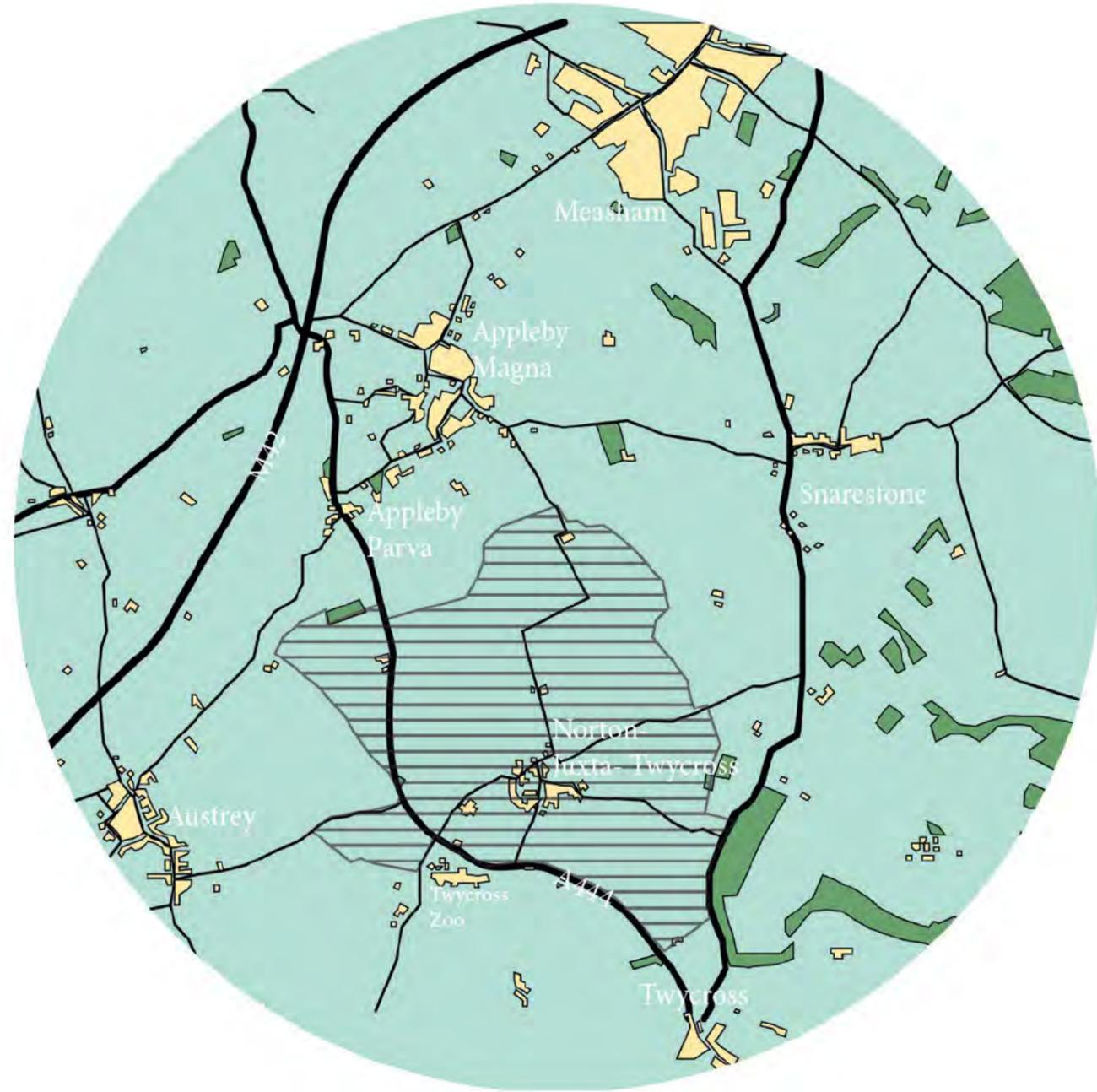
The new settlement would be subject to a landscape strategy to restore and enhance the surrounding landscape, taking opportunities to create multi-functional green infrastructure and create a net gain to biodiversity.

WOODLAND STRUCTURE

The area had been substantially cleared of woodland by the 11th century due to farming pressures. Leaving only some historical broad leaf plantations in blocks.

Restoration of hedgerows, extension of existing blocks and development of green corridors is advocated to benefit biodiversity and wildlife in the area.

New development has the opportunity to connect isolated blocks of green space and create a 'green village' that centralises around green infrastructure. Greatly improving the value to wildlife and people.



KEY



Notable woodland groups



Broad extent of development area



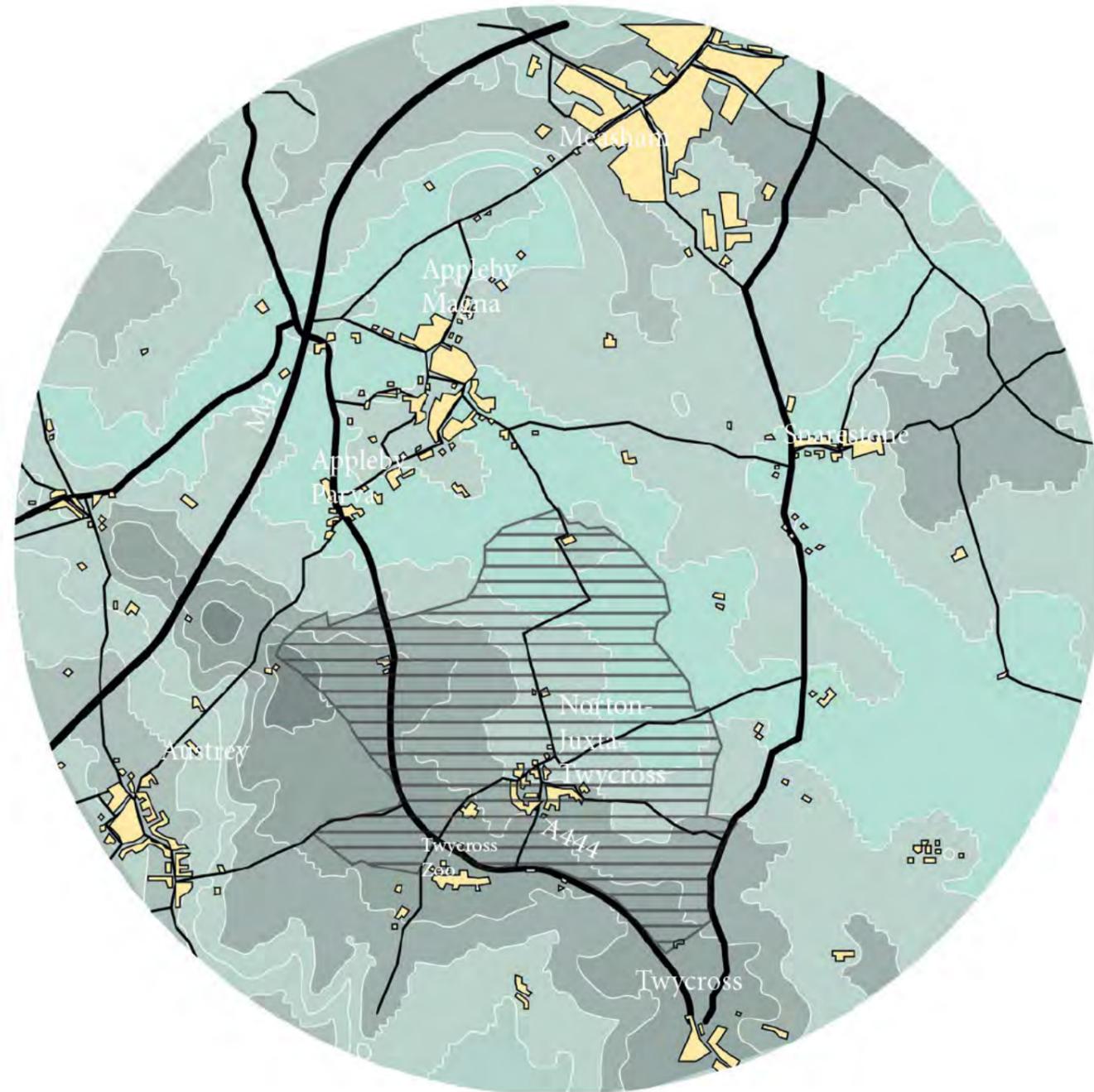
TOPOGRAPHY

A mostly flat and gently undulating landscape.

The land falls from a high of 126m AOD South of Appleby Parva to 85m AOD to the south of measham.

Norton-Juxta Twycross sits in a bowl like depression. Land rises gradually up to Appleby Parva in the north and up to Austrey and Twycross Zoo in the south, meaning Norton- Juxta-Twycross and surrounding fields are well hidden from view from surrounding towns.

This creates the opportunity for any new development centralising around Norton-Juxta-Twycross to be of minimal impact to the local landscape.



KEY

 Land height changes from high (dark) to low (light) - Contours mark a 10m change in height

 Broad extent of development area

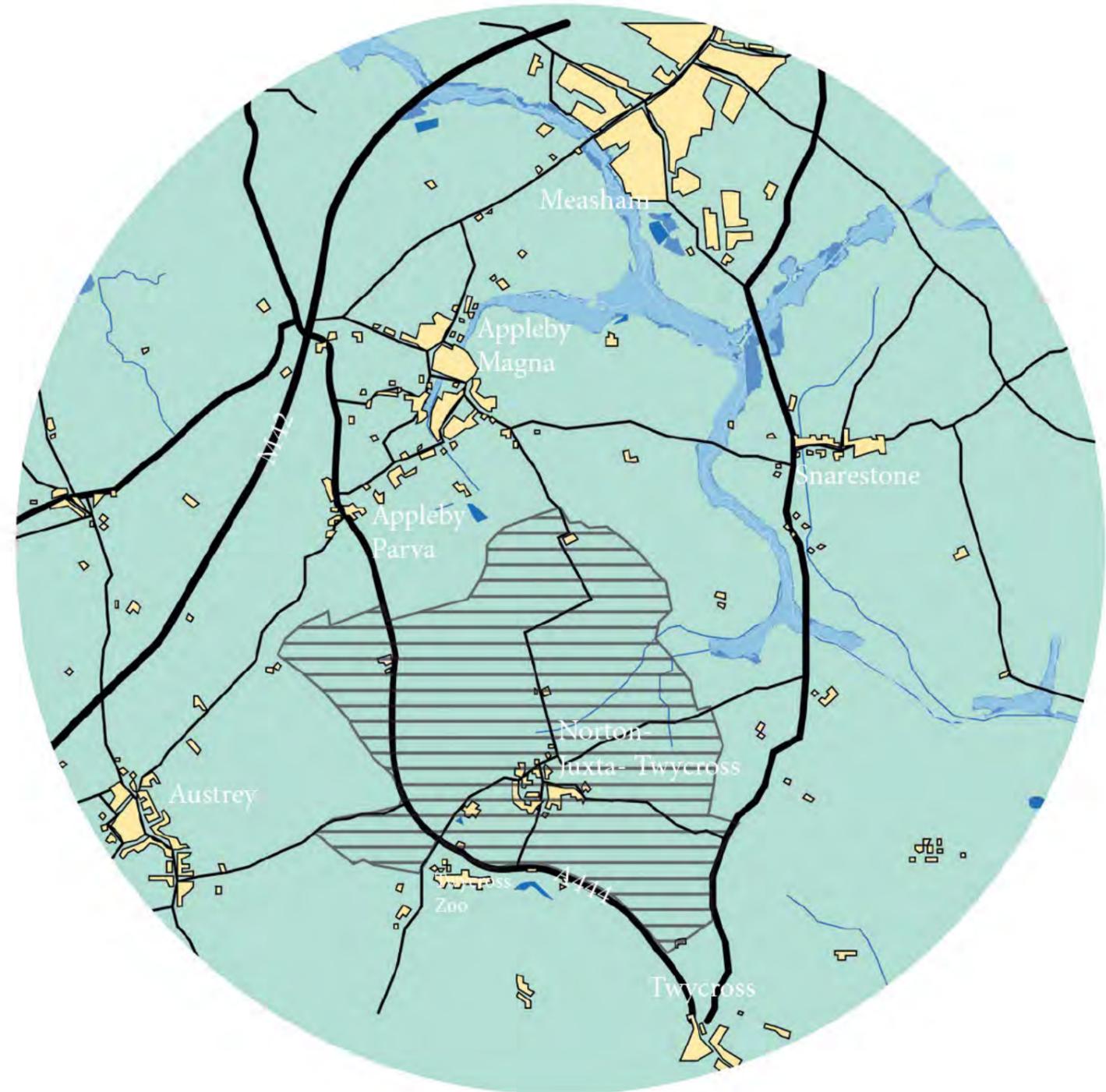
 1 Mile



RIVERS AND WATERCOURSES

Generally the land in and around the site falls to the east with localised flooding recorded along watercourses.

Any new development has the opportunity to install sustainable drainage. Storing and reducing surface water runoff that would currently be entering the watercourses and causing flooding.



KEY



Medium likelihood of flooding



Low likelihood of flooding



Water Course



Broad extent of development area



1 Mile



FIELD BOUNDARIES

The area comprises of many arable fields in a variety of sizes.

Previous growth of villages has been shaped by fields being developed into housing, meaning village shapes correlate to field boundary lines.

New development has the opportunity to be designed in this way. With blocks of housing following field boundaries.



KEY

-  Field Boundary
-  Broad extent of development area

1 Mile

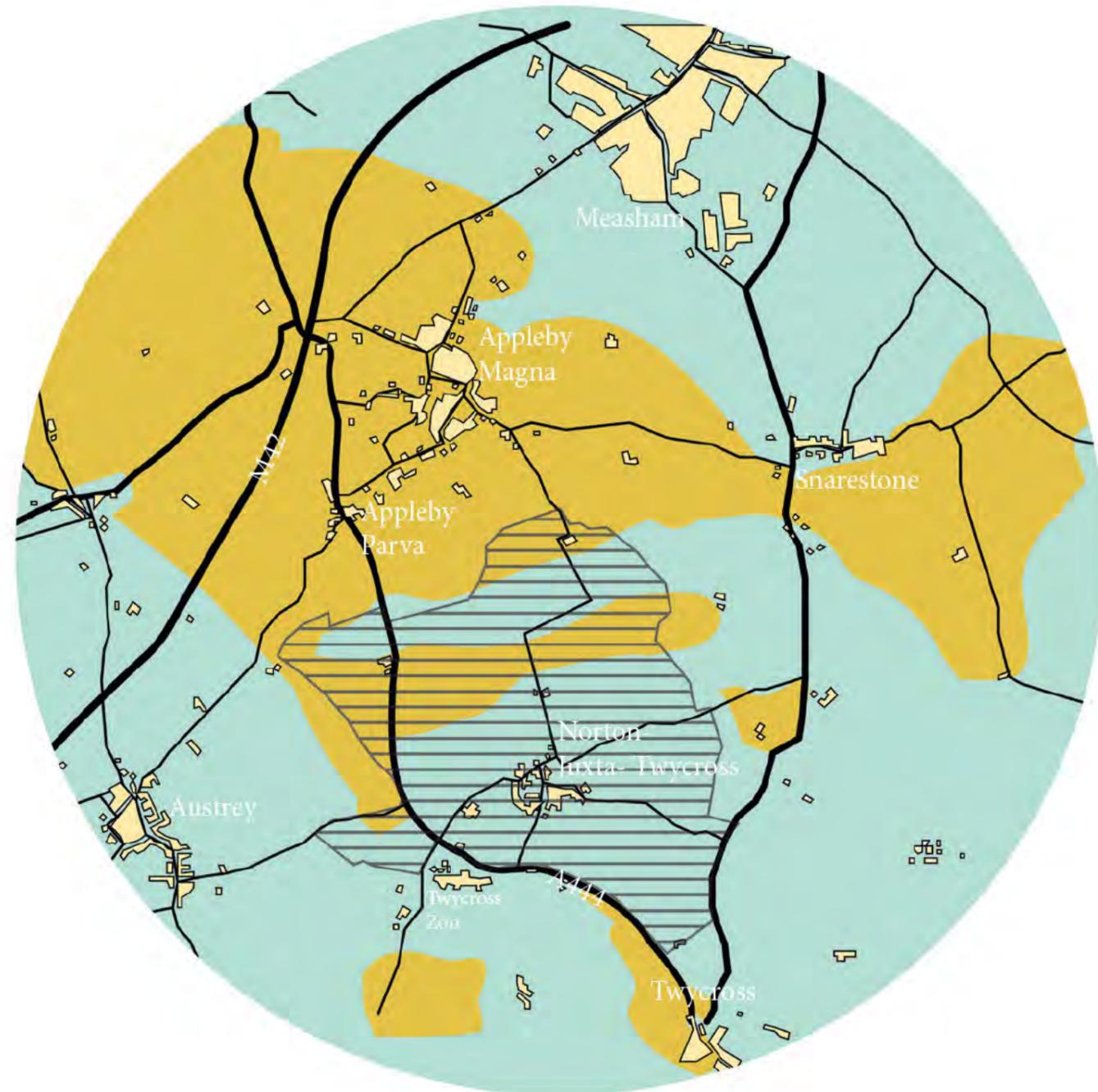


AGRICULTURAL LAND CLASSIFICATION

Generally the land is classed as being of good and very good agricultural land quality.

Most of the land is in commercial agricultural use, primarily for wheat, with more limited beef and dairy production.

Loss of agricultural land is a matter which must be weighed in the balance against the benefits of providing housing. Where a new settlement is required and is the most sustainable option to provide for housing needs, it will inevitably result in loss of agricultural land but this loss is likely to be far outweighed by the sustainability benefits of a new settlement.



KEY



Very Good agricultural land classification



Good agricultural land Classification



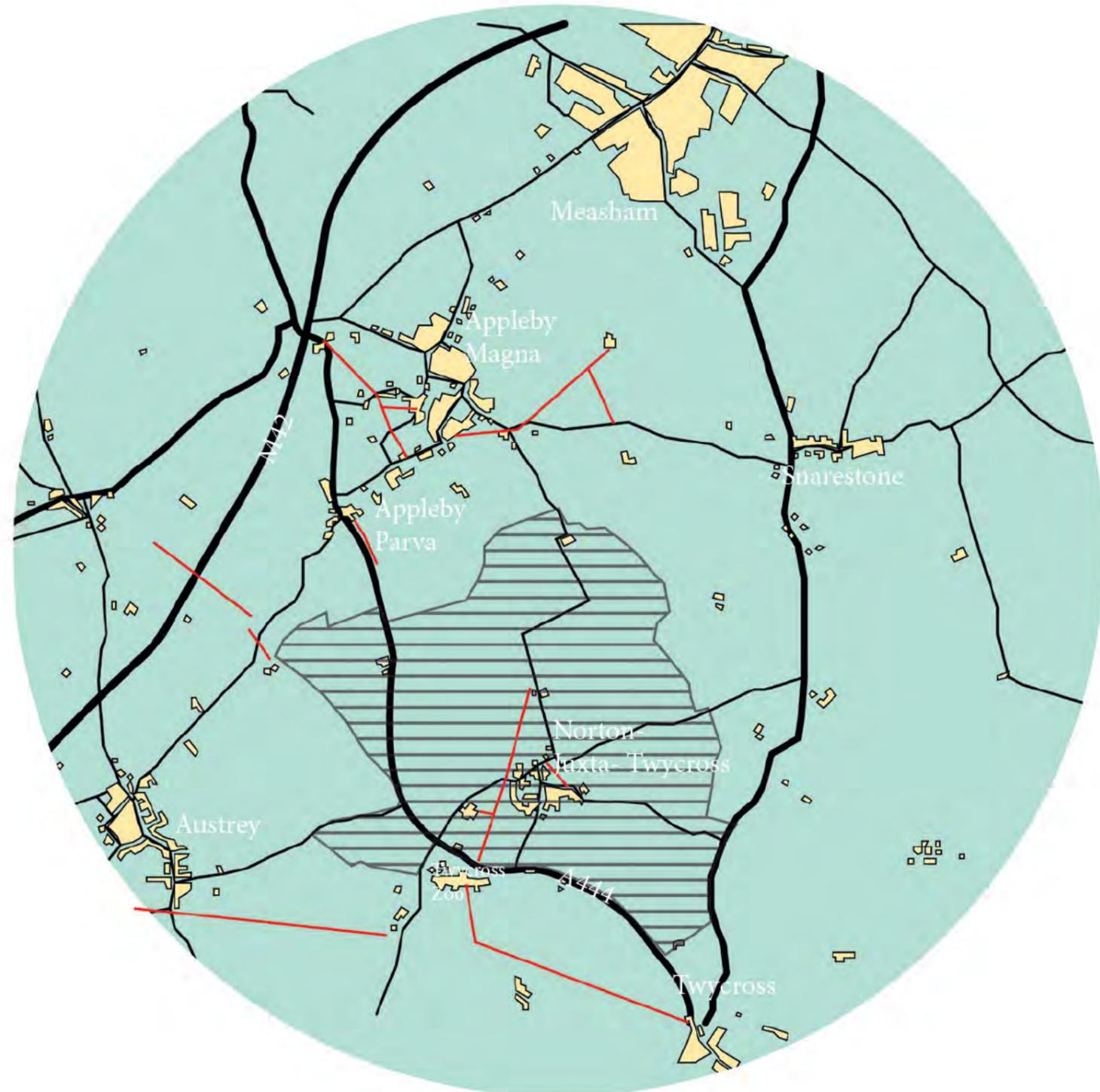
Broad extent of development area



UTILITIES

Sporadic overhead lines are evident centred around local villages.

*Details of utilities to be updated (TBC)



KEY

Overhead Electricity Lines

Broad extent of development area

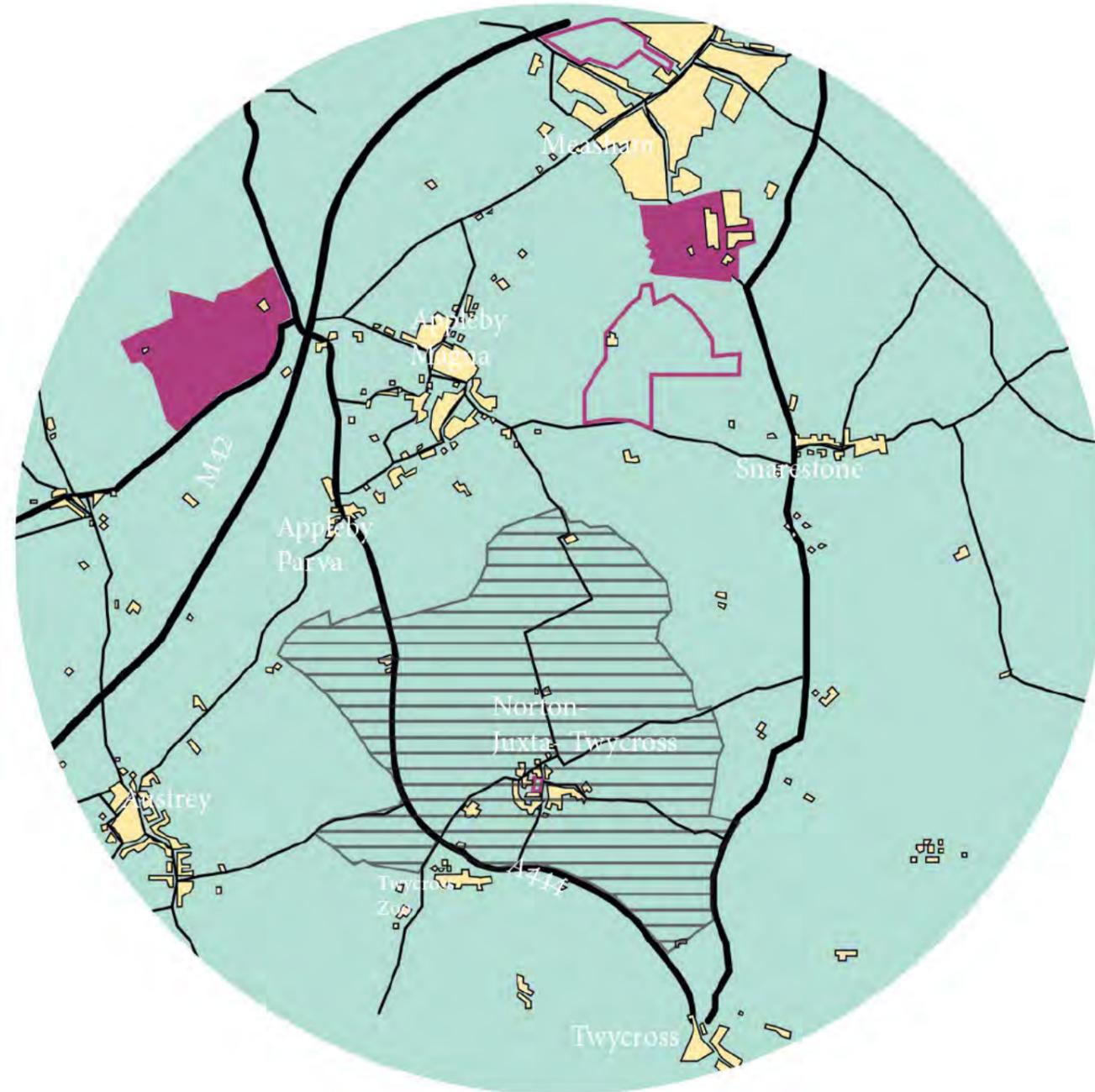
1 Mile



NEW DEVELOPMENT WITHIN THE WIDER AREA

There are a number of approved developments nearby, mainly located at Appleby Parva, Magna and Measham. These developments include a new distribution campus at M42 Junction 11; various housing developments; wind turbines; and a replacement brickworks at Measham.

Through co-ordinated development in the area, facilities, job opportunities, transport and housing can bring huge improvement to the area.



KEY

- Built or in construction
- Planning Approved but construction not begun
- Broad extent of development area



COMBINED PLAN 1 - ENVIRONMENT

KEY

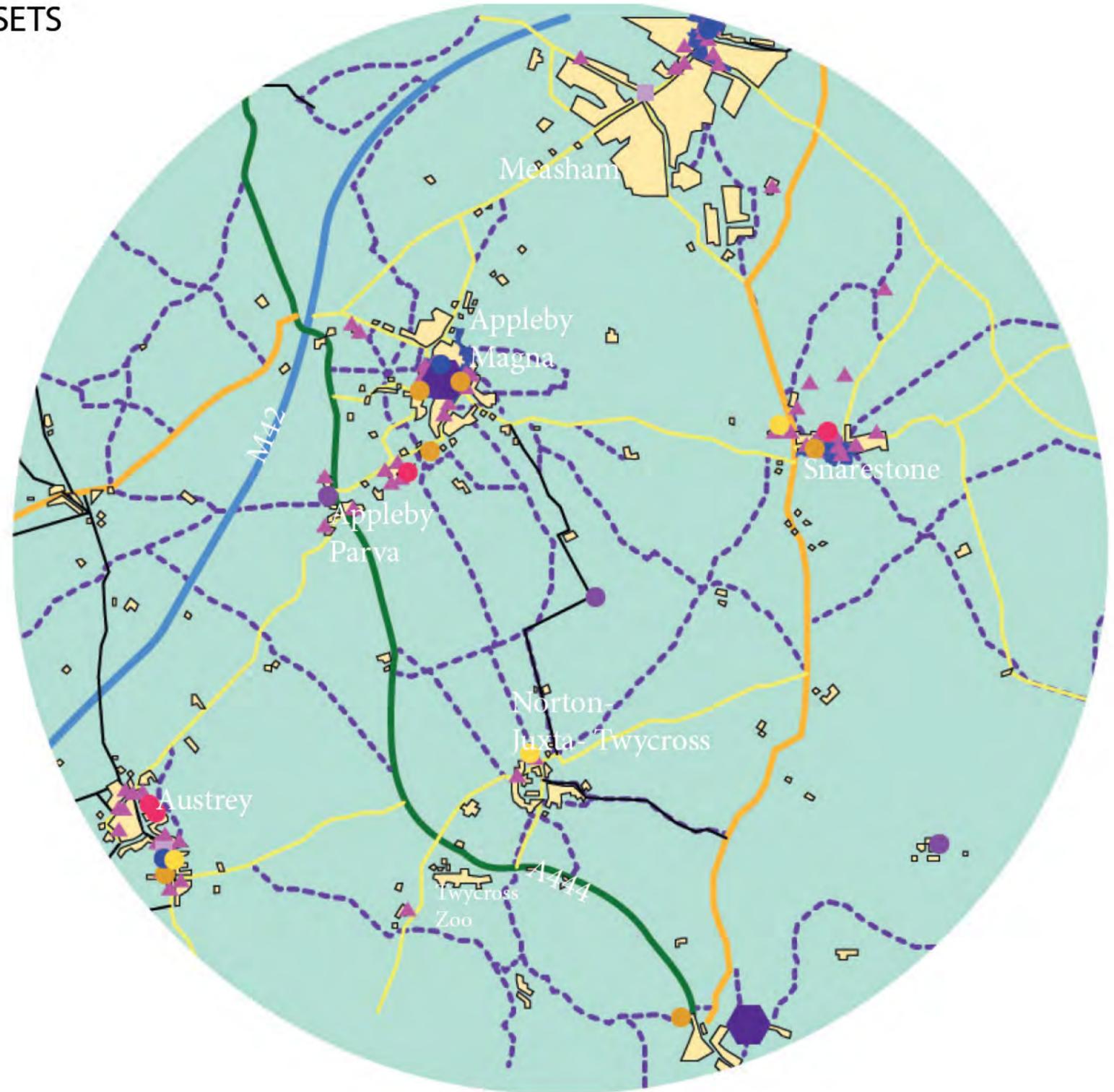
-  Field Boundary
-  Medium likeliness of flooding
-  Low likeliness of flooding
-  Water Course
-  Land height changes from high (dark) to low (light) - Contours mark a 10m change in height
-  Notable woodland groups
-  Public Right of Way



COMBINED PLAN 2 - TRANSPORT LINKS, HERITAGE ASSETS AND LOCAL FACILITIES

KEY

-  Public Right of Way
-  Motorway
-  A Road
-  B Road
-  C Class
-  Scheduled Monument
-  Conservation Area
-  Listed Building
-  School
-  Hotel/Accommodation
-  Public House
-  Convenience Store
-  Post Office
-  Place of Religious Worship



COMBINED PLAN 3 - LAND AND DEVELOPMENT

KEY

-  Very Good agricultural land classification
-  Good agricultural land Classification
-  Built or in construction
-  Planning Approved but construction not begun
-  North Warwickshire District
-  Hinckley and Bosworth District
-  North West Leicestershire District
-  Field Boundary



COMBINED PLAN 4 - ALL CONSTRAINTS

- KEY**
-  Public Right of Way
 -  Motorway
 -  A Road
 -  B Road
 -  C Class
 -  Scheduled Monument
 -  Conservation Area
 -  Listed Building
 -  School
 -  Hotel/Accommodation
 -  Public House
 -  Convenience Store
 -  Post Office
 -  Place of Religious Worship
 -  Overhead Electricity Lines
 -  Field Boundary
 -  Built or in construction
 -  Medium likelihood of flooding
 -  Low likelihood of flooding
 -  Water Course
 -  Land height changes from high (dark) to low (light) - Contours mark a 10m change in height
 -  Notable woodland groups
 -  Public Right of Way

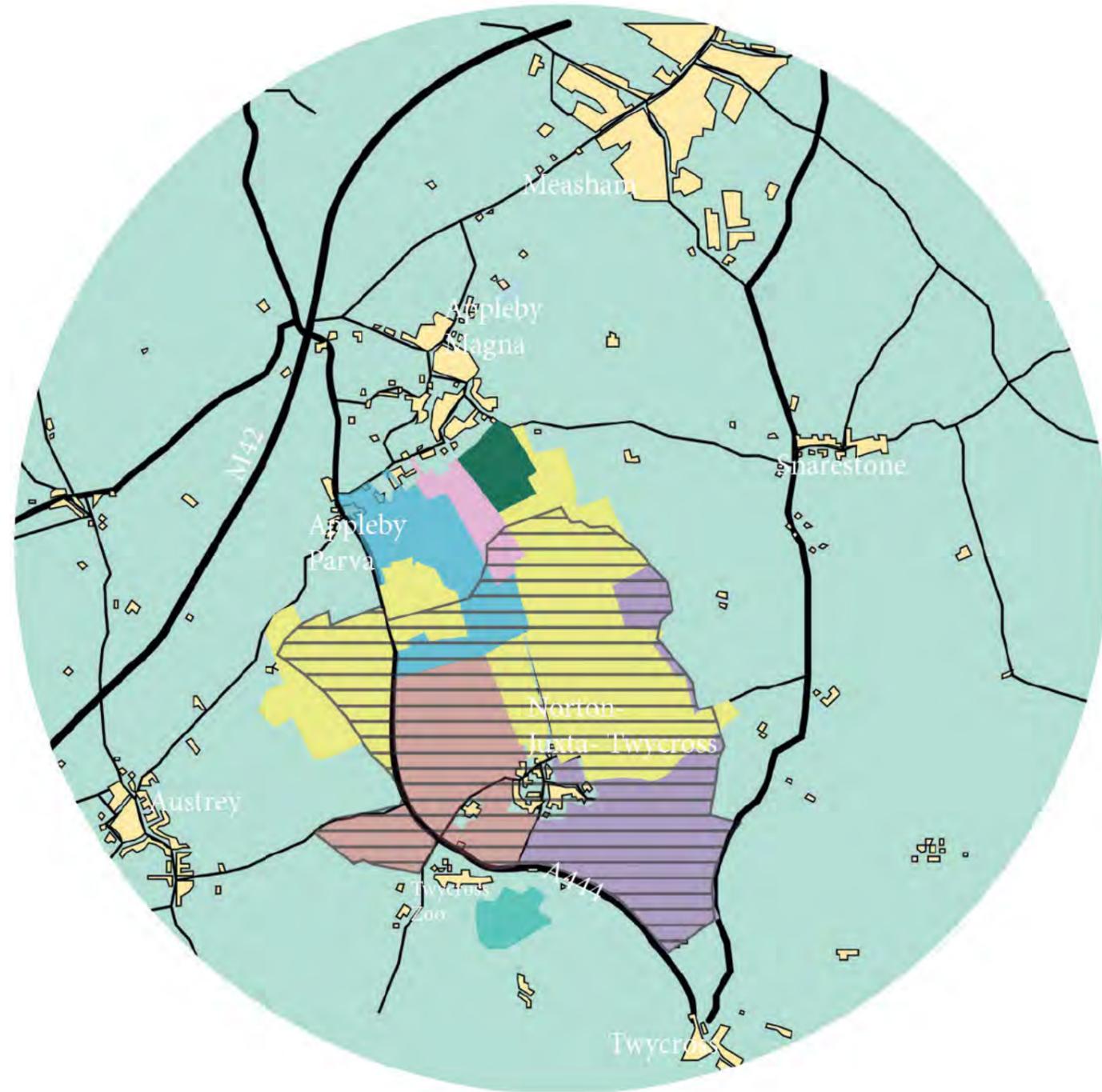


LAND OWNERSHIP

The area is split mainly between 6 landowners and Nurton Developments is working to bring together a development strategy for the comprehensive and co-ordinated development of land in multiple ownerships.

Further ownership of land in the area will be explored to develop further potential and development options.

At present, option 4 is the largest developed option. This option shows a possible layout for a 6000 unit development with green infrastructure has a total acreage of 376 acres.



KEY

	Massie		Vero		Corbett		Land to be confirmed
	Potts		M.I.P.L.		Howkins and Harrison		Broad extent of development area

1 Mile

EMERGING OPTION 1 - 4000 Units

A nucleated settlement around Norton Juxta Twycross with the potential to deliver circa 4000 units, 3 primary schools, 1 secondary school, a town centre, local employment and retail space, community facilities, new strategic green infrastructure and green space.

This option places Norton Juxta Twycross on the edge of the settlement which in turn expands east and north.

Land is also available for the extension of Twycross zoo for parking and visitor facilities.

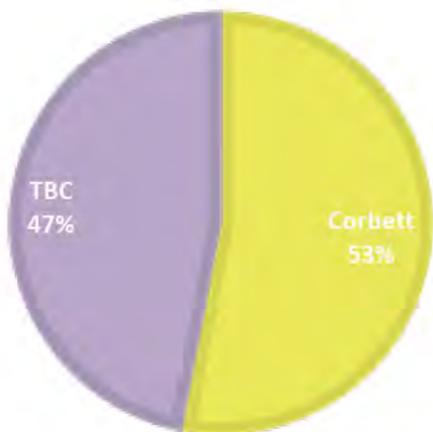
It includes land owned by Massie, Potts and Corbett alongside further land owners to the east (to be determined).

This option includes land in Hinckley and Bosworth district.



Approx % of land ownership
(inc. Green infrastructure)
OPTION 1-4000 UNITS

■ Vero ■ Corbett ■ Massie ■ TBC



- KEY**
- Existing Developments
 - Existing Roads
 - Proposed Residential Development- c.111ha
 - Proposed Primary Schools
 - Proposed Retail
 - Proposed Footpaths
 - Existing areas of trees
 - PROW
 - Proposed Secondary School
 - Proposed Structural Planting
 - Proposed Roads

EMERGING OPTION 2 - 4000 Units

A nucleated settlement around Norton Juxta Twycross with the potential to deliver circa 4000 units, 3 primary schools, 1 secondary school, a town centre, local employment and retail space, community facilities, new strategic green infrastructure and green space.

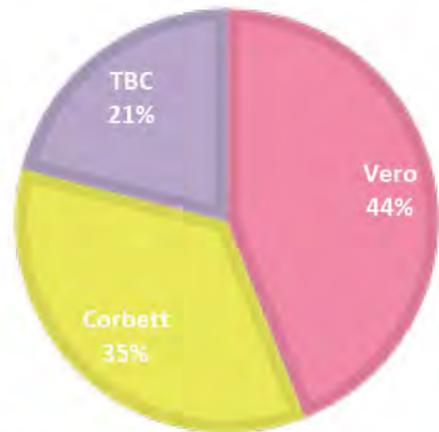
Land is also available for the extension of Twycross zoo for parking and visitor facilities.

It includes land owned by Massie, Vero, Potts and Corbett, alongside further land owners to the east (to be determined).

This option includes land in Hinckley and Bosworth district.

Approx % of land ownership
(inc. Green infrastructure)
OPTION 2- 4000 UNITS

Vero Corbett Massie TBC



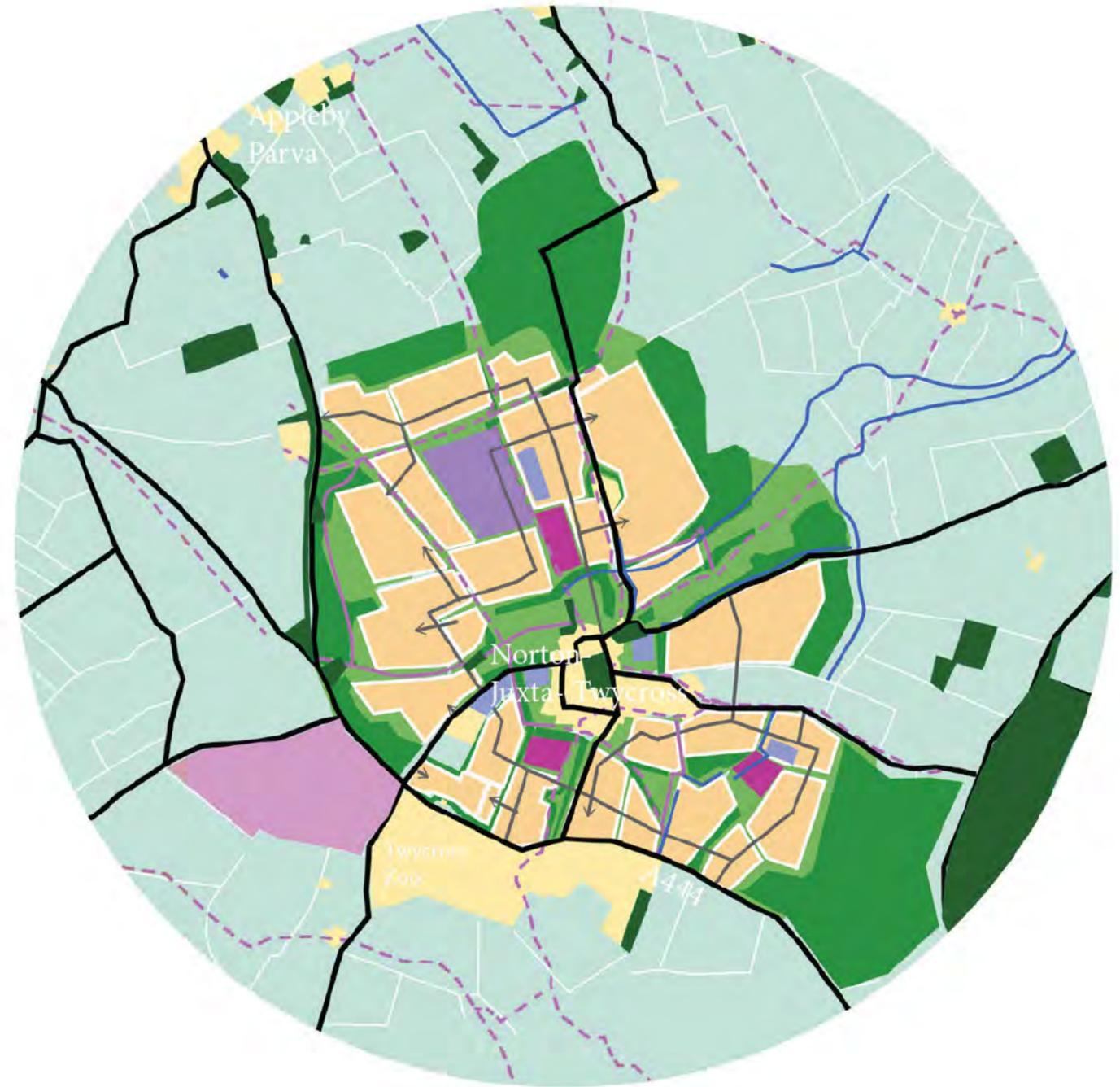
EMERGING OPTION 3 - 5000 Units

A nucleated settlement around Norton Juxta Twycross with the potential to deliver circa 5000 units, 3 primary schools, 1 secondary school, a town centre, local employment and retail space, community facilities, new strategic green infrastructure and green space.

Land is also available for the extension of Twycross zoo for parking and visitor facilities.

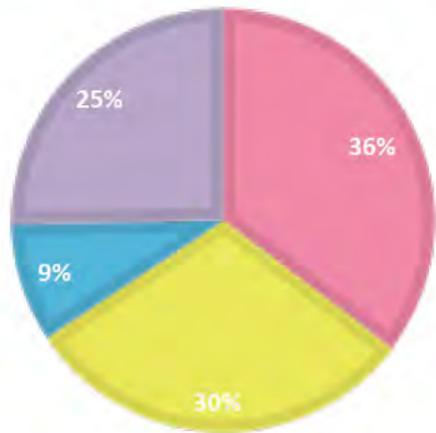
It includes land owned by Massie, Vero, Potts and Corbett, alongside further land owners to the east (to be determined).

This option includes land in Hinckley and Bosworth and North West Leicestershire districts.



Approx % of land ownership
(inc. Green infrastructure)
OPTION 3-5000 UNITS

■ Vero ■ Corbett ■ Massie ■ TBC



KEY

Existing Developments

Existing Roads

Proposed Residential Development-
c.130ha

Proposed Primary Schools

Proposed Retail

Proposed Footpaths

Proposed area for employment/
tourism/zoo

Existing areas of trees

PROW

Proposed Secondary School

Proposed Structural Planting

Proposed Roads

EMERGING OPTION 4 - 6000 Units

A nucleated settlement around Norton Juxta Twycross with the potential to deliver circa 6000 units, 4 primary schools, 1 secondary school, a town centre, employment to the west of the A444, local retail space, community facilities, new strategic green infrastructure and green space.

Land is also available for the extension of Twycross zoo for parking and visitor facilities.

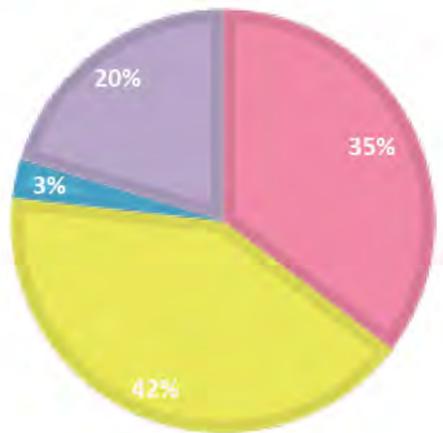
Crossing or diversion of the A444 would be necessary in this option.

It includes land owned by Massie, Vero, Potts and Corbett, alongside further land owners to the east (to be determined).

This option includes land in Hinckley and Bosworth and North West Leicestershire districts.

Approx % of land ownership
(inc. Green infrastructure)
OPTION 4- 6000 UNITS

Vero Corbett Massie TBC



- | | | | | | | | |
|-------------------------|-----------------------|---------------------------|---|---|--------------------------|-----------------|--------------------|
| KEY | Existing Developments | Existing Roads | Proposed Residential Development- c.140ha | Proposed area for employment/ tourism/zoo | Proposed Primary Schools | Proposed Retail | Proposed Footpaths |
| Existing areas of trees | PROW | Proposed Secondary School | Proposed Structural Planting | Proposed Roads | | | |

EMERGING OPTION 5 - 3000 Units

Dispersed Settlement form based on the creation of three villages with Norton Juxta Twycross at the heart of the largest.

Potential for this series of smaller developments to deliver circa 3000 - 3500 units. Including 3 primary schools, 1 secondary school, a new village centre, localised employment and retail and improved woodland and green space.

Land is also available for the extension of Twycross zoo for parking and visitor facilities.

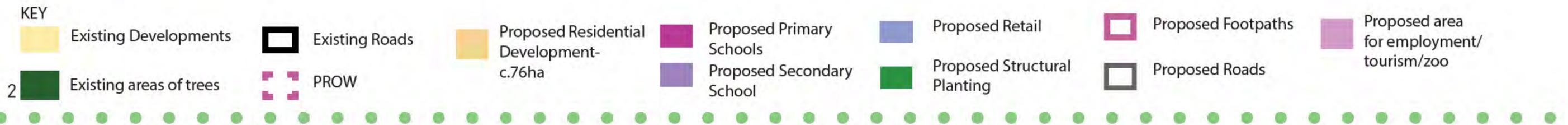
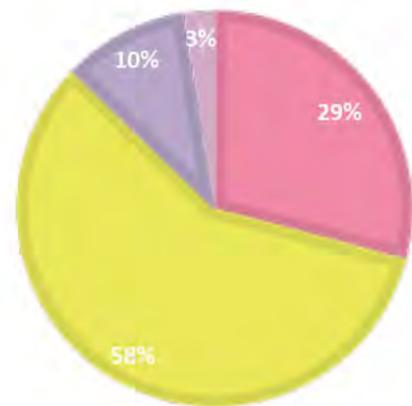
It includes land owned by Massie, Vero, Potts and Corbett, alongside further land owners to the east (to be determined).

This option includes land in Hinckley and Bosworth and North West Leicestershire districts.



Approx % of land ownership
(inc. Green infrastructure)
OPTION 5- 3000 UNITS

Vero Corbett Massie TBC Potts



APPENDIX A: OUTLINE TRANSPORT STRATEGY

Context

The site is located on the locally strategic A444 corridor. This provides a key link between the towns of Burton on Trent / Swadlincote to the north west and Nuneaton to the south east. It connects to Strategic Road Network both north (A42 /M42 Junction 11) and to the south at the A5. Significant investment is planned for the A5 corridor in particular by Department for Transport which identifies works in the RIS3 Pipeline (for implementation 2025-2030).

These works will be principally aimed at providing dual carriageway capacity from the M42 to the M69, with local junction improvements. Works have recently been completed at J11 where there is now a significant employment Mercia Park - which is due to become home to leading international businesses Jaguar Land Rover and DSV Group, which are the two principal operators that will occupy the majority of the new 238-acre employment park. According to the developer's website the site will support up to 3,400 jobs when fully occupied. Further land for employment development has been considered in the recent SHLAA assessment.

The A444 can be generally categorised as a good quality rural distributor road. Whilst there are localised constraints it generally has good horizontal and vertical alignment. It carries around 8,000 vehicles per day (pre-pandemic) of which around 500 are HGVs. In a technical sense the road is operating well within capacity, although it is noted that localised and peak time congestion is often experienced in relation to Twycross Zoo.

Opportunities

A development of this scale can and should be designed to internalise person trips as much as possible. To create a genuinely sustainable settlement, the overall layout and masterplanning of the site will seek to ensure work, schools, shops and leisure facilities are located within 15 minutes' walk of homes.. An extensive network of wide car free cycle and footways will form the basis of the overall movement strategy.

Longer journeys will be connected via neighbourhood hiring facilities to encourage active and sustainable travel. When residents need to travel further afield, the emphasis will be on public modes of transport supported by alternatives to private car ownership including car sharing and car clubs.

Currently public transport within the area is limited and the development offers significant opportunities to support and address this to serve both new development but also to increase accessibility for existing residents. The scheme would be able to provide a significant rural mobility Hub. Our concept for the hub is a location which can firstly reduce the need to travel by bringing services to people, rather than people to services. Secondly, a hub may also help public transport be more viable in rural areas by concentrating demand for journeys to places such as town centres, hospitals or business parks (i.e. Mercia Park). Key strategic destinations are likely to be Burton / Measham / Nuneaton and Bedworth and Tamworth.

A step change in public transport access can be delivered by the scheme with strategic links to key rail networks and settlements. This will include a combination of traditional bus services and as the development progresses more interactive transport service including demand responsive travel (bus and taxi) but also emerging vehicular technologies such as automated driving, connected cars and electric vehicles.

The promoters will work closely with the relevant highway authorities (including Leicestershire, Staffordshire, Warwickshire and National Highways) to refine the above strategy. Where off-site mitigation is necessary either to accommodate public transport priority measures or traffic capacity improvements these will be identified alongside emerging assessments in context of Local Plan progression which will allow appropriate funding and delivery processes to be identified. It is envisaged that works will include further improvements to M42 J11 and the A5.

Careful consideration will be needed in terms of the impacts on the A444. There have been several fatal and severe accidents on the route in the last 5 years, generally as a result of high vehicle speeds and as noted above the Zoo can generate peak period congestion. The development offers the opportunity to positively implement improvements in both these respects as well as traffic management in and around the settlements through which the A444 runs.

SJT/23402- David Tucker Associates, Transport Planning

2nd November 2021



THIS DOCUMENT HAS BEEN PREPARED BY URBAN WILDERNESS

Revision	Date Issued	Author	Checked by
A	19 Oct 2021	RS	NJE
B	10 Nov 2021	RS	NJE
C	21 Dec 2021	RS	NJE
D	10 Jan 2022	RS	NJE
E	04 Feb 2022	RS	NJE



'Norton-Juxta-Twycross' – Biodiversity Appraisal

1. This note has been prepared to inform the emerging options for mixed-use development surrounding the settlement of Norton-Juxta-Twycross within Hinckley and Bosworth District Council. It relates to matters concerning Biodiversity Net Gain (BNG) and provides detail of how the emerging masterplan (using the 6000 unit option as a basis) can or could accommodate BNG both within the site and/or the ability of the masterplan to provide 'surplus' BNG units to other development need in the Hinckley and Bosworth district. It also discusses issues and opportunities to inform the masterplan concept and, as it emerges, how the masterplan needs to respond to such issues.
2. The detail of this note concerns the 6000 unit scheme only at this point. In the absence of a full habitat survey, several assumptions regarding baseline and post-development habitats have been made.

Baseline Habitats

3. Based on aerial imagery review, it is assumed that the habitat across much of the site comprises either poor-quality agricultural grassland or cropland interspersed with woodland copses and ponds. The latter of these features are not taken into account in the baseline calculation given their small size and very small biodiversity unit value in the context of the wider site. They are, however, Priority Habitats so are targets for conservation. Similarly, linear hedgerow/water course units are not accounted for at this point. It is likely that some parcels of the site beyond the woodland and farmsteads comprise better quality grassland, which would influence the overall BNG baseline value.
4. Based on the above, the baseline value of the site is calculated at c.950 Biodiversity Units (830 of which is the open grassland/cropland).
5. No statutory designated nature conservation sites would be affected by development across the site, but several Local Wildlife Sites are also apparently present within and adjacent to the site – this is taken from LUC's '*Habitat Study of Proposed Allocation Sites, Part 3: Drawings*', May 2020. That study was done to inform the emerging Local Plan and within the document, the location of LWSs are provided but no more information is given. The location of these LWS in the context of the site are shown in the drawing appended to this report.



6. Whilst details of these LWS are not provided, a review of aerial imagery identifies that their location corresponds with apparent ponds and mature trees/woodland. **More detailed assessment of these LWSs should be undertaken to understand their value and reasons for designation so the masterplan can respond in a manner proportionate to the reasons for designation.** This may result in larger buffers between development and the LWS if they are designated for mobile fauna which require dispersal corridors. As a guiding principle in accordance with the Mitigation Hierarchy, impacts on such habitats and other priority habitats (i.e. ponds, woodland, hedgerows) should be avoided in the first instance.

Post-Development

7. Several assumptions have had to be made regarding post-development habitats, which are as follows:
 - The 'residential' parcels shown will comprise 70% built form and 30% garden areas, which is a generally accepted approach for the treatment of high-level masterplans;
 - The 'employment' parcels shown will comprise 90% built form and 10% amenity-grade landscaping (i.e. low scoring grassland/shrubs);
 - The treatment of the 'landscaping' parcels shown is taken from a general 'country-park' style treatment, taken to be 50% meadow grassland, 25% scrub and 25% woodland; and
 - Retention of all parcels of existing woodland;
8. Based on the above, the masterplan has the ability to deliver a net gain of c.190 biodiversity units, which equates to a c.20% uplift. 'Mandatory BNG' as detailed in the forthcoming changes to the Town and Country Planning Act will only require a minimum of 10% net gain in habitat value. The figure above does not account for linear features such as hedgerows and watercourses at this point, however. Assuming the scheme could deliver such a net gain, it would be in surplus of c. 95 units above the 10% mandatory net gain figure, which could theoretically be used to offset other development need for biodiversity units.

Masterplan Considerations

9. As detailed above, the 6000-unit option masterplan has the ability to deliver a measurable increase in BNG value in habitats. This is, however, reliant on a habitat survey to assess the baseline habitats and assumes that the landscape treatment could be delivered in line with the assumptions given in Paragraph 7. A balance is required within the green infrastructure strategy to ensure that measurable gains in biodiversity can be delivered whilst also delivering high-quality and multi-functional green infrastructure which is accessible to the public.

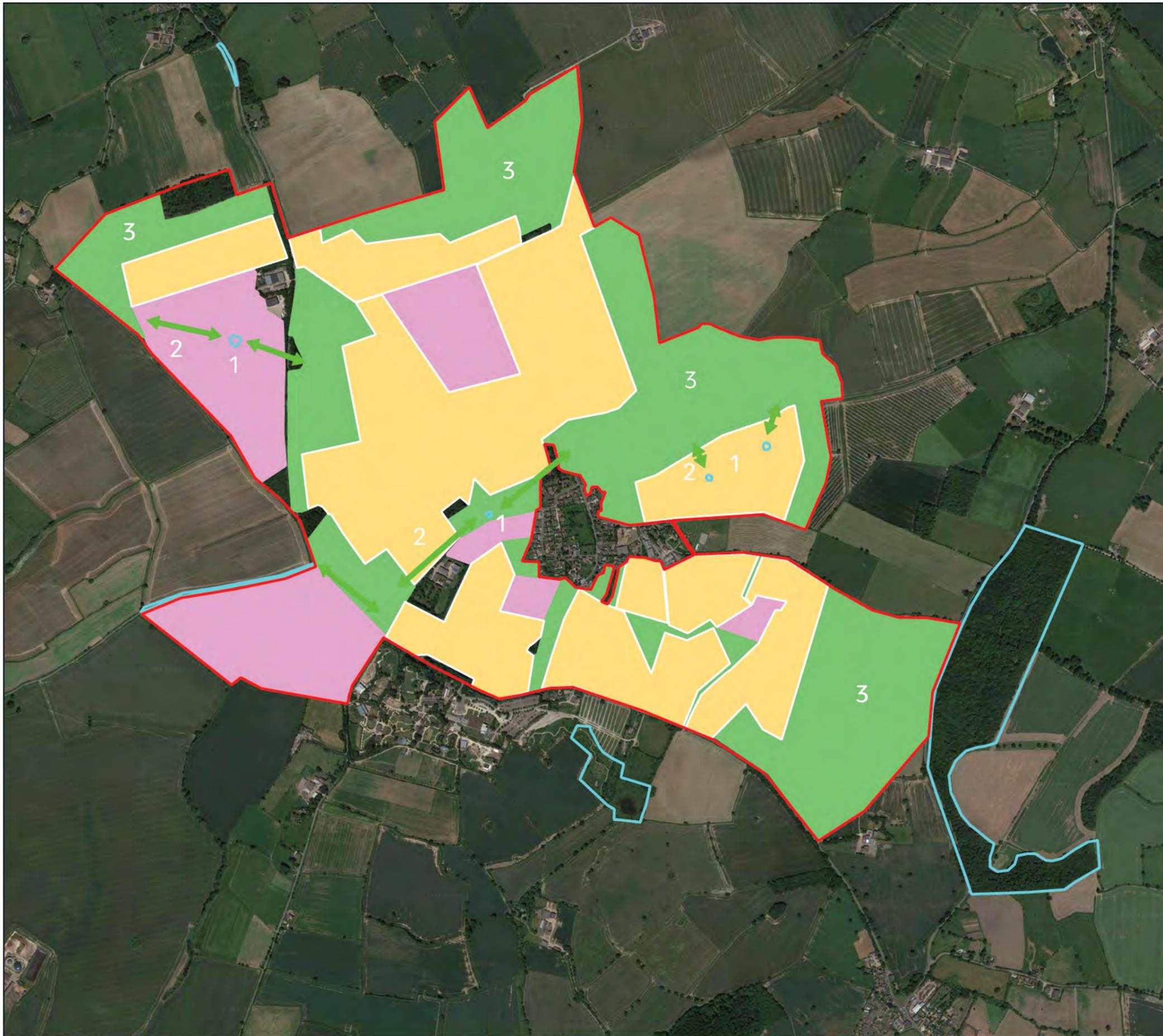


10. Consideration will also need to be given to 'linear' features such as hedgerows and watercourses to a) ensure that net gains in these features can be delivered and b) the value these corridors have to wildlife is also retained or replicated through replacement hedgerow planting as an example.
11. Several LWS and priority habitats are present across the masterplan area as well. Both existing and emerging local planning policy regarding LWS and priority habitats is to retain them wherever possible, so this needs to be carried forward and designed into the masterplan. Wildlife access to/from these features is also encouraged to ensure that they do not become enveloped and effectively isolated within development plots.

Yours sincerely

A handwritten signature in black ink that reads "J. Dance". The signature is stylized and cursive.

Joseph Dance
Client Director

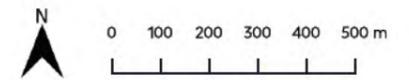


- Site Boundary
- Local Wildlife Sites
- ↔ Connections
- Post-Development Habitats
- Employment
- Landscaping
- Residential

1 - Several development parcels have conflicts with Local Wildlife Sites (LWS). Local Policy resists any impacts.

2 - Development will need to ensure continued connectivity between LWS and surrounding green infrastructure.

3 - >10% BNG can be delivered across masterplan - largely focussed around country park approach and mainly grassland enhancements, with an element of woodland and scrub.



Project	Norton-Juxta-Twycross
Drawing Title	Opportunities/Constraints
Scale	As Shown (Approximate)
Drawing No.	16288/P01
Date	October 2023
Checked	JD



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Norton Juxta Twycross, New Settlement

Transport and Accessibility Appraisal

Norton Juxta Twycross, New Settlement

Transport and Accessibility Appraisal

24th October 2023
ST/SC 23402-01a TSt

Prepared by:

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Prepared For:

Nurton Developments

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23402-01 Movement Strategy

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Appendix A Emerging Concept

Appendix B ATC Data

Appendix C A5 / A444 Redgate Island Roundabout:
Mitigation Scheme- MIRA Technology Park South Site



1. INTRODUCTION

1.1 Overview

1.1.1 This Transport and accessibility appraisal has been prepared by DTA on behalf of Nurton Developments to assist with the emerging masterplan for a potential new sustainable settlement ('the site') north of Norton Juxta Twycross, Leicestershire.

1.1.2 The vision for the site is to create a thriving, vibrant and sustainable settlement with a strong sense of community and identity where people enjoy living. The site will be a collection of neighbourhoods (upto approximately 6,000 dwellings) and employment land along with supporting infrastructure such as, local shops, schools, healthcare facilities, green infrastructure, community facilities, leisure opportunities and new sports facilities along with creation of new jobs.

1.1.3 The aim of this report is to provide a summary of the existing sustainable travel infrastructure in the area and to identify any potential opportunities to develop a Sustainable Transport Strategy for the site.

2. POLICY BACKGROUND

2.1 Overview

2.1.1 This chapter considers the adopted transport and land use policies that relate to the development proposals. This chapter will review the following documents:

- National Planning Policy Framework;
- Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen (January (2011));
- Leicestershire Country Council Local Transport Plan 3 (2011-2026); and
- Hinckley & Bosworth Local Plan 2006 to 2026: Core Strategy (December 2009)

2.2 National Planning Policy Framework (NPPF, Revised 2023)

2.2.1 Sustainable development is a core aim on the NPPF. This guidance requires transport issues to be considered at the very beginning of the development and planning process. This means that active travel shall be given priority from the earliest stage. It is advised that opportunities from existing or proposed transport infrastructure are



maximised, while, at the same time, promoting public transport use and active travel. It also encourages avoidance and mitigation of adverse environmental impacts of traffic and transport infrastructure, as well as identifying opportunities to make a positive environmental impact.

2.2.2 NPPF emphasises that significant development shall focus upon sites which are or can be made sustainable, achieved by reducing the need to travel and offering a variety of sustainable transport modes.

2.2.3 Development sites under consideration shall ensure they provide opportunities to promote sustainable transport modes, safe and suitable access for all users, and any network capacity or safety impacts can be cost effectively mitigated to an adequate degree.

2.2.4 It requires that sustainable modes of transport shall be promoted in order to mitigate against and avoid the negative effects of transport such as congestion and environmental impact. As a key example, Paragraph 112 a) requires that developments shall:

"give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use"

2.2.5 Additional key matters that applications shall address include (i) the needs of people with disabilities and reduced mobility; (ii) creating safe, secure and attractive spaces, allowing for efficient delivery of goods and access by service and emergency vehicles; and (iii) providing the ability for charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.

2.3 Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen

2.3.1 DfT Local Transport's White Paper Creating Growth, Cutting Carbon: Making Sustainable Local Transport Happen (June 2012) reiterates the government's vision for



a sustainable local transport system that supports the economy and reduces carbon emissions. The document explains how the government is placing locals at the heart of the transport agenda, taking measures to empower local authorities when it comes to tackling these issues in their areas.

2.4 Leicestershire Local Transport Plan

2.4.1 Leicestershire County Council (LCC) have produced their Local Transport Plan (LTP) outlining the strategic transport goals for the county:

- A transport system that supports a prosperous economy and provides successfully for population growth.
- An efficient, resilient, and sustainable transport system that is well managed and maintained.
- A transport system that helps to reduce the carbon footprint of Leicestershire. • An accessible and integrated transport system that helps promote equality of opportunity for all our residents.
- A transport system that improves the safety, health, and security of our residents.
- A transport system that helps to improve the quality of life for our residents and makes Leicestershire a more attractive place to live, work, and visit.'

2.4.2 In terms of new developments, the LTP3 sets out a range of objectives that aim to ensure that new developments are sustainable and help to facilitate the above goals:

- Encourage more people to walk, cycle and use public transport will help to reduce congestion and achieve a transport system that provides for the effective and efficient movement of people, materials, and goods.
- Continuing to support bus services/alternative forms of public transport and seeking to ensure that new developments can access a range of facilities by means other than the private car, should help to promote equality of opportunity.
- Efforts to improve information about existing sustainable transport services and facilities should help to improve satisfaction with our transport system.'



2.5 Hinckley & Bosworth Local Plan 2006 to 2026: Core Strategy (December 2009)

2.5.1 Hinckley & Bosworth Borough Council's Core Strategy for the Local Plan sets out the overarching strategy and policies to guide the future development of the borough up to 2026. It builds on policy at a national and regional level.

2.5.2 The Core Strategy identifies Hinckley as a Sub-Regional Centre. Policy 1 focuses on development in Hinckley:

'To support Hinckley's role as a sub-regional centre the council will:

'Allocate land for the development of a minimum of 1120 new residential dwellings. In particular, the council will seek to diversify the existing housing stock in the town centre to cater for a range of house types and sizes supported by Policy 15 and Policy 16.'

'To ensure development contributes to Hinckley's character and sense of place and that the town's infrastructure can accommodate the new development, the council will:

- Expect development to respect Hinckley's industrial heritage through sympathetic reuse of existing buildings unless it can be demonstrated that this is not achievable.
- Require new development to respect the character and appearance of the Hinckley Conservation Areas by incorporating locally distinctive features of the conservation area into the development.
- Require new development to enhance the poor public realm within the town centre.'

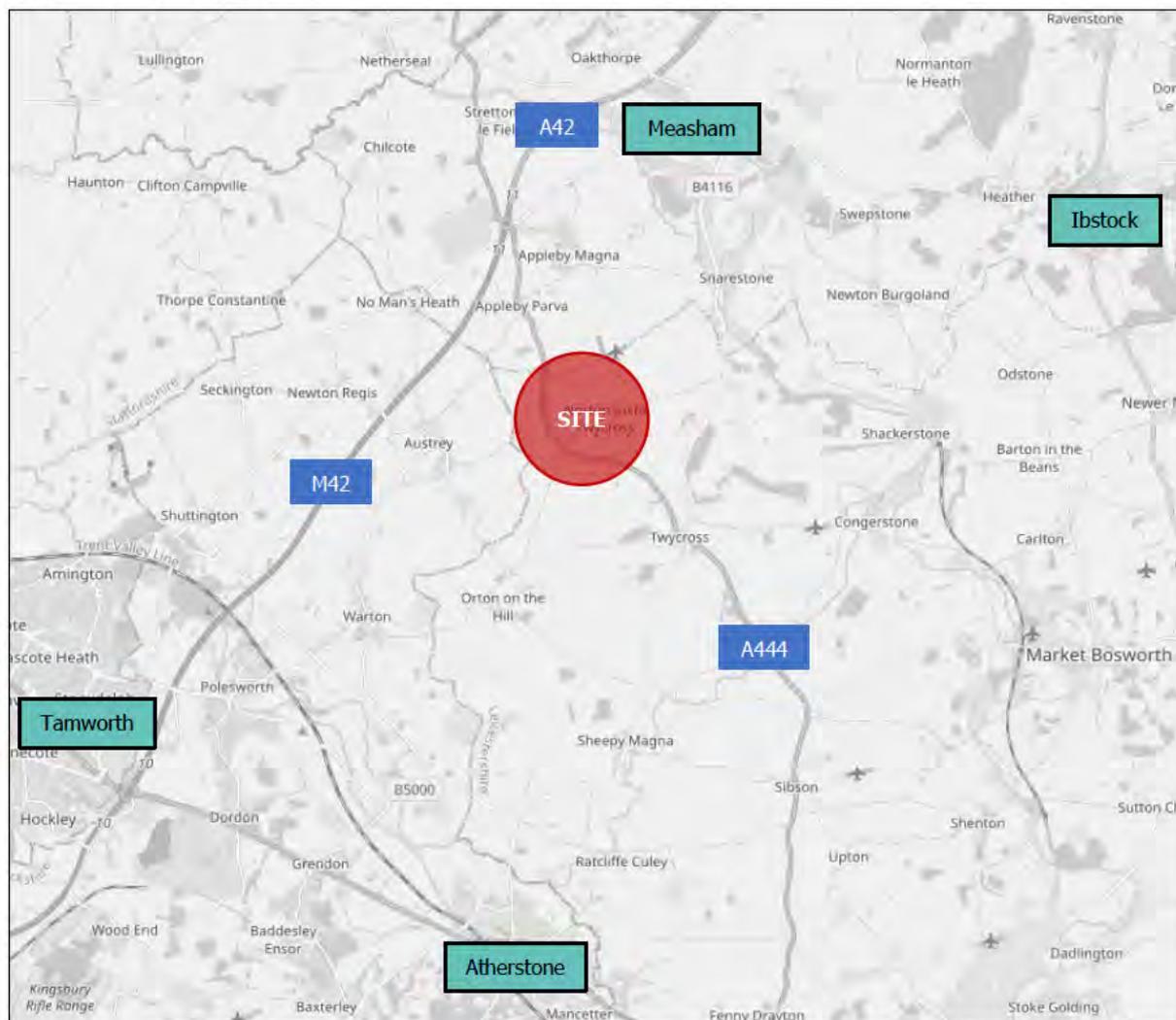


3. EXISTING CONDITIONS

3.1 Site Description and Location

3.1.1 **Figure 1** indicates the location of the site.

Figure 1: Site Location Plan



3.1.2 The rural hamlet of Norton Juxta Twycross is located to the north west of the borough of Hinckley and Bosworth, adjacent to the village of Twycross, and approximately 10km from Tamworth and 15km north of Nuneaton and Hinckley.

3.1.3 Norton Juxta Twycross is predominantly residential in character comprising some 100 houses. A 12th century church is located in the north of the hamlet. Adjacent to the church, at the junction of Main Street/ Orton Lane/ Shelford Lane is Norton-Juxta-



Twycross Village Hall. To the East of the village, on Wood Lane, there is an area of business units with large industrial sheds.

- 3.1.4 The surrounding area consists predominantly of farmland and small villages, with the exception of Twycross Zoo which is located circa 400m south of the hamlet across the Burton Road (A444).

3.2 Road Network

- 3.2.1 The site is located on the locally strategic A444 corridor. This provides a key link between the towns of Burton on Trent / Swadlincote to the north west and Nuneaton to the south east. It connects to Strategic Road Network both north (A42 /M42 Junction 11) and to the south at the A5. Significant investment is planned for the A5 corridor in particular by Department for Transport which identifies works for implementation 2025-2030.

- 3.2.2 These works will be principally aimed at providing dual carriageway capacity from the M42 to the M69, with local junction improvements. Works have recently been completed at J11 where there is now a significant employment park (Mercia Park) west of the site. The employment park, known as Mercia Park now home to leading international businesses Jaguar Land Rover and DSV Group, which are the two principal operators that will occupy the majority of the new 238-acre employment park. According to the developer's website the employment park will support up to 3,400 jobs when fully occupied. Further land for employment development has been considered in the recent SHLAA assessment.

- 3.2.3 The A444 can be generally categorised as a good quality rural distributor road. Whilst there are localised constraints it generally has good horizontal and vertical alignment. It carries around 8,000 vehicles per day (pre-pandemic) of which around 500 are HGVs. In a technical sense the road is operating well within capacity, although it is noted that localised and peak time congestion is often experienced in relation to Twycross Zoo.

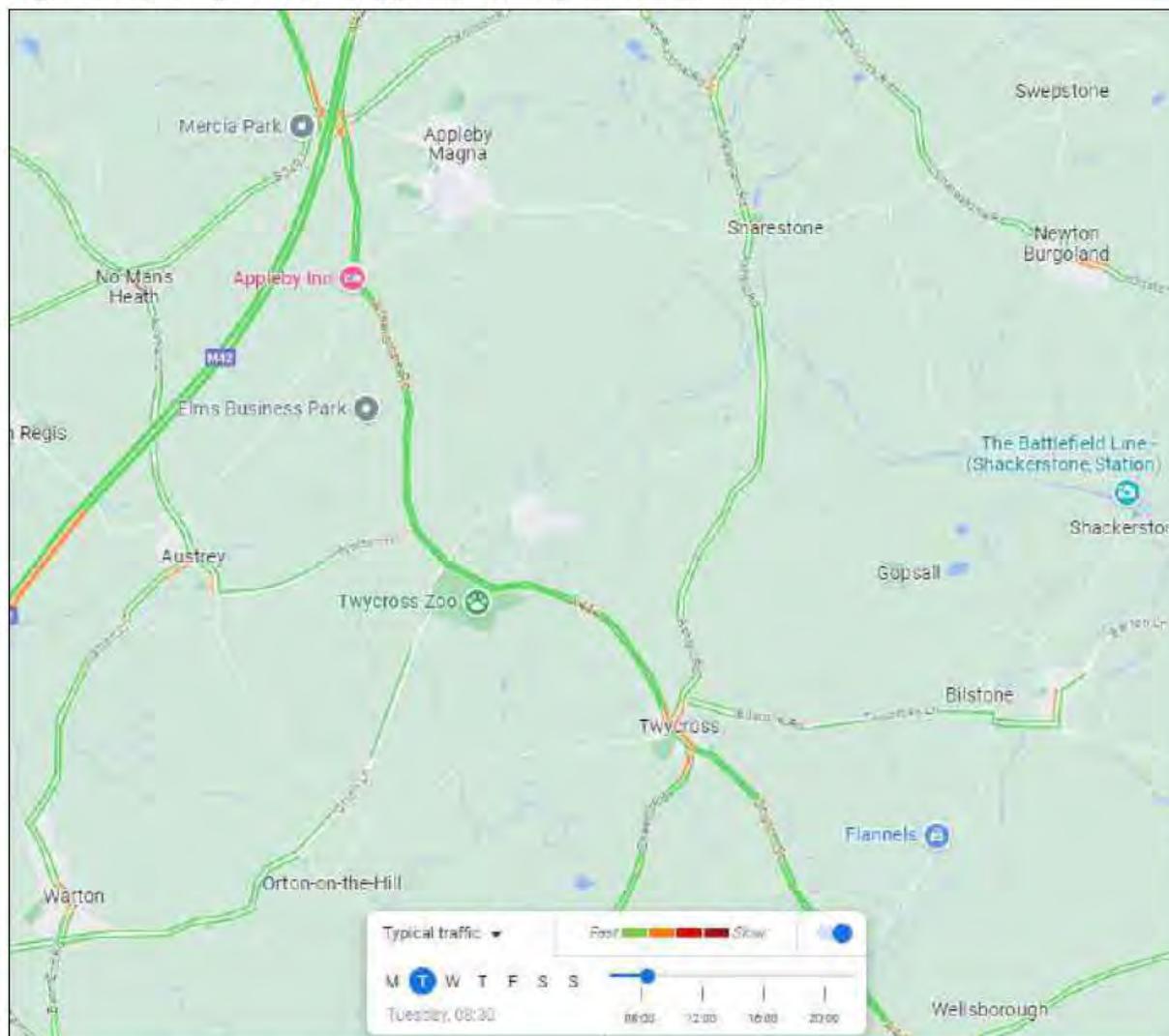
3.3 Existing Network Conditions

- 3.3.1 **Figure 2** shows the current typical morning peak network conditions along local roads as reported by Google; where the fastest, free flowing routes are shown in green and the slowest routes in dark red with intermediate levels shown in orange and light red.



3.3.2 As can be seen, the road network in the vicinity of the site operates well with the A444 along the site's frontage classified as green during the mid-AM peak period.

Figure 2: Morning Peak Period (08:30)- Existing Network Conditions



3.3.3 The position is similar in the PM peak as shown on **Figure 3**. The network in and around the site operates well with most local roads classified as green during the mid-PM peak period.

3.3.4 Overall, the traffic conditions during both peak periods operate well.

3.4 Existing Traffic Conditions

3.4.1 In order to establish the current traffic levels and vehicle speeds on the A444, two Automated Traffic Counts (ATC's) was undertaken over seven consecutive days



starting Monday 4th September. The results of the surveys are summarised in **Table 1** & **Table 2**. The full survey results are contained within **Appendix B**.

Table 1: ATC Summary (Weekday Average)- Location 1

ATC 1	A444, Norton Juxta Posted Speed Limit: 60mph	
	Northbound	Southbound
85 th ile Vehicle Speed	60.1mph	55.2mph
Mean Vehicle Speed	52.8 mph	48.1 mph
AM Peak	286	347
PM Peak	425	245
Daily Flow (24hr)	4,275	4,170

Table 2: ATC Summary (Weekday Average)- Location 2

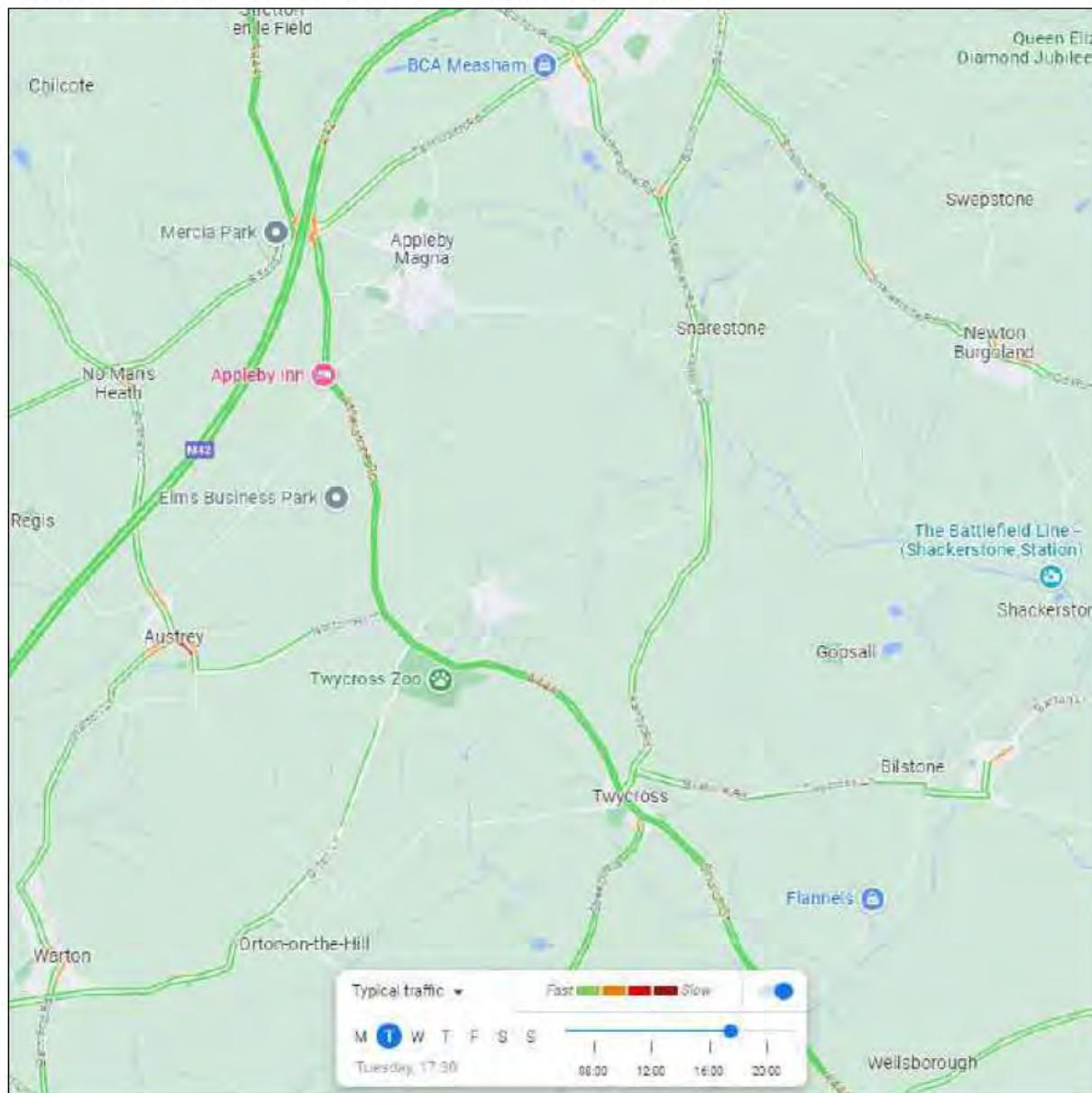
ATC 2	A444, Fenny Drayton Posted Speed Limit: 50mph	
	Northbound	Southbound
85 th ile Vehicle Speed	52.8mph	51.0mph
Mean Vehicle Speed	46.4mph	45.4mph
AM Peak	318	450
PM Peak	440	374
Daily Flow (24hr)	4,751	4,905

3.4.2 Information obtained from the ATC's shows that during the network peak periods (08:00-09:00 and 17:00-18:00), an average of around 650-750 two-way vehicle movements were recorded. This level of traffic is well within the capacity of the existing road and raises no issues with respect to the existing volume of traffic on the local highway network.

3.4.3 The speed survey show that traffic speeds are in keeping with the established speed limit at both locations.



Figure 3: Evening Peak Period (17:30) Existing Network Conditions



3.5 Pedestrian and Cycle Network

- 3.5.1 Pedestrian facilities include footways along the local roads, albeit with some gaps in provision, varying between 1m to 1.5m in width.
- 3.5.2 Access to/ from the site is supplemented by a series of Public Rights of Way (PRoW), with the village surrounded by PRoW's providing access to neighbouring locations and the local countryside.



- 3.5.3 There is no formal cycle infrastructure or National Cycle Routes (NCRs) designated in the vicinity of the site. As stated above, the streets surrounding the site are predominantly residential in character and therefore provides a good basis to cycle within the site. The closest NCRs to the site are:
- 3.5.4 Route 52 and Route 63. Route 52 runs from Warwick to Thringstone, [passing through Kenilworth, Coventry, Nuneaton and Coalville before finishing near Grace Dieu Priory, just west of Loughborough. Route 63 starts in Shobnall, and passes via the large cities of Leicester, Stamford and Peterborough before arriving at Wisbech. Both routes are accessible from Newton Burgoland, approximately 6km to the northeast of the village.
- 3.5.5 Overall, the pedestrian and cycle environment in the village provides a reasonable degree of pedestrian/ cycle access and permeability within the existing village.
- 3.5.6 The proposed development will provide significant improvements to the walking and cycling environment, including connections between the adjacent villages and the site. There will also be enhancement to the non-motorised environment owing to the proposals outlined for the Transport Mitigation Strategy in Chapter 4.

3.6 Public Transport

- 3.6.1 Currently, public transport within the area is limited. The nearest public transport infrastructure to the site are bus stops located in Little Twycross, approximately 2km to the southeast. The stops are served by service 7, providing sustainable travel to locations including Atherstone, Appleby Magna and Measham four times daily.
- 3.6.2 Polesworth Railway Station is located approximately 2km to the southwest. Polesworth station has a sparse train service of only one train, early morning, per day (Monday to Saturday) - and only in one direction (northbound) because the southbound platform is inaccessible.
- 3.6.3 In July 2019 Warwickshire County Council's Draft Rail Strategy for 2019–2034 proposed that a new station called Polesworth Parkway could be opened at a different location in proximity to the A5 road and B5000, which if approved could go ahead between 2027 and 2033.

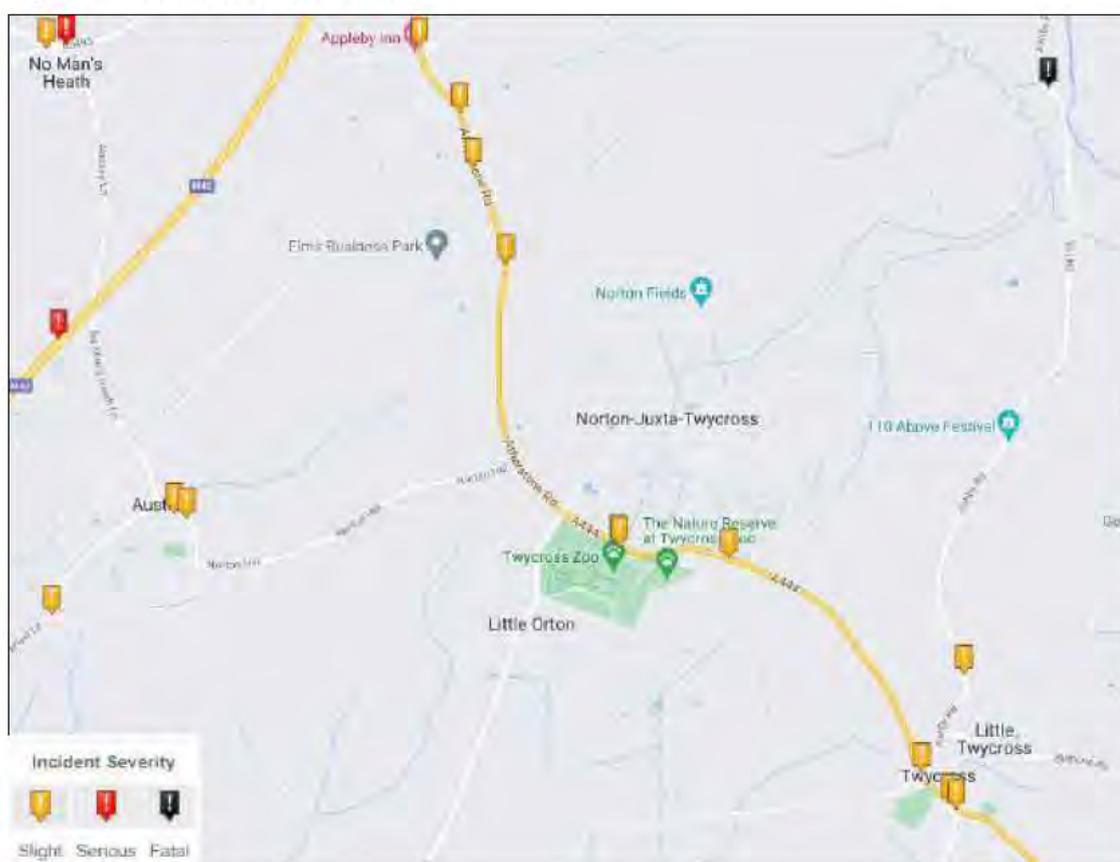


3.7 Highway Safety

3.7.1 A review of Personal Injury Collision (PIC) for the most recent five-year period (2017-2021) in proximity to the site has been undertaken using data extracted from CrashMap. Analysis has been undertaken to determine if there any trends in the types or location of accidents on the local road network in the vicinity of the application site.

Figure 4 presents the locations of the collisions recorded within a 1km radius of the site.

Figure 4: Collision Location Plan



3.7.2 As shown in **Figure 4**, collisions have occurred along main routes and close to junctions, as would be expected with heightened activity.

3.7.3 Analysis of the available PIC data does not indicate that there are any inherent faults in the layout of the local highway network. The causation factor for majority of the collisions were recorded as either 'driver error', 'failed to judge other persons path or speed' or 'careless/ in a hurry'. . There is also no recorded clustering of collisions that



would suggest a particular highway design issue for further investigation at this current time.

3.8 Facilities/ Amenities

3.8.1 Together with amenities on site, the availability of existing amenities in neighbouring areas that are in walking and cycling range will also offer opportunities to reduce car-based trips.

3.8.2 It is generally considered that for distances under 2km, walking offers the greatest potential to replace short car trips. This is confirmed by Manual for Streets (DfT 2007) which confirms that:

"Walkable neighbourhoods are typically characterised by having a range of facilities within 10 minutes (up to approximately 800m) walking distance of residential areas which residents may access comfortably on foot. However, this is not defined as an upper limit and PPG13 states that walking offers the greatest potential to replace short car trips, particularly those under 2km".

3.8.3 Furthermore, it is generally accepted that walking and cycling has the potential to substitute for short car trips, particularly those less than 2km for walking and 5km for cycling.

3.8.4 An accessibility assessment has been undertaken to determine the location of key local facilities and amenities in relation to walking and cycling. **Table 3** provides a summary of accessibility to key facilities located at the adjacent settlements. Owing to the size of the development site, the distances are provided as an approximate, with the shortest distance taken from the nearest proposed development access to the local facility. Therefore, the approximate minimum walking / cycling distance are provided.

Table 3: Local Amenities and Distance/ Time*

Amenity	Location	Distance from the site	Walking Target	Cycling Target
On site				
Nursery	Delivered on site		✓	✓
Primary School	Delivered on site		✓	✓
Secondary School	Delivered on site		✓	✓



Health				
Medical Practice	Delivered on site		✓	✓
Pharmacy	Delivered on site		✓	✓
Dentist	Delivered on site		✓	✓
Shops / Food / Recreation/ Services				
District Centre	Delivered on-site		✓	✓
Restaurants/ Takeouts	Little Twycross	3km		✓
Post Office	Austrey	3km		✓
Co-op Food	Measham	7km		✓
Aldi	Atherston	8km		✓
Norton Juxta Twycross Village Hall	Norton Juxta Twycross	0.1km	✓	✓
Appleby Park	Appleby Manga	3km		✓
Transport				
Bus Stops	Delivered on-site		✓	✓
Bus Stops- A444	Little Twycross	3km		✓
Rail Station	Delivered on-site		✓	✓
Employment				
Mercia Park	Appleby Manga	5km		✓

**Based on Google Route Planner*

3.8.5 Based on the distances presented in **Table 1**, it is evident that a range of facilities are already provided at adjacent towns/villages.

3.8.6 The pedestrian and cycle accessibility of the local area would be substantially improved through the development of the site. Therefore, the distances and journey times presented in **Table 1** have been based on the illustrative development masterplan access routes and indicative internal roads to provide an indication of accessibility to the local area following development. Furthermore, the proposed development will provide a sizable level of complementary local facilities and amenities, reducing the distances that residents will need to travel to access such facilities. This will also reduce the distances that existing residents of will need to travel to access services not currently available in the hamlet.

3.9 Summary

3.9.1 A new settlement at the site offers an attractive realistic opportunity for future residents to travel to and from the development by non-car modes. By doing so, the



development would fully accord with the relevant planning policies which emphasis the need to locate developments where there is a realistic and reasonable expectation that facilities may be accessed by travel modes other than the private car.

3.9.2 Overall, the new settlement would be situated in a highly suitable location for access to all modes of sustainable transport infrastructure and local facilities.

4. DEVELOPMENT PROPOSALS

4.1 Overview

4.1.1 The settlement would deliver a complimentary mix of land uses that will cater for the everyday needs of the future residents. The development aspiration comprises of:

- Up to 6,000 new homes delivering a range of sizes and tenure types;
- Three primary schools;
- A secondary school;
- A town centre to include E land uses;
- Employment area west of the A444;
- Community building and sports hall;
- Provision for both formal and informal open spaces; and
- Area for Twycross Zoo expansion.

4.1.2 The emerging concept is contained within **Appendix A**.

4.2 Movement Strategy

4.2.1 **DTA Drawing 23402** presents an overview of the connectivity strategy and described in the subsequent sub sections.

4.2.2 To support the sustainable aspirations, it is necessary improve alternative modes of transport such as walking / cycling and to reduce the need to travel outside the locality. Therefore, a comprehensive strategy will minimise the need to travel by car and to maximise the options for the future residents to integrate sustainable travel into their day to day lifestyle.



4.2.3 In compliance with the NPPF, the development of the site will be based on a movement strategy that will deliver a sustainable development. A sequential approach is therefore to be followed, as detailed below:

- **Encouraging environmental sustainability:** Reducing the need to travel, especially by car. The development would deliver a complimentary mix of land uses which would cater for the everyday demands of the residents. The development would also deliver employment opportunities that will results in residents being able to live and work within the confines of the development.
- **Managing and enhancing the sustainable networks:** Making best possible use of existing transport infrastructure together with delivering improvements where necessary. The development will actively encourage mode shift away from the private motor car through a comprehensive package of travel measures, as would be supported through a Travel Plan (TP). In addition, improvements are identified to the walking, cycling and public transport networks to enhance journey choice.
- **Mitigating residual impacts:** Following the improvements to the walking, cycling and public transport networks and the support of modal shift based on the measures contained within a Travel Plan, any residual highway impact may need to be managed.

4.3 Vehicular Access Transport Strategy

4.3.1 The settlement has the potential to be accessed from numerous locations along the bordering roads. This would ensure efficient public transport routeing (as discussed below), permeability and integration with existing built areas, dispersal of travel demand, and redundancy for safety and resilience purposes.

4.3.2 The form of the junctions would be considered in further detail with a Transport Assessment but access from the west along the A444 is likely to become the main access and form the gateway into the site.

4.3.3 To the east, further access points could be developed off Ashby Road (B4116), providing enhanced permeability to the wider road network.



4.4 Internal Layout

4.4.1 The internal layout of the site will be designed to provide a road network in which pedestrian and cyclist movements are prioritised, with a series of permeable pedestrian and cycle routes which will connect the entire development site. This will include the provision of the following where appropriate, in line with Warwickshire County Council guidance and Manual for Streets (MfS) guidance:

- a good level of street and path lighting;
- warning signs prior to junctions;
- on-site roads will be designed to 20mph;
- tactile and coloured surfacing;
- safety kerbing;
- reduced junction mouth widths and traffic calming measures to promote slower vehicle speed where appropriate; and
- signage to direct pedestrians and cyclists to key facilities and places of interest, including distances.

4.4.2 The master plan for the site would be based on a clear hierarchy that encourages the safe movement of all the future residents and employees and visitors, irrespective of the manner in which they travel. A broad hierarchy is described below:

- **Primary routes:** A spine road through the site connecting to the possible external access points designed to cater for public transport vehicles and includes a segregated walking and cycling path.
- **Secondary Routes:** Secondary routes are designed to penetrate the individual development blocks individual housing clusters and will be designed to encourage lower vehicle speeds and could incorporate shared spaces between motor vehicles, pedestrians and cyclists; and cater for vehicles at reduced speeds, which will be reflected in the design and appearance of these roads.
- **Tertiary routes:** These will be designed to penetrate individual housing clusters and will be designed to encourage lower vehicle speeds and could incorporate shared spaces between motor vehicles, pedestrians and cyclists.



4.4.3 The site would be designed to provide attractive active travel corridors to allow maximum permeability of the site by these modes of travel and excellent provision will be provided through the creation of a pedestrian and cycle priority route.

4.4.4 A mix of cycle parking facilities would be provided at the development to comply with local standards and would be designed and tailored to the likely needs of future occupants.

4.5 Parking Provision

4.5.1 The level and form of car parking provided for the site would be agreed at the planning application stage and would take into account the standards set out within local prevailing guidance.

4.5.2 Similarly, the development's cycle parking provision will accord with the standards set out within the same guide.

4.6 Traffic Calming

4.6.1 There are a variety of traffic calming measures that could be employed to reduce traffic speeds along the potential access roads and within the existing and new settlement environments. These may include some removal of clutter on existing streets, with the creation of 'naked streets', gateway features, buildings to create pinch points and narrowing's, landscaping/planted area, bends and islands, 20mph zones within the settlement centre and residential areas should be the aim.

4.7 Mobility Hubs

4.7.1 The changing technology and patterns of personal mobility can be further supported by on-site provision of mobility hubs. Mobility hubs located in visible and accessible locations within the site provide travel information and co-located facilities for public transport and active travel modes together with community facilities where appropriate. It is envisaged that there will be adaptability in the provision of mobility hubs to maximise the relevance of the hubs for the community within which the facilities may include:

- Package Delivery Lockers;
- Mini Play area;



- Café / Co -working spaces;
- Bus interchange within the site;
- EV charging;
- Community car share scheme with electric vehicles (EVs);
- Cycle Lockers for community bike share;
- Fixed bike repair facilities;
- Digital information pillar;
- Wifi / phone charging hub; and
- Shared ownership/Hire E Bikes or Scooters (A community owned facility to share usage of E bikes and scooters: <https://como.org.uk/shared-mobility/community-schemes/community-bike-share/>)

4.7.2 A community car share scheme can significantly reduce travel demands. Recent surveys on car sharing suggest:

- Car Clubs can reduce car parking spaces by 25%;
- Reduced cost of living;
- Valuable sales asset;
- Improvements air quality through use of Hybrid or Electric Provision; and
- Health benefits. Surveys from Netherlands suggest community car share schemes can reduce car usage by 26%, increase cycling by 10% and walking by 16%.

4.8 Active Travel Strategy

On-site Internal Infrastructure

4.8.1 As stated above, key to promoting walking and cycling is the design of the development – specifically that the environment addresses actual and perceived safety issues. Underlying this is an emphasis on placemaking with a user hierarchy which places pedestrians at the top reflecting the ethos extolled by Manual for Streets (MfS).

4.8.2 It is important that the site is integrated into the existing area both to ensure that there is a coherent network of routes, and to ensure that there are no external issues that would undermine the efforts to encourage walking and cycling within and to/from the site. This is achieved by identifying gaps in the provision for pedestrians and cyclists on the local road and public rights of way network.



- 4.8.3 Wherever possible walking / cycling routes should consider the following:
- Convenience – follow desire lines without any undue deviation from route;
 - Connectivity – link multiple origin and destinations;
 - Conviviality – be pleasant to use;
 - Coherence – be made legible through paving and/or signage; and
 - Conspicuousness – promote security and safety allowing pedestrians to see and be seen by others.
- 4.8.4 The masterplan for the settlement would include numerous walking and cycling routes within the development to provide a comprehensive route network that will comprise both on and off-road paths. This would include segregated walking/cycling routes adjacent to the main link roads through the development.
- 4.8.5 Highway crossing points would be designed to cater for all types of pedestrian users with the routes lit where appropriate.
- 4.8.6 The key offsite networks include those that provide linkages towards the north, south and west which reflects the key desire lines.
- 4.8.7 To provide connections towards key employment areas such as Mercia Park and Tamworth, it is proposed that measures for improving foot and cycle connectivity along these desire lines would be introduced as part of the development proposals, thus ensuring full integration with the surrounding area.
- 4.8.8 This provision would make walking and cycling a more attractive option and would also allow residents to access bus routes to wider destinations, increasing the availability of more sustainable transport options to the residents of the site.
- 4.8.9 It is also proposed to provide connections to the to the existing PRoW running through the proposed settlement, providing excellent opportunities for future residents to connect to facilities to the south.
- 4.8.10 If it is proposed to divert any public rights of way to enable development the specifications of the proposed diversions, including the route, width and surface type of the new route, would need to be agreed with Warwickshire County Council's Rights of Way team.



4.8.11 At this stage discussions have not been held with the local transport authorities to consider whether there are existing strategies or infrastructure plans that need to be taken into account. Notwithstanding this, it is concluded that the walking and cycling accessibility of the site can be fully addressed through the development of the design of the site.

Bike Share / E-Bike Scheme

4.8.12 A bike share scheme is a service whereby cycles are made available for use by individuals on a short-term basis for a small fee. Many bike share schemes allow people to borrow a bike from a docking station (bike rack) where it is locked until release by computer control following payment. The user then returns the bike to a dock from the same system. Other bike share schemes are dockless and bikes can be picked up and dropped off from virtual docks in a range of locations, which can be identified via a mobile phone app.

4.8.13 Bike share schemes have been found to be successful in achieving modal shift. The Bike Share Users Survey 2018 quantified this by asking respondents how they previously travelled for the trip that they last made by bike share. The results were as follows:

- 42% previously walked;
- 23% previously used the bus;
- 4% previously used the train/tram or light rail;
- 18% previously travelled by car or taxi;
- 7% previously used their own bike; and
- 7% were using the bike share scheme as a new journey.

4.8.14 Bike share has also been found to add flexibility to a journey and is often used as the first or last mile of a journey. The survey identified that 26% of respondents used bike share in conjunction with the bus and 21% in conjunction with the train. 24% of respondents use bikeshare in conjunction with the car.

4.8.15 Subsequently, new bike/e-bike hire hub/s could also be incorporated within the site which would provide simple and convenient access to cycle travel. This provision will



provide good opportunities for the residents and visitors to cycle for all or part of their journey. In addition, the provision of bike stations at a potential Polesworth Railway Station could also encourage multi-modal journeys. Funding can also be provided for an initial annual subscription to promote the scheme to residents at the site.

4.8.16 Discussions will be made with the key stakeholders to understand the viability of these options.

4.9 Public Transport Strategy

Bus

4.9.1 Together with walking and cycling, a fast-reliable public transport system will form the basis of a strategy which focuses on providing a robust alternative to the motorcar and a shift toward this mode of travel is essential for the development to be considered sustainable.

4.9.2 Existing bus service provision is limited; therefore, it is likely that entirely new services would be required.

4.9.3 The primary spine road through the site connecting the A444 road to the site must be designed to promote public transport. A series of secondary roads which loop through the development should also accommodate buses providing vehicular access to schools and employment areas.

4.9.4 A new, direct shuttle bus service between the potential future Railway Station and the new settlement is therefore viewed as key supporting infrastructure.

4.9.5 The public transport improvements would be phased with development to ensure the long-term viability. During the initial phase, it would be expected that the development would deliver a 30-minute peak time service as a minimum. It is expected that as the population (both residents and employees) grows, new routes and extensions to existing routes around the site will become more viable.

4.9.6 Appropriately equipped bus stops would also be required. In line with current best practice the majority of development within the site would be within a convenient



walking distance of their nearest boarding points. This is normally assumed to be a distance of around 400m which is commensurate to a walk time of around 5 minutes.

- 4.9.7 The stops would also incorporate high quality waiting environments (including good quality seating, timetable displays and potentially real time information) with a clearly lit zone whereby people will have 10 metre surrounding visibility. This will encourage a feeling of safety and help improve the image of the public transport option.
- 4.9.8 A public transport strategy will be included within a Transport Assessment that will be produced to support any subsequent planning application.
- 4.9.9 The public transport strategy is to be developed through discussions with local operators and the Highway Authority and, with input from local stakeholders, will build on opportunities created by the presence of existing bus services to employment sites. The strategy will identify the routes to be served and the frequency provided and will also seek to enhance provision for existing towns and villages.

Demand Responsive Transport

- 4.9.10 In addition to traditional bus services, the provision of Demand Responsive Transport (DRT) would be explored. DRT responds directly to customer needs, bookable via an app, customers share journeys with others travelling in the same direction for an agreed price which can vary depending on the number of travellers onboard. DRT provides a near door to door service and offers the convenience of a taxi with the cost effectiveness of a private vehicle, that takes passengers where they want, when they want. Customers travel in style with free Wi-Fi, charging points, tables and leather seats making it ideal for commuters and visitors.
- 4.9.11 Arriva Buses operate a service known as ArrivaClick which allows passengers to book and track an ArrivaClick vehicle, pre-pay and reserve a space for a pram or wheelchair within the app, which then cleverly optimises the best route for the driver to take for all passengers.
- 4.9.12 A potential network of DRT could include significant growth and employment hubs including Mercia Park and local villages, with a strategy expected to deliver a service that caters for the likely demand and at a frequency that will encourage modal shift.



4.10 Car Sharing and Car Clubs

Car Sharing

- 4.10.1 Car sharing is when two or more people share a car and travel together. Car sharing provides people with the convenience of the car, whilst reducing the costs and the number of single occupancy vehicles on the road, thereby helping to reduce pollution and congestion.
- 4.10.2 Typically, people sign up to a car share scheme and their details are held on a secure database to be matched with others who can provide or require a lift. Car sharing can take place on a regular basis, or ad hoc if required.
- 4.10.3 It is proposed that the site will be signed up to an established car share organisation such as Liftshare. They will provide the secure database and the messaging system to allow members to find someone to car share with. The scheme will then be promoted to all residents and businesses as part of the Travel Plan process.

Car Clubs

- 4.10.4 A car club offers the convenience of being able to use a car for those trips that cannot be undertaken using public transport, cycling or walking, or as an emergency alternative. Car clubs can provide a great alternative to car ownership, as people can have access to a car without having to own one.
- 4.10.5 Car clubs work by giving members access to a car on a short-term “pay as you go” rental basis and charging by the hour or the day. A car can be booked online or by phone and then unlocked from a designated bay.
- 4.10.6 This can provide cost savings, as there is no car tax, fuel, MOT or car servicing to pay. Instead, users pay for membership to the scheme and the car hire when they use it. Research has shown that low-mileage drivers i.e., those that drive less than 8,000 miles per year could save up to £3,500 a year.
- 4.10.7 In addition, car club vehicles tend to be more environmentally friendly, emitting over 20% less CO₂ per kilometre than the average car, and they are used more efficiently. One car club vehicle can replace over 20 private cars, helping to reduce congestion and free up parking spaces.



4.10.8 It is proposed that parking for car club vehicles would be provide within the site for use by employees at the site and also local residents.

4.11 Connectivity Strategy Summary

4.11.1 Overall, the connectivity Strategy for the site would transform the level of choice, attractiveness, viability and affordability of alternative modes of transport, and people travelling to and from the area will no longer be reliant on or consider the traditional car driver mode as the only travel option. This is entirely reflective of how travel demands are changing and will continue to change.

4.12 Sustainable Travel Promotion

4.12.1 To promote the use of modes other than the private motor car, a comprehensive Travel Plan would be implemented.

4.12.2 The purpose of a Travel Plan for a new development is to minimise the adverse environmental effects of development related travel from the outset. A holistic approach to the development proposals will result in a successful Travel Plan, where the need to travel is reduced inherently by design.

4.12.3 Any targets set within a Travel Plan should encourage the use of alternative and sustainable modes of travel, and in so doing, reduce the number of vehicle journeys to, from and within the development.

4.12.4 This can be achieved by:

- Reducing the need to travel;
- Providing realistic alternatives to the car;
- Making alternatives to driving alone more attractive; and
- Managing car parking provision.

4.12.5 Benefits of Travel Plans include:

- Improving health, fitness and wellbeing;
- Improving access; and
- Reducing congestion in the local area.



- 4.12.6 The Travel Plan endeavours to promote environmentally sustainable travel choices for residents. This will seek to encourage residents to use alternative modes to the single occupancy car and to emphasise the health benefits of more sustainable modes of travel.
- 4.12.7 The Travel Plan would include a list of ambitious measures to maximise sustainable forms of travel, including information guides, sustainable travel events, car share databases, car clubs and offer discounted vouchers for public transport trips.

4.13 Twycross Zoo Expansion

- 4.13.1 As mentioned above, the new settlement includes land to expand the adjacent Twycross Zoological Park.
- 4.13.2 The park is a long-established tourist attraction; located on the western side of the A444 and adjacent to the new settlement. The park is currently accessed via a three arm priority junction with the A444 and experiences congestion in the locality when demand is high.
- 4.13.3 In 2021, the park submitted an application (Hinckley & Bosworth reference 21/00386/FUL) with proposals including upgrading the access to include a right turn ghost island, minimising potential delay that is caused by queuing right-turning traffic on the A444. The application was supported by a Transport Assessment (prepared by consultants WSP) which demonstrated that the proposed improvements are deliverable. The application has been approved however the improvement scheme is yet to come forward.
- 4.13.4 The settlement would be supportive of any future improvements to the park, with these to be incorporated within the masterplan.

5. TRAVEL DEMAND & IMPACT

5.1 Person Trip Generation

- 5.1.1 It is envisaged that the site could support the development of 6,000 dwellings supported by additional land uses including employment space, primary school and local centre.



- 5.1.2 To derive trip generation figures for the residential areas of site, person trip rates have been obtained from an interrogation of the TRICS database 'houses privately owned' sub-land use. In practice, it is likely that there will be a broad mix of tenures on the site including rental where trip rates would tend to be 10-20% lower. This assumption is therefore robust.
- 5.1.3 Only multi-modal surveys were selected, with any sites in London or outside of England excluded from the analysis as unrepresentative.
- 5.1.4 Full and detailed TRICS outputs are provided in **Appendix B**, with a summary of the morning and evening peak hour person trip rates shown in **Table 4**.

Table 4: Residential Person Trip Rate and Generation (per dwelling)

Residential (6,00 units)	Morning Peak (08:00 – 09:00)			Evening Peak (17:00 – 18:00)			12 Hour (07:00 – 19:00)		
	Arrive	Depart	Total	Arrive	Depart	Total	Arrive	Depart	Total
Trip Rate	0.172	0.710	0.882	0.586	0.239	0.825	3.390	3.383	6.773
Trip Generation	1,032	4,260	5,292	3,516	1,434	4,950	20,340	20,298	40,638

- 5.1.5 To understand the implications of this demand it is necessary to consider how these trips will be distributed, i.e., where are they going to, and the mode of travel.
- 5.1.6 Internalisation is factored into the transport appraisal process whereby synergies between land uses, i.e., where trips are contained within a development boundary do not manifest themselves on the external transport system, for example trips between a primary school and housing. Localisation is a broader term whereby synergies within the wider community are considered i.e., the degree to which the future community of Norton, inclusive of new development, can meet its own needs.
- 5.1.7 **Table 5** sets out the journey purpose split by time of day as reported by the National Travel Survey table NTS0502 trip start time by trip purpose (Monday to Friday only) 2015-2019. As can be seen from this table during the morning peak period commuting and education trips account for most trips. During the evening peak period education trips are less significant and there is a greater proportion of social and personal business trips.

**Table 5:** Total Person Trip Rates by Journey Purpose (per dwelling)

	Commuting	Business	Education	Escort education	Shopping	Other personal business and escort	Social/ Entertainment	Holiday/ Day trip/ Other	All purposes
Time Period: 0800 – 0859									
% NTS	20%	3%	29%	23%	4%	14%	3%	4%	100%
Trip Rate	0.176	0.026	0.256	0.203	0.035	0.123	0.026	0.035	0.882
Trips	1058	159	1535	1217	212	741	159	212	5292
Time Period: 1700 – 1759									
% NTS	32%	3%	3%	2%	12%	20%	20%	8%	100%
Trip Rate	0.26	0.02	0.02	0.02	0.10	0.17	0.17	0.07	0.83
Trips	1584	149	149	99	594	990	990	396	4950

5.1.8 Journey purpose affects mode share. Table NTS 0409, average number of trips by purpose and main mode (2019) of the NTS provides a breakdown of mode share by journey purpose. Overall, this shows that on average 40% trips are car driver trips across all journey purposes. Only a small proportion of education trips (22%) will be made as car drivers as the majority of those in education will not be of driving age hence most of the drivers will be escort. The opposite is apparent in journey to work trips where the propensity to drive is higher (54%).

5.1.9 External trips are likely to be predominantly employment related trips and elements of the shopping and leisure trips. Internalising education trips and a quarter of non-employment trips as per the journey purpose splits in **Table 2** gives an external generation of the site of around 0.258 and 0.413 person trips per household in the AM and PM peak respectively. Assuming that 60% of these are car driver trips, at 6,000 households, this would be equivalent to 900 – 1,500 car trips during the peak hour periods.

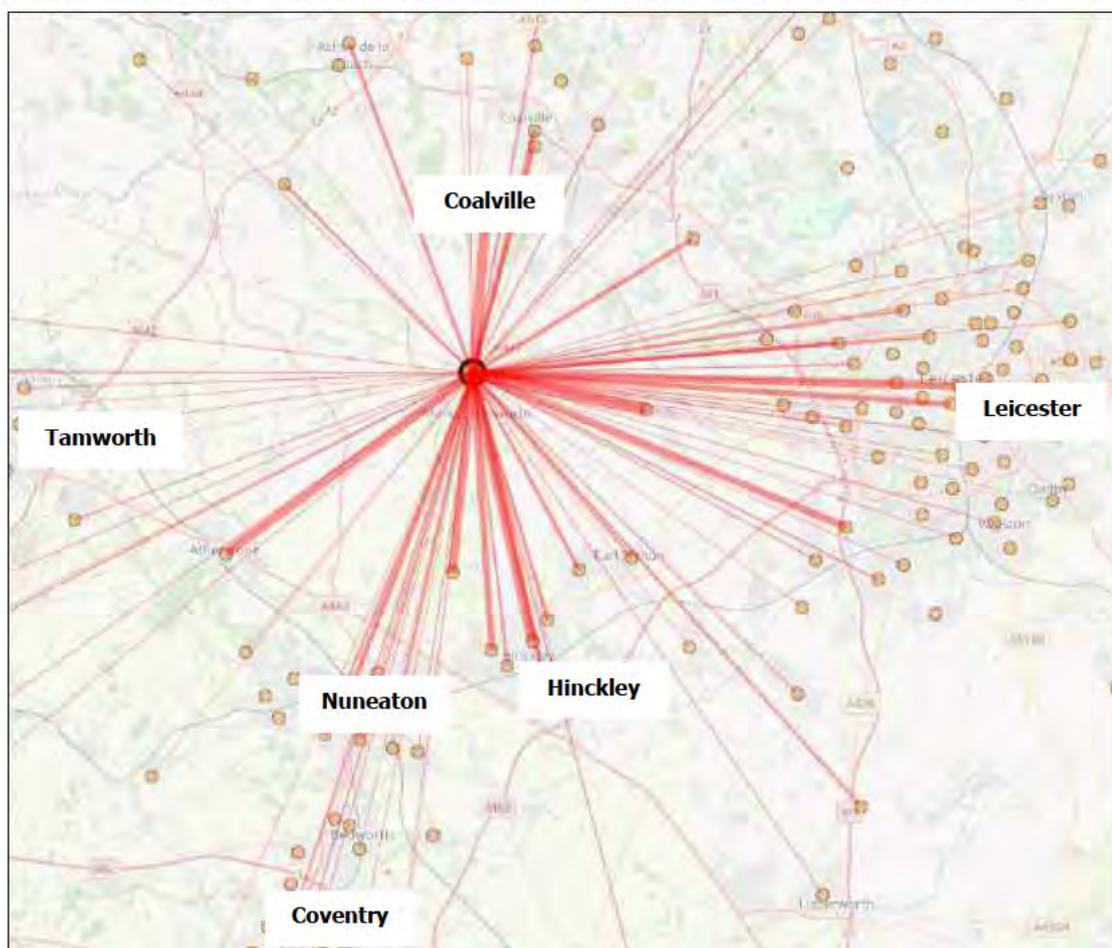


5.2 Mitigating Residual Impacts

Traffic Distribution and Assignment

- 5.2.1 To gain a greater understanding of how the traffic generated from the site may impact the operation of the local highway network, 2011 Census journey to work data for the local area has been reviewed.
- 5.2.2 Datashine Commute' compiles origin/destination statistics from 2011 Census, providing a useful indication as to where people are likely to travel to/from for work purposes. To calculate the distribution of journeys from the locality on weekday mornings and evening, the Datashine Commute website (www.datashine.org.uk) was used to select the Hinckley and Bosworth 004 Middle Super Output Area, with all modes of travel selected.
- 5.2.3 **Figure 5** below graphically shows the main journey to work destinations for existing residents in the locality.

Figure 5: Journey to Work Destinations From Hinckley and Bosworth 004 (All Modes)





- 5.2.4 Travel demand is heavily weighted towards Leicester, Hinckley, and south towards Nuneaton and Coventry.
- 5.2.5 Journeys to the key destinations have been assigned to routes to assess the distribution of future development vehicle trips across the highway network. Google Maps route finder has been used to make route choices based on the distance and/or time taken. This analysis, which determines the likely route to each destination, is summarised in **Table 6**.

Table 6: Trip Assignment

Destination	Percentage	Route
Leicester/ Blaby/ Charnwood	26%	Via A42/ local roads
NW Leicestershire District	11%	Via A42
Hinckley	32%	Via A444/ A5
Nuneaton	6%	Via A444/ A5
Coventry	3%	Via A444/ A5
North Warwickshire	5%	Via Twycross Rd/ B4116
Birmingham	3%	Via Twycross Rd/ A5
Other Destinations	14%	-

- 5.2.6 Ultimately the distribution of the traffic will be defined by run of the LCC Strategic Model (PRTM) but traffic is expected to be split, broadly 45% north and south on the A444 with 10% on other routes.
- 5.2.7 It is estimated that the external peak hour generation of the development would be circa 900 – 1,500 two-way vehicle trips in the peak hours. To understand what the potential traffic increases through this junction would be, the percentages in **Table 6** has been applied to the external trip generation of the development.
- 5.2.8 Application of the above results in approximately 450-750 two-way peak hour development trips forecasted to travel through this junction.
- 5.2.9 There will likely be the requirement for capacity enhancements at this as well as key local junctions to provide sufficient capacity and to ensure that the layouts are able to accommodate potential future public transport services.
- 5.2.10 To the north M42 J11 has recently been upgraded as part of Mercia Park to provide signalisation and localised widening. It is likely that further capacity enhancements



will be required as a result of this development and will be informed by detailed modelling appraisal.

5.2.11 To the south to the A5, an application has been submitted for an extension to Mira Technology Park extending south of the A5 Watling Street. This has identified an improvement for the Redgate roundabout to provide additional capacity. The scheme has been extracted from the application TA and enclosed within **Appendix C**.

5.2.12 Assuming that is consented it will significantly improve existing capacity although further works may well be necessary to accommodate additional development demands. Again, that will be informed by more detailed modelling at the application stage.

5.2.13 The detailed junction operation and the strategy for junction improvements will be included within a Transport Assessment that will be produced to support any future planning application.



6. SUMMARY & CONCLUSION

6.1 This report has been prepared to review the opportunities to deliver a new sustainable settlement comprising circa 6,000 residential dwellings at Norton Juxta Twycross, Leicestershire.

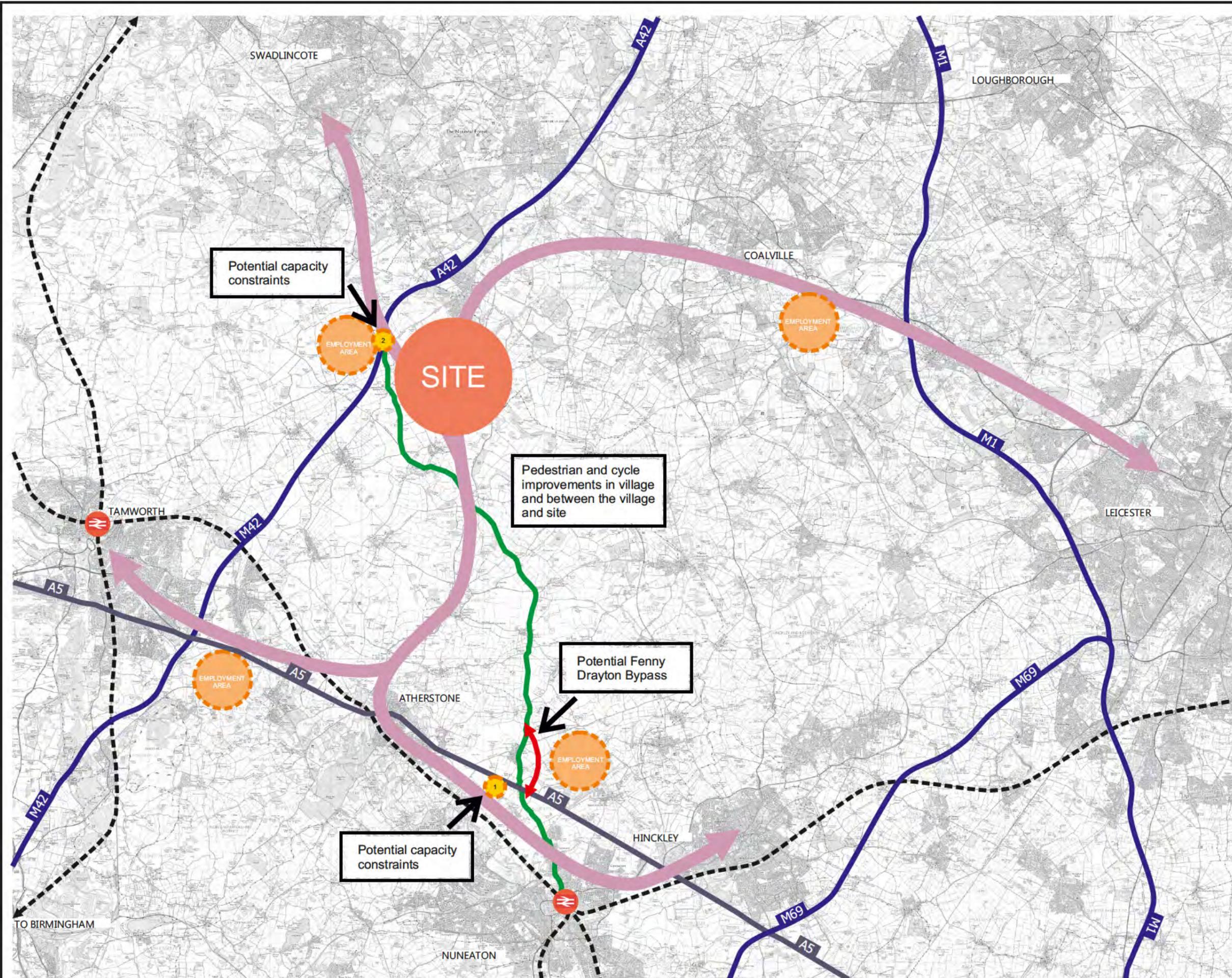
6.2 The report concludes that:

- The site is an appropriate and sustainable location in transport terms for significant growth. The proposed mixed use development would contain the provision of education, employment, retail, health and community facilities proposed on site, therefore allowing for a much greater proportion of day-to-day trips to be retained within the settlement itself.
- Those trips that are carried out externally will be encouraged to be carried out in a sustainable way. To encourage travel to and from the site by sustainable modes of transport, the proposed development will include a comprehensive and coherent network of routes for pedestrians and cyclists together with new walking/ cycling infrastructure.
- The development will also be supported by public transport improvements, which will be phased in line with the development. As the development quantum increases, the frequency of the services serving the development would be increased.
- A bus route should be provided through the site, linking the development to the wider established community and a relocated Polesworth Railway Station would provide a more centrally located and accessible station to serve future residents at the new settlement.
- Highway works at off-site junctions may be required to provide an appropriate level of operational performance with the additional travel demands.

DRAWINGS

Notes:

-  Walking and Cycling Links
-  Potential Bus Routes
-  M42 J11
-  Redgate Junction



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Norton Juxta New Settlement
Transport Strategy
Norton Juxta Twycross
Nurton

APPENDIX A

Emerging Concept

EMERGING OPTION 4 - 6000 Units

A nucleated settlement around Norton Juxta Twycross with the potential to deliver circa 6000 units, 4 primary schools, 1 secondary school, a town centre, employment to the west of the A444, local retail space, community facilities, new strategic green infrastructure and green space.

Land is also available for the extension of Twycross zoo for parking and visitor facilities.

Crossing or diversion of the A444 would be necessary in this option.

It includes land owned by Massie, Vero, Potts and Corbet, alongside further land owners to the east (to be determined).



KEY

Existing Developments	Existing Roads	Proposed Residential Development- c.140ha	Proposed Employment	Proposed Primary Schools	Proposed Retail	Proposed Footpaths
Existing areas of trees	PROW	Proposed area for zoo expansion	Proposed Secondary School	Proposed Structural Planting	Proposed Roads	



APPENDIX B

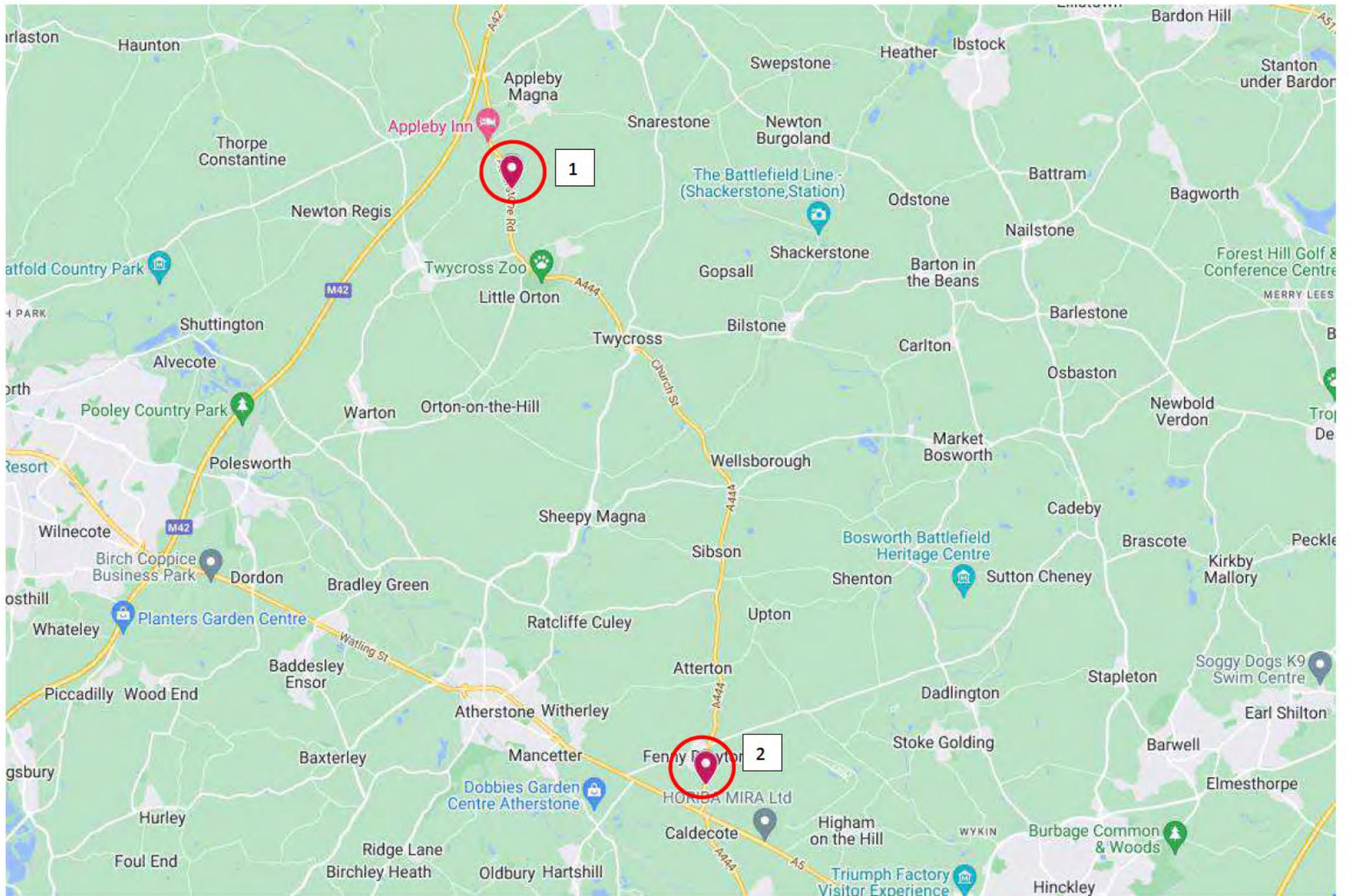
ATC Data

Site 1 - 52.668877, -1.539167



Site 2 – 52.563444, -1.482189

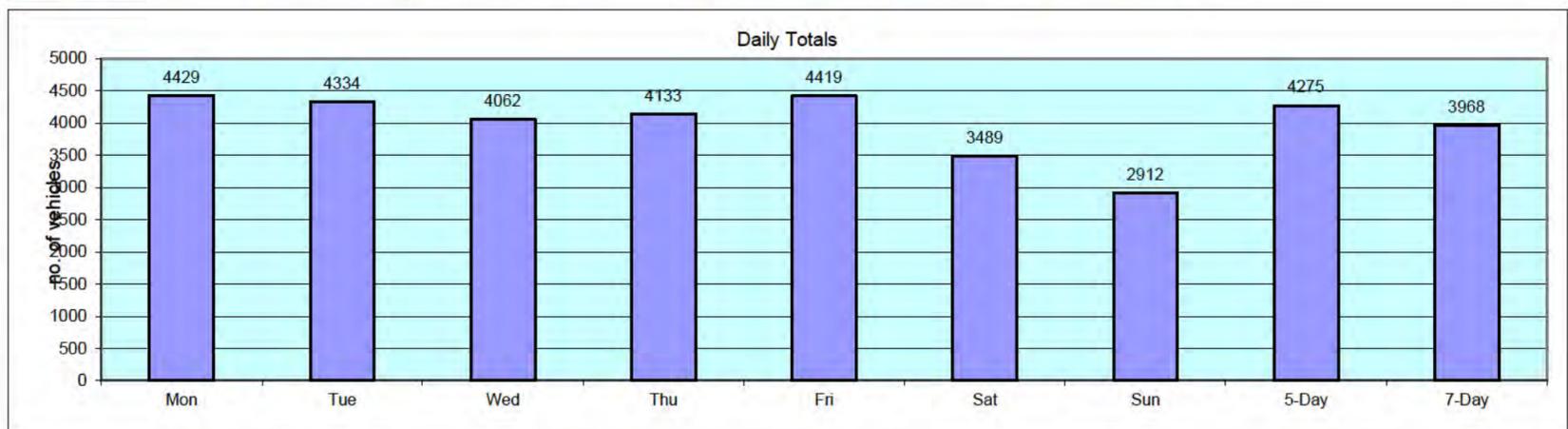




12612		TWYCROSS			Posted Speed Limit MPH (PSL)	Total Vehicles	5 Day Ave.	7 Day Ave.	Average 85%ile Speed	Average Mean Speed
Site	Location	Direction	Start Date	End Date						
Site No: 12612001	Site 1 - A444 Twycross (S of Appleby Magna) 52.66887, -1.53916	Channel: Northbound	Mon 04-Sep-23	Sun 10-Sep-23	NSL	27778	4275	3968	60.1	52.8
		Channel: Southbound	Mon 04-Sep-23	Sun 10-Sep-23		27143	4170	3878	55.2	48.1

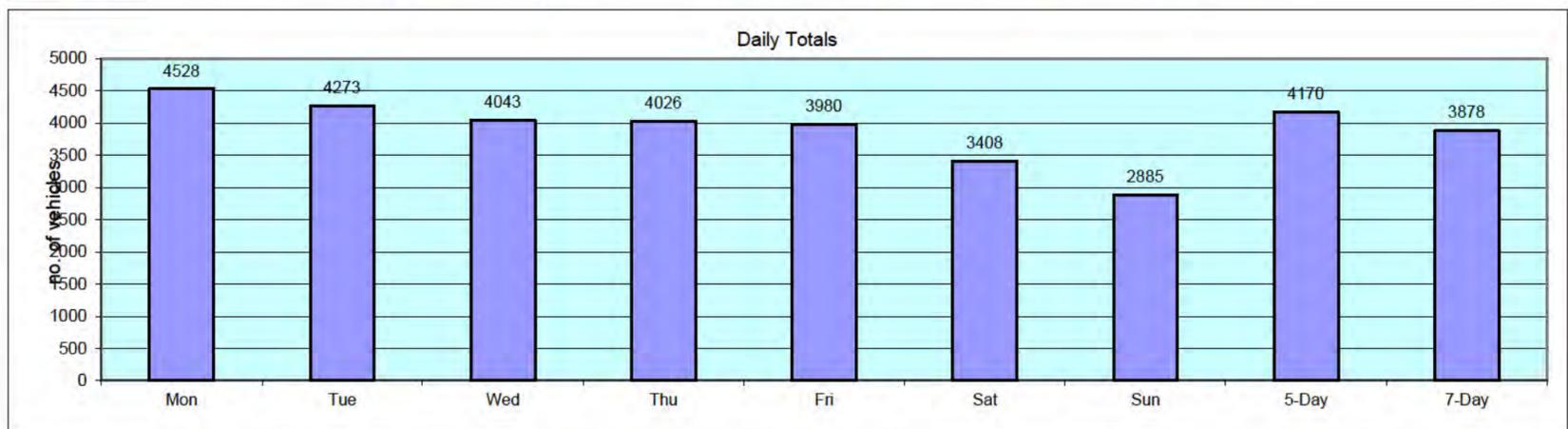
12612 TWYXCROSS Site No: 12612001 Location Site 1 - A444 Twycross (S of Appleby Magna)
 Channel: Northbound

TIME PERIOD	Mon 04/09/23	Tue 05/09/23	Wed 06/09/23	Thu 07/09/23	Fri 08/09/23	Sat 09/09/23	Sun 10/09/23	5-Day Av	7-Day Av
Week Begin: 04-Sep-23									
00:00	10	11	10	14	24	44	19	14	19
01:00	3	12	15	10	13	16	6	11	11
02:00	7	11	11	20	24	13	12	15	14
03:00	14	23	26	20	16	19	8	20	18
04:00	33	28	25	26	31	20	19	29	26
05:00	80	83	88	87	84	50	34	84	72
06:00	142	149	140	150	134	55	43	143	116
07:00	250	256	250	239	227	76	64	244	195
08:00	273	289	295	284	287	140	105	286	239
09:00	186	238	219	206	215	198	143	213	201
10:00	193	159	183	169	184	225	150	178	180
11:00	183	168	172	162	195	272	172	176	189
12:00	191	212	233	234	262	277	220	226	233
13:00	276	303	246	269	313	298	283	281	284
14:00	411	337	305	324	365	353	301	348	342
15:00	528	488	400	375	435	329	338	445	413
16:00	629	497	453	455	437	315	291	494	440
17:00	473	461	412	412	367	303	264	425	385
18:00	245	262	226	302	293	155	164	266	235
19:00	125	131	117	121	168	96	111	132	124
20:00	68	83	96	94	119	86	76	92	89
21:00	48	64	69	83	77	57	41	68	63
22:00	40	42	39	46	86	51	31	51	48
23:00	21	27	32	31	63	41	17	35	33
12H,7-19	3838	3670	3394	3431	3580	2941	2495	3583	3336
16H,6-22	4221	4097	3816	3879	4078	3235	2766	4018	3727
18H,6-24	4282	4166	3887	3956	4227	3327	2814	4104	3808
24H,0-24	4429	4334	4062	4133	4419	3489	2912	4275	3968
Am	08:00	08:00	08:00	08:00	08:00	11:00	11:00		
Peak	273	289	295	284	287	272	172		
Pm	16:00	16:00	16:00	16:00	16:00	14:00	15:00		
Peak	629	497	453	455	437	353	338		



12612 TWYXCROSS Site No: 12612001 Location Site 1 - A444 Twycross (S of Appleby Magna)
 Channel: Southbound

TIME PERIOD	Mon 04/09/23	Tue 05/09/23	Wed 06/09/23	Thu 07/09/23	Fri 08/09/23	Sat 09/09/23	Sun 10/09/23	5-Day Av	7-Day Av
Week Begin: 04-Sep-23									
00:00	9	13	23	24	19	33	21	18	20
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02:00	9	8	7	9	9	15	6	8	9
03:00	21	23	19	18	22	17	12	21	19
04:00	23	21	21	34	22	22	16	24	23
05:00	76	82	91	82	85	32	15	83	66
06:00	205	215	223	221	175	42	30	208	159
07:00	528	485	515	546	416	103	56	498	378
08:00	343	380	384	341	286	123	101	347	280
09:00	333	316	252	242	217	312	241	272	273
10:00	447	372	273	270	287	464	386	330	357
11:00	422	269	251	223	235	397	340	280	305
12:00	289	233	216	213	247	331	280	240	258
13:00	223	205	193	207	211	288	249	208	225
14:00	263	270	219	210	289	228	197	250	239
15:00	281	272	259	282	248	205	162	268	244
16:00	237	269	241	272	239	158	175	252	227
17:00	254	233	265	235	237	151	150	245	218
18:00	182	189	186	177	225	147	141	192	178
19:00	120	129	107	122	140	113	110	124	120
20:00	72	91	97	81	113	82	70	91	87
21:00	66	65	76	75	97	47	50	76	68
22:00	63	59	50	73	77	58	35	64	59
23:00	57	59	54	57	69	19	28	59	49
12H,7-19	3802	3493	3254	3218	3137	2907	2478	3381	3184
16H,6-22	4265	3993	3757	3717	3662	3191	2738	3879	3618
18H,6-24	4385	4111	3861	3847	3808	3268	2801	4002	3726
24H,0-24	4528	4273	4043	4026	3980	3408	2885	4170	3878
Am	07:00	07:00	07:00	07:00	07:00	10:00	10:00		
Peak	528	485	515	546	416	464	386		
Pm	12:00	15:00	17:00	15:00	14:00	12:00	12:00		
Peak	289	272	265	282	289	331	280		

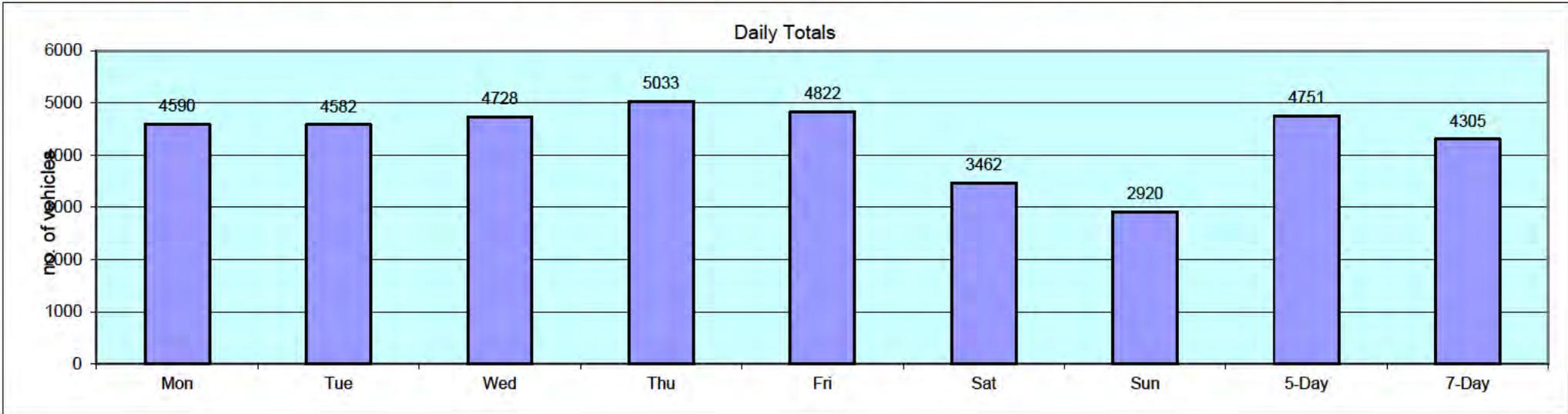


12612 TWYXCROSS									
SEPTEMBER 2023									
Site	Location	Direction	Start Date	End Date	Posted Speed Limit MPH (PSL)	Total Vehicles	5 Day Ave.	7 Day Ave.	Average 85%ile Speed
Site No: 12612002	Site 2 - A444 Twycross (S of Fenny Drayton) 52.563444, -1.482189	Channel: Northbound	Mon 04-Sep-23	Sun 10-Sep-23	50	30137	4751	4305	52.2
		Channel: Southbound	Mon 04-Sep-23	Sun 10-Sep-23		31106	4905	4444	51.0

12612		TWYXCROSS			Posted Speed Limit MPH (PSL)	Average Mean Speed
SEPTEMBER 2023						
Site	Location	Direction	Start Date	End Date		
Site No: 12612002	Site 2 - A444 Twycross (S of Fenny Drayton) 52.563444, -1.482189	Channel: Northbound	Mon 04-Sep-23	Sun 10-Sep-23	50	46.4
		Channel: Southbound	Mon 04-Sep-23	Sun 10-Sep-23		45.4

12612	TWYCROSS		Site No: 12612002		Location		Site 2 - A444 Twycross (S of Fenny Drayton)				
			Channel: Northbound								
TIME PERIOD	Mon 04/09/23	Tue 05/09/23	Wed 06/09/23	Thu 07/09/23	Fri 08/09/23	Sat 09/09/23	Sun 10/09/23	5-Day Av	7-Day Av		
Week Begin: 04-Sep-23											
00:00	9	15	6	27	25	29	30	16	20		
01:00	8	19	19	20	19	13	11	17	16		
02:00	20	10	18	18	17	19	16	17	17		
03:00	8	33	38	27	24	16	9	26	22		
04:00	35	32	16	32	36	14	16	30	26		
05:00	80	93	98	86	90	29	36	89	73		
06:00	179	169	174	194	171	60	53	177	143		
07:00	337	342	349	324	309	120	86	332	267		
08:00	309	312	346	315	306	174	118	318	269		
09:00	281	267	250	279	224	280	229	260	259		
10:00	318	270	268	243	259	345	255	272	280		
11:00	312	255	276	252	264	355	240	272	279		
12:00	265	245	291	273	307	322	272	276	282		
13:00	229	226	256	253	369	302	275	267	273		
14:00	342	310	328	314	411	221	209	341	305		
15:00	374	348	367	382	435	219	205	381	333		
16:00	413	432	439	538	448	207	192	454	381		
17:00	374	470	460	532	362	187	187	440	367		
18:00	257	274	264	423	271	140	149	298	254		
19:00	175	177	173	204	184	132	134	183	168		
20:00	109	117	109	130	107	100	85	114	108		
21:00	71	75	74	66	79	61	54	73	69		
22:00	57	59	67	59	59	62	39	60	57		
23:00	28	32	42	42	46	55	20	38	38		
12H,7-19	3811	3751	3894	4128	3965	2872	2417	3910	3548		
16H,6-22	4345	4289	4424	4722	4506	3225	2743	4457	4036		
18H,6-24	4430	4380	4533	4823	4611	3342	2802	4555	4132		
24H,0-24	4590	4582	4728	5033	4822	3462	2920	4751	4305		
Am	07:00	07:00	07:00	07:00	07:00	11:00	10:00				
Peak	337	342	349	324	309	355	255				
Pm	16:00	17:00	17:00	16:00	16:00	12:00	13:00				
Peak	413	470	460	538	448	322	275				

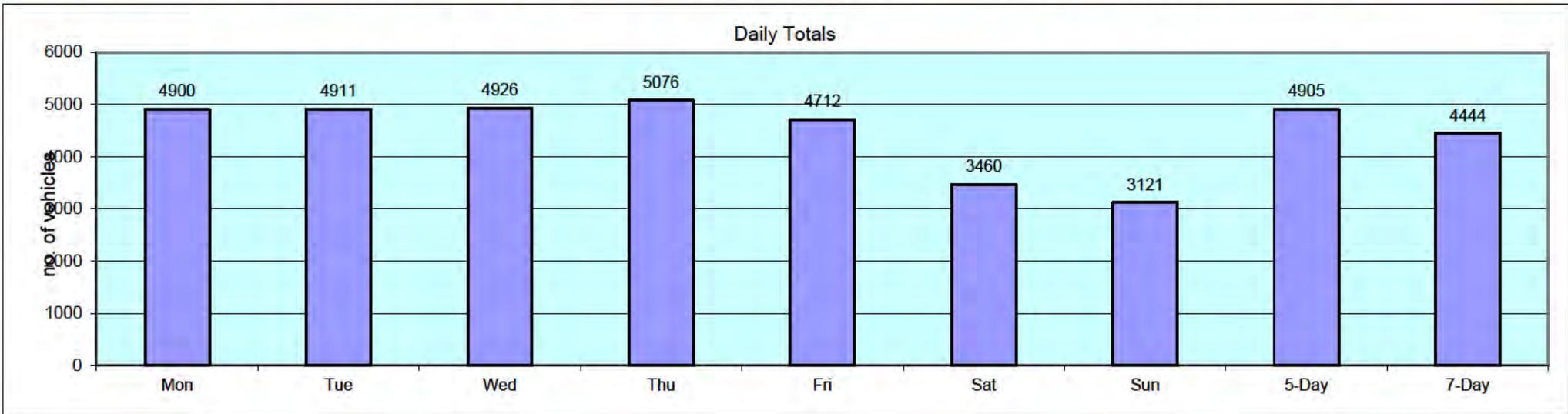
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			Channel: Northbound						
TIME PERIOD	Mon	Tue	Wed	Thu	Fri	Sat	Sun	5-Day	7-Day
	04/09/23	05/09/23	06/09/23	07/09/23	08/09/23	09/09/23	10/09/23	Av	Av



12612	TWYCROSS		Site No: 12612002		Location		Site 2 - A444 Twycross (S of Fenny Drayton)				
			Channel: Southbound								
TIME PERIOD	Mon 04/09/23	Tue 05/09/23	Wed 06/09/23	Thu 07/09/23	Fri 08/09/23	Sat 09/09/23	Sun 10/09/23	5-Day Av	7-Day Av		
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02:00	9	16	10	16	10	17	10	12	13		
03:00	21	20	19	20	29	19	13	22	20		
04:00	30	25	28	40	35	18	10	32	27		
05:00	79	87	101	80	92	34	28	88	72		
06:00	226	268	268	306	215	68	27	257	197		
07:00	523	555	551	591	399	101	58	524	397		
08:00	461	463	466	483	378	163	114	450	361		
09:00	309	306	297	323	290	258	188	305	282		
10:00	223	239	222	223	235	251	252	228	235		
11:00	267	222	251	223	254	277	244	243	248		
12:00	237	189	261	246	253	276	289	237	250		
13:00	284	278	269	260	280	250	287	274	273		
14:00	272	298	298	315	329	299	283	302	299		
15:00	395	392	367	348	369	279	291	374	349		
16:00	424	370	435	428	392	264	239	410	365		
17:00	394	387	368	396	325	225	216	374	330		
18:00	238	247	208	237	226	175	187	231	217		
19:00	171	184	158	148	150	146	132	162	156		
20:00	100	93	122	125	107	88	108	109	106		
21:00	86	100	86	108	110	72	43	98	86		
22:00	76	83	58	69	96	70	39	76	70		
23:00	58	44	43	51	80	48	20	55	49		
12H,7-19	4027	3946	3993	4073	3730	2818	2648	3954	3605		
16H,6-22	4610	4591	4627	4760	4312	3192	2958	4580	4150		
18H,6-24	4744	4718	4728	4880	4488	3310	3017	4712	4269		
24H,0-24	4900	4911	4926	5076	4712	3460	3121	4905	4444		
Am	07:00	07:00	07:00	07:00	07:00	11:00	10:00				
Peak	523	555	551	591	399	277	252				
Pm	16:00	15:00	16:00	16:00	16:00	14:00	15:00				
Peak	424	392	435	428	392	299	291				

12612 TWYXCROSS Site No: 12612002 Location Site 2 - A444 Twycross (S of Fenny Drayton)
 Channel: Southbound

TIME PERIOD	Mon 04/09/23	Tue 05/09/23	Wed 06/09/23	Thu 07/09/23	Fri 08/09/23	Sat 09/09/23	Sun 10/09/23	5-Day Av	7-Day Av
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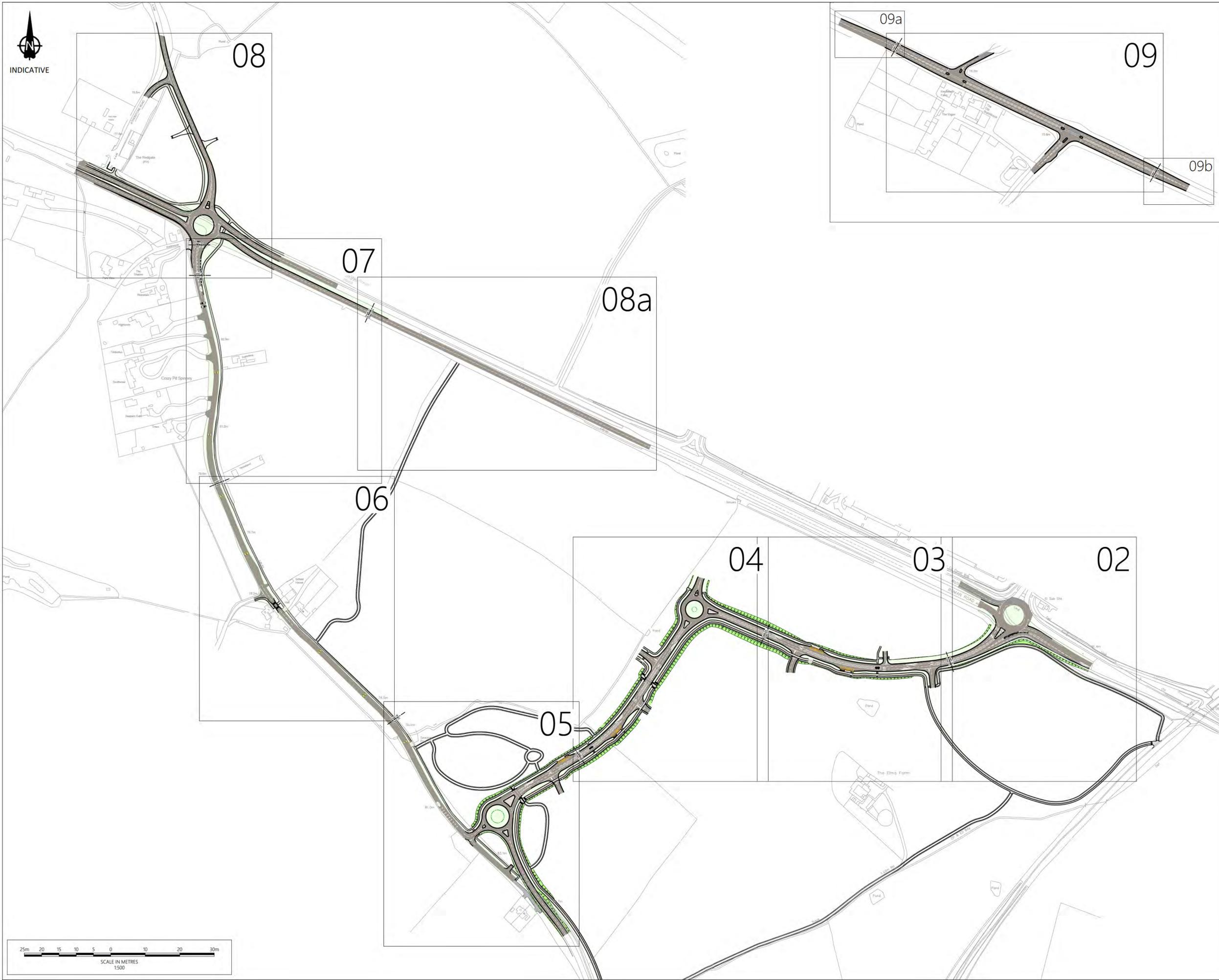


APPENDIX C

A5 / A444 Redgate Island Roundabout:
Mitigation Scheme- MIRA Technology
Park South Site



INDICATIVE



- Notes**
1. Do not scale from this drawing. All dimensions shown are in metres unless noted otherwise.
 2. This drawing has been based upon Ordnance Survey information produced by others and Milestone Transport Planning cannot be held responsible for any discrepancies which may arise because of it.
- Key**
- Carriageway
 - Footway
 - Cycleway
 - Verge
 - Landscaping

Ordnance Survey Licence number 100057360

Drawing Revisions

Rev:	Drn:	Date:	Details:	Chk:
-	DC	20/07/2022	First issue	MS
A	ZM	27/07/2022	Revised layout	MS
B	ZM	02/08/2022	Revised layout	MS

Client
ERI MTP Ltd

Project
MIRA Technology Park South Site

Title
Proposed Mitigation Works
Overall Layout

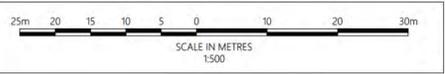
MILESTONE
TRANSPORT PLANNING

Abbey House, 282 Farnborough Rd, Farnborough, Hants GU14 7NA
Tel: 01483 397888
Gateshead IBC, Mulgrave Terrace, Gateshead, NE8 1AN
Tel: 0191 338 7220
web: www.milestonetp.co.uk

Drawing Number: 17059/GA/01

Scale: 1:2,500 @ A1

Revision: B





INDICATIVE

Additional capacity on A5: Proposed alterations to carriageway markings to provide continuous dual 2-lanes from MIRA roundabout to Redgate

1:2,000 @ A1

78.5m

ATHERSTONE ROAD

Red Gate House

77.9m

A 444

The Redgate (PH)

New field direct access in accordance with DMRB CD 123 Section 4

Rookwood

Sheet 08
Sheet 07

The Shades

Sheet 08
Sheet 07

1:500 @ A1

- Notes
1. Do not scale from this drawing. All dimensions shown are in metres unless noted otherwise.
 2. This drawing has been based upon topographical survey information produced by others and Milestone Transport Planning cannot be held responsible for any discrepancies which may arise because of it.
 3. All Earthworks slopes are at 1:3 gradient unless specified otherwise.

Key

	Carriageway
	Footway
	Cycleway
	Verge
	Landscaping



Drawing Revisions

Rev.	Drn.	Date	Details	Chk.
-	AM	18/07/2022	First Issue	MS
A	DC	20/07/2022	Amended Layout	MS
B	ZM	27/07/2022	Amended Layout	MS
C	ZM	02/08/2022	Amended Layout	MS

Client
ERI MTP Ltd

Project
MIRA Technology Park South Site

Title
Proposed A5 - A444 Link Road and Off-Site Mitigation

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Drawing Number:
17059/GA/08

Scale:
As Shown @ A1
Revision:
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From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Draft Local Plan Consultation Response - Kegworth Parish Council
Date: 14 March 2024 10:41:47
Attachments: [Local Plan Consultation Response.Kegworth Parish Council.docx](#)

I am attaching a response from Kegworth Parish Council to the NWLDC Draft Local Plan 2020-2040 consultation.

Please would you acknowledge receipt.

Donna Griggs

Clerk to Kegworth Parish Council

[REDACTED]

[REDACTED]

<http://www.kegworthparishcouncil.gov.uk/>

Working Days: Mon - Thurs, 9 am - 4 pm

Proposed Housing and Employment Allocations [D2]

Land North of Derby Road (A6), Kegworth (EMP73 (part))

[D2] 5.11-5.15

Land North of Remembrance Way (A453), Kegworth (EMP73 (part))

[D2] 5.16-5.20

Kegworth Parish Council has strong objections to the employment land allocations EPM73 (*Land North of Derby Road (A6), Kegworth* and *Land North of Remembrance Way (A453), Kegworth*) for the reasons set out in the document below.

Kegworth is a distinct and well-defined village location and is long and well-established village being recorded in the Domesday Book in 1086. The Land North of the Derby Road represents the last green space at this village boundary and keeps the Village distinct from the extensive Highway network (M1, M50, A453). In permitting this land allocation, the primary access to the village from M1 J24, we will be greeted by a large industrial area that runs seamlessly into our Historic village centre. This will cause significant harm, changing the character of our village and making it an integral part of an urban sprawl, including EMG, EMA and Castle Donington. Councillors also note that the proposed extension of the limit of development of Kegworth includes the Land North of the A6 but does not include the land North of Remembrance way. Given that the sites are contiguous, linked by the access road and also given most of this land is within the boundary of Kegworth Parish that would seem to be an error. This does, however, highlight that the development sprawls from Kegworth into the adjacent Parish.

To quote from 'Draft Policy Ec4 – Employment Uses on Unidentified Sites' we note that sites are suitable *where these do not have an unacceptable adverse impact on the amenities of any nearby residential properties or the wider environment and the local highway network*. Given the site across Derby Road is approved for new housing the adverse impact on residents well being due to loss of green space, heavy traffic and parking issues should be considered. It is clear that this site does create significant harm and adverse impact on our community.

The Employment land allocation is driven by a need to create opportunity for new employment. We note that in the table of section 5.2, there are six employment sites proposed totalling 127,710 sqm of building, of which 70,000 (55%) will fall within the enlarged village boundary of Kegworth. May we remind you that at the last census Kegworth had a population of 4,290. Clearly this site is not satisfying a local employment need. There are many thousands of existing employment opportunities at EMG, EMA and the various local distribution warehouse sites that far exceeds the local population. Within the wider context of NWL and the County of Leicester we contend that you have chosen the location with **the absolute least need** for extensive new employment opportunities. The Freeport and other development at the Ratcliffe on Soar site, is also very close by. This is a 265-hectare site and once fully occupied the redeveloped site claims the creation of between 7,000 and 8,000 jobs. The Fairham site North of Ratcliffe on Soar is providing an additional 100,000sqm of employment space. We find it hard to envisage there is convincing evidence that there

is a current and significant requirement for the development being proposed in this location.

The adjacent Highway infrastructure the (M1 J23A, J24, J24A) also serving the A453 and A50 is already highly stressed and has been continuously redeveloped over the last 30 years. The developments discussed above across the border in Rushcliffe are already causing concern about the additional stress on the highway network. This proposed land allocation exacerbates this problem and constrains potential solutions. Highway problems already have an impact on the quality of life for many Kegworth residents.

We also consider it imprudent to allocate land for development on top of the Derwent Valley Aqueduct (DVA). The DVA is a critical piece of vital national infrastructure that provides water for Loughborough and Leicester.

The site is on "Trent Valley Washlands" as denoted on Inset Map 15. The HS2 plans clearly showed this land is within the 100-year flood contour and is thus unsuitable for development. Hydrological changes within the last 10 years will have undoubtedly increased the flood risk for this area, certainly not decreased it. These sites will create more rapid surface run-off and remove volume from the flood plain. It is difficult to conceive of any mitigation that can be made on these sites. Effective detention ponds are not possible as the ponds would be on existing flood plain and indeed the lack of elevation above the Soar/Trent water table would also make proper mitigation impractical. This will increase flood risk in Kegworth and will have detrimental downstream effects and some limited upstream effects.

Councillors did note that the plan should have included possible access to the rear curtilage to Refresco which would allow HGVs to avoid the residential areas of Sideley.

Proposed Limits to Development Review [D3]

Kegworth Parish Council has the following comments on the document detailed above:

The changes *LtD/K/01 Refresco* and *LtD/K/02 New Brickyard Lane* shown in Inset Maps 15 and detail maps generally make sense and are supported.

As is detailed under employment land allocations, councillors are opposed to the loss of greenspace and other community impacts of the expansion to the North of Derby Road (emp73). We also believe this change is not shown correctly on the plans as it does not include the land within our Parish North of Remembrance Way which is contiguous, and which has common highway access within the village boundary. When this is included, this development then goes beyond our Parish boundary, sprawling into the next Parish.

Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth

The Council believes that this site is an exception on account of its anomalous location in the overall Local Plan proposals regardless of 'reasonable demand to use the premises for the uses in Table 5 (E(g), B2 and B8)'.

In the case of Kegworth, policies Ec5 and H5 cannot safely be taken in isolation if the integrity of the village is to be maintained.

It is noted that the existing soft drinks factory and the proposed new Employment sites are all to the East of Derby Road. The Computer Centre site is to the West, potentially creating an urban rather than rural feel across that part of Derby Road and impinging on existing and new residential areas.

This is effectively a brownfield site. It is sandwiched between existing housing areas (Pritchard Drive/Munnmoore Close/Suthers Road) and committed housing areas (policy H5). Unless the employment created here were complementary to residential use to enhance and strengthen the facilities of a Local Service Centre, e.g. to include a supermarket or leisure centre, it would create not only a physical barrier and potentially a visual or environmental barrier. It would reduce the chances of the new 141 home development by M1J24 being integrated into Kegworth.

If the HS2 embargo is lifted, there is a one-off opportunity to replace a piecemeal approach development on the West side of Kegworth with something resembling an integrated community development. This can only happen if a sensitive approach is taken to including the Computer Centre site in both Housing and Employment considerations.

Houses in Multiple Occupation Topic Paper and Draft Policy H8 - Houses in Multiple Occupation in Kegworth

The Parish Council supports the rationale for the Draft Policy which is set out in the document topic paper and welcomes Policy H8.

Topic Paper para. 3.4: we note that the work to identify and map HMOs in Kegworth is a work in progress and suggest that 14.0% is almost certainly an underestimate.

Topic Paper para 3.8: we suggest that any policy that is adopted will be subject to challenge at the planning application stage while there is no licensing scheme in place at NWLDC to cover HMOs of occupancy 3 or 4. We have researched the matter and note that many local authorities have used their discretionary right, established under the Housing Act 2004 to go beyond the now mandatory licensing of HMOs of occupancy 5 or more. It is imperative that an Additional Licensing Scheme or some registration scheme be introduced for the whole district or for the parish of Kegworth as a matter of urgency so that policy H8 will be workable.

Topic Paper para 5.2: we believe that the number of HMOs, and maybe also the percentage of properties that are HMOs, will continue to increase. Given that 14% could be an underestimate, that Article 4 proved to be insufficient to slow the increase, a commitment to an annual review of the policy's operation and effectiveness based on sound data, improved monitoring and control across the relevant Council departments and Kegworth Parish Council is required, building on the openness that Appendix A represents.

Topic Paper para 5.2: in order to limit unnecessary growth both within the terms of the new policy and, we hope, as a result of having comprehensive data by the time the policy becomes effective, we suggest a separate clause and appropriate policy measure to require planning permission to continue as an HMO when an existing HMO is sold.

Policy H8 para 6.74: we note that 14.6% would be better stated as 'at least 14%' to reflect the, as yet, incomplete data.

Policy H8 para 6.79: we note that if records of HMOs are not comprehensive, that will not only be a disadvantage, but will also be a weakness, rendering the policy less effective and fair. An Additional Licensing Scheme for HMOs of 3 or 4 occupants and some other enforceable registration scheme will be essential and should be introduced ahead of the Local Plan process.

Car Parking Provision (6.84-6.86): the parish council strongly supports this section and the proposal at H8(c) for the provision of off-street parking of one space per occupant. The parish council wishes to see a similar car parking rule for self-contained apartments in Kegworth. either in a separate policy or in an amendment to the Leicestershire Highway Design Guide.

Wording: at 6.73 the word 'smaller' should be removed – it is larger HMOs, 4-bed and more, that predominate.

Town Centre Topic Paper / Policy Paper Appendix A, 'Policy Maps'

The area proposed for removal on High Street, Kegworth has traditionally been occupied by shops of similar development. The proposal is opposed. Whilst current economics make residential development more financially attractive to owners, the village is still growing in size, and we believe that proposals for future retail/commercial applications within this area should still be looked on favourably.

We suggest that an expansion of the Town/Village Centre boundary is needed, not a contraction. This is to compensate for the trauma of Covid 2020-22, felt in every commercial and community centre, but also the protracted and difficult Public Realm Project (2018 – present and ongoing). In the High Street, central community facilities extend as far as the Community Library and the Heritage Centre. In London Road as far as the Parish Office. In Dragwell as far as Orchard Surgery. These expanded limits should be reflected in the boundary.

We suggest that for Kegworth Town/Village Centre the diversity of facilities and infrastructure is limited for a fast growing 'Local Service Centre' located close to a Freeport and a central hub of the national road network. Bus services are good, but car parking is limited. There are no NWLDC/LCC owned car parks and the Parish Council needs support to improve this situation and expand car parking as soon as possible. If the Town Centre boundary is expanded as we suggest, options and opportunities for community asset acquisition and development will increase. To that end, the expanded boundary should include all the back land of properties in High Street, Derby Road, Dragwell, Church Gate, Market Place included in our suggested expansion.

East Midlands Airport (Draft Policy Ec8):
Land and air quality (Draft Policy En 6)
Donington Park Circuit (Draft Policy Ec 11)

para 7.50/7.53 The continuing ambition and expansion of the Airport outlined at para 7.50 and the emergence of the Freeport make the admission in 7.53, that the last Sustainable Development Plan was dated as long ago as 2015, concerning. The next Airport Sustainable Development Plan will certainly have implications for this Local Plan and the wording of 7.53 should be tightened to ensure proper scrutiny and adequate consideration by the Airport of the objectives, policies and allocations in the Draft Local Plan.

The relationship of Policy Ec8 to the Freeport's jurisdiction and to policy IF1 (Development and Infrastructure) and IF5 (Transport Infrastructure and New Development) both need to be clarified.

Clause (3)(d) expands upon the unrestricted support for Airport growth in Clause (1): Noise: Kegworth Parish Council applauds the Airport Noise Action Plan process but feels that the cumulative effect of noise from the Airport/aircraft, Donington Park Circuit, the M1, and the EMAGIC railhead is not properly acknowledged here or elsewhere in the Local Plan.

Clause (3)(b) fails to define 'local' in relation to Air Quality and is vague in relation to scientific monitoring. Proven links between Air Quality and Health, the reinstatement of Housing sites in Kegworth adjacent to the M1, and the latest focus on Fine Particulate Matter all suggest that the removal of all monitors in the Kegworth area was premature. At least one up to date device should be reinstated.

Clause (3)(d) seems to imply that the reduction of airport-generated road traffic is an effect of improved public transport but fails to say clearly that improved road infrastructure is a prerequisite of growth given the pressures on M1 J24 and the A453.

Clause (3) of Draft Policy En (6) is inadequate in the light of the significant obligations placed on the District and described in paragraphs 10.76 onwards. Self-assessment will only be effective if continuous air quality monitoring takes place and if precise limits are laid down, to be used at the planning stage and post development.

East Midlands Airport: Safeguarding (Draft Policy Ec 9)

Kegworth Parish Council supports this policy, not least because memories remain of the Kegworth Air Disaster. We wish to see land South of the Development Boundary remain as valuable agricultural land. We believe that the Melbourne Parklands designation fits the intention of this policy. In particular we support clause (2)(g) and suggest that large scale solar arrays can be best concentrated on the EMAGIC or other Freeport sites.

East Midlands Airport: Public Safety Zones (Draft Policy Ec10)

The reduction in the area and size of the PSZs described at 7.64 is unwelcome in a community where memories remain of the Kegworth Air Disaster. The proximity of the M1 was a high-risk factor in 1989 and remains so. As well as requesting a review of the 1 in 100000 risk contour East of the M1, we request that no unnecessary increases of activity are permitted. We regard that the use of words and phrases like 'low density' 'very few' and 'reasonable expectation of low intensity use' are subjective and unhelpful when it comes to deciding planning applications.

Housing Policy H2 (Housing Commitments)

(Land adjoining 90 Ashby Road, Land Adjacent to Computer Centre and J24)

We note that this policy is to be updated, particularly to cover any lapse of planning permission. This is pertinent to our two housing sites, both having Reserved Matters approved but delayed because of HS2. We request that special provision be made, as far as possible within planning law, for a review of the following before implementation of existing plans for the two Kegworth sites which will represent a 10% increase in population during the lifetime of the Plan:

- Measures in plans to ensure integration into other built and planned development sites with the rest of Kegworth ie connectivity for pedestrians, cyclists and cars. This is especially important for Social Cohesion, Health and Well Being, and the growth and viability of commercial sites in the Village/Town Centre.
- The provision of public open space and leisure and sport facilities, in particular full-size pitches and team facilities per head of population in Kegworth given the growth in population by 16% in the ten years to 2021 alone. The nearest leisure centre in the district is Coalville and we know of no cross-boundary arrangements with other districts.
- New overall noise and air quality assessments, including the adequacy of monitoring to take into account the cumulative effect of continuing growth and development since Reserved Matters were approved. Contributors to noise and air quality in Kegworth, M1, Donington Park, the Airport, EMAGIC and its railhead and the growth and development plans of the Freeport sites. Prevailing westerly winds increase the cumulative impact.
- The adequacy of supermarket floor space in Kegworth per head of population.

Housing Policy H4 (Housing Types and Mix) and related policies **Housing Policy H11 (Adapted Housing)**

We are pleased to see this new policy which we believe should be applied to the two Committed sites in Kegworth. We are in broad agreement with the references to Affordable Rents but the policy preamble is not reflected in the proposed wording and falls short completely on 'Housing for Older People'.

There is an overall shortage in Kegworth of the accommodation types listed at 6.16, including Adapted Housing (Policy H11). However, given the strong evidence base for this policy in the HEDNA, the APR and the HENA , and the long period of time elapsed since both initial planning applications and 'reserved matters' on our sites we consider that the selection of a 'criteria-based approach' leaves too many loopholes and, unless the obligation on developers is tightened, the need in Kegworth, in particular, will not be met as a result.

Clause 4 of proposed Policy H4 is inadequate to close the gap that has opened up across all the accommodation types listed at para 6.16. The clause 4 statement

'Developments which include housing suitable for older people will be supported' makes no suggestion that schemes that do not include such housing for older people will not be supported. Continuing, the use of 'a proportion' renders this useless in ensuring extra provision for older people and belies both the policy heading and the subsection devoted to this group.

From: [REDACTED]
To: [PLANNING POLICY](#)
Cc: [REDACTED]
Subject: EXTERNAL: Draft North West Leicestershire Local Plan (2020 – 2040) Consultation - Marrons Submission OBO Strata Limited
Date: 14 March 2024 12:24:09
Attachments: [Publication Consultation Response Form - Strata.pdf](#)
[Representations on NWLDC Regulation 18 Consultation - Strata.pdf](#)

Good afternoon,
I hope you're well.

I am emailing to submit Written Representations to the North West Leicestershire Draft Local Plan 2020-2040 Public Consultation (Regulation 18).

As per the attached Public Consultation Response Form, the attached Representations have been prepared by Marrons on behalf of Strata Limited and respond to the Proposed Policies Consultation Document, namely Draft Housing Policies H4 'Housing Types and Mix', H5 'Affordable Housing', H10 'Space Standards' and H11 'Accessible, Adaptable and Wheelchair User Homes'.

Please may I request receipt of this email and the attached document.

Many thanks,
Phoebe

Phoebe Conway
Planner



Marrons

Waterfront House, Waterfront Plaza, 35 Station Street, Nottingham, NG2 3DQ
DX10004 Nottingham 1



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Miss
First Name		Phoebe
Last Name		Conway
Job Title (where relevant)		Planner
Organisation (where relevant)	Strata Limited	Marrons
House/Property Number or Name		██████████
Street		██████████
Town/Village		██████████
Postcode		██████
Telephone		██████████
Email address		████████████████████

PART B – Your Representation

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

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

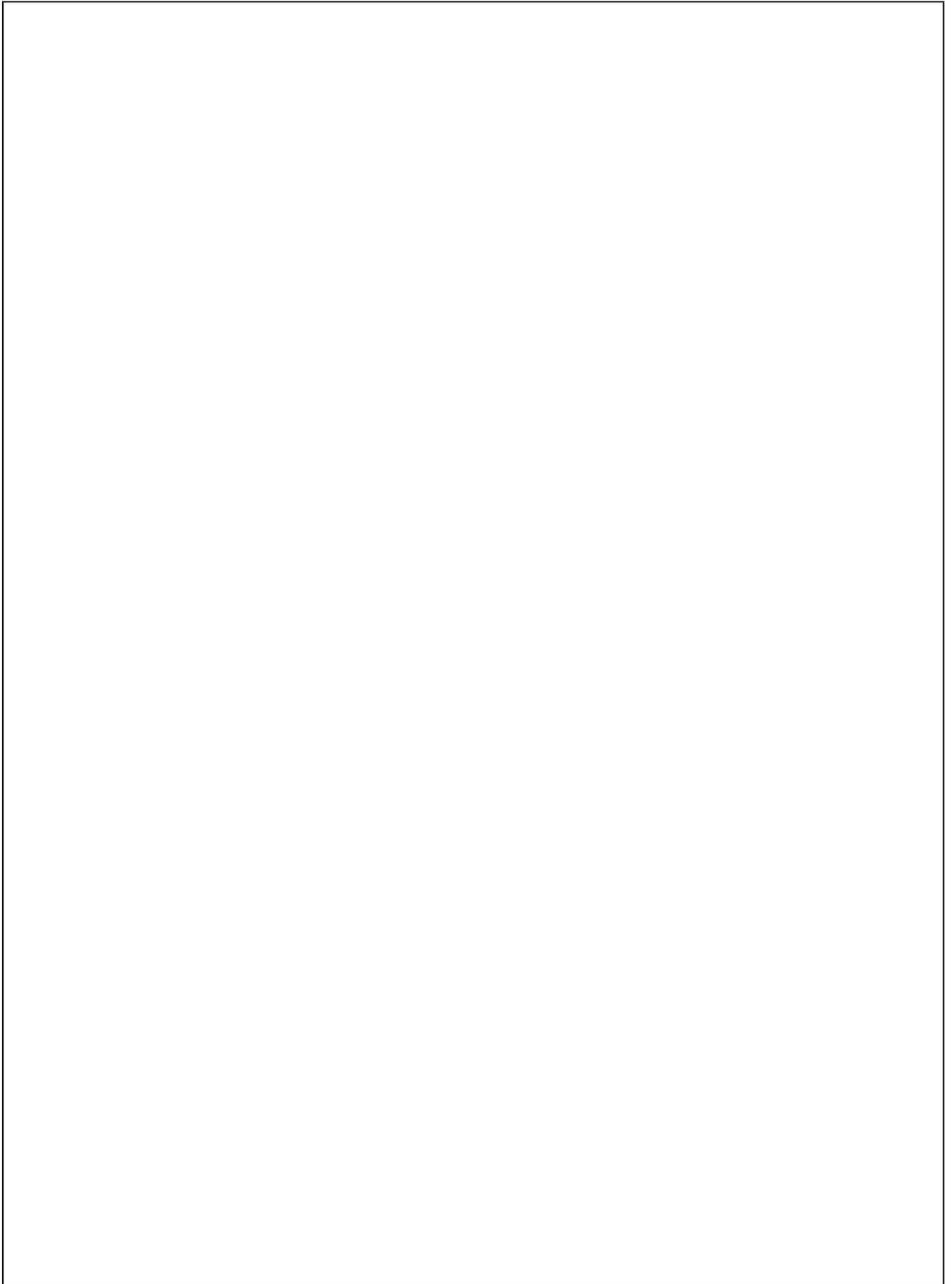
2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

Use this box to set out your response.

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

Please see supporting written Representations which respond to the following proposed policies:

- Housing Policy H4 – Housing Types and Mix (Strategic Policy);
- Housing Policy H5 – Affordable Housing (Strategic Policy);
- Housing Policy H10 – Space Standards; and
- Housing Policy H11 – Accessible, Adaptable and Wheelchair User Homes.



Declaration

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

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

Signed: Phoebe Conway

Date: 14th March 2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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

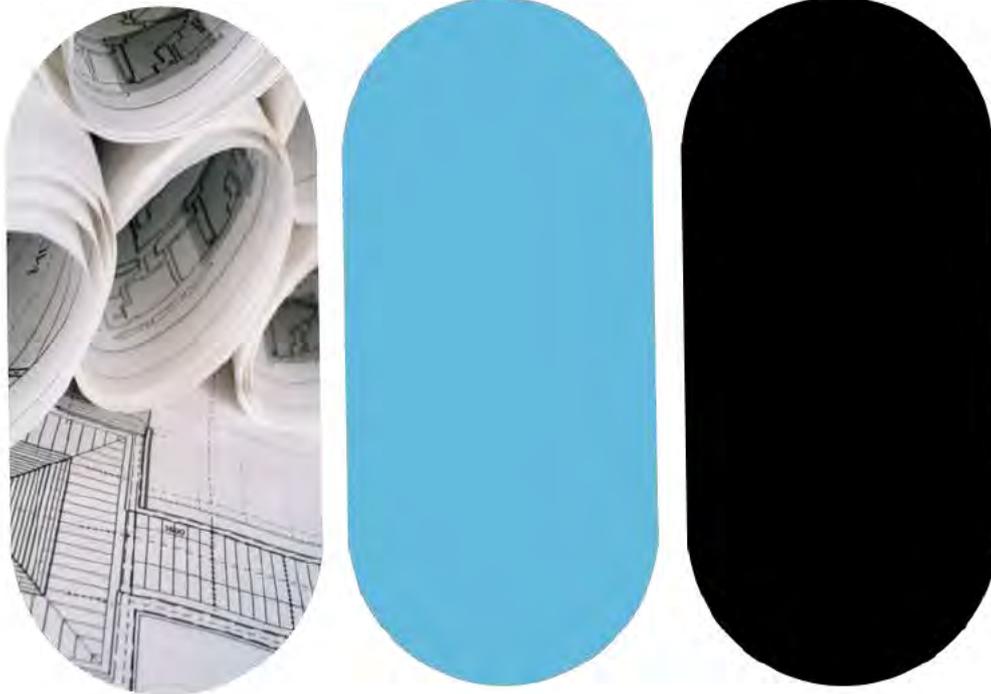


 Part of Shakespeare Martineau

**Representations in Respect of the Draft North West
Leicestershire Local Plan 2020 – 2040 Public Consultation
(Regulation 18)**

March 2024

On behalf of Strata Limited



Waterfront House, Waterfront Plaza, 35 Station Street, Nottingham, NG2 3DQ
www.marrons.co.uk



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1. Introduction

- 1.1 These Representations are made in respect of the Draft North West Leicestershire District Council Local Plan 2020 – 2040 (Regulation 18) Public Consultation, on behalf of our client, Strata Ltd.
- 1.2 The Council is inviting comments between Monday 5th February and Sunday 17th March 2024.
- 1.3 The following chapters will review the overarching planning policy framework and respond to the Proposed Policies for Consultation Document, specifically Housing Policies H4 (Housing Types and Mix (Strategic Policy)), H5 (Affordable Housing (Strategic Policy)), H10 (Space Standards) and H11 (Accessible, Adaptable and Wheelchair User Homes).



2. Planning Policy Context

2.1 Chapter 3 of the National Planning Policy Framework 2023 (NPPF), addresses 'Plan Making' and states in paragraph 16 that, "*plans should:*

- a. *Be prepared with the objective of contributing to the achievement of sustainable development;*
- b. *Be prepared positively, in a way that is aspirational but deliverable;*
- c. *Be shaped by early, proportionate and effective engagement between plan-makers and communities, local organisations, businesses, infrastructure providers and operators and statutory consultees;*
- d. *Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals;*
- e. *Be accessible through the use of digital tools to assist public involvement and policy presentation; and*
- f. *Serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area.*

2.2 Paragraph 35 explains that Local Plans and spatial development strategies are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. It goes on to state that "*plans are 'sound' if they are:*

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



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

2.3 In relation to draft Housing Policies H4 (Housing Types and Mix (Strategic Policy)), H5 (Affordable Housing (Strategic Policy)), H10 (Space Standards) and H11 (Accessible, Adaptable and Wheelchair User Homes) of the draft North West Leicestershire District Council (NWLDC) Local Plan the NPPF says the following:

2.4 Chapter 5, 'Delivering a Sufficient Supply of Homes', specifically paragraph 60 states that, "*the overall aim should be to meet as much of an area's identified housing need as possible, including with an appropriate mix of housing types for the local community*". Paragraph 61 explains that, "*to meet the minimum number of homes needed, strategic policies should be informed by a local housing needs assessment, conducted using the standard method in national planning guidance*".

2.5 Paragraph 63 identifies that "*within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.*"

2.6 Affordable Housing is addressed within paragraph 34 of chapter 3, 'Plan Making' under the category of 'Development Contributions' and states that, "*plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required*". It is also addressed in paragraph 64 which states that, "*where a need for affordable housing is identified, planning policies should specify the type of affordable housing required, and expect it to be met on-site unless:*

a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and

b) the agreed approach contributes to the objective of creating mixed and



balanced communities”.

- 2.7 Chapter 12, ‘*Achieving Well-Designed and Beautiful Places*’, lightly touches on space standards and accessible, adaptable and wheelchair user homes within paragraph 135, specifically footnote 52, which states, “*planning policies for housing should make use of the Governments optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties. Policies may also make use of the National Described Space Standard, where the need for an internal space standard can be justified*”.



3. Responses to the Proposed Policies for Consultation

Draft Housing Policy H4 – Housing Types and Mix (Strategic Policy)

- 3.1 In line with Paragraph 61 of the NPPF, Draft Policy H4 sets out requirements for the mix of housing that residential developments should deliver across the District reflective of the up-to-date Leicester and Leicestershire Housing and Economic Needs Assessment 2022 (HENA). The draft Policy is set to replace the Adopted Local Plan Policy H6 (House Types and Mix).
- 3.2 In general, Strata are supportive of draft Policy H4 and the importance of ensuring the provision of a mix of housing types and tenure in meeting the needs of the District. The draft Policy is not overly prescriptive and the flexibility provided in this policy is essential in taking account of specific circumstances and viability considerations. The table identifying dwelling size breakdown from the HENA, is included within the Policy (point 2) and is to be used as the starting point. This thereby makes the findings of the HENA planning policy itself rather than just supporting text, unlike the adopted Local Plan position.
- 3.3 Point 2a allows for a deviation of up to 5% from the figures within the dwelling size table providing the criteria relevant to market housing are engaged. Strata support the flexibility of this approach, although Strata do comment that 5% is a narrow allowance for deviation from the HENA and would not sufficiently achieve the flexibility aims the deviation provides for. Strata would urge the Council to broaden their allowance for deviation from the HENA to at least 10%.
- 3.4 Additionally, we believe that there should be another criterion (iv) added to point 2a which refers to justification being permissible based upon up to date market evidence/local need.



- 3.5 Point 2b relates to affordable housing and allows for a deviation of up to 5% from the HENA figures where one or more of the criteria are relevant as justification. As stated in paragraph 3.3, Strata would encourage the Council to broaden their allowance for deviation from the HENA from 5% to at least 10%. One of the criterion is ‘the Registered Provider’s requirements’ (2b. vi). In this respect, Strata would comment that further flexibility should be allowed for in the policy wording (in order to facilitate a deviation from the affordable housing position of the District) on the basis of the Registered Provider’s (RP) interest in taking on a site alongside technical or operating requirements. Again, as in the case of point 2a, an allowance should also be made for market considerations and local need at the point of a planning application. In respect of custom/self-build/housing for older people, Strata would argue that an allowance should also be made for viability considerations.
- 3.6 In respect of both points a) and b), deviation from the HENA should also be deemed ok where an outline planning permission or Design Code indicate otherwise.

Draft Housing Policy H5 – Affordable Housing (Strategic Policy)

- 3.7 Draft Policy H5 sets out the requirements for sites to deliver an affordable housing contribution in the District. The draft Policy is set to replace the Adopted Local Plan Policy H4 (Affordable Housing), but at this stage does not include the percentage requirements or tenure mix, which are to follow, subject to a whole plan viability test. Without any set requirements, Strata are unable to comment at this stage on the onsite provision of affordable housing (point 1). Referring back to paragraph 2.5 of these Representations, Chapter 3 of the NPPF states that “*plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required*”, and it is expected that this will be provided in future iterations of the draft plan.



- 3.8 Strata are largely supportive of draft Policy H5 point 2 and agree that in line with paragraph 64 of the NPPF (as noted above), any offsite provision should be robustly justified and should contribute towards the objective of creating mixed and balanced communities. In respect of point 3, Strata agree that a lower proportion of affordable housing should be acceptable where a viability assessment demonstrates that full policy compliance cannot be achieved. Strata would however also like to reiterate a point from paragraphs of these Representations above in that they strongly believe that a lower proportion of affordable housing, or a deviation from the HENA mix, should be acceptable if there is very little or no RP interest in or support for a site.
- 3.9 Strata are in full agreement with draft Policy H5 point 4 in that the affordable housing units should be integrated within the design and layout of a scheme in order to create mixed communities. This, in conjunction with delivering a mixed tenure of homes in compliance (subject to the allowances) with the HENA, should be supported.

Draft Housing Policy H10 – Space Standards

- 3.10 Draft Policy H10 requires all new housing to be built in accordance with the Nationally Described Space Standards, published in 2015 (NDSS). The inclusion of space standards within the New Local Plan would be a new policy for the District. Although the NPPF states that Space Standards are optional, Strata support the decision to include them within the Draft Plan.
- 3.11 The draft Policy is evidenced by the ‘Space Standards for New Homes Topic Paper’ which investigated 340 varying housetypes over 44 developments throughout the District, 25% of which were affordable and the remaining 75% were market, the findings concluded that 89% of the affordable homes were not NDSS compliant and 34% of the market homes were not NDSS compliant.
- 3.12 Strata strongly believe that all housing should meet the minimum NDSS



as set out within the table on page 75 of the Proposed Policies for Consultation Document, and there should be no differing requirements between market and affordable housing. Strata reiterate paragraph 6.104 of the Proposed Policies for Consultation Document in that housing with adequate internal space provides occupants with a decent standard of living and that this should be a mandatory requirement.

- 3.13 Following a review into the recent plan making practice of neighbouring Local Authorities, it is noted that Charnwood Borough Council have also included a planning policy on 'Internal Space Standards' within their Draft Local Plan (Policy H3) which seeks compliance with the NDSS for all new homes. Indeed, similar to North West Leicestershire District Council (NWLDC), Charnwood had not previously adopted a space standards policy within the Local Plan. This is the same for neighbouring Authority, Hinckley and Bosworth Borough Council, who having not previously adopted a space standards policy within their adopted Local Plan have now included a policy (HO03 'Space Standards') within their draft Local Plan. It would be fundamental that NWLDC retain this policy within their draft Local Plan to eliminate the insufficient provision of living and storage space within new build homes across the District and subsequent poor standards of living.
- 3.14 However, Strata disagree with paragraph 6.108 in support of draft Policy H10, and note that the requirements for all affordable rented homes to meet the standards as set out within the paragraph are far too restrictive. For instance, Strata would argue that the provision of some 2 bed 3 bed space homes should be allowed in affordable rent properties and the requirement for all 2 beds to provide 4 bed spaces is too restrictive, not necessary, nor conducive to creating a mix of house types and sizes.
- 3.15 Strata also query paragraph 6.111, in that they do not understand why the floorplans of affordable housing types should be clearly distinguishable from those for market housing. This is arguably contrary to the sentiment of draft Policy H5 point 4 which states that all affordable housing should be integrated within the design and layout of the scheme



such that they are externally indistinguishable from the market housing.

Draft Housing Policy H11 – Accessible, Adaptable and Wheelchair User Homes

- 3.16 In line with Paragraph 63 of the NPPF, draft Policy H11 requires all new homes to meet Part M4(2) of the Building Regulations and a proportion of new homes to meet Part M4(3) of the Building Regulations to deliver accessible, adaptable and wheelchair user housing.
- 3.17 Similar to draft Policy H10, this Policy would be a new requirement within the Local Plan. Strata agree that this is an important inclusion within the New Local Plan in order to meet the needs of differing groups and offer a better choice of accommodation to those with specific housing requirements.
- 3.18 However, Strata do not agree with draft Policy point 1 that all new homes will be required to meet Part M4(2) of the Building Regulations (accessible and adaptable homes). Internally, this is could be achievable and acceptable, however to accord with Part M4(2) externally could be challenging in certain circumstances, for example, such as in locations with a complex topography. In addition, it is asserted that there needs to be a degree of flexibility within this Policy to allow for viability, market conditions, and also specific housing needs at the time of a planning application.
- 3.19 Point 2 states that on housing developments of 10 or more dwellings, at least 9% of market housing will be required to meet Part M4(3)(2)(a) (point 2a) and at least 23% of affordable homes will be required to meet Part M4(3), with the expectation that these will be built to M4(3)(2)(b), although a provision of M4(3)(2)(a) will be considered where justified (point 2b).
- 3.20 Strata are extremely concerned with point 2. In terms of point 2a,



delivering 9% of all market dwellings as M4(3)(2)(a) without the appropriate evidence of need could reduce the saleability of the plots if they are not being sold to individuals who would require the additional requirements. Delivering an oversupply of M4(3)(2)(a) units, and for those not in need, would not make the best use of internal space. This would result in larger than necessary internal space in circulation areas that could otherwise be better made use of elsewhere in bedrooms or living spaces.

3.21 The same argument goes for point 2b, Strata would also express concern here for the extremely high percentage requirement for M4(3)(2)(b) units of at least 23%. Allocating 23% of all affordable housing on development sites as M4(3)(2)(b) without any justified need significantly reduces the number of standard affordable homes on each site, thereby limiting the target residents. Paragraph 6.120 in support of draft Policy H11 states that the figures are based on estimates, and as such, this strongly suggests that flexibility should be included within this Policy as the percentages are not based on actual evidence of need.

3.22 Again, following a review of draft and adopted policy requirements for M4(2) and M4(3) of neighbouring Local Authorities, the opinion remains the same. The NWLDC draft Policy H11 requests are extraordinarily high, particularly the request for at least 23% of affordable homes to be M4(3)(2)(b). Within the Hinckley and Bosworth draft Local Plan, draft Policy HO05 'Accessible Housing' only requests 5% of all new housing to be M4(3), "*unless evidence of local need dictates otherwise*". Hinckley and Bosworth have adopted an approach that wheelchair accessible homes should only be applied to those dwellings where the Local Authority is responsible for allocating a person to live in that dwelling. Similarly, draft Policy H2 of Charnwood's draft Local Plan seeks at least 10% of all new market homes to be delivered as M4(2) and states that, "*an appropriate proportion of affordable homes to meet M4(2) and M4(3) should be sought in consultation with relevant RP's*". Strata would urge NWLDC to adopt a similar approach to their policy and reduce the requirements currently being proposed in order to ensure the policy has



the required flexibility in order for the plan to be viably delivered.

- 3.23 With regards to point 3 of draft Policy H11, Strata are in agreement with the concessions proposed, however, as noted above, this Policy has a strong potential of significantly affecting the viability of development sites. The delivery of M4(2) and M4(3) units is dependent on each site in terms of constraints, particularly topography *and* market/RP buyer requirements. Therefore, it is essential that a more flexible approach is proposed. As stated within footnote 52 of the NPPF, “*planning policies for housing should make use of the Governments optional technical standards for accessible and adaptable housing, where this would address an identified need for such properties*”, Strata do not believe there is justification to request such a high percentage contribution towards M4(2) and M4(3) without the appropriate identified need.
- 3.24 To conclude, Strata agree with the concept of draft Policy H11, however they strongly disagree with the percentage contributions of M4(2) and M4(3) dwellings across the District. Strata would argue that in its current form the Policy is not feasible, and thereby not justified, and needs serious reconsideration.



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Ms	
First Name	Delia	
Last Name	Platts	
Job Title (where relevant)	NA	
Organisation (where relevant)	NA	
House/Property Number or Name	█	
Street	██████	
Town/Village	██████	
Postcode	██████	
Telephone	██████████	
Email address	████████████████████	

PART B – Your Representation

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

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

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

Use this box to set out your response.

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

Policy IW1

I do not support the new town development of Isley Woodhouse for the reasons below:

Too close to Diseworth, Donnington racetrack & EM airport

Will massively affect the flooding issues in Diseworth which are already a huge problem

Increased air, noise & light pollution as a result of over development

Will destroy acres of agricultural land affecting food production & hedgerows affecting wildlife

Road infrastructure will not be able to cope & Diseworth will become a rat run affecting the health & safety of the villagers – the 30/40 mile per hour limits are already ignored

How will the conservation village status of Diseworth be maintained when it is joined to such a large housing development

Policy EMP90

I am asking NWLDC not to include the EMP90 site for potential development for the following reasons:

Current road system cannot cope now when there is a diversion in place with traffic being re-routed through the village causing rat runs/traffic hold ups / safety issues with residents as well as the primary school located on a bend / increased littering & parking

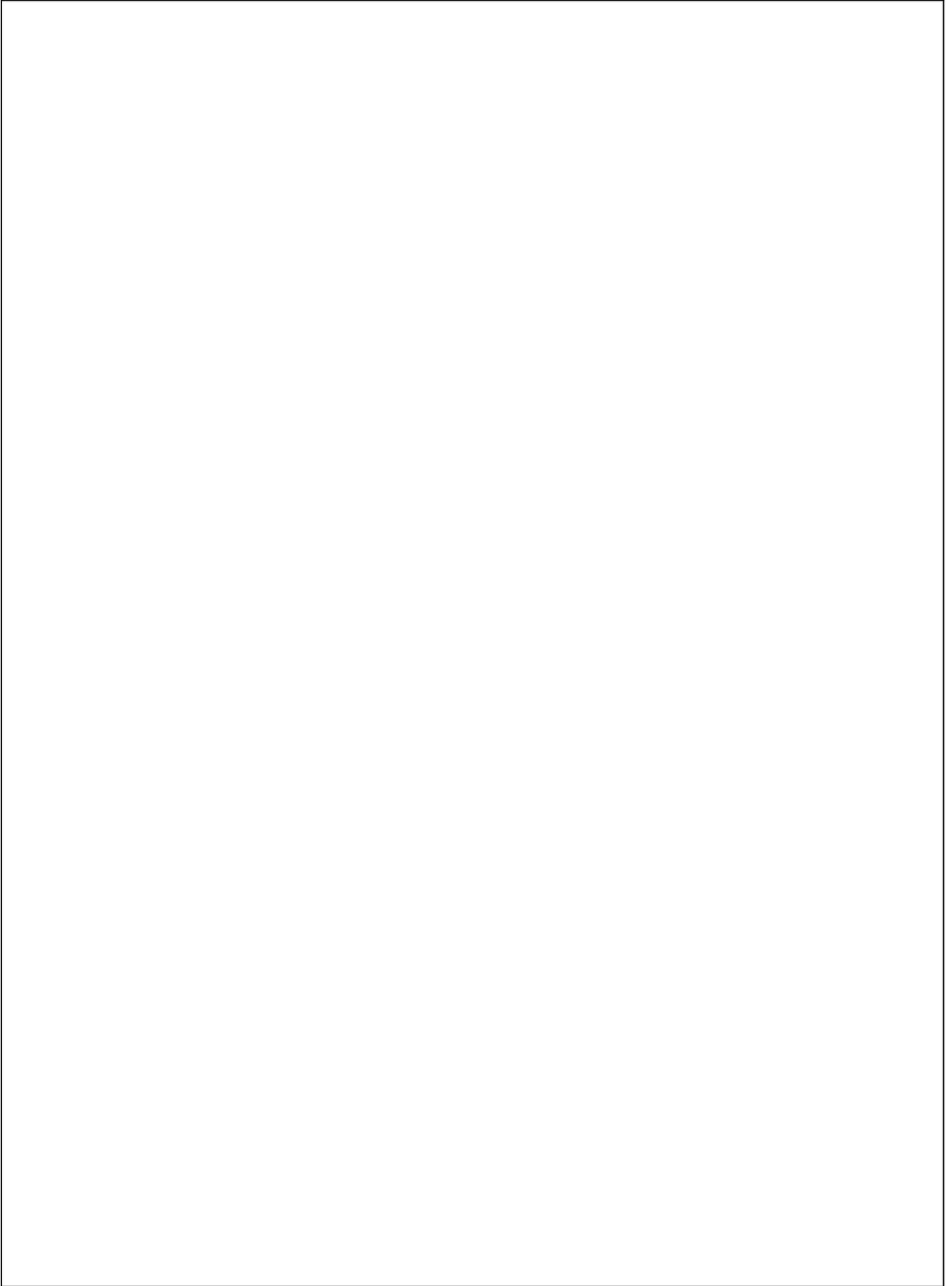
Will massively affect the flooding issues in Diseworth – no amount of drainage will prevent additional flooding affecting residents homes, drivers & pedestrians safety

How can the effects of this development be mitigated by buffering, screening or any other term that suggests the impact will be minimal – it will not stop 24/7 noise & light, air pollution, increase traffic light & pollution, road changes – it will affect wellbeing & health

Will destroy acres of agricultural land affecting food production & hedgerows affecting wildlife

Increased noise, light & pollution not just from the development but also vastly increased HGV & normal traffic will affect villagers mental health & safety

Undemocratic process is being followed if the government impose this development due to freeport status



Declaration

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

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

Signed: Delia Platts

Date: 14/03/24

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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



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

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Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Michael	
Last Name	Doyle	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
Street	██████████	
Town/Village	██████	
Postcode	██████	
Telephone	██████████	
Email address	████████████████████	

PART B – Your Representation

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

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

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

My response relates to both Policy EMP90 (the EMA / SEGRO industrial / warehousing development to the East of Diseworth) and IW1 (Isley Woodhouse new settlement to the West of Diseworth).

INTRODUCTION:

As a Diseworth resident, I am extremely concerned about the impact on the Conservation Village of Diseworth and its residents. I have lived in Diseworth since 1987, raised my children here, and cherish its special heritage and community.

I would like to start by saying that (particularly as a North Leics Litter Womble) I fully subscribe to the "Love Your Neighbourhood" message of this leaflet which accompanied my Council Tax Notice from NWLDC this week:



However, from reading the NWLDC Draft Local Plan, I question whether NWLDC shares my love of my neighbourhood. The two proposals on which I am commenting will not "make my environment better". They will make it worse, destroying hundreds of acres of countryside, productive farmland and wildlife habitat. I would prefer to feel that NWLDC is 'working together' with me with its proposals.

The two proposed developments to which I am objecting will permanently change the landscape around Diseworth and have the potential to not only affect the nature of our village and its environs, but also cause damage to the health of its residents and future generations.

NWLDC's proposals for these developments conflict starkly with other laudable policies in the DLP which promote well-being, caring for the countryside, flooding, pollution, air quality, climate change, sustainability, employment, heritage and more.

One of my prime concerns is that, for planning purposes, **these developments should NOT be seen in isolation from each other.** The cumulative effect on Diseworth of so many factors from multiple directions (including loss of wildlife habitat and rural landscape, air quality, light, noise, flooding, mental and physical health, traffic and more) must be viewed holistically.

The 'Green Lungs' around Diseworth are threatened with being lost forever.

It seems to me that both the EMP90 and IW1 developments are driven by Freeport Designation of our Area. As NWLDC is represented on the Freeport Board, how can you persuade me that your apparent support for both of these developments is not being pushed on to you by Central Government? If NWL had not been designated as a Freeport Zone, would you still be supporting the inclusion of these development proposals in the Draft Local Plan?

I am also concerned about the 'reach' of the Freeport designation. Where is the joined-up thinking of the three counties of Derbyshire, Nottinghamshire and Leicestershire? Why does NW Leics (and particularly Diseworth) appear to be bearing the brunt of this?

And may I ask about the "levelling up" justification of the Freeport designation of our area? I understand that NW Leics has some of the "highest levels of employment in the UK, with 1.2 jobs for every person of working age" (quoting from our MP). How does that qualify us for needing "levelling up"?

All of this comes on top of the various developments in NW Leics already experienced as a result of Diseworth being designated at the centre of the "Leicestershire International Gateway" as declared in NWL's Strategic Growth Plan published in 2018.

Nowhere in the Draft Local Plan can I see any reference to protecting agriculture and food production.

Is this not a priority? Diseworth's landscape has been shaped by over two millennia of agriculture. Are we prepared to throw that away, not only for ourselves, but for our grandchildren and beyond? Where will our future food security come from?

Those involved in formulating NWLDC's DLP probably have children of their own. How can they be comfortable with the proposed legacy of wholesale, permanent countryside loss which they will pass on to their grandchildren and beyond?

But down to specifics of the EMP90 and IW1 Proposals ...

EMP90 Industrial Development East of Diseworth:

My understanding is that there are two proposed developments in the pipeline:

- 1: EMA's proposal to develop south of the A453 down to Hyams Lane.
- 2: SEGRO's proposal to develop south of Hyams Lane down to Long Holden.

For a sense of scale, please see this mock-up of the village of Diseworth superimposed on those two sites:

Representative area of Diseworth Village (in black) superimposed on proposed EMA / SEGRO site of 250 acres (in white)



Image created by Protect Diseworth
December 2023

What is the gain (apart from corporate profit from a cheap land grab) from destroying 250 acres of productive farmland, trees and (I estimate) at least 7 miles of hedgerow wildlife habitat to build industrial units? How can Biodiversity Net Gain be obtained from this destruction? Please do not tell me that you expect to get a BNG of 10% by planting trees elsewhere. This destruction is proposed to happen within the Parish of Long Whatton & Diseworth. Any BNG accrued should be within the zone that the destruction is occurring. What are NWLDC's plans for achieving that? Why does NWLDC seem to have gone for the option of destroying the natural environment instead of utilising existing brownfield sites?

A Renewed Invitation:

In June 2023, residents of Diseworth invited all members of the Freeport Board (which includes NWLDC) to take an evening walk with us along Hyams Lane to see the area that would be destroyed if this goes ahead. We received no response from any Freeport Board Members, nor did any of them show up on the evening of our walk. We had a lovely stroll amongst the green fields. It's a shame that nobody from NWLDC (or anybody else on the Freeport Board) accepted our invitation. If they had, they might better understand the potential impact of this proposed destruction.

But it's not too late. If any representative of NWLDC is reading this and wishes to join me on a Spring evening stroll up Hyams Lane to see with your own eyes, please contact me:

Mike Doyle. [REDACTED]

Here's a picture of Hyams Lane where we would walk:



Lovely, isn't it? Would you like to join me on that walk, and see it with your own eyes?

IW1 (Isley Woodhouse new settlement to the West of Diseworth).

This proposal for a new settlement (I estimate about the size of Castle Donington) to the west of Diseworth is, unlike the EMP90 proposal, not within the Parish of Diseworth & Long Whatton. However, its impact on Diseworth would be significant.

My personal worries are:

- Seen in conjunction with the EMP90 proposal, this will squeeze Diseworth from both sides, with loss of a further 750 acres of agricultural land and ancient hedgerows.
- Diseworth is already subject to regular (and increasingly frequent) flooding from the west. Where will all the increased water from IW1 go?
- Air quality: given the prevailing westerly wind towards Diseworth, combined with Diseworth's situation in a dip (61 metres above sea level), how will the increased air pollution be managed? The current 'Green Lung' to the west of Diseworth, with its ability to scrub the air, will be lost to the new settlement.
- Why does so much of County & District Council's housing requirement need to be concentrated in this place, which comprises solely of undeveloped countryside?
- The IW1 proposal seems to me to be linked to Freeport development; Industrial development to the east of Diseworth, new settlement to the west of Diseworth.
The cumulative impact of both of these proposals MUST be viewed as a whole for planning purposes.
- Increased pollution of all kinds for Diseworth ... noise, air, light, traffic emissions (not just tailpipe, but increasing concern about tyre particulates) ...
Again, this MUST be seen holistically with the EMP90 proposal, as well as East Midlands Airport's continued expansion and current implementation of brighter lighting which is already affecting Diseworth.

A Final Observation regarding CLIMATE EMERGENCY:

This, to me, is the real kicker, and I write from my heart about it.

NWLDC (together with Leics County and City Councils), recognises that Global Warming and Climate Change is real, is accelerating, and that human activities are a major contributory factor. **NWLDC declared a Climate Emergency in 2019**, and set targets to achieve a Net Zero Carbon Council by 2030 and a Net Zero Carbon District by 2050.

I am trying (and failing) to see how the EMP90 and IW1 proposals, together with continued expansion of East Midland Airport (all three of which surround Diseworth), are driving us towards Net Zero.

Destroying hundreds of acres of carbon sink countryside either side of Diseworth to enable the building of EMP90 and IW1 puts us straight into carbon deficit before a spade is even put into the ground ... doesn't it?

Why do these developments have to involve the destruction of Diseworth's Green Lungs?

Destroying open, rolling countryside to build them is totally inappropriate.

Please, consider the future world we are creating for those who come after us.

The NWLDC Local Plan shapes the legacy we leave for OUR children, grandchildren (yes ... both yours and mine), and further generations to come.

What legacy will NWLDC's Local Plan create for our OWN future families down the generations?



There must be a balance between achieving economic growth, corporate profit, and destroying our environment to achieve it.

I believe that the EMP90 and IW1 proposals, combined with continued EMA expansion, have got this balance utterly wrong.

SUMMARY:

Frankly, my mind is frazzled by all this. The bucolic nature of my beloved village is under threat from three primary sources:

1. To the East, within our Parish: **EMP90 industrial development.**
2. To the West, bordering on our Parish: **IW1 new town.**
3. To the North: **East Midlands Airport.** Diseworth is located one mile south of the plateau on which EMA sits. EMA already has significant growth plans for the future, for both cargo and passenger flights. This EMA expansion gives me particular concerns about deteriorating air quality down in the “Diseworth Dip”. Also, in recent weeks, EMA has erected new LED lighting which has increased light pollution shining directly down the hill into Diseworth. EMA did this without prior consultation with, or involvement of, Diseworth residents.

The feeling of powerlessness in the face of all of this is, I know, affecting the mental health of my neighbours and friends in Diseworth.

Finally ... what do I ask of NWLDC?

I ask to feel listened to.

I ask to feel understood.

In particular, I would like NWLDC to clarify whether they really understand the cumulative effect of all the development threats to Diseworth, particularly those which appear to be sneaked in under the umbrella of Freeport designation.

I would like to feel that NWLDC really does ‘Love My Neighbourhood’.

Right now, I find that difficult to do.

My invitation for somebody from NWLDC to walk up Hyams Lane with me, and simply have a chat, still stands.

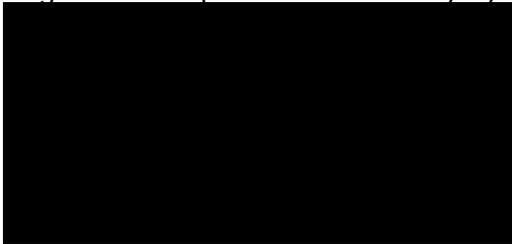
- Mike Doyle

Declaration

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

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

Signed: Completed electronically by Michael John Doyle



Date: 14 March 2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

Please ask for: Grant Butterworth
Direct line: [REDACTED]
Email: planning.policy@leicester.gov.uk
Website: www.leicester.gov.uk
Our ref: **North West Leicestershire DC Local Plan
consultation Feb/ Mar 2024**
Date: 14th March 2024



Planning Policy & Land Charges Team
North West Leicestershire District Council
PO Box 11051
Coalville
LE67 0FW

Dear Sir/ madam,

RE: North West Leicestershire District Council's Local Plan Consultation February/ March 2024

Thank you for consulting Leicester City Council on the Local Plan consultation. The following comments relate to the Proposed Policies Document:

Chapter 3 Background to the Plan

The Duty to Cooperate: Paragraphs 3.17 to 3.20

Reference to ongoing commitment to Duty to Cooperate around Leicester and Leicestershire SCOG is welcomed. We would welcome an ongoing commitment to this joint working to address unmet need.

Chapter 4: Strategy

Paragraph 4.8-4.9

The reference to Leicester's unmet need in the Strategy chapter is supported by LCC. The housing requirement has been calculated taking into account: the standard formula for calculating housing needs, included the figure from the SoCG of the 314 dwellings anticipated to be taken up from Leicester's unmet need, and acknowledges the 35% uplift that is relevant to Leicester.

Draft Policy S2: Settlement Hierarchy (Strategic Policy)

LCC supports the establishment of a settlement hierarchy (Draft Policy S2), and that housing supply will be supported by Local Needs Villages as a strategy for housing growth.

Chapter 5: Creating Attractive Places

Paragraph 5.33: Energy reduction bullet point

The bullet point states that *“The use of high energy efficiency lighting and mechanical ventilation with heat recovery should also be considered.”* It is preferable to avoid installing mechanical ventilation systems as they increase energy consumption and carbon emissions during the summer. This runs counter to purpose of the “Energy Reduction” section of the Energy Hierarchy. Therefore, although we agree that the heat recovery should be utilised wherever mechanical ventilation are installed, we think it should be made clear in this section that the use of mechanical ventilation systems should only be acceptable where less energy intensive options have been considered beforehand and found not to be appropriate.

Paragraphs 5.45 to 5.55

It is good to see a strong section on Health and Wellbeing. However, this is a cross cutting issue that is relevant to so many of the topic areas in the Local Plan. In addition to a dedicated section on Health and Wellbeing, consideration could also be given to adding extra reference to Health and Wellbeing throughout the Plan. This will give the issue greater emphasis and ensure that this critical issue is central to the aims of the Local Plan.

Chapter 6: Housing

Draft policy H1: Housing Strategy (Strategic Policy)

The 10% buffer in policy H1 is welcomed.

Paragraph 6.90

The GTAA for North West Leicestershire was completed recently in November 2022. However, in December 2023 a change was made to Planning definition in the Planning Policy for Travellers Sites. It may be necessary to consider the implications of the change in planning definition for the study through an update or position statement.

Chapter 9: Infrastructure and Facilities

Supporting text for draft policy IF1: Development and Infrastructure

The supporting text for IF1 should mention the need to support public transport connections between the city and North West Leicestershire, in particular, routes that go to the various logistics hubs. This is because a large number of people who live in the city, work in these developments.

Paragraph 9.31

An earlier paragraph of the consultation document (para 7.2) states that “North West Leicestershire falls within the Greater Leicestershire Functional Economic Area” and this reflects the strong economic partnerships between the city and Leicestershire and the high level of commuting “containment.” As such

we are concerned with any likely adverse highway impacts on routes into the city. The areas of concern include A7 Hinckley Road, A563 Outer Ring Road, A50 Groby Road, as well as parts of the Strategic Road Network (M1 and A46). Mitigation measures for Leicester's highway network may be required to support this new growth based on any strategic transport modelling findings. This should be recognised in paragraph 9.31.

Paragraph 9.34

The principle of the text is supportive, but it would be helpful to have a reference to Leicester, as its role as the "central city" as identified within the 2018 Strategic Growth Plan. This would assist in ensuring that there is effective public transport connectivity and accessibility to the city of Leicester.

Unmet Employment Need

The city council are looking to address an unmet employment need. Is there any land in North West Leicestershire that could be used to take some of this unmet need?

We would appreciate being consulted on further issues that may have cross border impacts on Leicester's infrastructure.

Yours sincerely,



Grant Butterworth
Head of Planning

PART B – Your Representation

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

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

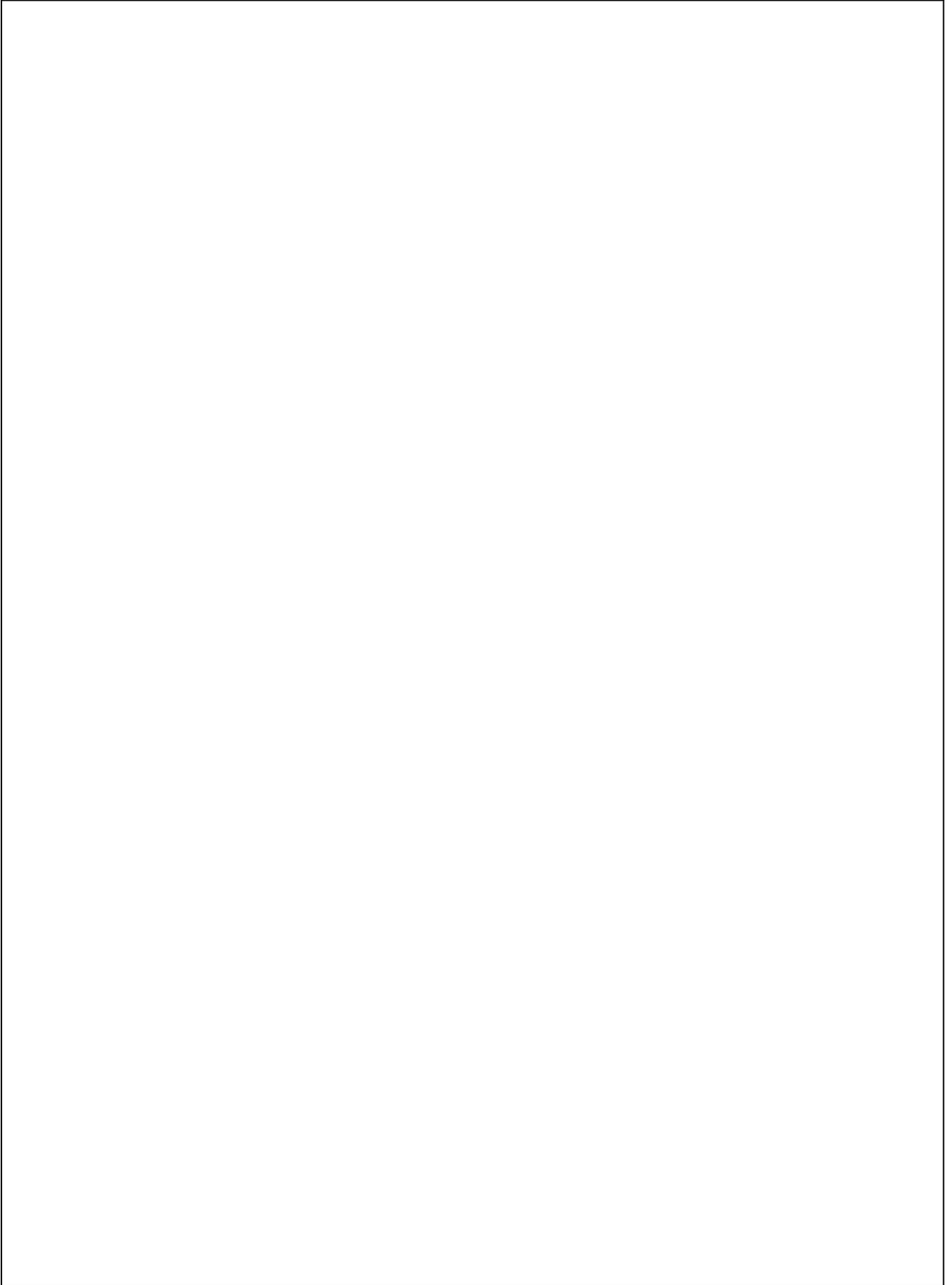
2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

Use this box to set out your response.

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

Oakthorpe Allocations - Proposed Housing and Employment Allocations for Consultation

A separate document giving a detailed response has been submitted on the viability of our client’s site (referenced as 0a7 within the SHELAA 2021 Assessment of Potential Housing) alongside this form.



Declaration

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

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

Signed: *Andrew Large*

Date: 14/03/2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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

Land at Measham Road, Oakthorpe

Referenced as Oa7 within the SHELAA 2021 Assessment of Potential Housing



Figure one: Extract from SHELAA 2021 Assessment of Potential Housing

1.0 Background

The site known as Land at Measham Road, Oakthorpe was put forward during the 2021 SHELAA. It was not included in the most recent Proposed Housing and Employment Allocations for Consultation (Draft North West Leicestershire Local Plan 2020- 2040)_however this document seeks to address any issues raised as part of the previous assessment and also provide further information on the opportunities and constraints specific to this site. A subsequent application would include a Design and Access Statement, Flood Risk Assessment, Transport Statement , Phase 1 Habitat Survey (followed up with any necessary species surveys), Bio Diversity net Gain Assessment, Coal Mining Risk Assessment, Mineral Risk Assessment, Section 106 Undertaking and anything else that the local authority deemed necessary.

2.0 Site Location

The site is located between Measham Road, New Street and Canal Street, with Saltersford Wood and adjoining car park on the north western boundary. The site slopes quite steeply downwards from its highest point at the rear of the houses along New Street to where it adjoins Saltersford Wood. There is a public footpath that runs along the site's boundary with Saltersford Wood (P64) and then a further footpath (P2) crosses straight through the site. There are overhead power cables currently present - running alongside the site's boundary with Measham Road and then a further set run diagonally across the very western extent of the site from Canal Street across to the north western boundary. Boundaries are predominantly mature hedgerows and trees.

Oakthorpe has a range of services and facilities including a post office, public house, primary school, leisure centre, general store, children's play area and benefits from a regular bus service. The nearest railway station is Tamworth, and East Midlands Airport is within the district.

3.0 Allocation details

Within the SHELAA 2021 Assessment of Potential Housing Sites, the following points were raised in terms of the lands suitability for development.

- Planning Policy

The site is located outside the Limits to Development as identified on the adopted Local Plan Policies Map (2017). The adopted Local Plan identifies Oakthorpe as a sustainable village. Within the latest consultation sites which fall outside the limits to development have been included for consultation. This cannot therefore be seen as a reason for exclusion, especially given the sites relationship to existing built form.

- Highways

The indicative layout (Appendix One) shows that a proposed vehicular access off Measham Road can be incorporated, which meets the standards set out in the Leicestershire Highways Design Guide. The previous SHELAA references an accident occurring in close proximity to the site. Looking at Crash Map Data UK there was a fatal traffic accident at the junction between Measham Road and New Street in 2015. This is

107 metres from the proposed access to the site, and it is understood that traffic calming measures have now been installed along this stretch of road.

- Minerals

The whole site falls within the Mineral Consultation Area for the potential presence near or at surface coal resources. As such the applicant understands that the County Council would need to be contacted regarding the potential sterilisation of this mineral resource. A Mineral assessment would also be undertaken and submitted as part of a future application.

The site also falls within a Coal Development High Risk Area, and as such a Coal Mining Assessment would be a prerequisite for any application.

- River Mease

The whole site is located within the River Mease catchment. As such we understand that any development needs to allow provision for the discharge of wastewater into the River Mease catchment in accordance with the provisions of Policy En2.

We understand the necessity to ensure that any pollutants and sediments arising from the development do not reach the River Mease. A Construction Environmental Management Plan will be submitted as part of the application to address this.

It is understood there is likely to be capacity for additional sewage circa 2028 however given current constraints with capacity within the River Mease, a temporary non mains drainage solution can be been allowed for as shown within the indicative proposal with a transfer to main sewerage when capacity is available locally.

There is an existing public foul sewer which could serve the development as highlighted on the site layout. In the event that capacity wasn't available a temporary single package treatment plant would be used for the proposed residential units instead.

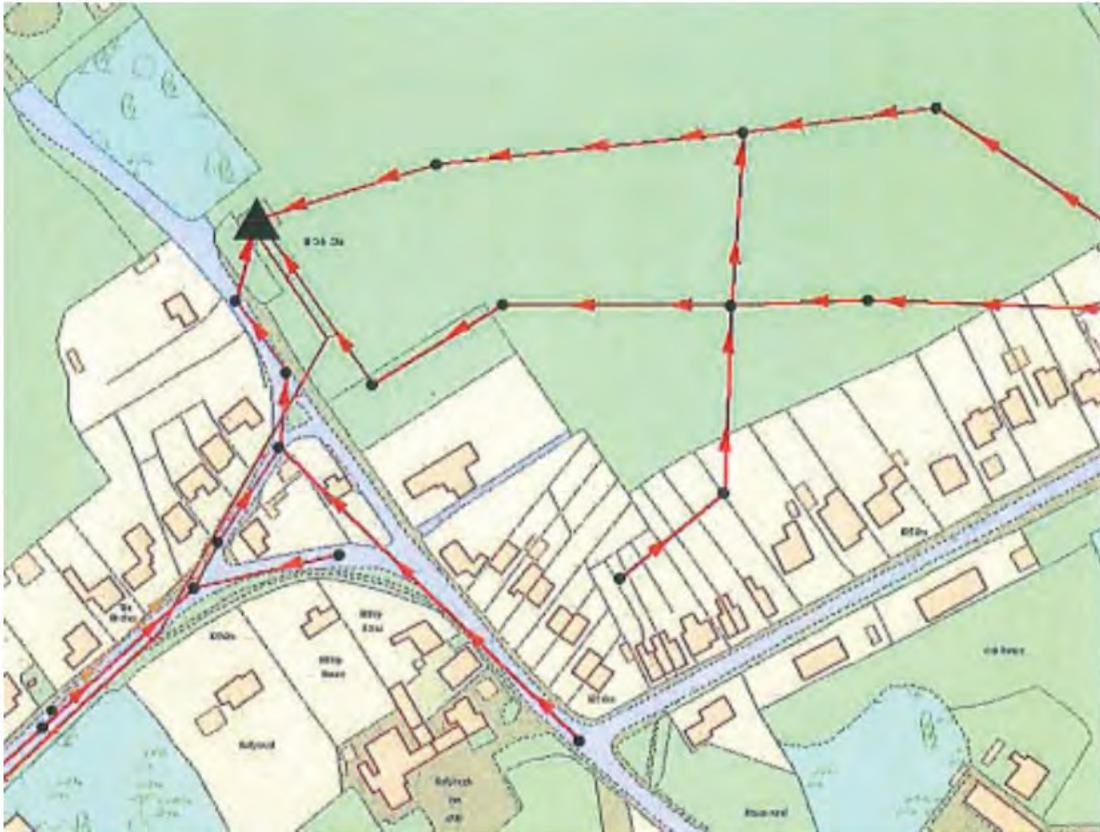


Figure two: Severn Trent Sewer Records

It is estimated that a tank capable of treating the equivalent population will be required.

A BioDisc / klargester type package treatment plant would be proposed.

The details of the unit and its output would be provided as part of any application

The package treatment plant will discharge into the stormwater drainage and thereafter into the pond as shown for indicative purposes on the accompanying layout.

The construction of the new carrier drains would provide self-cleaning velocity for the relative pipe diameter as per Building Regs 2015 Part H.

Minimum pipe dia. to be 100mm.

Minimum gradient to be 1:80 for 100mm pipe and 1:150m for 150mm pipe.

Manholes and inspection chambers to be located at no more than 45m centres.

- Ecology

As there is a potential for badgers to be on site, a Phase 1 Habitat Survey would be undertaken as part of the application which would form the basis of a bio diversity net gain calculation. Any submitted scheme would allow for a 10 metre buffer along the site's boundary with the woodland and buffer zones along the hedgerow. A Great Crested Newt (GCN) survey or entry into the GCN District Level Licensing Scheme would be required.

- Availability

The owner of the site is a developer and house builder with a good track record of delivering sites quickly within the district.

As well as the above, we envisage that any development would need to meet the following criteria:

(a) Provision of affordable housing in accordance with draft Policy H5

Affordable housing will be provided on site in line with policy requirements.

(b) Provision for self-build and custom housebuilding in accordance with draft Policy H7

Self – build and custom housebuilding will be provided on site in line with policy requirements.

(c) Areas of public open space

An area of public open space will be provided on site in line with policy requirements.

(d) Surface water drainage provision (SuDS)

A detailed drainage design will be submitted as part of the full application, allowing for SuDS and the sites location within the Rover Mease. The site is located within Flood Zone 1, but would still require a flood risk assessment as is over 1 hectare.

(e) Retention of the existing public rights of way in so far as possible, with any diversions made to a convenient route nearby;

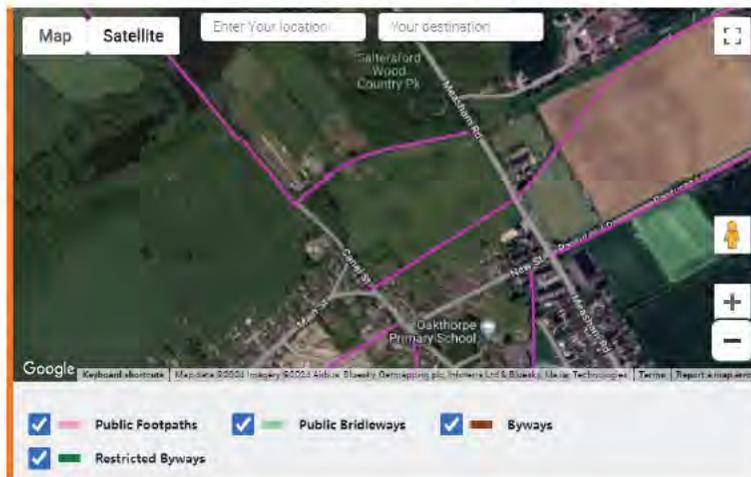


Figure three: Leicestershire County Council rights of way map extract

Two footpaths are currently located on or bordering the site, P64 and P2. P64 is located on the edge of the site and remains unaffected. The indicative layout shows that P2 can also be incorporated into the scheme with no diversions necessary.



Figure four: Indicative site layout with diversion of route P2 shown

(f) Provision of a high-quality landscaping scheme

The attached plan shows the incorporation of landscaping withing the scheme.

(g) Achievement of biodiversity net gain in accordance with national requirements;

The proposal is for the northern part of the site, bordering Saltersford Wood to be set aside for the Biodiversity net gain and National Forest Planting. This will also ensure that built line of development does not impact the nearby Local Wildlife Site at Saltersford Brook Wetlands in any way, and the footpath route P64 remains unaffected.

(h) Provision of tree planting and landscaping in accordance with draft Policy En3 (The National Forest);

The attached plan shows how tree planting and landscaping can be incorporated into the scheme.

4.0 Conclusion

This report and attached plan have demonstrated that the site can allocated for housing development, as all potential constraints can be addressed.

APPENDIX ONE – INDICATIVE SITE LAYOUT



PART B – Your Representation

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

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

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

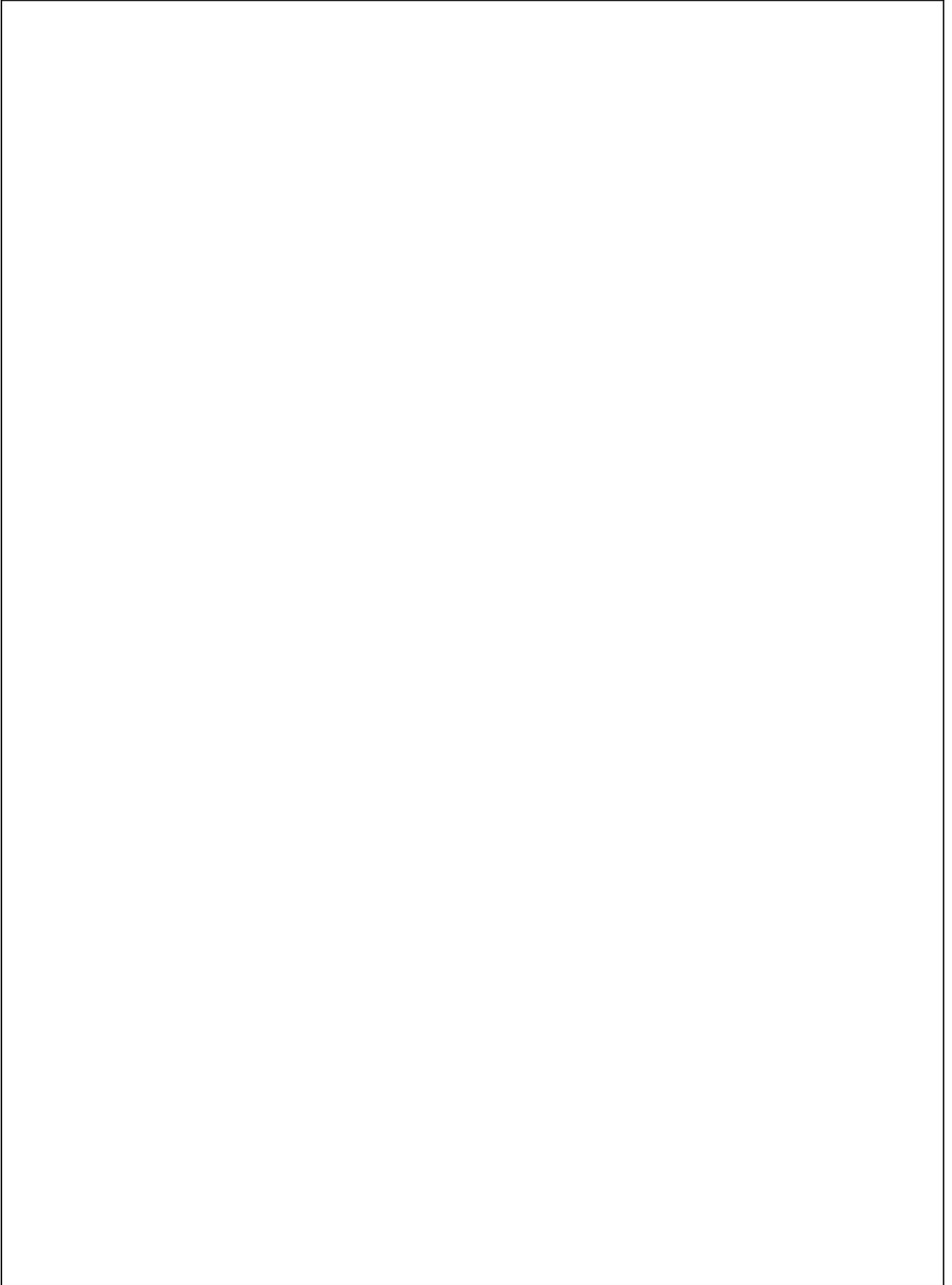
Use this box to set out your response.

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

Allocation 0a5 within the Draft North West Leicestershire Local Plan 2020- 2040

Proposed Housing and Employment Allocations for Consultation

A separate document giving a detailed response has been submitted on the viability of Allocation 0a5 along side this form.



Declaration

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

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

Signed: *Andrew Large*

Date: 14/03/2024

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

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

1.0 Background

The site has been put forward for allocation within the Draft North West Leicestershire Local Plan. It has subsequently been included within the Proposed Housing and Employment Allocation consultation. This document seeks to address any issues raised as part of this consultation and also provide further information on the opportunities and constraints specific to this site. A subsequent application would include a Design and Access Statement, Flood Risk Assessment, Transport Statement, Phase 1 Habitat Survey (followed up with any necessary species surveys), Bio Diversity net Gain Assessment, Coal Mining Risk Assessment, Mineral Risk Assessment, Section 106 Undertaking and anything else that the local authority deemed necessary. This representation is accompanied by an indicative layout at Appendix One.

2.0 Site Location

The site is situated to the south of the former Home Farm, Oakthorpe being enclosed on three sides by the village; Silver Street to the west, Main Street to the north and School street to the east. The site is accessed off school street and extends to 1.88 hectares. The boundaries are a mixture of hedgerows and fences bordering onto neighbouring residential and agricultural properties.

Oakthorpe has a range of services and facilities including a post office, public house, primary school, leisure centre, general store, children's play area and benefits from a regular bus service. The nearest railway station is Tamworth, and East Midlands Airport is within the district.

3.0 Allocation details

The Proposed Housing and Employment Allocation consultation states that the site is allocated for:

- (a) Around 47 homes*
- (b) Provision of affordable housing in accordance with draft Policy H5*
- (c) Provision for self-build and custom housebuilding in accordance with draft Policy H7*
- (d) Areas of public open space*



(e) Surface water drainage provision (SuDS)

We are confident that a scheme can be put forward that incorporates provision for all of the above. The indicative layout (Appendix One) shows provision for 47 units which would include a proportion of self build units and affordable housing provision. Public open space is incorporated within the development site. Attenuation for surface water drainage would be to a pond within the area shown labelled SUDS with discharge to the nearest watercourse or soakaway as applicable.

The consultation document further goes on to caveat that development of the site will be subject to certain requirements.

(a) Provision of a safe and suitable access from the adjacent residential development at Home Farm;

The applicant can confirm that access rights are available to the site owner and developer through the Home Farm development. The image below shows that an access through the site has already been created within the new development.



Figure two: Aerial Photography

(b) Retention of the existing public rights of way (P71, P72 & P74) in so far as possible, with any diversions made to a convenient route nearby;

A scheme can be devised which allows for the retention of the three existing public rights of way. The existing rights of way are shown in figure three below.

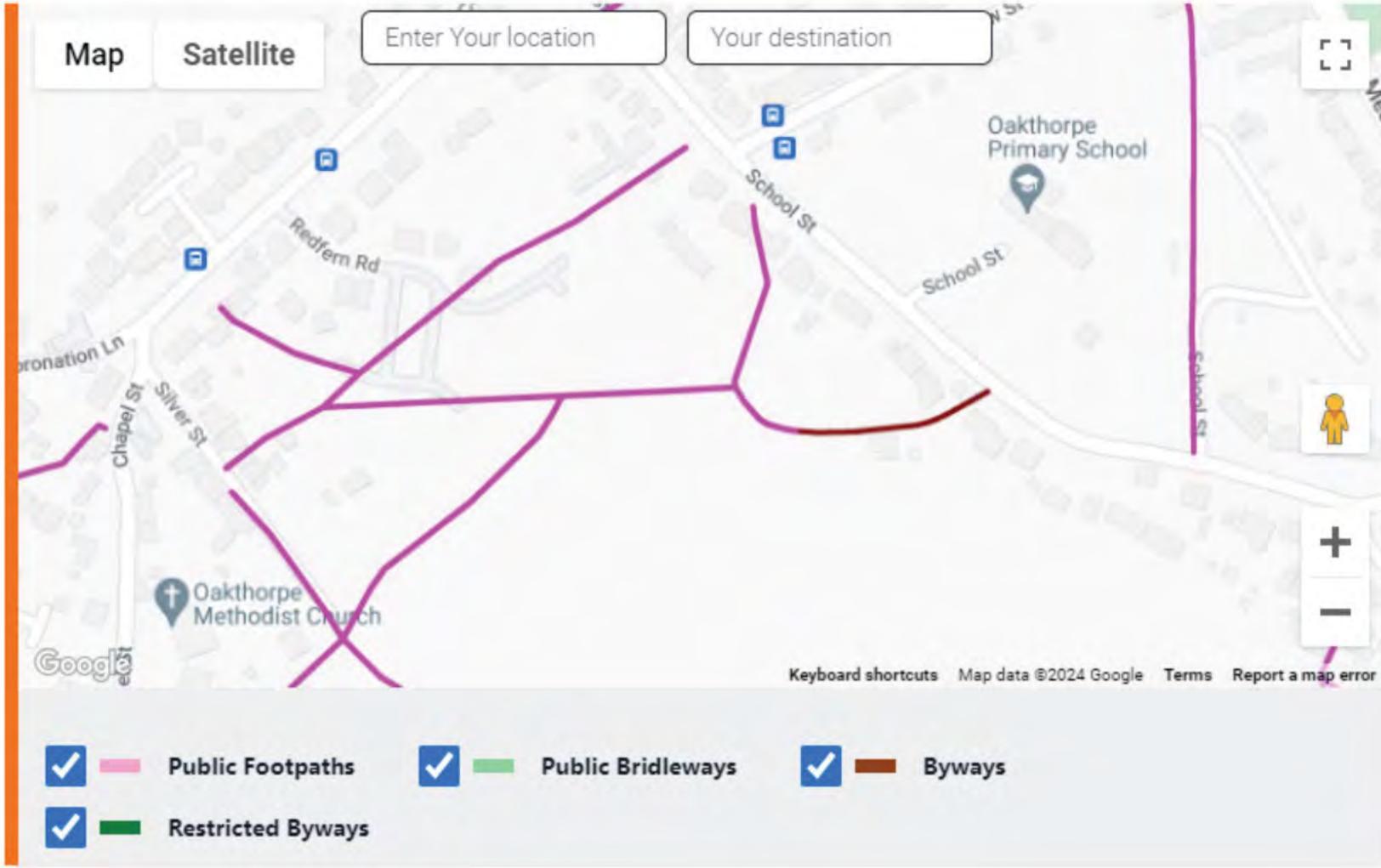


Figure three: Leicestershire County Council Rights of Way Plan

Figure four shows how the existing footpaths could be effectively diverted and retained.



Figure four: Indicative footpath routes through development

The routes shown at figure four would require minor diversions and which would form part of any planning application submission. To the east of the site; the existing connection to footpath P72 from School lane to Chapel St and that to footpath P71 from School Street to Silver Street would be incorporated within the proposed layout. To the south west of the site an access to Footpath 74 (From Footpath 71 to Chapel St) would be created utilising internal roads and a cut through the proposed landscaping shown on the indicative site layout. A similar approach was taken as part of the earlier contiguous scheme to the north as shown in figure five.



Figure five: Earlier scheme (Home Farm Residential Scheme) showing diverted footpath routes and access through to allocation site OA5



(c) Provision of a high-quality landscaping scheme to the southern and eastern boundaries to help mitigate the visual impacts of development;

The attached plan shows the incorporation of landscaping to the southern and eastern boundaries.

(d) Achievement of biodiversity net gain in accordance with national requirements;

Land is available to the south of the allocation which is available for Biodiversity net gain and National Forest Planting. The BNG land is therefore in the same local planning authority, immediately contiguous to the allocation and within the applicants control.

(e) Provision of tree planting and landscaping in accordance with draft Policy En3 (The National Forest);

The attached plan shows how tree planting and landscaping can be incorporated into the scheme.

(f) Provision for the discharge of wastewater into the River Mease catchment in accordance with the provisions of Policy En2. Development which does not meet these provisions will not be permitted. Proposals should be accompanied by a Construction Environment Management Plan (CEMP) which demonstrates how pollutants and sediments from a proposed development will be prevented from reaching the River Mease;

We understand the necessity to ensure that any pollutants and sediments arising from the development do not reach the River Mease. A Construction Environmental Management Plan will be submitted as part of the application to address this.

It is understood there is likely to be capacity for additional sewage circa 2028 however given current constraints with capacity within the River Mease, a temporary non mains drainage solution can be been allowed for as shown within the indicative proposal with a transfer to main sewerage when capacity is available locally.

There is an existing public foul sewer which could serve the development as highlighted at figure five below. In the event that capacity wasn't available a temporary single package treatment plant would be used for the proposed residential units instead.



Figure six: Severn Trent Sewer Plan showing sewers to the north and south of the site

It is estimated that a tank capable of treating the equivalent population of 350 will be required.

A BioDisc / klargester type package treatment plant would be proposed.

The details of the unit and its output would be provided as part of any application

The package treatment plant will discharge into the stormwater drainage and thereafter into the pond as shown for indicative purposes on the accompanying layout, labelled SUDS and within the applicants control.

The construction of the new carrier drains would provide self-cleaning velocity for the relative pipe diameter as per Building Regs 2015 Part H.

Minimum pipe dia. to be 100mm.

Minimum gradient to be 1:80 for 100mm pipe and 1:150m for 150mm pipe.

Manholes and inspection chambers to be located at no more than 45m centres.

(g) Provision of a Mineral Assessment for at or near surface coal.

A Mineral assessment would be undertaken and submitted as part of a future application.

(h) Provision of a Coal Mining Risk Assessment; and

A Coal Mining Risk assessment would be commissioned and submitted as part of an application.

(i) Any necessary Section 106 financial contributions, including towards primary and secondary education, healthcare, the North West Leicestershire Cycling and Walking Infrastructure Plan (LCWIP), offsite highways and public transport improvements.

The applicant understands if approved the scheme will be subject to Section 106 financial contributions.

4.0 Conclusion

This report and attached plan have demonstrated that the site can allocated for housing development, as all potential constraints can be addressed.

APPENIDX ONE – INDICATIVE SITE LAYOUT

From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Local Plan 2017 - Limits to Development
Date: 14 March 2024 15:14:04

Dear Sir/Madam,

We write in respect of the line of the Limit to Development for the village of Belton, as defined in the Local Plan 2017. The delineation of this line came to our attention when we were looking at the consultation documentation available to the public in respect of the review of the 2017 Local Plan.

We have lived at [REDACTED] since 2006. Our concern is specifically about the line of the Limit to Development that is shown immediately behind our property and the properties numbered 21 to 29 Church Street.

When these properties were built in the early 1990's the Limit to Residential Development dissected the rear gardens of 21 - 29 Church Street. It ran from the rear boundary of the gardens on Thompson Ave through to the eastern edge of the garage (now demolished) of 29 Church Street, ending at the farm track known as Whatton Lane.

It therefore came as quite a shock to see that on the Limit to Development Plan for Belton, submitted as part of the review of the Local Plan 2017, a completely different line is shown as the 'existing line' at the rear of our property. The plan shows the 'existing Limit to Development' running along the rear boundary fence line of the properties 21 to 29 Church Street.

We have conducted research and established that the Limit to Development as we believed it to be, i.e. dissecting our rear garden, is shown as such in the 1991 - 2006 Local Plan and remained as such until the production of the 2017 Local Plan. The 2017 Local Plan shows the Limit to Development following a very different line. The issue being the 2017 version of the Local Plan is now being used as the definitive plan from which revisions can be drawn or proposed.

We can categorically state that we were never informed or consulted about the change to the Limit to Development for Belton that forms the existing 2017 Local Plan. As owners of a property directly affected by the change we should have been informed, in the same way that we would be informed about an application for planning consent adjacent to our property. Had we have been informed we would have objected strongly to the Limit to Development being relocated to the rear boundary fence line. Also, if we had been informed, we would have told you that there is a restrictive covenant contained with our and our neighbours property deeds that states that no building or buildings shall be erected on defined parts of the land. The defined parts are referenced in the Title Plans to each property. By moving the Limit to Development you, the planning authority, have given the impression that the restricted land is developable, whereas it is not. It should therefore not have been included within the Limit to Development either in the production of the 2017 Local Plan or indeed be considered a given in this current review.

The current consultation taking place on the review to the 2017 Local Plan should be brought to the attention of all residents in the district, in writing by letter, and not allowed to be reliant on social media, open days or residents accessing the District Council website to seek out information. This review has been taking place for some time. We only became aware of the review a few days ago and by pure chance. A third party had posted an item on social media. Had we not seen that post, we would have been unaware of the 2017

Local Plan review.

We would ask that the District Council demonstrate to us the powers and methodologies that were used to inform and consult residents on the production of the 2017 Local Plan, specifically the revisions to the Limit of Development that affected our property. Why weren't we consulted directly? And it begs the question, were the revisions we have described above lawful?

Yours faithfully

Christopher & Rosemary Groves



From: [REDACTED]
To: [PLANNING POLICY](#)
Subject: EXTERNAL: Sport England [REDACTED] - Draft Local Plan Public Consultation (Regulation 18) for NW Leicestershire DC
Date: 14 March 2024 15:55:15
Attachments: [REDACTED]

Dear Planning Policy,
Thank you for consulting Sport England on the above consultation.
Please find attached our comments on the Proposed Policies Document and the Proposed Housing and Employment Allocations Document.
Kind regards,
Sharron Wilkinson [REDACTED]

[Sport England](#)



[Sport England SIA award 2021](#)



[This Girl Can](#)



We have updated our Privacy Statement to reflect the recent changes to data protection law but rest assured, we will continue looking after your personal data just as carefully as we always have. Our Privacy Statement is published on our [website](#), and our Data Protection Officer can be contacted by emailing [REDACTED]

The information contained in this e-mail may be subject to public disclosure under the Freedom of Information Act 2000. Additionally, this email and any attachment are confidential and intended solely for the use of the individual to whom they are addressed. If you are not the intended recipient, be advised that you have received this email and any attachment in error, and that any use, dissemination, forwarding, printing, or copying, is strictly prohibited. If you voluntarily provide personal data by email, Sport England will handle the data in accordance with its Privacy Statement. Sport England's Privacy Statement may be found here <https://www.sportengland.org/privacy-statement/> If you have any queries about Sport England's handling of personal data you can contact [REDACTED] Sport England's Data Protection Officer directly by emailing [REDACTED]



Creating sporting opportunities in every community

Planning Policy Team,
North West Leicestershire District Council,
PO Box 11051
Coalville
LE67 0FW

Email: planning.policy@nwleicestershire.gov.uk
14 March 2024

Letter by email only to planning.policy@nwleicestershire.gov.uk

Dear Planning Policy Team,

Draft Local Plan Public Consultation on Proposed Policies, Proposed Housing and Employment Allocations and Proposed Limits to Development Review

Sport England has an established role within the planning system which includes providing advice and guidance on all relevant areas of national, regional and local policy as well as supporting local authorities in developing the evidence base for sport.

Sport England's role is focused exclusively on sport, although it is recognised that sport can, and does, play an important part in achieving wider social, community and economic benefits (most notably in the context of health). Sport England recognises the vital role that the planning system can play in assisting with the delivery of our strategy. In addition, the development of sport within a local area can provide sufficient benefits to assist local authorities with the implementation of Local Plans and Frameworks. In this, well designed and implemented planning policies for open space, sport and recreation are fundamental to deliver broader Government objectives.



Creating sporting opportunities in every community

Sport England's response to the consultations is outlined in the document below.

If you require any further information or clarification, please do not hesitate to contact the undersigned on the detail listed below.

Yours sincerely,

Sharron Wilkinson



North West Leicestershire Draft Local Plan

Proposed Policies for Consultation (Regulation 18 Consultation) January 2024

3.8 The Evidence Base

The NPPF deals with promoting healthy communities. Paragraph 102 states;

Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the need for open space, sport and recreation facilities (including quantitative or qualitative deficits or surpluses) and opportunities for new provision. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

The assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained from the assessments should be used to determine what open space, sports and recreational provision is required.

In light of the above, it is Sport England's policy to challenge the soundness of Local Plan documents which are not justified by:

- an up to date playing pitch strategy (carried out in accordance with a methodology approved by Sport England)
- an up to date built sports facilities strategy (carried out in accordance with a methodology approved by Sport England).

For a playing pitch strategy to be considered "up to date", it should have been undertaken within the last three years. For a built facilities strategy to be considered "up to date" it should have been carried out within the last five years.

The North West Leicestershire Playing Pitch Strategy and Action Plan (PPS) is dated April 2017 and so is considered "out of date." The Infrastructure Delivery Plan (2022) indicates that the Council had planned to refresh the 2017 PPS before the end of 2022. This refresh was not undertaken. There is a requirement for this document to

be updated to provide the robust assessment required by paragraph 102 of the NPPF.

In 2017 The Council commissioned an Indoor and Built Sport and Recreation Facilities Framework 2017- 2021. This Framework is out of date. There is a requirement for this document to be updated to provide the robust assessment required by paragraph 102 of the NPPF.

Paragraph 9.24 does acknowledge that "in view of the age of these studies the Council are in the process of commissioning updates. This future evidence work should be included in the list in 3.11.

Sport England has guidance on the production of Playing Pitch Strategies and other indoor and outdoor sport facilities studies, and they can be viewed on this links:

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/playing-pitch-strategy-guidance/>

<http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/assessing-needs-and-opportunities-guidance/>

4.4 Local Plan Objectives

3. Support is given to promoting active, healthy and sustainable communities. This objective would accord with Government policy in paragraph 96(c) of the NPPF (2023 and Sport England's 'Uniting the Movement' Strategy

<https://www.sportengland.org/about-us/uniting-movement>.

11. In relation to community infrastructure, it is requested the objective protects and enhances community infrastructure as well as making sufficient provision for it as the Local Plan has a major role to play in influencing the protection/enhancement of existing infrastructure as well as providing for new infrastructure through development

Draft Policy S4 – Countryside (Strategic Policy)

Paragraph 103 of the NPPF offers clear advice on how sports facilities including playing fields should be protected from development. It states:

“Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- a) an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or*
- b) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or*
- c) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.*

There is a need for the criteria 2 in Policy S4 to include wording on the protection given to sports facilities and playing fields in accordance with paragraph 103. Therefore, Sport England **objects** to the current wording of this draft policy.

Draft Policy AP5 – Health and Wellbeing (Strategic Policy)

This policy is supported. Sport England believes that being active should be an intrinsic part of everyone’s daily life – and the design of where we live and work plays a vital role in keeping us active. Good design should contribute positively to making places better for people and create environments that make the active choice the easy choice for people and communities.

Sport England in partnership with Active Travel England and the Office for Health Improvement and Disparities have produced the Active Design Guidance (2023). This guide seeks to help planners, designers and everyone involved in delivering and managing our places to create and maintain active environments. The foundation principle of “Activity for all” is supported by the remaining principles which are brought together under the three themes of ‘Supporting active travel,’ ‘Active, high-quality places and spaces’ and ‘Creating and maintaining activity.’

The Active Design Principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design.

The guidance can be viewed on this link:

<https://www.sportengland.org/guidance-and-support/facilities-and-planning/design-and-cost-guidance/active-design>

Draft Policy IF1 – Development and Infrastructure (Strategic Policy)

The content of the policy is broadly welcomed as it supports increased and improved community infrastructure (which includes sports facilities) As stated in the Evidence section above there is a requirement for the North West Leicestershire Playing Pitch Strategy and Action Plan (PPS) and the Indoor and Built Sport and Recreation Facilities Framework 2017- 2021 to be updated to provide the robust and up-to-date assessments, as required by paragraph 102 of the NPPF, to determine what open space, sport and recreational provision is needed, which plans should then seek to accommodate.

There is a need for (2) (b) to include sport and leisure facilities under the community facilities list.

Draft Policy IF4 – Open Space, Sport and Recreation Facilities (Strategic Policy)

9.25 Sport England welcomes the Council's commitment to update the Playing Pitch Strategy and the Built Facilities Assessment which are both out-of-date.

9.26 With regards to proposed thresholds, Section 8 of the NPPF advises that any new sports facility needs arising as a result of new development should be met. With an up-to-date and robust evidence base in place the Council can use Sport England's Playing Pitch Calculator and Sports Facilities Calculator which are important planning tools for assessing the demand and requirement for additional on site and/or off site provision and/or potential cost contributions arising from any development for indoor and outdoor sports facilities. The following links provide more information on these calculators:

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/playing-pitch-calculator>

<https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport/sports-facility-calculator>

The policy principles of Draft Policy IF4 would generally accord with Government policy in section 8 of the NPPF. However, the following issues are identified with the content of the policy and so Sport England **objects** to the current wording of this draft policy:

Loss of Open Space

4) The policy needs to apply to the protection of all playing fields, sport and recreation facilities in the District and not differentiate between protection for facilities within the Limits to Development and facilities within the Countryside. To apply different levels of protection would be contrary to the wording in paragraphs 102 and 103 of the NPPF.

- Criterion (b) should be amended for consistency with the NPPF and to provide greater clarity and offer less potential for misinterpretation when the policy is applied. The wording should be amended to reflect the wording in paragraph 103 of the NPPF:

“the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location or the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.”

Proposed Housing and Employment Allocations Consultation Document**And Policy H3 – Housing Provision – New Allocations and Policy Ec3 – New Employment Allocations (Strategic Policy)****Draft Housing Allocations****C46 – Land at Broom Leys Farm**

4.10 – Coalville Rugby Football Club lies to the north of this proposed allocation. This sports club is in community use and is included in the PPS as having four senior rugby pitches – one pitch near to the boundary of this site is fully floodlit and two pitches are partially lit. There are 2 mini rugby pitches. The pitches are used evenings and weekends. The Club also has a large clubhouse on site which is hired out and a car park for over 100 vehicles.

Paragraph 193 of the NPPF requires that new development should be integrated effectively with existing businesses and community facilities such as sports clubs. It further goes on to state that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Therefore, the applicant (or “agent of change”) would need to include details of measures to protect the operation of Coalville Rugby Football Club from any significant adverse effect arising from the siting of this proposed housing development in order to comply with the requirements of the NPPF.

With regards to the above, the following requirements should be included in this draft policy:

Details of measures to protect the operation of Coalville Rugby Football Club from any significant adverse effect arising from the siting of this proposed housing development.

C83 – Land at [REDACTED]

Scotlands Playing Fields lies to the west of this proposed allocation. This playing field is in community use and is included in the PPS as having 6 football pitches.

The PPS states that the changing facilities at the site are of poor quality and in need of renovation.

Paragraph 193 of the NPPF requires that new development should be integrated effectively with existing businesses and community facilities such as sports clubs. It further goes on to state that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Therefore, the applicant (or “agent of change”) would need to include details of measures to protect the operation of Scotlands Playing Fields from any significant adverse effect arising from the siting of this proposed housing development in order to comply with the requirements of the NPPF.

With regards to the above, the following requirements should be included in this draft policy:

Details of measures to protect the operation of Scotlands Playing Fields from any significant adverse effect arising from the siting of this proposed housing development.

C92 – Former Hermitage Leisure Centre, Silver Street, Whitwick

Part of Hermitage Recreation Ground is included in this allocation. The playing field is in community use and is included in the PPS as having 5 football pitches and a small sized 3G pitch.. The PPS states that the changing facilities at the site are of poor quality and in need of renovation and that the pitches are of poor quality.

The proposal to redevelop the site for housing would result in the loss of part of the playing field, would have the potential to have a prejudicial impact on the use of the playing field and may lead to the loss of ancillary facilities required to support the use of these pitches. Paragraph 103 of the NPPF requires that existing open space, sports and recreational buildings and land including playing fields should not be built on unless one of the three criteria applies. Sport England **objects** to the allocation of the Former Hermitage Leisure Centre for housing at this stage as it has not been demonstrated that any of the exception criteria in paragraph 103 of the NPPF would apply.

Money Hill, Ashby-de-la-Zouch (A5)

Part of this site lies adjacent to Ivanhoe School's Playing Fields. Paragraph 193 of the NPPF requires that new development should be integrated effectively with existing businesses and community facilities such as sports clubs. It further goes on to state that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Therefore, the applicant (or "agent of change") would need to include details of measures to protect the operation of Ivanhoe's Playing Fields from any significant adverse effect arising from the siting of this proposed housing development in order to comply with the requirements of the NPPF.

With regards to the above, the following requirements should be included in this draft policy:

Details of measures to protect the operation of Ivanhoe School's Playing Fields from any significant adverse effect arising from the siting of this proposed housing development.

[REDACTED]

From: Phoebe Conway [REDACTED]
Sent: 14 March 2024 15:55
To: PLANNING POLICY
Cc: David Pendle
Subject: EXTERNAL: Draft North West Leicestershire Local Plan (2020 – 2040) Consultation - Marrons Submission OBO Clarendon Land and Development
Attachments: Publication Consultation Response Form - Clarendon Land and Development.pdf; Representation to NWLDC Regulation 18 Consultation - Clarendon Land and Development.pdf

Good afternoon,
I hope you're well.
I am emailing to submit Written Representations to the North West Leicestershire Draft Local Plan 2020-2040 Public Consultation (Regulation 18).
As per the attached Public Consultation Response Form, the attached Representations have been prepared by Marrons on behalf of our client, Clarendon Land and Development. The Representations respond to the Proposed Policies Consultation Document, namely Policies S1, S2, H1 and H5, Proposed Housing and Employment Allocations Document, housing allocations AP15 and AP17, and Proposed Limits to Development Review Consultation Document proposed change reference LtD/AM/01.
Please may I request receipt of this email and the two attached documents.
Many thanks,
Phoebe

Phoebe Conway
[REDACTED]

[REDACTED]

[REDACTED]



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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		██████████
First Name		Phoebe
Last Name		Conway
Job Title (where relevant)		██████████
Organisation (where relevant)	Clarendon Land and Development	Marrons
House/Property Number or Name		████████████████████
Street		████████████████████
Town/Village		██████████
Postcode		██████████
Telephone		████████████████████
Email address		██

PART B – Your Representation

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

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

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

Use this box to set out your response.

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

Please see supporting written Representations which respond to the following proposed policies:

Proposed Policies Consultation Document:

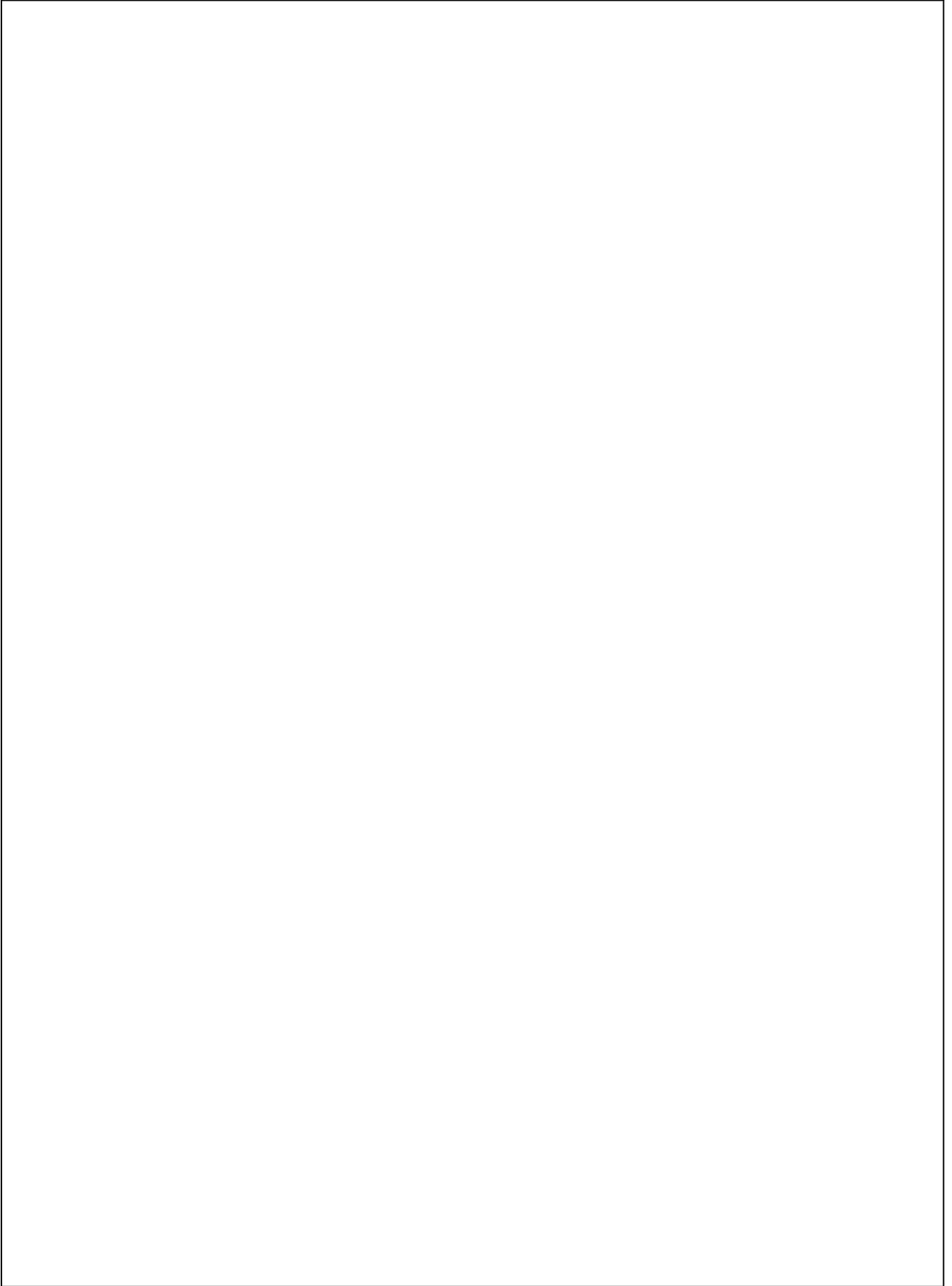
- Policy S1 – Future Development Needs
- Policy S2 – Settlement Hierarchy;
- Policy H1 – Housing Strategy; and
- Policy H5 – Housing Provision – New Allocations.

Proposed Housing and Employment Allocations Consultation Document:

- Housing Allocation AP15; and
- Housing Allocation AP17.

Proposed Limits to Development Review Consultation Document:

- Proposed change reference: LtD/AM/01.



Declaration

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

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

Signed: Phoebe Conway

Date: 14th March 2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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

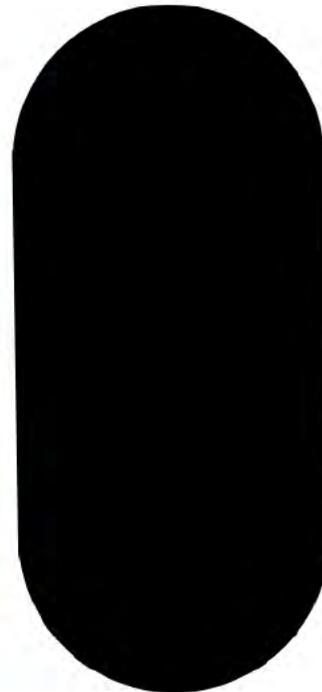


 Part of Shakespeare Martineau

Representations to the Draft North West Leicestershire Local Plan Consultation (Regulation 18)

March 2024

On behalf of Clarendon Land and Development



www.marrons.co.uk



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1. Introduction

1.1 These Representations are made on behalf of our clients, Clarendon Land and Development, who are promoting the emerging residential allocation AP17 at Measham Road, Appleby Magna as identified by the North West Leicestershire Local Plan 2020-2040 Proposed Housing and Employment Allocations Regulation 18 Consultation.

1.2 The Council is inviting comments between Monday 5th February and Sunday 17th March 2024 in respect of three consultation documents:

- Proposed Policies for Consultation;
- Proposed Housing and Employment Allocations for Consultation; and
- Proposed Limits to Development for Consultation.

1.3 These Representations provide our views on the:

- The Plan Objectives;
- Amount of and Type of Housing Development;
- Plan Period;
- Settlement Hierarchy; and
- Land at [REDACTED]
[REDACTED]



2. Responses to the Regulation 18 Consultation

- 2.1 The Regulation 18 Consultation documents build upon the matters consulted on between January and March 2022 which covered several key issues such as the distribution of housing and employment development across the District, as well as more specific policy topics such as addressing climate change issues.
- 2.2 The documents set out a number of Plan Objectives for what the new Local Plan aims to achieve which provide a guiding framework for the Plan's policies and proposals.
- 2.3 We welcome Objective 2 which seeks to ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of number, size, tenure and type. However, this objective could be strengthened through a commitment to address the acute housing affordability issues within the District rather than a simple reference to delivery of affordable housing.
- 2.4 Objective 3 seeks to achieve sustainable high quality development which responds positively to local character and creates safe places to live, work and travel. Objective 4 works in tandem with Objection 3 and seeks to reduce the need to travel including by private car and increase opportunities for travel by sustainable method alongside the delivery of new infrastructure.
- 2.5 The NPPF encourages focusing significant development on locations which are already or can be made sustainable. Accordingly, opportunities for enhancing the sustainability of places should also be referred within these objectives.
- 2.6 We are supportive of Objective 11 which seeks to maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and
-



health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a coordinated and timely way. It is clear that such an approach cannot be viewed in isolation and the relationship between this objective and others, particularly Objective 2, must be carefully considered.

Draft Policy S1 – Future Development Needs

- 2.7 Draft Policy S1 – Future Development Needs identifies a housing requirement for North West Leicestershire of 686 dwellings a year, a total of 13,720 dwellings over the plan period of 2020-2040. This figure comprises a local need figure of 372 dwellings per annum (2020-36) as detailed within the HENA (and extended to 2040 in alignment with the plan period) and a further 314 dwellings per year as a contribution towards meeting Leicester City's unmet housing need as set out in the Statement of Common Ground for Leicester and Leicestershire Housing Market Area (SoCG) (June 2022).
- 2.8 Policy S1 is clear that it is this figure, the 686 dwellings per annum, that is to be utilised for the calculation of the council's five year land supply and Housing Delivery Test.
- 2.9 It is particularly relevant that when considered the various options, the Local Plan Committee of 27th September 2022 agreed that Option 7b was the preferred development strategy which identified an annual requirement of 730 dwellings per annum. This is clearly higher than the requirement figure now being pursued by the Council.
- 2.10 Ultimately, the Council is seeking to utilise their local housing need (LHN) figure of 372 dwellings per annum for the purposes of their spatial strategy given the additional dwellings to meet the unmet need from Leicester City are to meet the City's need rather than any proportional uplift within North West Leicestershire.
- 2.11 The Planning Practice Guidance is clear that the LHN is the minimum



starting point for calculating the number of homes needed. The LHN is not a housing requirement figure and there are numerous reasons why the latter could be higher than the LHN.

- 2.12 Meeting only the LHN for North West Leicestershire will not address housing-related deprivation because the LHN on its own only provides a need figure based on demographic projections with a mechanical affordability uplift. It does not consider the specific needs for affordable housing or other specialist housing types which will not be delivered purely by planning for LHN alone. Conversely, the provision of a higher growth option would provide a greater amount of opportunities to address affordability and specialist housing needs which will promote social inclusion and diversity.
- 2.13 This is a matter that the Council should continue to explore as further analysis is undertaken in respect of whole plan viability testing to inform Draft Policy H5 on affordable housing provision. Particularly given that the 2022 Leicester & Leicestershire Housing & Economic Needs Assessment (HENA) concludes there is a need for up to 382 affordable homes of all tenures per year within the District which is higher than the LHN alone and represents around 56% of the overall annual housing requirement currently being pursued. Clearly, there will also be affordability issues associated with the 314 homes from unmet need.
- 2.14 The National Planning Policy Framework (NPPF) sets out at paragraph 22 that strategic policies should look ahead over a minimum of 15 years from adoption. Where larger-scale developments such as new settlements or significant extensions to existing settlements are part of the strategy, policies should be set within a vision that looks at least 30 years ahead, to take account of the likely timescales for delivery. A plan period to 2040 has been proposed and the plan contains large scale development proposals.
- 2.15 In the context of the Leicester and Leicestershire Strategic Growth Plan 2018 (SGP), any transformational housing growth to address matters of housing affordability, strategic infrastructure or economic prosperity



should be underpinned by a wider strategic vision that looks beyond 2041 to establish what the District will look like to 2050.

- 2.16 The Local Development Scheme (October 2023) programmes adoption of the plan for October 2026. A plan period to 2040 would fall short of the minimum time horizon established within the NPPF and more important when large scale development proposals form part of the strategy. We recommend this be reviewed as the plan-making process unfolds to ensure that at least a 15 year period from adoption is delivered and that the corresponding plan period will respond to the priorities of the Plan, its strategy for addressing these and the emerging evidence base, in particular the review to the SGP.

Draft Policy S2 – Settlement Hierarchy

- 2.17 Draft Policy S2 – Settlement Hierarchy seeks to direct new development to appropriate locations within the Limits to Development consistent with the settlement hierarchy defined within the policy. The exception to this being the focusing of growth at the new settlement at Isley Woodhouse.
- 2.18 The Policy is reliant on the Settlement Study undertaken in 2021 which formed part of the previous consultation undertaken in January 2022. The Settlement Study methodology includes an assessment of services and facilities available within a settlement, but also considered accessibility to services and facilities elsewhere by public transport. Given that such provision can contribute towards the sustainability of a settlement the site assessment should take into account settlements that are, or can be made, sustainable. This is considered a sensible approach in the context of the settlement pattern within North West Leicestershire.
- 2.19 Appleby Magna is identified as a Sustainable Village in the 4th tier of the hierarchy. Sustainable Villages form the 4th tier of the settlement hierarchy and are recognised as places which have a limited range of services and facilities, where a limited amount of growth will take. Importantly, Appleby Magna scores positively for facilities and services in relative terms compared to other Sustainable Villages (scoring 5 as



evidenced by the Council's Settlement Study 2021 - Table 4.1 Comparative settlement scoring from the assessments).

- 2.20 The proposed changes to the Limits to Development (reference LtD/AM/01) include the site (AP17) as a proposed housing allocation within the Limits of Development of Appleby Magna. The selection of site AP17 is supported (see further commentary in section 3).

Draft Policy H1 – Housing Strategy

- 2.21 Draft Policy H1 sets out how the 13,720 new homes will be distributed by the development strategy and settlement hierarchy required by Policy S1. The Policy says that the housing provision will be uplifted by 10% above the housing requirement in effect providing a flexibility allowance (criteria 3).
- 2.22 We welcome the recognition that the emerging Local Plan will need to provide more land for housing than the minimum housing requirement to ensure flexibility in supply and to safeguard to an extent against potential non-delivery. However, Table 2 within the Proposed Housing and Employment Allocations consultation document says that this 10% requirement is applicable only to the remaining dwellings necessary to meet the housing requirement as oppose to the housing requirement as a whole. This number of homes identified amount to 1,132 dwellings which represents only an 8.25% flexibility allowance.
- 2.23 Deliverability should also be a key consideration in the selection of any particular spatial strategy and contingency should not be relied upon in and of itself as a way to insulate from failure. This should include the allocation of smaller allocations which can often deliver quickly and thereby ensure any delays in delivery at the larger strategic allocations can be appropriately managed. Similarly, supply-side contingency is not sufficient to address a non-robust housing requirement and so, all these matters should still be given full and proper consideration, irrespective of the level of contingency planned for.



- 2.24 As identified in the Independent Review of Build Out – Final Report (the Letwin Review), local market absorption rates are the single biggest factor explaining slow build-out. In our view, plan-making can address this through adopting an overall level of housing provision which provides for choice and competition in the market; diverse types and tenures including enough affordable homes to meet need; a balanced spread of development across the District and providing for a variety of site sizes.
- 2.25 An allowance closer to 20%, rather than the 10% proposed (and 8.25% in actuality) within Policy H1, would assist in driving forward these objectives as well as insulating the Plan’s strategy against economic uncertainty, or unexpected constraints and barriers for large scale sites.
- 2.26 Policy H1 Criteria 5 relates to affordable housing and says that to meet the affordable housing requirement, provision will be made in the district over the plan period for a mix of affordable housing types to be delivered through development in accordance with Policy H5.
- 2.27 However, there appears to be a disconnect between this objective (which clearly seeks to meet the affordable housing need) and Policy H5 which does not yet define an affordable housing percentage, preferring to await whole plan viability before doing so. There is a possibility that the emerging housing allocations will be sufficient to meet the housing requirement defined in Policy S1 but not to meet the (as yet undefined) affordable housing requirement of Policy H1. As per previous comments, the level of affordable housing need identified by the 2022 Leicester & Leicestershire Housing & Economic Needs Assessment (HENA) is 382 affordable homes of all tenures per year within the District.
- 2.28 Careful consideration is clearly required to understand whether sufficient affordable housing will be provided as a result of the identified housing allocations and ultimately whether further allocation are to support an increased delivery.



Draft Policy H5 – Housing Provision – New Allocations

2.29 Policy H3 refers to the allocations identified within the Proposed Housing and Employment Allocations consultation document which are grouped within Table 1 below by settlement hierarchy tier.

Hierarchy Classification	Number of Dwellings – Draft Allocations
Principal Town	1,666
Key Service Centre	1,126 - (2,326 less the 1,200 units committed at Money Hill (site reference: A5))
New settlement (Isley Woodhouse)	1,900
Local Service Centre	450
Sustainable Villages	334
Local Housing Needs Villages	0
Small villages or hamlets in the countryside	0
Total	5,476

Table 1 – Draft Housing Allocations by Hierarchy Tier

2.30 Critically, the Council have identified the 1,200 units at Money Hill (A5) within the Draft Housing Allocations table, however these units are already allocated in the adopted Local Plan and are noted as a commitment within footnote 8. We do not criticise their inclusion in the Draft Housing Allocations table, but it is clear that the Council has



effectively counted the site twice. As detailed in Table 1 above, the total allocations total 5,476 dwellings which is below the 5,693 dwellings required in Table 2 within the Proposed Housing and Employment Allocations consultation document and represents an under provision of 217 dwellings against the total housing requirement. We note that further allocations are likely to be required to meet the housing requirement identified within the draft Local Plan.

2.31 Notwithstanding this, the allocations, and ultimately the Council's spatial approach, has been to focus growth on the most sustainable settlements consistent with the settlement hierarchy. We are supportive of this approach which allows for the delivery of a good mix of sites across a range of locations and more incremental expansion to rural settlements to facilitate deliverability.

2.32 As set out in respect of our commentary on Policy S1 and the need to review and potentially increase the housing requirement, we would encourage the Council to continue to focus growth in the most sustainable locations and explore opportunities to increase the yield of the identified allocations.



3. The Grange, 40 Measham Road, Appleby Magna (AP17)

- 3.1 We welcome the identification of the Land at 40 Measham Road, Appleby Magna as a draft Housing Allocation AP17 in conjunction with Land at Old End (AP15) for approximately 32 dwellings.
- 3.2 The site at [REDACTED] is located within the northern region of the village of Appleby Magna and extends to approximately 1.37ha (3.40 acres). The site comprises a single residential dwelling with surrounding paddocks, and benefits from immediate vehicular access from Measham Road (30mph speed limit).
- 3.3 The draft Local Plan identifies Appleby Magna as a Sustainable Village, remaining in the same tier as defined by the adopted Local Plan. The site is well related to the village, immediately adjoining existing residential development to the north and south (including draft allocation AP15) and west of the site, adjacent to Measham Road is Mulberry Homes development, Oak View (13/00797/FULM).
- 3.4 The village has access to a Primary School (Sir John Moore C of E Primary School), a Church Hall, two Pubs, a Place of Worship, a Recreational Ground with a Cricket Club, two LEAPs and allotment gardens. The site has a small number of employment opportunities within a 2km distance and also a bus service (number 7) running a service from Measham to Fenny Drayton, where there are an extended offering of services and facilities.
- 3.5 The New Local Plan Site Assessment Proforma for AP17 assesses the site as being 'potentially suitable', 'available' and 'potentially achievable' with a capacity of 27 dwellings. The Assessment concludes that there are no planning or technical constraints on the site which would prevent its future development. The developable area of the land is entirely within Flood Zone 1. There are no Public Rights of Way running through or adjacent to the site, nor are there any Nature Reserves or Sites of



Special Scientific Interest. There are no heritage assets within, or adjoining the site, and it is located outside of Historically Significant Landscape Areas.

3.6 The comments within the Assessment are generally positive and it can be concluded that with sufficient highways mitigation and sympathetic landscaping and design, development of the site is acceptable. This is confirmed through the sites draft allocation and inclusion within the Appleby Magna Limits to Development as within the Draft Local Plan.

3.7 Page 46 and 47 of the Proposed Housing and Employment Allocations for Consultation Document introduces draft housing allocations AP15, 'Land at Old End, Appleby Magna' and AP17, [REDACTED] [REDACTED]. The two sites together are allocated for:

- Around 32 homes;
- Provision of affordable housing in accordance with draft Housing Policy H5;
- Provision for self-build and custom housebuilding in accordance with draft Housing Policy H7;
- Areas of public open space; and
- Surface water drainage provision (SuDS).

3.8 It is important to note that draft allocation AP15 has partially been built out. The eastern section of AP15 was granted Outline Planning Permission in May 2015 for the "*demolition of two existing buildings and the erection of four detached dwellings and garaging (including two self-build units) and creation of paddock for equestrian or agricultural use*" (14/00595/OUT), subsequently, four Reserved Matters Applications were approved for the four individual plots (plot 1 – 17/00862/REM, plot 2 – 17/00863/REM, plot 3 – 17/00864/REM and plot 4 - 17/00865/REM).

3.9 Draft Policy H7, 'Self-build and Custom Housebuilding' states that on sites of 30 or more dwellings, the Council will require a minimum of 5% of the site's capacity as services plots for self-build and custom house



builders, as such the draft Policy requirement for self-build on this joint allocation has been addressed. Therefore, it can be agreed that the provision of affordable housing, public open space and SuDS are still to be sought as part of the development, along with the requirements as set out within criterion 2a to g.

- 3.10 To conclude, we support the allocation of the AP17 in conjunction with AP15 for housing within the sustainable village of Appleby Magna. The site, specifically A17, is suitable, available and achievable for development within a 5-year period and can therefore assist in meeting housing need in the short-term in a logical location. Clarendon Land and Development are willing and able to take a flexible approach to the development of the site and welcome further discussions with the Council as the Local Plan continues to develop.



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

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Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	█	
First Name	Adrienne	
Last Name	Chester	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
Street	██████████	
Town/Village	██████	
Postcode	██████	
Telephone	██████████	
Email address	████████████████████	

PART B – Your Representation

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

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

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

Use this box to set out your response.

EMP90

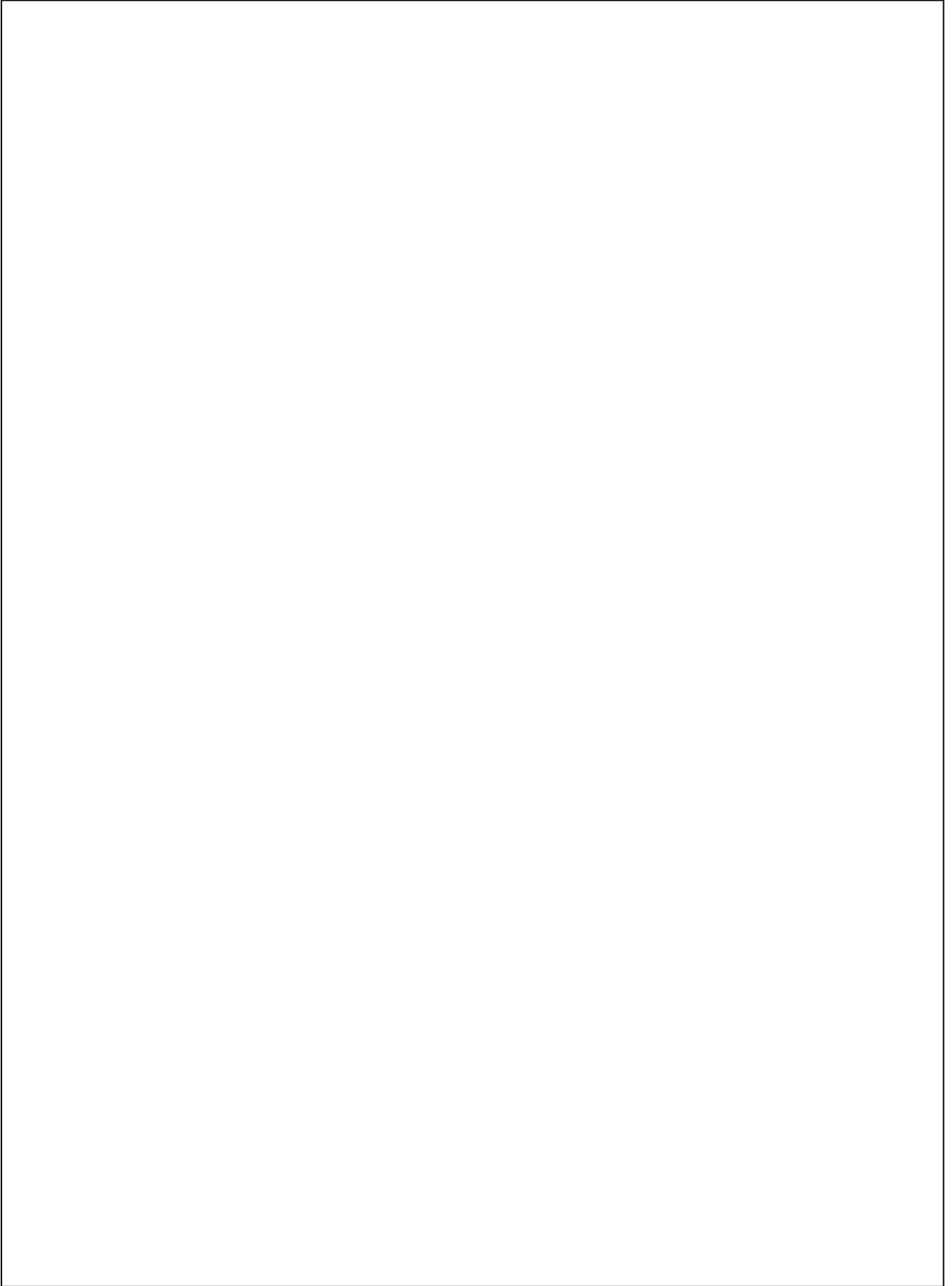
I oppose the potential location for the Freeport development for the following reasons:

- The impact this will have on wildlife.
- The road systems can't cope now with the traffic especially when there are issues on the M1 or events at Donington Park. Traffic in the village is bad now and will only become worse with a risk to the safety of the residents and school children.
- Loss of village status – we will become part of a logistics park.
- There is limited available workforce in the local area which will mean more people having to commute to the area causing more traffic chaos as there are not great transportation links nearby. Whereas there are more preferential sites like Clifton that are near to great transportation links from all across the city of Nottingham via the tram.
- If you allow development of this land no amount of elaborate drainage will capture all the water running off concrete that was previously absorbed by the earth. It will find its way into the village and into the dip of Diseworth, resulting in threats to homes, drivers, cyclists and pedestrians.
- My mental health will suffer as a result of increased noise and light pollution.
- We will see an increase in littering in the village which is already a concern with vehicles parking in the village and littering whilst waiting to pick up passengers arriving at East Midlands Airport.

Policy IW1

I oppose the proposed location for a new housing settlement at Isley Woodhouse for following reasons:

- The road systems can't cope now with the traffic especially when there are issues on the M1 or events at Donington Park. Traffic in the village is bad now and will only become worse with a risk to the safety of the residents and school children.
- It will destroy the rural nature of Diseworth especially if any part of the Freeport land is also developed.
- It will destroy 750 acres of agricultural land and miles of ancient hedges at a time when food production is critical.
- How will the conservation village status of Diseworth be maintained when it becomes adjoined to such a large housing development?
- It is likely to add massively to the flooding issues for Diseworth and Long Whatton.



Declaration

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

Signed: Adrienne Chester

Date: 14/3/24

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Title	[REDACTED]	
First Name	Eilish	
Last Name	Gardner	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)	National Forest Company	
House/Property Number or Name	[REDACTED]	
Street	[REDACTED]	
Town/Village	[REDACTED]	
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Policy IF3 – Green and Blue Infrastructure (Strategic Policy)

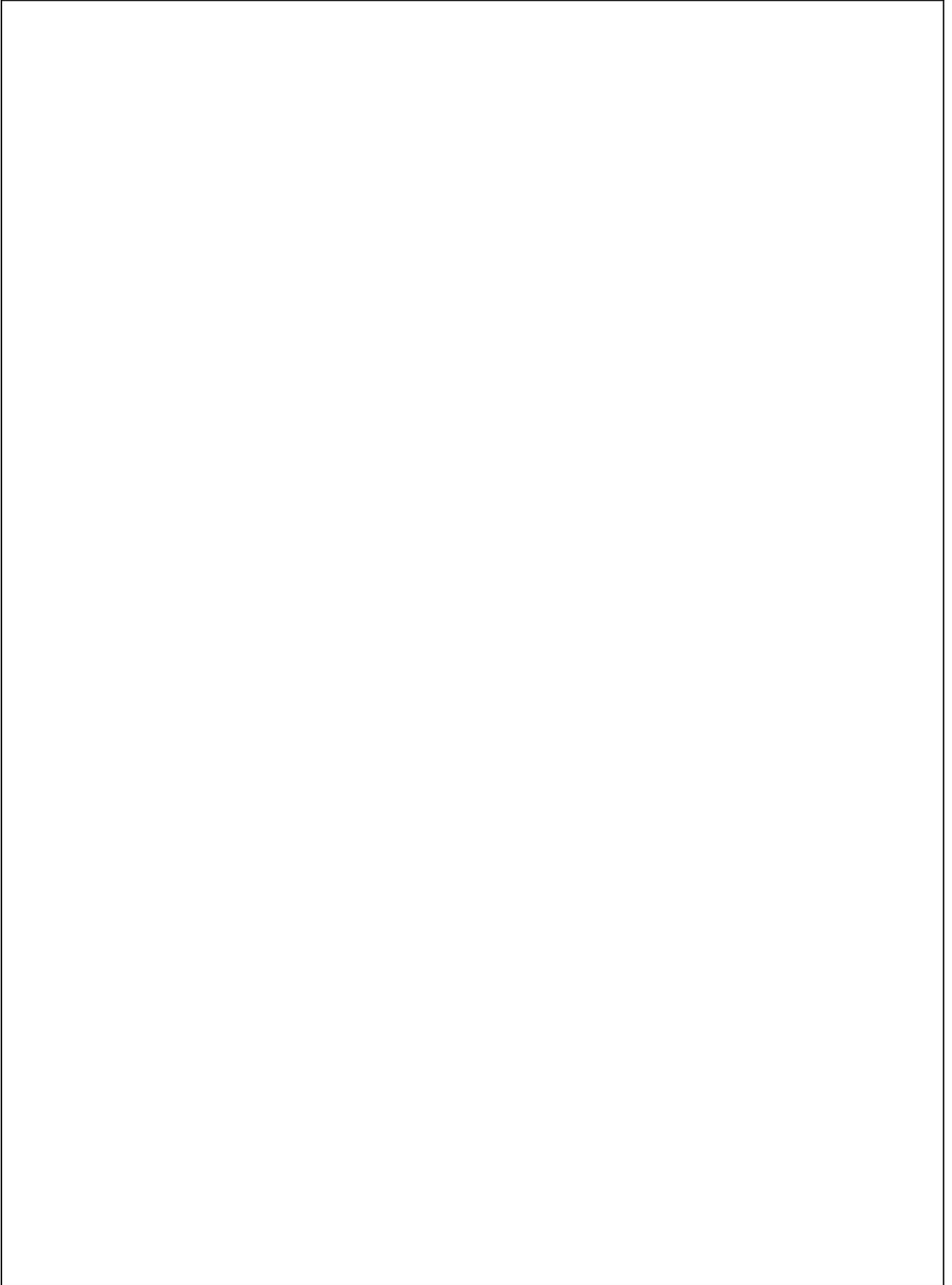
Use this box to set out your response.

Suggested amended wording to criterion (2):

Add '*and enhanced*' to criterion (2) to encourage/secure improvements to existing green infrastructure.

(2) Proposals that cause loss or harm to the green infrastructure network, including its function and amenity value, will not be permitted unless the need for and benefits of the development outweigh any adverse impacts. Existing trees, woodlands and hedgerows should be retained *and enhanced* wherever possible.

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



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Signed: Eilish Gardner

Date: 14/03/2024

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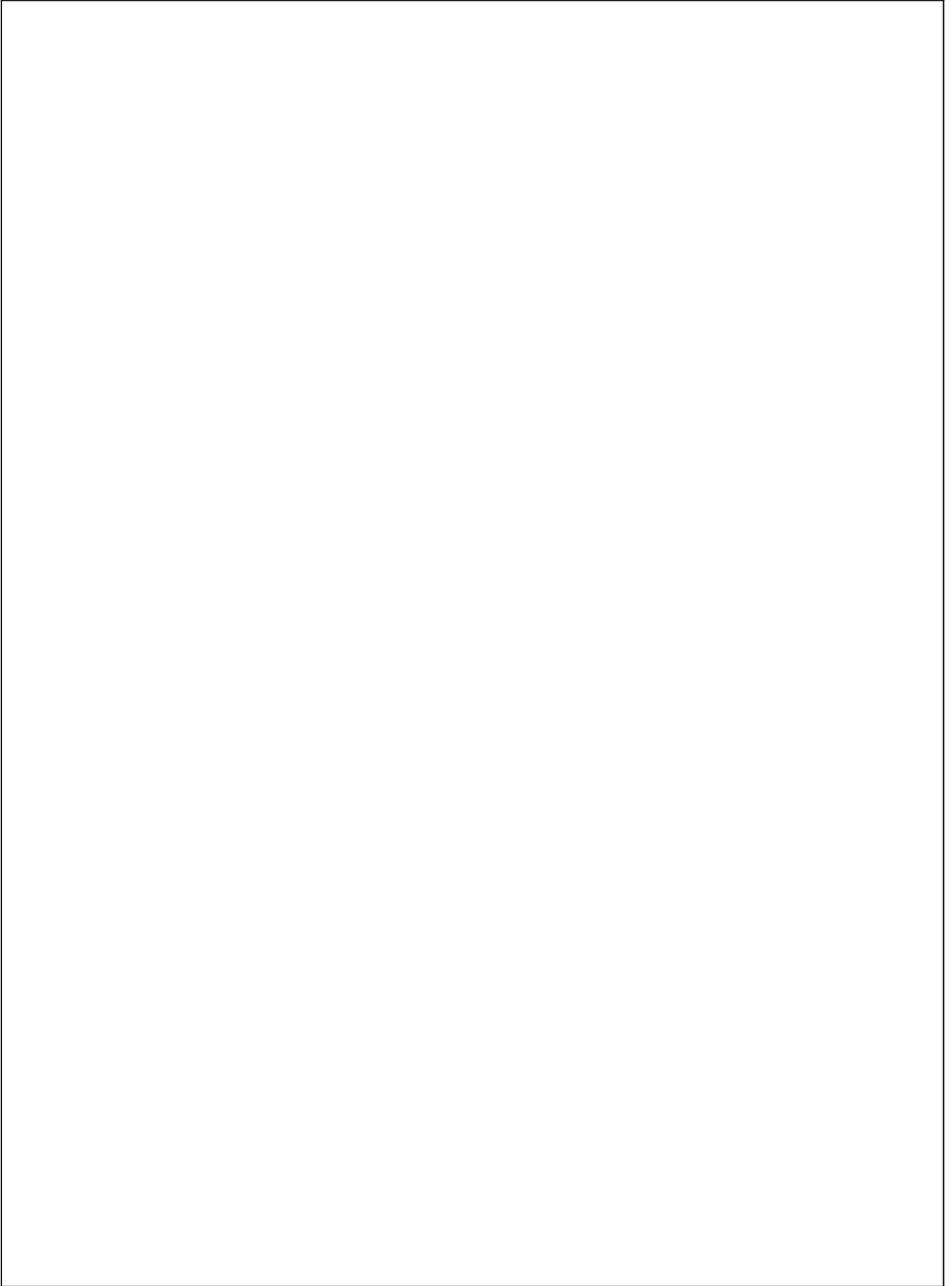
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Use this box to set out your response.

Blackfordby Limits to Development

We consider that the limits to development in relation to the Butt Lane development (application ref: 18/01973) should be amended to only include the housing element of the development, i.e. run along Lawton Road. The change in the limits to development as shown includes a significant area of National Forest planting delivered by the development, which we consider should be excluded from the limits to development.

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



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Signed: Eilish Gardner

Date: 14/03/2024

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Policy Ec12 – Tourism and Visitor Accommodation (Strategic Policy)

Use this box to set out your response.

Ec12 – Supporting text

Suggested amendment to paragraph 7.80:

We request omitting reference to the National Forest Tourism Growth Plan 2017-2027 as we are working on an updated tourism plan with NWDLC Economic Development Officers. The document has the working title of 'Transformative Tourism Plan 2024-2029' and accordingly we request the following amendment to paragraph 7.80.

7.80 We will work with the National Forest Company and other tourist organisations to maximise the opportunities for tourism and visitor attractions in the district. ~~The National Forest Company have published the National Forest Tourism Growth Plan 2017-2027 which outlines strategies to further strengthen and grow sustainable tourism in the area.~~ The National Forest Company's Transformative Tourism Plan 2024-2029 outlines approaches to support the development of sustainable tourism across the National Forest.

Suggested amendment to paragraph 7.86:

We request omitting '*... especially where they are associated with the National Forest*' from the first sentence, and including more about the National Forest and visitor accommodation in the next criterion as we hope that the Policy is more supportive of (appropriate) tourism accommodation in the National Forest than elsewhere in the District.

7.86 Some types of visitor accommodation (including lodges, glamping, camping, caravans) are more suited to a countryside location, ~~especially where they are associated with the National Forest.~~ However, applicants for visitor accommodation in the countryside must robustly demonstrate a need for the type of accommodation proposed in that particular location. The need for any onsite overnight manager's accommodation will also need to be justified. We will give particular support to any proposals that make use of previously developed land or are well related to existing tourist attractions/facilities (especially by sustainable modes of transport).

Suggested amendment to paragraph 7.87:

Include reference to retrofitted/existing accommodation as the Sustainable Tourism Accommodation Guide is a guide for new and retrofitted tourism accommodation, and include wording from paragraph 10.54 *[Can/should this criterion also refer to criterion 10.54 which provides an insight into the Sustainable Tourism Accommodation Guide?]*

7.87 *Within the National Forest, new and retrofitted visitor accommodation (which can range from glamping sites and cabins through to guest houses, pubs and hotels) will be supported where it is appropriately related to the National Forest and demonstrates distinctive National Forest character and sense of place by aligning to the design principles in the National Forest Company's Sustainable Tourism Accommodation Guide.*

Suggested additional paragraph in the supporting text referring to the Heart of the Forest:

Within the Heart of the National Forest tourist attractions and facilities should support the delivery of the Heart of the National Forest Vision as set out in policy En3 [see our suggested wording for a criterion relating to developments in the Heart of the Forest in our response to En3].

Ec12 – Policy wording

The Policy does not currently refer to the National Forest or the Sustainable Tourism Accommodation Design Guide. The NFC requests that there is a criterion referring to tourism attractions and facilities in the wider National Forest and within the Heart of the Forest, and reference to the Sustainable Tourism Accommodation Guide in the visitor accommodation section.

Suggested additional criterion in the tourism and attractions section of Policy Ec12:

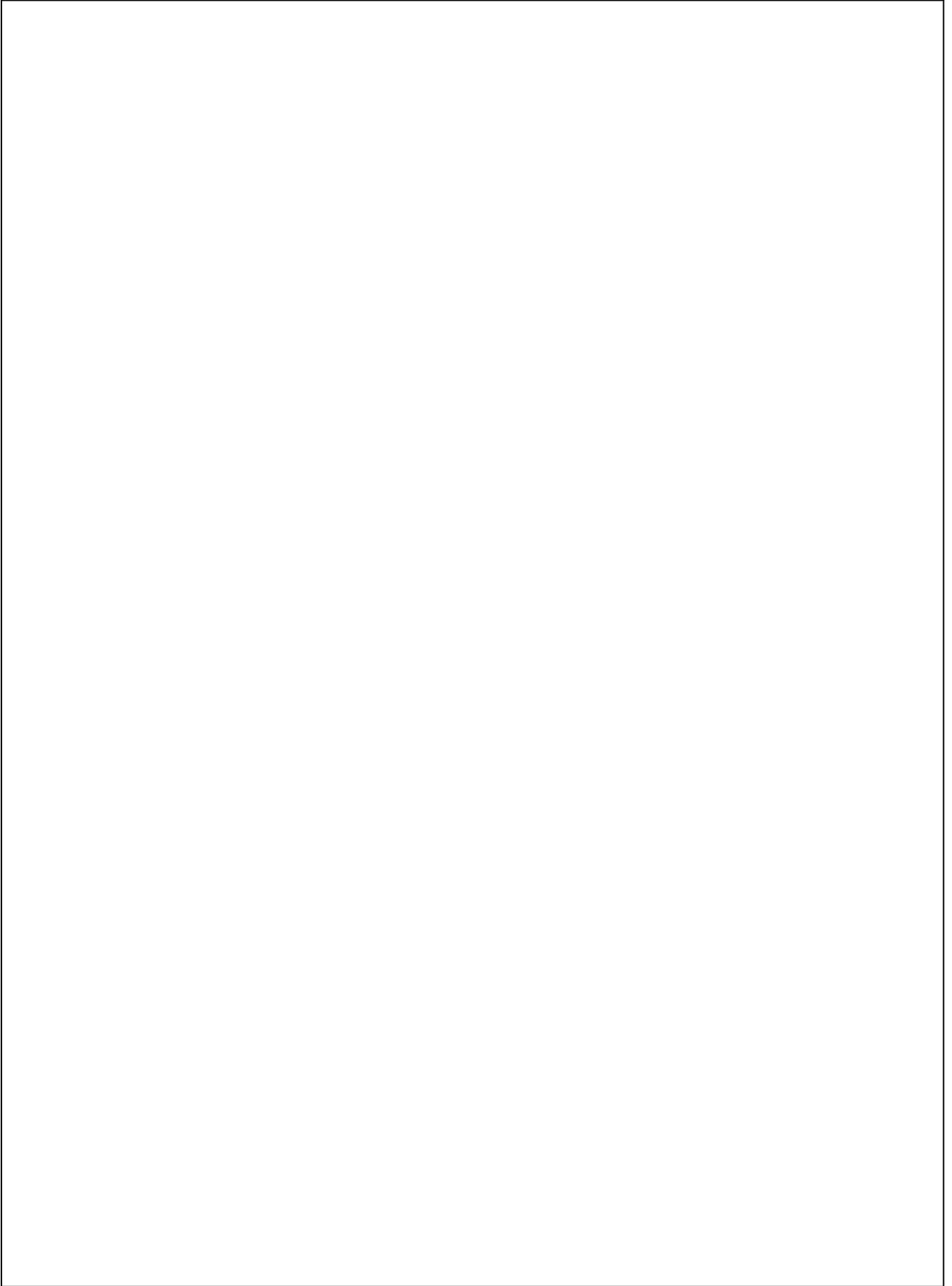
Within the National Forest, appropriately located and designed sustainable tourism attractions and facilities should have regard to the National Forest Transformative Tourism Plan, and within

the Heart of the National Forest tourist attractions and facilities should support the delivery of the Heart of the National Forest Vision as set out in policy En3 [see our suggested wording for a criterion relating to developments in the Heart of the Forest in our response to En3].

Suggested additional criterion in the Visitor Accommodation section of Policy Ec12:

New and retrofitted visitor accommodation in the National Forest will be supported where distinctive National Forest character and sense of place is demonstrated by aligning to the design principles in the National Forest Company's Sustainable Tourism Accommodation Guide.

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



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Policy En3 – The National Forest (Strategic Policy)

Use this box to set out your response.

En3 - Supporting text

10.46 In addition to enhancing the physical appearance of the landscape, the National Forest also provides a range of other benefits including enhanced biodiversity; recreation, leisure, tourism and economic opportunities. It also provides a “carbon sink” which helps store CO₂; forest carbon sinks are considered the best natural mitigation measure against global warming. There is also evidence that woodland creation and woodland management can help in reducing flood flows, particularly in smaller catchments. The National Forest is not just about planting woodland but increasing tree cover within urban areas. This helps to create an attractive forest setting as well as green space for the local community which can contribute towards improving health and wellbeing.

Comment:

!....forest carbon sinks are considered the best natural mitigation measure against global warming.'

This reads a little dated and may not be true, is the ocean a larger carbon sink?

Could instead reference government policy to increase tree planting such as the Environment Act which sets out the policy to increase woodland and tree canopy cover in England to 16.5% of land area.

Suggested amended wording to paragraph 10.49:

We would request that the second sentence referring to the thresholds in the Guide is omitted as we are in the process of updating the National Forest planting thresholds. While the thresholds for residential and commercial/industrial development are unlikely to change, we are hoping to provide further clarity the types of developments which require National Forest planting [we will of course liaise with you on changes to the Guide].

We would request that the section of 10.49 from 'other appropriate habitats...' is amended as detailed below to more accurately reflect what is sought from National Forest woodland planting and landscaping.

10.49 The National Forest Guide for Developers and Planners sets out the requirements for woodland planting and landscaping as part of new developments. ~~The Guide expects residential development over 0.5ha and commercial development over 1ha to include woodland planting and landscaping.~~ Landscaping *National Forest woodland planting and landscaping* will generally involve resilient woodland planting but can also include the creation and management of ~~other appropriate habitats, open space provision associated with woodland and the provision of new recreational facilities.~~ Landscaping does not just include woodland planting and the appropriate mix of landscaping features will depend upon the setting and the opportunities that the site presents *other appropriate habitats such as wood pasture, parkland and ponds where they form part of a connected green infrastructure network. Public access should be included in areas of green infrastructure and footpath/cycleway connections to adjoining woodlands and public rights of way should be incorporated.*

Suggested amended wording to paragraph 10.52:

The Heart of the Forest Vision is due to be launched in April 2024, and we would therefore be grateful for the following amendment to paragraph 10.52:

10.52 The area between Ashby de la Zouch, Measham and Swadlincote is recognised as 'The Heart of the National Forest'. The National Forest Company and partners are working on updating the Vision for the Heart of the National Forest. ~~As the Vision has not yet been published, we will take this into account at the next stage of the Local Plan.~~ *The Vision identifies three investment priorities and six investment zones which will support more diverse and thriving wildlife; improve wellbeing; will be accessible for everyone; encourage more people to visit and stay for longer; create greener jobs, support sustainable modes of travel and renewable energy and increase participation and volunteering opportunities.*

Suggested additional paragraph in supporting text:

Development will be expected to incorporate the required National Forest planting in addition to compliance with Biodiversity Net Gain requirements set out in Policy En1 – Nature Conservation / Biodiversity Net Gain (Strategic Policy). The strategic significance multiplier in the metric will

apply to woodland habitats and tree planting within the National Forest.

En3 - Policy wording

We would encourage the following criterion to be included in the Policy relating to development in the Heart of the National Forest.

Suggested additional criterion:

Within the Heart of the National Forest development should support the delivery of the Heart of the National Forest Vision. The following types of development will be supported:

A) Tourism and leisure attractions

B) Visitor accommodation where it complies with the Sustainable Tourism Accommodation Design Guide.

C) Proposals associated with the woodland, environmental and green economy and education or research in those sectors.

D) Enhancements to the footpath and cycleway network.

E) Small scale renewable energy installations.

F) Volunteer facilities.

Development in the Heart of the National Forest should strengthen linkages to nearby urban areas and leisure and tourism attractions. Development will be exemplars of sustainable design and construction and seek to promote the use of non-motorised modes of travel. The District Council will support the National Forest Company and others in the delivery of the Heart of the National Forest Vision. Development in the Heart of the National Forest should demonstrate compliance with the Vision.

Other comment/s:

We would hope that the policy would be more supportive of tourism accommodation in the Forest than elsewhere in the District, particularly where the Sustainable Tourism Accommodation Guide has been taken into account.

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

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North West Leicestershire District Council Local Plan 2020 - 2040

Regulation 18 Proposed Policies and Allocations Plan

March 2024



[gladman.co.uk](https://www.gladman.co.uk)



01260 288888

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1 INTRODUCTION

1.1 Context

1.1.1 Gladman Developments Ltd. (Gladman) welcome the opportunity to comment on the Draft North West Leicestershire Local Plan 2020-2040 Proposed Policies and Allocations Plan (Regulation 18) consultation and request to be updated on future consultations and the progress of the Local Plan.

1.1.2 Gladman specialise in the promotion of strategic land for residential development and associated community infrastructure and have considerable experience in contributing to the development plan preparation process having made representations on numerous planning documents throughout the UK alongside participating in many Examinations in Public.

1.1.3 Gladman have four land interests in the district which are being promoted through the emerging Local Plan, three of these sites are included within the emerging Local Plan as draft housing allocations. The sites are available, suitable and deliverable for housing as demonstrated in **Appendix 1** of this representation. Gladman looks forward to engaging further with the Council as the plan preparation process progresses.

1.2 National Planning Policy Framework

1.2.1 The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and how these should be applied within which plan-making and decision-taking. The NPPF requires plans to set out a vision and a framework for future development and seek to address the strategic priorities for the area. Local Plans should be prepared in line with procedural and legal requirements and will be assessed on whether they are considered 'sound'.

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

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

- **Justified** – the plan should be an appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.

1.2.3 The NPPF reaffirms the Government’s commitment to ensuring up-to-date plans are in place which provide a positive vision for the areas which they are responsible for, to address housing, economic, social, and environmental priorities and to help shape the development of local communities for future generations.

1.2.4 In particular, paragraph 16 of the NPPF states that Plans should:

- a) Be prepared with the objective of contributing to the achievement of sustainable development;
- b) Be prepared positively, in a way that is aspirational but deliverable;
- c) Be shaped by early, proportionate, and effective engagement between plan-makers and communities, local organisations businesses, infrastructure providers and operators and statutory consultees;
- d) Contain policies that are clearly written and unambiguous, so it is evidence how a decision maker should react to development proposals;
- e) Be accessible through the use of digital tools to assist public involvement and policy presentation; and
- f) Serve a clear purpose avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant).”

1.2.5 Paragraph 230 of the NPPF identifies that the policies within the revised NPPF (published 19 December 2023) will apply for the purpose of examining plans, where those plans reaching regulation 19 of the Town and County Planning (local Planning) (England) Regulations 2012 (pre-submission) stage after 19 March 2024. As identified within the consultation document, the Council’s Local Development Scheme anticipates that Regulation 19 consultation will occur January to February 2025 and as such the Plan will be examined under the revised Framework.

2 DRAFT NORTH WEST LEICESTERSHIRE LOCAL PLAN 2020-2040: PROPOSED POLICIES FOR CONSULTATION

2.1 Background

2.1.1 North West Leicestershire District Council is preparing a new Local Plan until 2040. Gladman support the Council's timescales relating to the new Local Plan as set out in the most recently published Local Development Scheme which is dated October 2023.

2.1.2 The sections that follow below include specific comments from Gladman on the proposed policies and housing allocations published by the Council for consultation with a particular focus on housing and residential development.

2.2 S1 - Future Development Needs

2.2.1 Draft Policy S1 identifies the housing requirement for North West Leicestershire as a total figure of 13,720 dwellings, which equates to an annualised requirement of 686 dwellings per annum. The Plan intends to cover the period 2020-2040. The explanatory text for the policy explains that this figure is composed of the Council's Standard Method figure which was identified as a minimum figure of 372 dwellings, the Council states that in line with the PPG accepted that it was appropriate to plan for a level above the housing need figure. This primarily appears to stem from the unmet housing need of Leicester City Council which has a current unmet need of approximately 18,700 homes. Gladman supports the Council's proactive stance on meeting housing needs not only within the local authority boundary but outside it as well.

2.2.2 Taking the above into account it currently appears that the Council have increased the housing figures from the Standard Method purely to meet the unmet housing need of Leicester City Council. However, it is key that the housing requirement also enables the Council to provide for aspects such as affordable housing. The Joint HENA identified that there is an annual need for social/affordable rented housing of 236dpa and for affordable home ownership of 146 dpa within North West Leicestershire, taken at face value this would amount to over half of the current annual delivery. The PPG¹ states that in order to help deliver the required number of affordable homes an increase in the total housing figure could be considered. As identified elsewhere in the document the percentage of affordable

¹ Paragraph 024 Reference ID: 2a-024-20190220

housing to be provided is yet to be defined but Coalville are experiencing a rising affordable housing need requirement and will need to demonstrate that the housing requirement assists in meeting this demand.

- 2.2.3 Within the Committee Report “New Local Plan – Proposed Housing and Employment Allocations”² which was presented to the Local Plan Committee on the 17th January 2024, the Council acknowledge that, currently, there is a shortfall in the number of dwellings allocated compared to the housing requirement both across the LPA with a total deficit of around 200 dwellings. As detailed in Appendix 1 Gladman demonstrates that through the sustainable increase of dwellings on already allocated sites and the further allocation of suitable and sustainable sites which are capable of being delivered quickly within the identified tiers, for instance at land off Blackfordby Lane, Moira, this deficit can be suitably rectified.

2.3 S2 - Settlement Hierarchy

- 2.3.1 The policy clearly sets out the Council’s settlement hierarchy and Gladman supports the Council focussing development towards the most sustainable settlements in the district. Gladman would highlight that development should also be spread across the settlement hierarchy in a meaningful way to ensure that those settlements towards the lower end of the hierarchy still receive proportionate development and growth which will bring tangible benefits and ensure that these settlements do not stagnate and become increasingly unsustainable. This strategy would also enable that a broad range of sites can be brought forward at a similar time assisting the Council in achieving a sufficient supply of deliverable and developable land.
- 2.3.2 Gladman raise a query with regard to bullet 3. This identifies that if during the plan period any of the sustainable villages were to lose facilities and services then this would be taken into account, there is no indication that the reverse could occur, if a development came forward which proposed a new service(s), which would make the settlement more sustainable, would this also be taken into account?

² Item 5. New Local Plan – Proposed Housing and Employment Allocations <https://minutes-1.nwleics.gov.uk/ieListDocuments.aspx?CId=344&MIId=2549>

2.4 S4 - Countryside

- 2.4.1 Draft Policy S4 sets out the Council's approach to development within the Countryside, which is defined as all land outside the limits to development. The policy identifies that the Council will support developments as set out between (a) and (r). Bullet (2) then identifies that for those supported developments identified within the policy there are a list of further requirements in order to gain further support from the Council. Gladman's concern with this policy is that section 2 is reliant on sites progressing past section 1. As it is currently written a site which is not within the closed list (a) – (r) would then not be obliged to be assessed against (2) (a)-(d). If for instance the limits to development were found to be out of date in the future the Council would lack a landscape policy for development in the countryside. While the Council have a subsequent policy which covers 'Residential Development in the Countryside' Gladman do not consider that this fills the void currently in S4 in particular major residential development.

2.5 AP4 - Reducing Carbon Emissions

- 2.5.1 It is acknowledged that the planning system has an important role to play in tackling the effects of climate change. Chapter 14 of the NPPF deals specifically with Meeting the Challenge of Climate Change, Flooding and Coastal Change. Paragraph 157 of the Framework identifies how the planning system should:

'Support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.'

- 2.5.2 This has clearly been recognised by the Council who declared a Climate Emergency in June 2019 and are committed to becoming a Net Zero Carbon district by 2050.
- 2.5.3 Gladman support policies which seek to tackle climate change and reduce carbon emissions. It is, nonetheless, vital that any policy requirements are justified by robust evidence and drafted with references and consideration to the relevant Building regulations and emerging Future homes Standard which offer the most appropriate mechanism to deliver low carbon and energy efficient developments. In December 2023, a Written Ministerial Statement was released which identifies that with regards to the energy efficiency building regulations a further change is planned to occur in 2025. This alteration

will mean that homes are to be built to be net zero ready and as such should not need any significant alterations or work to ensure that they can be net zero when the wider national infrastructure begins to decarbonise. Gladman also supports the Council's utilisation with the National Planning standards rather than setting any LPA specific standards so as to give clarity to developers.

- 2.5.4 Gladman would raise a concern that within the policy currently there appears to be no recognition of the difference in the level of information required to meet the policy requirements depending on whether an Outline Application, Reserved Matters or Full Application has been submitted. An Outline Application would not provide the same level of detail as a Reserved Matters or Full Application and as such would only be able to give a broad indication of measures that could be taken to reduce lifecycle carbon emissions and the reuse of materials as it does not identify the actual development on site. This however should not penalise the approval of a site but be updated within following, more detailed, applications.

2.6 AP6 - Health Impact Assessment

- 2.6.1 There is no draft policy to fully assess as the Council are still in conversation with other Leicestershire authorities and the Public Health Team at Leicestershire County Council on the final policy. However, Gladman would like to raise that Health Impact Assessments (HIA) are covered within the PPG which identifies them as a 'useful tool to use where there are expected to be significant impacts'³, but it also outlines that the Local Plan as a whole should consider wider health issues in an area and ensure that policies respond to these. Additionally, these HIAs must be proportionate to the development being proposed, and any policy be clear as to the circumstances required to generate the need for a HIA.

2.7 AP9 - Water Efficiency

- 2.7.1 Draft Policy AP9 identifies the Council's emerging requirement identifies that new residential developments are required to achieve the national optional water efficiency standard of a maximum of 110 litres of water per person per day. The main evidence highlighted by the Council is an Environment Agency report on Water Stressed Areas which identified the Severn Trent as seriously water stressed and the letter from Steve Double MP which confirms that the letter can be used as evidence by local planning authorities to set

³ PPG paragraph: 005 Reference ID: 53-005-20190722

out local plan policies requiring the 110 l/p/d if identified as being within areas of serious water stress.

- 2.7.2 However, while this supports the setting out of a local plan policy on water efficiency Gladman consider that more evidence is required to fully justify the adoption and subsequent implementation of the policy in particular the requirement of 110 l/p/d. The PPG sets out the requirements needed to implement this policy, a requirement to identify a clear local need, and for this need to be established through interaction by the Council not solely with the Environment Agency but with local water and sewerage companies and catchment partnership⁴. Additionally, the policy's impact on viability will need to be tested and confirmed in order that it does not hinder the development of housing within the authority.

2.8 H1 - Housing Strategy

- 2.8.1 Gladman support the housing strategy outlined within the policy. The 10% flexibility allowance will provide greater certainty for the Council to meet its overall housing need requirement, including the identified unmet housing need from Leicester City Council, over the plan period.

2.9 H3 - Housing Provision – New Allocations

- 2.9.1 Gladman's comments on the specific draft housing allocations is contained within appendix 1: Site Submission and Housing Provision – New Allocations.

2.10 H4 - Housing Types and Mix

- 2.10.1 Draft Policy H4 identifies the housing type and mix anticipated to be provided on new developments. It uses the HENA as a starting point, while Gladman acknowledges that within the wording of the policy a 5% deviation is in-built, Gladman would highlight that flexibility is key to this policy and ensuring that future development schemes are not hindered in their delivery.

- 2.10.2 Gladman would also note that the requirement for bungalow and for other single level housing needs to be considered in terms of viability and effects on site density.

⁴ PPG Paragraph: 014 Reference ID:56-014029150327

2.11 H5 - Affordable Housing

2.11.1 As the Council are yet to set out the specific policy requirement for affordable housing provision, there is no specific detail to provide comment on. Nevertheless, Gladman support the Council's intention to undertake a viability investigation before setting the final affordable housing figure, the figures should not be set so high that negotiation is needed on every site.

2.11.2 A degree of flexibility is requested when applying the Affordable Housing requirement in particular where a site is adjacent to one settlement but falls within the affordable housing designation of another so as to not penalise development unnecessarily.

2.12 H7 - Self-build and Custom Housebuilding

2.12.1 The Council reference the PPG and the need to take into account the register when preparing planning policies and the number on the register is also likely to be a material consideration when determining planning applications for self-build and custom housebuilding plots. The Council highlight that since April 2016 there have been 129 registrations on the Council's register. There is however no indication of how many people have left the register over that period, this is key considering that over this period 37 self-build and custom housebuilding plots were provided up to 30th October, it follows that the overall registration should be less 37 applicants, this does not appear to be the case. This may imply that those 37 self-build and custom housebuilding plots are not being taken up by those on the register for reasons unknown. On top of this 7 further self-build and custom housebuilding plots were provided through additional sources correspondingly lowering the current need further. The Council have utilised the increase in members on the register to calculate an overall demand over the plan period, resulting in a need of 415 self-build and custom housebuilding plots. With this overall figure the Council have proposed a requirement of 5% of sites of general market housing of 30 or more to be provided as serviced plots. An initial calculation based on the Council's draft allocations indicates that there will be 462 plots provided by the allocations, it is likely more will be provided as more sites are allocation. Gladman is encouraged with the Council's flexibility which allows for serviced plots to revert to Market Housing following 12 months marketing. Gladman would encourage the Council to investigate the utilisation of specific self-build and custom housebuilding sites of small to medium size in locations identified by those on the register.

2.13 H10 - Space Standard

2.13.1 Policy H10 requires that all new housing both Market and Affordable will need to meet or exceed the Nationally Described Space Standards. It is important to note that the Nationally Described Space Standards have been introduced as an optional target and the use of them required a clear need while also ensuring that development remain viable. The imposition of these standards requires justification as set out in footnote 52 of the NPPF and reiterated within the PPG (PPG ID: 56-020-20150327⁵) "Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies". The PPG goes on to identify the types of evidence which would be required to justify the introduction of policy H10. This includes need, viability and timing. This is recognised by the Council within the Space Standards Topic Paper which accepts that the policy would need to be tested as part of the whole plan viability assessment. It is imperative that should the Council continue with the policy all the relevant justification is demonstrated.

2.14 H11 - Accessible, Adaptable and Wheelchair user Homes

2.14.1 The policy sets out that all new homes will be required to meet Part M4(2) of the Building Regulations and for housing developments of 10 or more dwellings or on sites of more than 0.5ha at least 9% of all market homes will be required to meet Part M4(3)(2)(a) and at least 23% of all affordable homes will be required to meet Part M4(3). The expectation is that these will be built to M3(3)(2)(b) standard (wheelchair accessible dwellings), although provision of M4(3)(2)(a) (wheelchair adaptable dwellings) will be considered where justified and agreed with the Council's Strategic Housing Team prior to the granting of planning permission.

2.14.2 Gladman would highlight that the PPG outlines the evidence required to introduce a policy such as H11, including the likely future need; the size, location, type and quality of dwellings needed; the accessibility and adaptability of the existing stock; how the needs vary across different housing tenures; and the overall viability.

2.14.3 The requirement for all new homes to meet Part M4(2) standard appears to originate in the Leicester and Leicestershire Housing and Economic Needs Assessment (HENA, 2022). This evidence does not identify particular local circumstances which demonstrate that the needs

⁵ PPG Paragraph: 020 Reference ID: 56-020-20150327

of Council differ substantially to those across the East Midlands or England as a whole. As such the Council should provide further, detailed localised evidence making the specific case for North West Leicestershire which justified the inclusion of optional higher standards for accessible and adaptable homes in this policy.

2.14.4 The requirements to meet Part M4(2) will be superseded by changes to residential Building Regulation. The Government response to 'Raising accessibility standards for new homes'⁶ states that the Government proposed to mandate the current M4(2) requirement in Building Regulations as a minimum for all new homes, with M4(1) applying in exceptional circumstances. This will be subject to a further consultation on the technical details and will be implemented in due course through the Building Regulations. The requirement to address this issue within planning policy is therefore unnecessary.

2.15 IF1 - Development and Infrastructure

2.15.1 Gladman do not have any particular concerns with the policy but would highlight that a development can only be required to mitigate its own impact and cannot be required to address existing deficiencies in the infrastructure or services. As such it is important that the Council understand the existing issues with the LPAs infrastructure and ensure that any contributions which are requested for a development would mitigate additional impacts.

2.16 IF5 - Transport Infrastructure and New Development

2.16.1 The policy recognises that the provision of infrastructure is vital to support for sustainable development to be brought forward whether it be physical, social or green. The Council's supporting text reiterates the requirements of national planning policy that there are three tests which any obligation must meet in order to be required by a new development. Gladman would reiterate previous comments in response to draft Policy IF1 that the development required must mitigate the impact of the development itself and not be utilised to address existing deficiencies present in the authority.

2.16.2 Gladman would recommend a change in the wording of bullet (5) which currently states that 'Development that has a demonstrable transport impact'. While demonstrable translates to a clearly apparent impact which in of itself does imply adverse effects, in the context of Town Planning Gladman consider that demonstrable conveys negative

⁶ <https://www.gov.uk/government/consultations/raising-accessibility-standards-for-new-homes/outcome/raising-accessibility-standards-for-new-homes-summary-of-consultation-responses-and-government-response#government-response>

connotations to a development if it was to be found to have a 'demonstrable transport impact'. Instead Gladman would recommend using the phrase 'noticeable transport impact' or 'perceptible transport impact' this would achieve the same result without applying unnecessarily negative connotations to a development.

2.17 EN1 - Nature Conservation/BNG

2.17.1 Gladman has concerns with the wording of (1) (a) which identifies that development would provide a net gain in biodiversity consistent with any national policy prevailing at the time that a planning application is determined. Gladman concern relates to the determination requirement. This goes against national policy and puts an unnecessary burden on development if national policy changes over the course of an application. Within the Governments up to date guidance on BNG⁷ it notes for the current BNG regulations if a planning application for a development was made before day one of mandatory BNG (12th February 2024) the development is exempt from these BNG requirements. While there is no indication as to an upcoming change in national policy it is likely that if there is a change there will be a similar transitional exception which the Local Policy should reflect. As such Gladman recommend that development should instead provide a net gain in biodiversity consistent with any national policy prevailing at the time that a planning application is submitted.

2.17.2 Gladman confesses to some confusion with regards to 1(d) and whether this part of the policy relates to the biodiversity resources identified in (c) (i) – (vi) or if it also relates to the biodiversity net gain requirements, as biodiversity requirements should be district wide (through the purchase of credits) rather than needing to be located in close relation to the proposed development. Gladman feel that the overall policy may need further detail relating to the provision of off-site and statutory credits with regards to BNG provision. The policy could identify that on-site biodiversity should be fully explored before moving to consider off-site units or statutory credit, but to emphasise that these are options to be pursued when providing BNG.

2.18 EN3 - National Forest

2.18.1 This Policy sets out the development which the Council would support within the National Forest, which covers approximately 56% of North West Leicestershire, in particular the

⁷ <https://www.gov.uk/guidance/biodiversity-net-gain-exempt-developments>

main development locations of the Coalville Urban Area, Ashby-de-la-Zouch, Ibstock and Measham. Reference is made within the explanatory text of the National Forest Guide for Developers and Planners which sets out the requirements for residential development over 0.5ha within the National Forest. It also sets out that there is a hierarchy to contributions and provisions towards the National Forest with an emphasis on on-site provision of tree covers before off-site provision or financial contributions. Gladman support the aims behind the policy and have no overriding issues with the policy and requirements within in.

2.18.2 Nonetheless, Gladman would recommend a change to the wording of the policy in order to convey greater clarity. While the explanatory text identifies the acceptance of residential development within the National Forest the policy as it is currently written within points (a) – (e) appears to not directly support residential development within the National Forest. Whilst there is an insinuation that residential development is allowed Gladman feel this could be set out clearer within the policy text itself highlighting that residential development is not excluded from the National Forest per se. This is especially critical as some of the key locations for housing delivery within the local planning authority fall within the National Forest. It may be useful to use similar terminology to that used within Draft Policy EN4 which identifies there are some developments which would be given priority but does not rule out other development as long as it meets the policies criteria.

2.19 EN7 – Conservation and Enhancement of the Historic Environment

2.19.1 Gladman’s only comment on this policy is whether there is the need for bullet (1) to be within the policy, this is a requirement of all planning applications as enshrined within National Planning Policy and Law.

3 CONCLUSIONS

3.1 Summary

- 3.1.1 Gladman welcomes the opportunity to comment on the issues and options that are currently being explored by the Council. These representations have been drafted with reference to the revised National Planning Policy Framework (NPPF 2023) and the associated updates that were made to Planning Practice Guidance. Gladman notes that the Council have set out that they will update the policies and general document in line with the revised NPPF 2023 in due course.
- 3.1.2 Gladman have provided comments on a number of the issues that have been identified in the Council's consultation material and recommend that the matters raised are carefully explored during the process of undertaking the new Local Plan.
- 3.1.3 We hope you have found these representations informative and useful towards the preparation of the new North West Leicestershire Local Plan.
- 3.1.4 Gladman welcome any future engagement with the Council and if you would like to discuss this representations or other matters, please contact us at policy@gladman.co.uk.

APPENDICES

Appendix 1: Site Submissions and Housing Provision – New Allocations

1 LAND AT THE JUNCTION OF WASH LANE AND COALVILLE LANE, RAVENSTONE

1.1 Context

- 1.1.1** Gladman are promoting land at the junction of Wash Lane and Coalville Lane for residential development. The site has been identified by the Council as a draft housing allocation (site reference: R17) for around 153 dwellings in the Draft Local Plan (Policy C48). The northern part of the site is currently subject to a 'live' planning application submitted by Gladman for up to 105 dwellings (application ref: 21/00494/OUTM).
- 1.1.2** The full site provides a logical and sustainable extension to the current built form of Coalville. As will be demonstrated within this site submission, development on this site will be of a high-quality and in line with the majority of draft policies of the emerging Local Plan. It will contribute to both Coalville's housing requirement and the wider housing need across North West Leicestershire.
- 1.1.3** Due to the presence of an active planning application on the northern parcel of the site, the following sections will refer in the main to the information provided as part of that application. It is Gladman's opinion that the southern part of the allocation would form a Phase 2 which would be brought forward following the grant of planning permission on the northern parcel of the site.
- 1.1.4** The 'live' application represents 4 hectares (ha) of land shown edged in red on Figure 1 below. The site would deliver up to 105 residential dwellings, structural landscape planting, 1.14 ha of formal and formal open space with the creation of New Woodland and Woodland belt. Vehicular access will be achieved from Wash Lane.



Figure 1: Land at the junction of Wash Lane and Coalville Lane, Ravenstone (R17).



Figure 2: Site Location Plan (q183-L-01 Rev B)

1.2 Site Location

- 1.2.1** The site is located to the west of the existing residential development on the edge of Coalville and is currently within the Parish of Ravenstone with Snibstone, following the changes to the limits of development, the site will fall within the Coalville Urban Area. The Coalville Urban Area is identified by the Council as the 'Principal Town' and the main location for new development due to its extensive range of services and facilities and access to sustainable transport. The site is located in a sustainable location and enables future residents to access a number of services and facilities by both walking and cycling including a primary school, a post office, supermarkets, a public house, bars, multiple play areas, supermarkets amongst others. The Transport Assessment submitted as part of the pending planning application demonstrates these are well within the 'preferred maximum' walk distance guidance. It is anticipated that the remainder of the site will also be able to capitalise on the sustainable location and utilise linkages through the site to the north.
- 1.2.2** The site is well served by public transport. The closest bus stops to the site are located to the north on Coalville Lane, with additional stops located on Wash Lane. These stops are served by two services currently the number 15 and 29A which provide services to Coalville centre, Ashby-de-la-Zouch, Ibstock and Swadlincote Bus Station, providing future residents with a plethora of opportunities to access services, facilities and employment in the surrounding area.

1.3 Access

- 1.3.1** A Transport Assessment was prepared and submitted as part of the outline planning application and subsequent discussion was held between the Highways Authority and the Applicant. The site is intended to be access via a priority T-Junction from Wash Lane incorporating a ghost island. There are no objections to the scheme on access grounds from Leicestershire County Council Highways. The access has been assessed as capable of successfully providing access for the remainder of the allocated site.
- 1.3.2** Draft allocation R17 requires that the development provides pedestrian connectivity to the existing built form of Coalville to the north east. To the existing built form of Coalville to the north east. The adjacent land has already been developed for housing and properties sold. Unless the Council adopted the internal highways within the development and no ransom strips have been retained by the developer, then it is unlikely that a link between the two

developments will be legally deliverable. This should therefore be rewritten as a 'desirable' rather than a strict requirement of the allocation.

1.4 Landscape

1.4.1 The Landscape and Visual Appraisal (LVA) submitted with the current application identifies that the site is not subject to any national or local designations that afford it specific protections. While it does lie within The National Forest it is subject to guidance around Green Infrastructure and tree planting requirements. The Appraisal assesses the landscape effects of the proposals to have a minor adverse – negligible impact at a local scale on completion and year 15.

1.4.2 The LVA notes that with the extensive green infrastructure proposed, along with the retention of existing trees and hedgerows along the site boundaries, would enable the scheme will soften the current edge of Coalville and help to reinforce the separation between Coalville and Ravenstone.

1.5 Ecology

1.5.1 An amended Ecological Impact Assessment was submitted to the Council in November 2021 reflecting comments received by Leicestershire County Council and constituting a desk-based study and an extended Phase 1 habitat survey including tree and hedgerow assessment, assessment of bat roost potential in trees and search for signs of badger to inform the baseline assessment of the ecology of the study area. This assessment found that the current habitats within the study area are generally of low ecological importance being dominated by arable land with associated species-poor field margins and native species perimeter hedgerows, scrub and mature trees. The Assessment outlines that through habitat creation and mitigation measures the development will avoid or otherwise minimise potential adverse impacts on habitats of ecological value and notable species, and is likely to enable a net biodiversity gain to be achieved.

1.5.2 Gladman recognise that this appraisal may now be out-of-date and are committed to ensuring that 10% biodiversity net gain can be achieved on site.

1.5.3 The statutory consultee found the Ecological Impact Assessment to be satisfactory subject to the recommendations within the report being followed and conditions recommended.

1.6 Flooding and Drainage

- 1.6.1 The site is located within Flood Zone 1 (i.e. less than a 1 in 1,000 annual probability of river or tidal flooding in any one year) and, on this basis, the site is considered to pass the sequential test. A Flood Risk Assessment was submitted as part of the application documents and detailed that the site will achieve greenfield run off rates via a complex hydrobrake system utilising a surface water attenuation located within the south western area of the site. Through detailed correspondence with the Lead Local Flood Authority and Severn Trent Water, as part of the application process, two potential options have been identified to deal with surface water flows for the development which include a combined gravity connection to Severn Trent combined sewer system down Wash Lane to the south or a pumped surface water connection to the north. Severn Trent is satisfied that the scheme can be drained and have no objection to the proposals subject to an appropriately worded condition. This is confirmed in the consultation response from the Lead Local Flood Authority in May 2022.

1.7 Heritage and Archaeology

- 1.7.1 The site does not contain, nor is in close to proximity of any listed buildings or conservation areas. An Archaeology and Built Heritage Desk-Based Assessment supported the planning application, while a number of Grade II and Grade II* listed Buildings were identified in the surrounding area, within both Coalville and Ravenstone, they are predominantly located towards the centre of the respective settlement as are the conservation areas for the two settlements. The assessment concluded that the site is not anticipated to impact upon the significance of any identified designated or non-designated heritage assets in the wider vicinity through changes in setting. Additionally, the site is considered to have low potential for significant archaeological remains from all periods.
- 1.7.2 In terms of the potential for as-yet to be discovered archaeological assets within the site, it is suggested that further work prior to or during development would ensure that any assets could be identified, recorded and conditioned.

1.8 Illustrative Framework Plan

- 1.8.1 An illustrative framework plan has been developed following a series of surveys and appraisals of the site and its surroundings. The findings from these investigations have fed

into the masterplanning process, with the masterplan showing how 105 homes can be suitably accommodated within the site boundary.

- 1.8.2 Figure 3 below shows how Gladman consider the site can come forward, but we would welcome the opportunity to discuss this further with the Council, especially in light of the Draft Planning Policies.
- 1.8.3 As the illustrative framework plan demonstrates, the site offers an exciting opportunity to deliver a scheme of new high-quality market and affordable homes.
- 1.8.4 The new housing will be set within a robust network of Green Infrastructure consisting of retained and new features, which will help to integrate development within the landscape and create a distinctive sense of place, as well as ensuring the site delivers net gains in biodiversity. Newly accessible formal and informal open space will be provided, designed to meet the express needs of the local community. It is also demonstrated that both vehicular and pedestrian linkages can be made to the remainder of the allocation to come forward as phase 2. .
- 1.8.5 In line with the strategic objective of adapting to climate change, Gladman fully acknowledge and are serious about the importance of ensuring future development is climate resilient. As such, the site will provide significant areas of Green Infrastructure, including new tree and structural planting (in line with the requirements of the National Forest Guidance) which will absorb CO₂ and create new habitats to support biodiversity. The new houses will be built to meet a high standard of energy efficiency and include provision of EV charging points and photovoltaics. By the very nature of the site's sustainable location on the edge of Coalville, services and facilities can be accessed via active or public transport, reducing need for the use of private vehicles.



Figure 3: Indicative Development Framework (9183-L-03 Rev H)

1.9 Draft Housing Allocation - R17 Land at Junction of Wash Lane and Coalville Lane, Ravenstone

1.9.1 As demonstrated in the red line location plan at the start of this section, the Council have allocated land to the east of Wash Lane and South of Coalville Lane for around 153 dwellings. The allocation is identified to deliver both affordable and self-build and custom housebuilding dwellings as part of the overall scheme, Gladman has made submissions on these specific policies within the main body of the representations. Part (2) of the policy sets out site specific requirements of R17. The above sections demonstrate how the site can meet the requirements of criteria (a) to (g). However, Gladman would recommend an alteration to the wording of criteria (c) as the site can explore the provision of pedestrian links internally within the site and can provide connections up to the edge of the site, to

facilitate future connections, but it would be unreasonable for the policy to request or condition these linkages as it requires land outside legal control.

- 1.9.2** Insert recommended wording for criteria C here. As stated previously Gladman believes this policy should be rewritten to emphasise that this link is desirable rather than a requirement of the allocation. As such Criteria C could read “exploration for the provision of a pedestrian link through the site from Wash Lane to the adjoining residential development to the east of the site” or the requirement could be altered to the provision of a pedestrian link to the edge of the site to enable future connectivity to existing development to the east”.
- 1.9.3** Additionally, Gladman consider that the information provided as part of the planning application currently pending on phase 1 demonstrates that the wider allocation is capable of delivering more than the currently identified 153 across the entire site. Indeed, the northern portion of the site can deliver a high-quality well-designed scheme which meets the requirements of the Council for 105 dwellings. The Council have identified in the 17th January 2024 Local Plan Committee Report on “New Local Plan – Proposed Housing and Employment Allocations” that the Council are still some 300 dwellings short of the requirement for Coalville and are anticipating new submitted sites to account for this current deficit. There is the opportunity to reduce this deficit in a location the Council already identify as suitable and sustainable by increasing the number allocated to R17.

2 LAND SOUTH OF CHURCH LANE, NEW SWANNINGTON, COALVILLE

2.1 Context

2.1.1 Gladman are promoting land south of Church Lane, New Swannington, Coalville for residential development. The site has been identified by the Council as a draft housing allocation for around 283 dwellings in the Draft Local Plan (Parcel C48). The location of the site is shown on Figure 4 below.

2.1.2 The 15.08 hectare site offers an ideal opportunity to continue growth in Coalville and develop a high quality, sustainable residential scheme that could make an important contribution to meeting housing needs in North West Leicestershire as well as helping to ensure the viability of local services and facilities within Coalville.

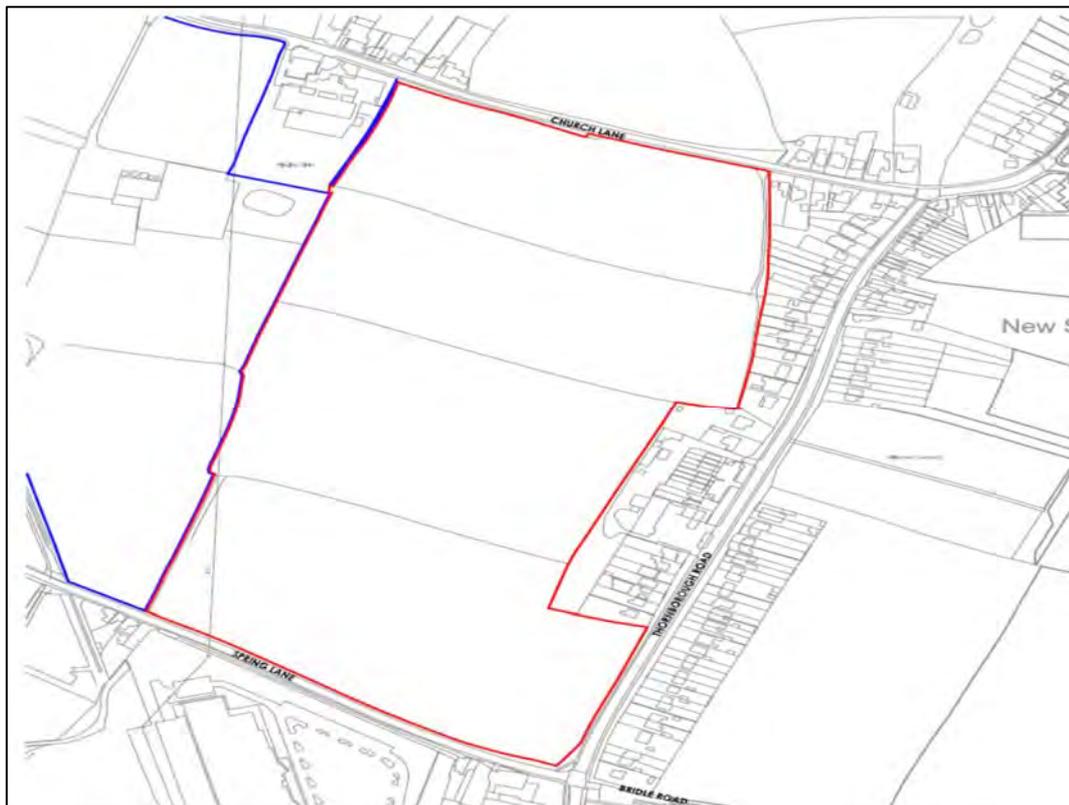


Figure 4 – Site location plan: Land south of Church Lane, Coalville

2.2 The Site

2.2.1 The site lies adjacent to the residential edge along Thornborough Road, in the north of Coalville. Coalville town centre lies approximately 1.3km south of the site. The site is bound

by Spring Lane to the south, and Church Lane to the north. Stephenson College is located approximately 100 metres south of the site.

- 2.2.2 The A511 dual carriageway lies approximately 230 metres south of the site and contains the northern edge of Coalville's urban area. Here, business and industrial parks line the southern side of the A511, which serves as a trunk road between Leicestershire and Burton-upon-Trent.

2.3 Site Location

- 2.3.1 The site is located close to the principal town of Coalville. New Swannington Primary School is located at the north western corner of the site. Stephenson College is located to the south of the site. Numerous retail facilities are located within 10 minutes walking distance of the site at the retail park located on Thornborough Road. Coalville town centre is roughly a 15-minute walk from the site. There are a good range of employment opportunities available within walking distance of the site at Stephenson Industrial Estate and the Coalville employment area.
- 2.3.2 The site is also well served by public transport. There are existing bus stops on both sides of Thornborough Road which are within 400m of the site. The no. 26 and 29 bus services operate half hourly along Thornborough Road to Leicester and Coalville. The no. 16 provides an hourly service to Loughborough and Whitwick. The Skylink bus service operates hourly to East Midlands Airport, and Nottingham.
- 2.3.3 In addition, the site has good public transport links to larger employment centres, such as Nottingham and Coalville itself. There are existing bus stops on both sides of Thornborough Road which are within 400m of the site.
- 2.3.4 Growth at Thornborough Road will both support, and be supported by, a range of services and facilities that are within walking and cycling route of the site. These include, but are not limited to; a primary school, a supermarket, two medical centres, a library, village hall, newsagent with Post Office, pubs, sports facilities and a dentist.
- 2.3.5 The nearest railway station to the site is Loughborough which can be accessed via the no. 16 bus service. From Loughborough station, employment, and service centres such as Leicester, Nottingham, Sheffield and London St Pancras can all be reached. New and existing residents of Coalville will have access to a wide range of locations as part of a wider multi-modal trip.

2.4 Draft Policy C48 – South of Church Lane, New Swannington

2.4.1 Gladman don't have any major comments on draft Policy C48. The majority of the outlined policy requirements were incorporated into the indicative Development Framework Plan (drawing ref: CSA/3006/101 Rev F) which was submitted in support of the previous application including:

- Provision of a safe and suitable access from both Spring Lane and Thornborough Road. No access was proposed previously via Spring Lane;
- Provision of active travel cycle routes through the site and pedestrian and cycle recreational routes with the site;
- Retention and enhancement of the existing public rights of way N43, O12 and O13;
- Achievement of a biodiversity net gain in accordance with national requirements (10% biodiversity net gain to be delivered on-site);
- Provision of tree planting and landscaping;
- Provision of a noise bund along the eastern boundary of the site where it adjoins existing business uses; and
- A design which respects the amenity of adjoining residential and employment uses.



Figure 5 – Indicative Development Framework Plan submitted with previous application

2.4.2 Gladman will ensure that an Archaeological Impact Assessment is submitted in support of any future application on the site to comply with policy requirement 2(f).

2.5 Previous planning application on the site

2.5.1 The site has previously been subject to an outline planning application (app reference: 16/01407/OUTM) submitted by Gladman in November 2016 for:

'Erection of up to 270 dwellings with public open space, landscaping, sustainable drainage systems, car parking area for New Swannington Primary School and vehicular access points from Thornborough Road and Spring Lane (outline - all matters other than part means of access reserved).'

2.5.2 Although the above application was refused by North West Leicestershire District Council in August 2017, there were no technical reasons for refusal cited within the Decision Notice. A comprehensive suite of technical reports and surveys were submitted as part of the outline planning application which demonstrated that there were no technical constraints to the delivery of the site. The key technical considerations of the site are summarised in the following sections below:

2.6 Access

2.6.1 A Transport Assessment was submitted as part of the previous outline planning application on the site. The site will be accessed from both Spring Lane to the south and Thornborough Road to the east, via priority controlled junctions. It was previously confirmed that the required visibility splays can be achieved and that the site access junction will operate comfortably within capacity in both the morning and evening peak periods. Gladman note the requirement in the draft policy for no vehicular access to be provided from Spring Lane to the north.

2.6.2 Improved connectivity to, and the retention and enhancement of the existing Public Right of Way networks across the site (PRoW No. O12, O13 and N43) which will provide new recreational and functional walking routes for new and existing residents. The provision of safe and convenient footways will help to reduce the reliance on private vehicles to access local services and facilities.

2.7 Landscape

2.7.1 A Landscape and Visual Impact Assessment (LVIA) was submitted with the previous application which concluded that the that the site is able to absorb residential development within its lower lying eastern section, and that the proposed development would cause a minimal localised landscape and visual impact, would be successfully integrated into the

settlement pattern of Thornborough Road, and would not cause harm to the landscape character or visual amenity. The development would not introduce any incongruent elements into the landscape, would not impact upon views to or from the wider landscape, nor would affect the sense of separation between settlements.

2.7.2 The proposed development would be contained by the local landform and both existing mature and establishing vegetation, within the extents of development set by the local limits along Thornborough Road, and that the proposals would retain the special quality of views within the local area, producing an enhanced settlement boundary to the west, and reinforcing the sense of separation with Swannington.

2.7.3 The LVIA also refers to the North West Leicestershire Settlement Fringe Assessment which identifies that the site had low potential to achieve mitigation in keeping with landscape character. It set out recommendations on the form of development in the event that the site was developed.

2.8 Ecology

2.8.1 An initial desk study and extended Phase 1 Habitat survey were undertaken in 2016, with additional Bat, Reptile, Badger, Breeding Bird and Great Crested Newt surveys being conducted between April and July 2017.

2.8.2 Gladman recognise that this appraisal may be out-of-date and are committed to ensuring that 10% biodiversity net gain can be achieved on site.

2.9 Flooding and Drainage

2.9.1 A Flood Risk Assessment and Outline Drainage Strategy and two Foul Drainage Analysis reports were submitted in support of the application. The Environment Agency flood zone maps indicate that the site lies within Flood Zone 1 (i.e. less than a 1 in 1,000 annual probability of river or tidal flooding in any one year). The site passes the sequential test.

2.9.2 To mitigate the risk of surface water flooding, the Flood Risk Assessment and Outline Drainage Strategy recommend minimum finished floor levels within the development, and the attenuation of surface water run-off rates. No objections were raised to the development by the Lead Local Flood Authority, subject to the imposition of appropriate conditions.

2.10 Heritage and Archaeology

- 2.10.1 The site does not contain, nor is in close to proximity of any listed buildings or conservation areas. In terms of non-designated heritage assets, the application was supported by an Archaeological Desk-Based Assessment which concluded that the site contains one non-designated asset, a HER record relating to a find of small sherds of Roman pottery.
- 2.10.2 In terms of the potential for as-yet to be discovered archaeological assets within the site, the Assessment concludes that the site has a low potential for any significant archaeological evidence. Gladman note that draft Policy C48 includes a requirement for an Archaeological Impact Assessment to be submitted in support of a planning application.

2.11 Illustrative Framework Plan

- 2.11.1 An illustrative Development Framework Plan was prepared in support of the previous application on the site, which was designed following a series of surveys and appraisals of the site and its surroundings. The findings from these investigations have fed into the masterplanning process and the final masterplan shows how the homes can be suitably accommodated within the site boundary.
- 2.11.2 We would welcome the opportunity to discuss the site in more detail with the Council. As the illustrative framework plan demonstrates, the site offers an exciting opportunity to deliver a scheme of new high-quality market and affordable homes.
- 2.11.3 The new housing will be set within a robust network of Green Infrastructure consisting of retained and new features, which will help to integrate development within the landscape and create a distinctive sense of place, as well as ensuring the site delivers net gains in biodiversity. Newly accessible formal and informal open space will be provided, designed to meet the express needs of the local community.
- 2.11.4 In line with the strategic objective of adapting to climate change, Gladman fully acknowledge and are serious about the importance of ensuring future development is climate resilient. As such, the site will provide significant areas of Green Infrastructure, including new tree and structural planting which will absorb CO₂ and create new habitats to support biodiversity. The new houses will be built to meet a high standard of energy efficiency and include provision of EV charging points. By the very nature of the site's sustainable location on the edge of Coalville, services and facilities can be accessed via active or public transport, reducing need for the use of private vehicles.

3 BROAD LOCATION WEST WHITWICK

3.1 Context

3.1.1 Gladman are promoting parcels C81 and C47 of the Broad Location site on land to the west of Whitwick, Coalville. The site has been identified by the Council as a Broad Location for potential future development for around 500 dwellings in the Draft Local Plan (Parcels C47, C77, C78, C86, C81). The location of the site is edged in red on Figure 6 below.

3.1.2 The approx. 35-hectare site offers a fantastic opportunity to continue growth in Coalville and develop a high quality, sustainable residential scheme that could make an important contribution to meeting housing needs in North West Leicestershire as well as helping to ensure the viability of local services and facilities within Coalville.

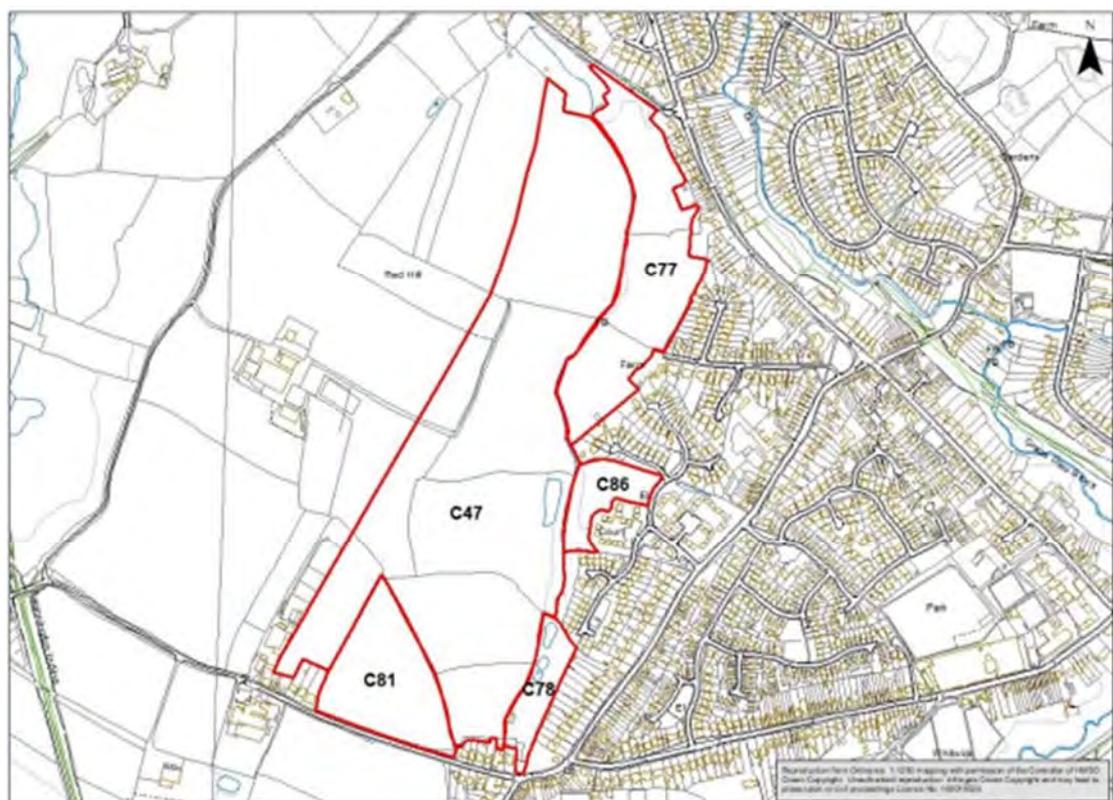


Figure 6 – Site location plan for Broad Location West Whitwick

3.1.3 Gladman recommends that following the close of the Regulation 18 local plan consultation, for Gladman and the landowners/site promoters of parcels C77, C78 and C86 to arrange a meeting with planning policy officers to discuss the best approach to bringing this site forward in a timely manner. This is reiterated in clause (2) of the draft policy which notes: *'there will need to be an agreement between the Council and the various site promoters which*

commits the various parties to work together to deliver a comprehensive and well-planned development in a timely manner that would also need to address the following matters (a) – (h):

- 3.1.4 In response to paragraph 4.36 of the supporting text, Gladman confirm that they are willing to establish a commitment to joint working alongside the various landowners and site promoters. Gladman would be happy to take a lead on the masterplanning work, supported by planning policy officers as well as the promoters/landowners of the various parcels. Following this and subject to the Council's approval, consultation can commence with the local community and key stakeholders.

3.2 Site Location

- 3.2.1 The site is located close to the principal town of Coalville. New Swannington Primary School is located at the south-west corner of the site. Stephenson College is located to the south of the site. Numerous retail facilities are located within 10-15 minutes walking distance of the site at the retail park located on Thornborough Road. Coalville town centre is roughly a 15-minute walk from the site. There are a good range of employment opportunities available within walking distance of the site at Stephenson Industrial Estate and the Coalville employment area.

- 3.2.2 The site is also well served by public transport. There are existing bus stops on both sides of Brooks Lane which are within 400m of the site. The no. 26 and 29 bus services operate half hourly along Brooks Lane to Leicester and Coalville. The no. 16 provides an hourly service to Loughborough and Whitwick. The Skylink bus service operates hourly to East Midlands Airport, and Nottingham. In addition, the site has good public transport links to larger employment centres, such as Nottingham and Coalville itself.

- 3.2.3 Growth at the Broad Location site will both support, and be supported by, a range of services and facilities that are within walking and cycling route of the site. These include, but are not limited to; a primary school, a supermarket, two medical centres, a library, village hall, newsagent with Post Office, pubs, sports facilities and a dentist.

- 3.2.4 The nearest railway station to the site is Loughborough which can be accessed via the no. 16 bus service. From Loughborough station, employment, and service centres such as Leicester, Nottingham, Sheffield and London St Pancras can all be reached. New and existing residents of Coalville will have access to a wide range of locations as part of a wider multi-modal trip.

3.3 Site Considerations

- 3.3.1 As part of any development proposal, a multi-disciplinary team of specialist consultants will be commissioned to undertake a series of detailed surveys and appraisals of the site and its setting. These technical studies will assess the site's ability to accommodate a sustainable residential development, taking account of features and characteristics including landscape, heritage and access.
- 3.3.2 It is anticipated that the site main vehicular access points into the site will be situated off Talbot Street to the north and Church Lane to the south of the site. However, this isn't explicitly stated within the draft policy or within the supporting text. An initial access appraisal would be required to be undertaken to determine the best locations for the points of access.
- 3.3.3 Improved connectivity to, and the retention and enhancement of the existing Public Right of Way networks across the site (which include PRow no.s N34, N36, N43, O14 and O15) will provide recreational and functional walking routes for new and existing residents. The provision of safe and convenient footways will help to reduce the reliance on private vehicles to access local services and facilities.
- 3.3.4 The site is located entirely located within Flood Zone 1, at the lowest risk of flood and there are no sources of surface water flood risk on site.

Summary and Delivery

- 3.3.5 Parcels C47 and C81 of the wider site are in the control of willing landowners who are committed to progressing a residential-led proposal as soon as possible. In Gladman Developments Ltd, the site has the benefit of a promoter with the necessary experience and expertise to successfully guide a proposal through to implementation.
- 3.3.6 The site has the ability to accommodate a high-quality residential development that could be successfully assimilated into its landscape setting. It is sustainably located in relation to Coalville's services and facilities, and benefits from sustainable modes of transport.
- 3.3.7 As noted within the draft policy, any future development would need to be comprehensively masterplanned to achieve a high-quality design and layout that integrates well with the surrounding built and natural environments and ensures a high degree of connectivity, particularly for pedestrians and cyclists, and provides good access to facilities and sustainable forms of transport.

4 LAND OFF BLACKFORDBY LANE, MOIRA

4.1 Context

4.1.1 Gladman are promoting land off Blackfordby Lane, Moira for residential development. The majority of the site falls under the neighbouring parish, although the two northernmost fields sit within Blackfordby Parish, east of Driftside and Blackfordby Lane. The site is shown edged red on Figure 7 below.

4.1.2 The 6.39 hectare site lies adjacent to the settlement boundary of Moira and is capable of delivering up to 115 dwellings (including a policy compliant level of affordable housing). The site offers an ideal opportunity to continue growth in the village and develop a high quality, sustainable residential scheme that could make an important contribution to meeting housing needs in North West Leicestershire as well as helping to ensure the viability of local services and facilities within Moira.



Figure 7 – Site location plan: Land off Blackfordby Lane, Moira

4.2 The Site

4.2.1 The site comprises five distinct but adjoining parcels of land to the east of Blackfordby Lane and is currently in agricultural use. The site is fairly flat and each parcel of land is bound by mature hedgerows. To the south of the site are residential dwellings and to the south-west

corner is Moira Primary School. The site is within the Minerals Consultation Area for the potential presence of at or near surface coal resources. It lies within the catchment of the River Mease SAC.

4.3 Site Location

4.3.1 Moira is designated as a 'Sustainable Village' in the adopted North West Leicestershire Local Plan and in the new Draft Local Plan. Sustainable villages are defined as settlements which have a limited range of services and facilities. Moira features a good range of services including a local shop, post office, primary school, village hall, industrial business park, and a public house which are all within 2km walking and cycling distance of the site.

4.3.2 Moira has good public transport links providing a choice of travel means. There are existing bus stops on both sides of Blackfordby Lane is within 400m walk and cycling distance of the site. The no. 29 A/29B/X29 bus service operates through Moira on Blackfordby Lane and Ashby Road, providing two services per hour to larger settlements including Coalville, Ashby-de-la-Zouch and Leicester. The site is therefore considered to occupy a sustainable location.

New Homes

4.3.3 The site can deliver a wide range of market and affordable homes to meet the county's general and specialist housing needs, with the potential to deliver up to 200 new homes. The site would deliver a policy compliant level of affordable homes.

4.3.4 This will contribute significantly towards the Council's affordable housing supply requirements, without subsidy, and will provide people with a local connection to the area an affordable property to call their own.

Landscape

4.3.5 The site is not subject to any landscape quality designation and lies outside of the Green Belt, AoNB and Special Landscape Area. The site, nor the immediate landscape, contains any rare or unusual landscape features.

Highways

4.3.6 It is proposed that the site will be accessed from Blackfordby Lane, via a simple priority junction. The required visibility splays can be achieved and the site access junction will

operate comfortably within capacity in both peak periods with the proposed development traffic.

Biodiversity, Green Open Space and Local Wildlife

- 4.3.7 Development the site is not expected to negatively impact on statutory and non-statutory designated sites within the local area due to its scale and distance from sites.
- 4.3.8 The site could deliver net benefits for wildlife in the form of additional habitats which include substantial areas of green public open space, additional hedgerow and tree planting, and the provision of a SuDS feature. There are also opportunities to provide additional biodiversity enhancement measures alongside the new housing.

Flooding and Drainage

- 4.3.9 The entire site lies within Flood Zone 1 and therefore is considered to be at low risk of fluvial flooding and appropriate for residential development.
- 4.3.10 New Sustainable Drainage System features will be provided in the lower parts of the site which will form an integral part of the development's green infrastructure and be designed to maximise landscape and biodiversity benefits.

Heritage and Archaeology

- 4.3.11 The site does not contain, nor is in close to proximity of any listed buildings or conservation areas. There is only a single Grade II Listed Building within 1km of the site (Norris Hill Farmhouse) to the north-west of the site's boundary, however it is anticipated that development of the site would have a less than substantial harm impact upon the asset.
- 4.3.12 In terms of the potential for as-yet to be discovered archaeological assets within the site, it is suggested that further work prior or during development would ensure that any asset could be identified and recorded and conditioned.

Development Framework Plan

- 4.3.13 Gladman have prepared an indicative Development Framework Plan (see Figure 8 overleaf) to demonstrate how any development on the site may take shape and how the aforementioned benefits will be integrated into the site.
- 4.3.14 The site is relatively flat and there are no public rights of way crossing the site. There is a line of single tier pylons running along the western boundary of the site. The new housing

will be set within a robust network of Green Infrastructure consisting of retained and new features, which will help to integrate development within the landscape and create a distinctive sense of place, as well as ensuring the site delivers net gains in biodiversity. Newly accessible formal and informal open space will be provided, designed to meet the express needs of the local community.

4.3.15 A significant area of public open space (approx. 3.15ha) will be provided on-site which will included proposed tree and woodland planting, proposed footpath and cycle links, attenuation basis, equipped children’s play area, trim trail and the retention of the existing woodland.



Figure 8 – Indicative Development Framework Plan. Land off Blackfordby Lane, Moira

4.3.16 In line with the strategic objective of adapting to climate change, Gladman fully acknowledge and are serious about the importance of ensuring future development is climate resilient. As such, the site will provide significant areas of Green Infrastructure, including new tree and structural planting which will absorb CO₂ and create new habitats to support biodiversity. The new houses will be built to meet a high standard of energy efficiency and include provision of EV charging points. By the very nature of the site’s sustainable location on the edge of Coalville, services and facilities can be accessed via active or public transport, reducing need for the use of private vehicles.





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Please complete both Part A and Part B.

PART A – Personal Details

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

Personal Details

Agent's Details (if applicable)

Title	█	
First Name	Duncan	
Last Name	Ferguson	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
Street		
Town/Village	██████	
Postcode	██████	
Telephone	██████	
Email address	██████████	
	██████████████████	

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

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

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

This is a response to application 23/01697/EAS, Policy IW1, the proposed new settlement of Isley Woodhouse.

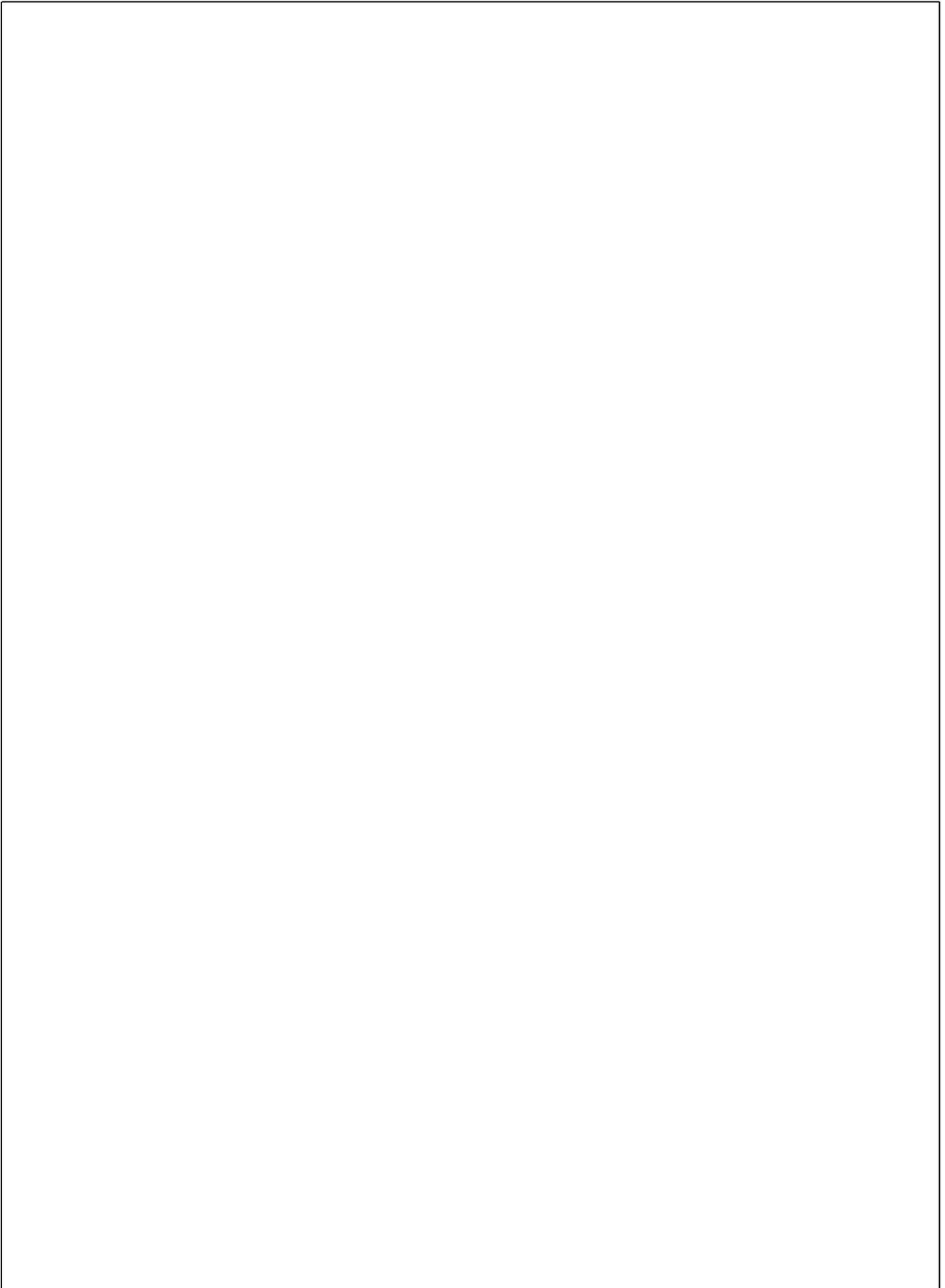
I oppose the application for the following reasons:

1. This in my opinion is lazy planning. Dumping all of NWLDC housing allocation on one site is just lazy. Whilst I appreciate this then meets the thresholds for the construction of amenities such as shops, surgeries and schools the application does not meet the needs of the surrounding villages and is not sympathetic to the local aesthetic. Diseworth has conservation village status, having a large new development adjacent to the village would impact this.
2. Such a large development is not in-keeping with the local area, especially the historic villages of Diseworth, Wilson, Tonge, Breedon-on-the-Hill, Islay Walton, Worthington and Belton, and will have a detrimental effect on the surrounding villages aesthetics.
3. Environmental impact on the surrounding area. The proposed site sits at approx. 90m elevation whilst Diseworth sits at approx. 60m elevation, Wilson sitting at approx. 55m elevation and Long Whatton sits at approx. 50m elevation. Diseworth Brook is fed from field run-off from the surrounding countryside (this includes the farmland that the proposed site would replace) and the overflow holding ponds from East Midlands Airport. Diseworth already suffers from an increasing flood problem. The new settlement (along with other proposed developments as opposed below) will have a significant impact on Diseworth Brook and will require significant infrastructure to mitigate any increase on already high levels of surface water from entering Diseworth Brook.
4. Increase in air, noise and light pollution. With the airport kicking out as much light pollution as Loughborough, a further development of the magnitude of the proposed site will only increase the light pollution. With Diseworth sitting in a dip, the village will be surrounded by light. The proposed site will take a very long time to build, this will increase the air pollution long term with not only the physical building of the proposed site but also the increased traffic going to the site in the long term once it is completed. Noise pollution will also increase with the building of the site due to onsite traffic and groundworks being completed. The surrounding villages will have to tolerate more traffic as they will become rat-runs for traffic to and from the proposed site in the future.
5. Current road infrastructure will not cope with the increase in traffic to and from the proposed site. Any changes to the current road infrastructure, such as turning the A453 into a dual-carriageway, will mean that Diseworth would then be surrounded on all sides by multiple carriageway roads with the M1, and A42 flanking the village already. This will only increase noise and air pollution.
6. Food production is critical in the UK. This development will destroy 750 acres of agricultural land and miles of ancient hedgerows and trees. Not only would we permanently lose this rich farmland but also the carbon sink that it provides, contributing to the climate crisis.
7. Have other proposals been considered, such as smaller developments sympathetically attached to existing villages. Smaller developments built onto existing villages may be more welcomed than one massive development.
8. The single development site proposed would attract more crime in the area as the allure of new houses on such a large scale will attract criminality.
9. Having a large development on the doorstep of smaller villages that is not in-keeping with the area may have a detriment on house prices, those already living in the

surrounding villages may see a significant fall in house prices due to ongoing building work, increase in crime and other impacts already mentioned such as air quality.

This is a response to application 22/00938/EAS, the further SEGRO freeport development EMP90. I oppose the application for the following reasons:

1. This is a cumulative development, along with the planning application above this would surround the historic village of Diseworth with an inappropriate amount of new development that would destroy the historic, rural nature of the village which has conservation village status.
2. The warehouse development would abut the village boundary causing significant detriment to the village aesthetic, especially those properties on the eastern edge of the village. This would no longer be a rural village.
3. The warehouse development would have a significant impact on surface run-off of rainwater towards Diseworth, a village that is already plighted by an increase in flooding and would be severely impacted by further run-off.
4. Current road infrastructure will not support the proposed development, new road infrastructure will have to be considered and this will cause more noise, light and air pollution.
5. Biodiversity will be hugely impacted, replacing the agricultural land, hedgerows and trees with concrete and steel will have a negative impact on local wildlife. Buffering, shielding or screening will not mitigate the negative impact caused by building the proposed warehouses in the first place.
6. There will be a significant increase in air, noise and light pollution. Diseworth sits down hill and this development will appear to tower over the village. This will have a significant impact on the mental and physical wellbeing of village residents.
7. The Local Plan states "We do consider that the potential impacts on Diseworth, particularly in terms of heritage, landscape and amenity, are likely to be unacceptable based on the current extent of the designated Freeport land", why then is this land even being considered within the local plan? A freeport is 45km in diameter which will include a number of customs sites. Have other more appropriate sites been considered which can be proposed instead of the one that the Local Plan states is unacceptable? Could areas along the A453 towards Nottingham be considered, areas along the A50 corridor, the former Willington power station site, A46 corridor, land surrounding existing industrial sites at Bardon Hill, West Hallam, Langley Mill or Appleby Magna.



Declaration

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

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

Signed: DFerguson

Date: 13/03/24

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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

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

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

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

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

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title	[Redacted]	
First Name	Kay	
Last Name	Armitage	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	[Redacted]	
Street	[Redacted]	
Town/Village	[Redacted]	
Postcode	[Redacted]	
Telephone	[Redacted]	
Email address	[Redacted]	

PART B – Your Representation

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

1. To which consultation document does this representation relate? IW1 2. EMP 90		Proposed policies
		Proposed housing and employment allocations
		Proposed Limits to Development Review

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

Use this box to set out your response.

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

I am writing to oppose both of the above schemes because it seems absurd to surround a small village with a large housing estate and Freeport. Not only will it destroy agricultural land and natural habitats, it will completely destroy a rural village with noise and light pollution. Flooding is already a problem in Diseworth and these schemes will undoubtedly make everything worse. I'm sure the planners could find other places nearby which would be just as good without ruining the lives of many of my friends , other Diseworth families , the land and the natural habitat containing an abundance of wild life .

Declaration

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

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

Signed: K. Armitage

Date: 14/032024

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2024p**



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	Personal Details	Agent's Details (if applicable)
Title		Miss
First Name		Jessica
Last Name		Graham
Job Title (where relevant)		Associate Director
Organisation (where relevant)	David Wilson Homes (East Midlands)	Savills (UK) Limited
House/Property Number or Name	C/O Agent	■
Street		■■■■■■■■■■
Town/Village		■■■■■■■■
Postcode		■■■■■
Telephone		■■■■■■■■■■
Email address		■■■■■■■■■■■■■■■■■■■■

PART B – Your Representation

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

1. To which consultation document does this representation relate?	<input checked="" type="checkbox"/>	Proposed policies
	<input type="checkbox"/>	Proposed housing and employment allocations
	<input type="checkbox"/>	Proposed Limits to Development Review

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

Policy S1 - Future Housing and Economic Development Needs (Strategic Policy)

Use this box to set out your response.

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

We **object** to Part 1 of Draft Policy S1 which states: *'the housing requirement for North West Leicestershire is 686 dwellings each year and 13,720 dwellings over the plan period 2020-2040 as set out in the Statement of Common Ground for Leicester and Leicestershire Housing Market Area'*.

The National Planning Policy Framework ('NPPF') (paragraph 60) and Planning Practice Guidance ('PPG') (reference 2a-010-20190220) set out the Government's objective of significantly boosting the supply of homes. North West Leicestershire District Council's ('NWLDC') proposed housing requirement (686 dwellings per annum) has been calculated using the standard method (372 dwellings per annum) in addition to the agreed contribution towards Leicester City's unmet need (314 dwellings per annum). This means that there is no contingency buffer included for the purposes of calculating the District's local housing need. National planning policy and guidance is clear that, the standard method identifies the minimum annual housing need which should be used as a starting point (PPG reference 2a-002-20190220).

Paragraph 6.25 of the Plan states that: *'The HENA concludes there is a need for up to 382 affordable homes of all tenures per year and the equivalent figure in the LHNA is 387 affordable homes. In both cases this amounts to some 56% of our overall annual housing requirement'*. The PPG (Paragraph: 024 Reference ID: 2a-024-20190220) encourages local planning authorities to consider increasing planned housing numbers where this can help to meet the identified affordable need. We therefore consider that the proposed housing requirement for the District should be increased above the minimum standard method figure in order to address affordability needs. The contribution towards Leicester City's unmet needs should then be added.

In addition to the above, at the Hinckley and Bosworth Council ('HBBC') Full Council meeting on the 30

January 2024, HBBC agreed to sign the Statement of Common Ground ('SoCG') but disputed 87 of the 187 dwellings apportioned to them¹. As a result of this decision, there will be a shortfall across the Housing Market Area ('HMA') which might need to be accommodated by one or more of the HMA authorities should HBBC continue to dispute the contribution. NWL will need to continue to engage with HBBC and the other HMA authorities in order to ensure that the Leicester City shortfall is fully accommodated.

Should a higher housing requirement be pursued, then additional residential sites will need to be identified. David Wilson Homes East Midlands ('DWH') is promoting land in the northern part of the Coalville Urban Area to the east of Thornborough Road for residential development (SHELAA reference C18). The Site is circa 17 hectares (42 acres) with a net developable area of circa 10.1 hectares (25 acres) and could deliver circa up to 400 dwellings. The Site offers an immediate development opportunity which could be delivered within the next 5 years.

Coalville Urban Area (comprising Coalville, Donington le Heath, Greenhill, Hugglescote, Snibston, Thringstone, Whitwick and Bardon employment area) is identified as the 'Principal Town' in the emerging Local Plan where the highest proportion of growth will be concentrated. Draft Policy S2 – Settlement Hierarchy (Strategic Policy) recognises that Coalville Urban Area is *'the primary settlement within the District which provides an extensive range of services and facilities...which is accessible by sustainable transport from surrounding areas to other large settlements outside the District'*.

The DWH Site was assessed as potentially available, achievable and suitable in the 2021 SHELAA. The SHELAA concludes that *'the Site is within an Area of Separation and it would be necessary for any development proposal to demonstrate that development would not erode the separation between Coalville and Whitwick. It would also be necessary to demonstrate that issues relating to flooding and minerals/geo environmental factors can be satisfactorily addressed. Subject to these the site is considered potentially suitable'*. Since the SHELAA assessment, DWH now have an option on the Site so could deliver the site in the short term if required.

As stated above, the Site is located within the Area of Separation (AoS) (Policy EN5) between Coalville and Whitwick. As part of the promotion of the site landscape advice will be sought and it is considered development can be focused on areas which play a limited role in separating Coalville and Whitwick. It is also considered that landscape buffers and planting could be proposed in order to retain separation between the settlements (please also refer to our response to Policy EN5).

In addition to the above, the report that was taken to the NWLDC Local Plan Committee on 17th January 2024² recognised at paragraph 5.30 that there is a shortfall of dwellings identified in the Coalville Urban Area and that the allocation of sites within the AoS should be considered: *'not allocating any further land within the AoS does mean there would be a shortfall in the Coalville Urban Area of at least 300 dwellings compared to option 7b. If at the Regulation 19 stage it is apparent that there is still a shortfall in the Coalville Urban Area, then this issue will have to be addressed. Members are advised that this is likely to require the allocation of more land in AoS if the Council is to be able to demonstrate at Examination that it has prepared a 'sound' plan. Based on the AoS study, any additional allocation will involve some areas identified as making a primary contribution to the AoS'* [Savills Emphasis].

Paragraph 5.20 of the NWLDC Local Plan Committee Report (17th January 2024) recognises that *'The AoS is a local designation which is not specifically recognised in the NPPF'* and states that *'whilst recognising*

¹ Hinckley and Bosworth Council Agenda 30 January 2024 <https://moderngov.hinckley-bosworth.gov.uk/ieListDocuments.aspx?CId=119&MIId=2374>

² <https://minutes1.nwleics.gov.uk/documents/s42824/New%20Local%20plan%20Proposed%20Housing%20and%20Employment%20Allocations%20Local%20Plan%20Committee%20Report.pdf>

that allocating for land for housing development in the AoS is likely to be unpopular it would be consistent with the comments of the Planning Inspector who conducted the Examination of the adopted Local Plan and who concluded that “there is scope for reconsideration of the detailed boundaries and land uses of the AoSs, in the event that it becomes necessary, at any time in the future, for the Plan to be reviewed in the light of increased development needs” [Savills Emphasis].

As set out above, it is considered that the housing requirement should be increased in order to address affordable housing needs. Additional residential sites will be required and as stated in the Local Plan Committee Report (17th January 2024), housing needs within the Coalville Urban Area are not currently being met and sites within the AoS may be required. Although the DWH Site is within the AoS, the SHLAA has assessed the site as potentially suitable, available and achievable. It is considered that mitigation could be provided in order to avoid coalescence of Coalville and Whitwick. We therefore consider that the site should be allocated within the emerging Local Plan.

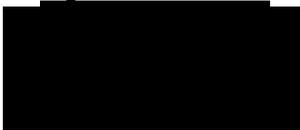
In addition to the above, we do not consider that the current plan period included is appropriate. NWLDC have included a new settlement as a draft allocation (IW1 – Isley Woodhouse) for 4,500 dwellings (1,900 dwellings built by 2040). Paragraph 22 of the NPPF states ‘*that when the proposed local plan strategy incorporates larger scale developments such as new settlements or significant extensions to existing villages and towns, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery*’. This is also stated in the PPG at Paragraph: 083 Reference ID: 61-083-20211004). Furthermore, Page 6 of Lichfield’s Start to Finish Report (February 2020) states that ‘*The average time from validation of an outline application to the delivery of the first dwelling for large sites [2,000+ dwellings] ranges from 5.0 to 8.4 years dependent on the size of the site*’. We therefore consider that the plan period should be extended to at least 2050 and the housing requirement should be adjusted accordingly.

Declaration

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

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

Signed:

A large black rectangular redaction box covering the signature of the declarant.

Date: 14/03/2024

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Please complete both Part A and Part B.

PART A – Personal Details

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	Personal Details	Agent's Details (if applicable)
Title		Miss
First Name		Jessica
Last Name		Graham
Job Title (where relevant)		Associate Director
Organisation (where relevant)	David Wilson Homes (East Midlands)	Savills (UK) Limited
House/Property Number or Name	C/O Agent	■
Street		■■■■■■■■■■
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PART B – Your Representation

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

1. To which consultation document does this representation relate?	<input checked="" type="checkbox"/>	Proposed policies
	<input type="checkbox"/>	Proposed housing and employment allocations
	<input type="checkbox"/>	Proposed Limits to Development Review

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

Policy S2 – Settlement Hierarchy (Strategic Policy)

Use this box to set out your response.

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

We **support** Policy S2 and the Coalville Urban Area being identified as *‘the Principal Urban Town’* and *‘the primary settlement in the district which provides an extensive range of services and facilities’*. Policy S2 also confirms that *‘the largest amount of development will be directed here’*.

Paragraph 5.6 of the Settlement Study (2021) states that the *‘Coalville Urban Area is the most sustainable settlement having regard to the range of services and facilities available’*. Table 5.1 of this study scores Coalville Urban Area as ‘33’ (the higher the number the most sustainable the settlement). Ashby de la Zouch is the second most sustainable settlement listed in table 5.1 but only scored ‘23’ so significantly less sustainable than the Coalville Urban Area.

It is clear from Settlement Study (2021) that the Coalville Urban Area is highly sustainable and should therefore be identified as the principal town and be the subject to the most housing growth. From the table on page 10 of the Proposed Housing and Employment Allocations for Consultation document, it is evident that although the Coalville Urban Area is identified as the most sustainable settlement, this is not where most growth is going. The table proposes to allocate 1,666 dwellings in Coalville Urban Area. However, a greater number of dwellings (2,326 dwellings) are proposed to be allocated in Ashby de la Zouch and Castle Donington which are lower in the hierarchy and less sustainable than the Coalville Urban Area. The Coalville Urban Area is also not constrained by the River Mease SAC unlike Ashby de la Zouch and therefore more housing growth should be directed to the Coalville Urban Area in the shorter term.

Furthermore, there is a draft allocation proposed for around 32 dwellings (site reference C92 Former Hermitage Leisure Centre, Sliver Street Whitwick) (north east of the David Wilson Homes (East Midlands) ‘DWH’ site) and therefore if this site was developed we consider that DWH’s site at Thornborough Road being allocated would be a natural extension of the existing settlement. As explained in our representation to draft Policy S1 although it is acknowledged that DWH’s Site is located within the Area of Separation (‘AoS’), the Council have recognised that some of the land in the AoS may need to be allocated and DWH consider that Site (SHELAA reference C18) could be developed sensitively in order to retain separation between Coalville and Whitwick.

Additionally, as explained in the representation to draft Policy H3, we do not think there is currently enough evidence to support IW1 Isley Woodhouse being allocated as a new settlement and therefore if additional sites are needed to replace this draft allocation, DWH's Site within the most sustainable settlement in the District, should be considered.

Declaration

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

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

Signed:



Date: 14/03/2024

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Please complete both Part A and Part B.

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PART B – Your Representation

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

1. To which consultation document does this representation relate?	<input checked="" type="checkbox"/>	Proposed policies
	<input type="checkbox"/>	Proposed housing and employment allocations
	<input type="checkbox"/>	Proposed Limits to Development Review

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

Policy S4 – Countryside (Strategic Policy)

Use this box to set out your response.

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

We **object** to Draft Policy S4 – Countryside. The policy states *'land outside the Limits to Development, as shown on the Policies Map, is identified as countryside where uses listed (a) to r) below will be supported, subject to the considerations set out in criteria (a) to (d)'*. It is considered that the policy should be amended to be more flexible recognising that sometimes uses beyond those listed (a) to (r) will need be supported to meet the housing need according to the market. Language used should be positive and this is in accordance with paragraph 16 (b) of the National Planning Policy Framework 'NPPF' which states: *'plans should be prepared positively in a way that it is aspirational but deliverable'*.

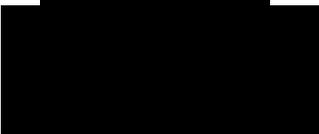
Often land outside or adjacent to the limits to development may be the most suitable location for new development and that existing sites within the development limits may not be the most appropriate land to deliver the development required (nor the most sustainable option). Paragraph 7 of the NPPF recognises that *'the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner'*. Paragraph 69 of the NPPF also states that *'planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability'*.

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Policy AP1 – Design of New Development (Strategic Policy)

Use this box to set out your response.

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

The principle of Draft Policy AP1 is supported however the Council have not yet drafted a policy in relation to this. It is considered that any District Design Code prepared needs to acknowledge that site specific circumstances are a key consideration and wording within the code should be flexible e.g. 'where possible' rather than applying unrealistic blanket restrictions to all development. This is in accordance with paragraph 16 (b) of the National Planning Policy Framework which states: *'plans should be prepared positively in a way that it is aspirational but deliverable'*.

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Policy AP4 – Reducing Carbon Emissions (Strategic Policy)

Use this box to set out your response.

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

We **object** to draft Policy AP4 and consider it goes beyond national requirements. The December 2023 Written Ministerial Statement¹ which states that ‘a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes’. It goes on to state that ‘the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations’ [Savills Emphasis]. Therefore, it is considered that the plan should only require development to comply with current or planned building regulations.

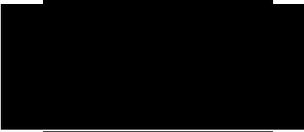
¹ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

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

Policy H1 – Housing Strategy (Strategic Policy)

Use this box to set out your response.

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

David Wilson Homes (East Midlands) ('DWH') **object** to part 1 of the policy which states that '*provision will be made to address the requirement of 13,720 new dwellings in the period to 31 March 2024*'. A detailed response to the proposed housing requirement is set out in our response to draft Policy S1.

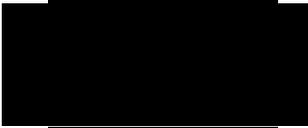
Part 8 of Policy H1 states that proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development. The Policy also goes on to state that '*applications for major development should demonstrate how they will make an optimal use of land and provide a mix of homes, including size, tenure and specialist adaptations to support people with different needs*'. We consider that it is important that any policy is realistic and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, for example, requiring a specific housing mix that does not consider market demand at the time of the application. This is in accordance with paragraph 16 (b) of the National Planning Policy Framework which states '*plans should be prepared positively, in a way that is aspirational but deliverable*'.

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Date: 14/03/2024

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First Name		Jessica
Last Name		Graham
Job Title (where relevant)		Associate Director
Organisation (where relevant)	David Wilson Homes (East Midlands)	Savills (UK) Limited
House/Property Number or Name	C/O Agent	■
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2. Please state which section (for example, page/paragraph number/policy/allocation/Limits to Development change) of the consultation document your response relates to.

Policy H4 – Housing Types and Mix (Strategic Policy)

Use this box to set out your response.

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

David Wilson Homes (East Midlands) ('DWH') **object** to policy H4 as currently written. Part 1 of the policy states that *'planning applications for major residential and mixed use schemes should provide a mix of housing types and sizes including custom and self-build plots in accordance with the requirements of policy H7 [to follow]'*. A separate response has been submitted in relation to Policy H7.

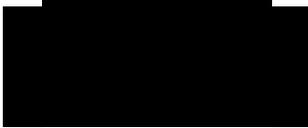
DWH do not support the Local Plan applying a blanket requirement for housing mix and types across the District. Proposed housing types and mix should be determined on a site by site basis at the time of an application and be informed by market demand. This is considered to be the true measure of housing need within the locality. This is in accordance with paragraph 31 of the National Planning Policy Framework which states *'the preparation...of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals'*.

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Policy H5 – Affordable Housing (Strategic Policy)

Use this box to set out your response.

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

This policy states that affordable housing will be provided on site as part of major residential and mixed-use developments. However, the percentage requirements and tenure mix have not yet been set and are awaiting whole plan viability testing.

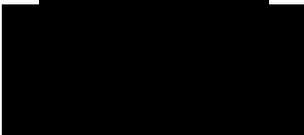
David Wilson Homes East Midlands ('DWH') supports the need to address the affordable housing requirements of the District. However, a blanket approach should not be applied for on-site provision, this instead should be considered on a site by site basis. It is considered that this is an approach in accordance with paragraph 35 (b) of the National Planning Policy Framework which states that '*plans are 'sound' if they are justified and are based on proportionate evidence*'. Any affordable housing policy taken forward should be caveated that the provision of affordable housing will be subject to viability.

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

Policy H7 – Self-build and Custom Housebuilding

Use this box to set out your response.

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

We **object** to policy H7 which requires market housing sites of 30 or more dwellings to deliver a minimum of 5% of the site's capacity as serviced plots for self-build and custom-housebuilding. We do not support large sites being required to deliver a percentage of self-build housing. The requirement for custom and self-build housing plots should be determined on a case by case basis and based on the preferences of those on the self-build register.

The Self-Build Topic paper (February 2024) states that the data '*supports a demand of 24 plots a year for self-build and custom housebuilding*'. It is therefore considered unreasonable (and will deliver over the need) for all sites over 30 or more dwellings to provide 5% self-build, the register is purely interest and the Council do not have to provide the means for everyone on the register to build a house.

Furthermore, paragraph 12.136 of the Leicester and Leicestershire Housing and Economic Needs Assessment (2022) states that '*as a first step the local authorities should seek to adopt a general 'encourage' policy for all sites but might consider implementing a further policy on strategic sites*' [Savills emphasis]. Draft Policy H7 goes beyond a 'general encourage policy'. We therefore do not consider that the proposed policy aligns with the evidence provided.

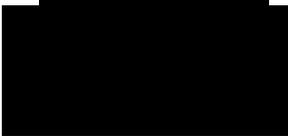
In addition to the above, the very nature of self and custom build housing means that it is difficult to plan for precise locations of delivery. The delivery of such provision can present a number of operational and health and safety issues which has the potential to act as a drag on the progression of development sites. Such requirements should be based on local evidence such as the self and custom build register and local eligibility test (Planning Practice Guidance: Paragraph: 025 Reference ID: 57-025-20210508).

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Policy H10 - Space Standards

Use this box to set out your response.

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

We **object** to Draft Policy H10 which states that *'all new housing will be required to meet or exceed the Nationally Described Space Standard (NDSS) (or any subsequent government update) for gross internal floor areas and storage space'*.

Footnote 52 of the National Planning Policy Framework states that policies can require NDSS where the need for an internal space standard can be justified. Should NDSS be required then the Council must provide evidence to justify the requirement taking account of the need, viability and timing (PPG Reference ID: 56-020-20150327). If evidence is provided, then the policy should be worded to "encourage" rather than "require" major developments to deliver housing to meet the NDSS. Site specific circumstances and the type of product being produced means that it would be onerous to apply the standards in a blanket fashion.

The Space Standards Topic Paper (February 2024) states that there is evidence that the majority of one, two and three bed homes do not meet the minimum gross internal floorspace standards as set out in the NDSS (paragraph 7.1). The Topic Paper does not provide evidence that these homes have not sold or do not meet the needs of the residents of these homes.

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Policy H11 – Accessible, Adaptable and Wheelchair User Homes

Use this box to set out your response.

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

We **object** to draft policy H11 which requires on housing developments comprising 10 or more dwellings (or on sites more than 0.5 hectares) to provide:

- A) At least 9% of all market homes will be required to meet Part M4(3)(2)(a)
- B) At least 23 % of all affordable homes will be required to meet Part M4(3)

Requirements for M4(2) and M4(3) standard dwellings should only be included when justified by evidence (PPG Paragraph: 009 Reference ID: 63-009-20190626) and should be done on a site by site basis. The Planning Practice Guidance (PPG) states that Councils have the option to “*set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access*” where there is a justified need (PPG Paragraph: 002 Reference ID: 56-002-20160519. We therefore consider that the requirement included within policy should be evidenced and balanced against the need to make the most efficient use of land available and ensure site viability.

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Policy IF1 – Development and Infrastructure (Strategic Policy)

Use this box to set out your response.

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

We **object** to draft Policy IF1 part 1 as it states that *'development will be supported by, and make contributions as appropriate to the provision of new physical, social and green infrastructure in order to mitigate its impact upon the environment and its communities'* [Savills emphasis]. The National Planning Policy Framework paragraph 75 states that *'planning obligations must only be sought where they meet all the following tests:*

- a) necessary to make the development acceptable in planning terms;*
- b) directly related to the development; and*
- c) fairly and reasonably related in scale and kind to the development'*

Development should only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for the Infrastructure Development Plan (IDP) to clearly show the existing and known deficiencies in the current infrastructure, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.

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Policy IF2 – Community Facilities (Strategic Policy)

Use this box to set out your response.

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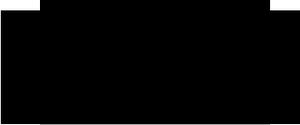
We **object** to part 3 of the draft policy. This states '*major residential/residential-led development is required to make provision for new community facilities where no facilities exist or facilities are insufficient for the demand likely to be generated from new development*'. This policy provides no detail in relation to what is regarded as 'insufficient'. It is considered that this policy needs to be reworded to provide sufficient detail. This is in accordance with paragraph 31 of the National Planning Policy Framework which states: '*the preparation and review of all policies should be underpinned by relevant and up-to-date evidence*'.

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	Personal Details	Agent's Details (if applicable)
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First Name		Jessica
Last Name		Graham
Job Title (where relevant)		Associate Director
Organisation (where relevant)	David Wilson Homes (East Midlands)	Savills (UK) Limited
House/Property Number or Name	C/O Agent	■
Street		■■■■■■■■■■
Town/Village		■■■■■■■■
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PART B – Your Representation

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

1. To which consultation document does this representation relate?	<input checked="" type="checkbox"/>	Proposed policies
	<input type="checkbox"/>	Proposed housing and employment allocations
	<input type="checkbox"/>	Proposed Limits to Development Review

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

Policy En1 – Nature Conservation/Biodiversity Net Gain (Strategic Policy)

Use this box to set out your response.

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

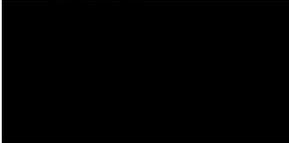
Part 1 (a) of Policy EN1 is **supported** which states that the council will seek to conserve and enhance the biodiversity in the district by *'ensuring that development provides net gain in biodiversity consistent with any national policy prevailing at the time a planning application is determined'*. This proposed policy is in accordance with paragraph 35 (d) of the National Planning Policy Framework which states *'plans are 'sound' if they are: consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.'* Should the Council pursue a requirement above national standards then this would need to be sufficiently justified and tested against its impact on viability and site yields.

Declaration

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	<input type="checkbox"/>	Proposed Limits to Development Review

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

Policy En5 – Areas of Separation

Use this box to set out your response.

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

We **object** to draft Policy EN5 Areas of Separation ('AoS') which states that the land as identified within the policies map is an area of land *'where only agricultural, forestry, nature conservation, leisure and sport and recreation uses will be allowed'*. David Wilson Homes East Midlands' ('DWH') site land north of Thornborough Road (SHLAA reference C18) is located within the Area of Separation (AoS) (Policy EN5) between Coalville and Whitwick.

Adjacent to DWH's Site is the Leisure Centre and the land this has been constructed on was previously included in the AoS. In the Officer's Planning Committee report for the approved application it was concluded that *'whilst the site lies within an AoS as defined in the adopted North West Leicestershire Local Plan, the impacts on AoS would be limited to a degree, given the extent of enclosure of the site and, when taking into account the need for and the benefits of the proposed scheme, the harm to the AoS would be outweighed by the benefits of the scheme in the overall planning balance. In particular, the design is considered acceptable, and there are no technical issues that cannot be addressed'*.

Following this North West Leicestershire District Council 'NWLDC' produced an Area of Separation Study Update (May 2022) which takes into account the recent development of the Whitwick and Coalville Leisure Centre. Therefore it is considered that the policy is not as permissive as it should be and the wording should allow for development provided it does not make settlements physically or visually coalesce any more. In Charnwood's adopted Policy CS 11 Landscape and Countryside it includes the following wording: *'we will protect the predominantly open and undeveloped character of Areas of Local Separation unless new development clearly maintains the separation between the built-up areas of these settlements'*. It is considered that wording of a similar nature should be included to Policy EN5. Furthermore, as part of any future development on the site, it is considered that landscape buffers and planting could be proposed in

order to retain separation between the settlements.

In addition to the above, the report that was taken to the NWLDC Local Plan Committee on 17th January 2024¹ recognised at paragraph 5.30 that there is a shortfall of dwellings identified in the Coalville Urban Area and that the allocation of sites within the AoS should be considered: *'not allocating any further land within the AoS does mean there would be a shortfall in the Coalville Urban Area of at least 300 dwellings compared to option 7b. If at the Regulation 19 stage it is apparent that there is still a shortfall in the Coalville Urban Area, then this issue will have to be addressed. Members are advised that this is likely to require the allocation of more land in AoS if the Council is to be able to demonstrate at Examination that it has prepared a 'sound' plan. Based on the AoS study, any additional allocation will involve some areas identified as making a primary contribution to the AoS'* [Savills Emphasis].

Paragraph 5.20 of the NWLDC Local Plan Committee Report (17th January 2024) recognises that *'The AoS is a local designation which is not specifically recognised in the NPPF'* and states that *'whilst recognising that allocating for land for housing development in the AoS is likely to be unpopular it would be consistent with the comments of the Planning Inspector who conducted the Examination of the adopted Local Plan and who concluded that "there is scope for reconsideration of the detailed boundaries and land uses of the AoSs, in the event that it becomes necessary, at any time in the future, for the Plan to be reviewed in the light of increased development needs"*' [Savills Emphasis].

As set out in our response to Policy S1 and as stated in the Local Plan Committee Report (17th January 2024), housing needs within the Coalville Urban Area are not currently being met and sites within the AoS may be required. Although the DWH Site is within the AoS, the Strategic Housing and Economic Land Availability Assessment has assessed the site as potentially suitable, available and achievable. It is considered that mitigation could be provided in order to avoid coalescence of Coalville and Whitwick. We therefore consider that the site should be allocated within the emerging Local Plan.

Declaration

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

Signed:



Date: 14/03/2024

1

<https://minutes1.nwleics.gov.uk/documents/s42824/New%20Local%20plan%20Proposed%20Housing%20and%20Employment%20Allocations%20Local%20Plan%20Committee%20Report.pdf>

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PART B – Your Representation

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		Proposed Limits to Development Review

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

Money Hill, Ashby-de-la-Zouch (A5)

Use this box to set out your response.

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

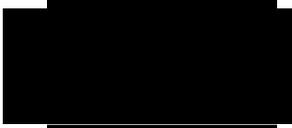
We **object** to this allocation being included in the emerging plan. This is a historic allocation that has been retained from the adopted Local Plan due to no planning applications being submitted for part of the Site. Paragraph 126 of the National Planning Policy Framework ('NPPF') states that '*planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability*' [Savills Emphasis]. As part of the Local Plan Review North West Leicestershire District Council should assess whether there is any reasonable prospect of this site being delivered within the plan period. If there is no evidence provided on its deliverability then it should be removed.

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A black rectangular box redacting the signature of the person who provided the declaration.

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

New Settlement Isley Woodhouse (IW1)

Use this box to set out your response.

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

David Wilson Homes (East Midlands) ('DWH') **object** to draft allocation IW1 – Isley Woodhouse being included in the plan. It is considered that the proposed 'new settlement' does not have sufficient evidence to prove it is deliverable. The National Planning Policy Framework ('NPPF') (paragraph 35 (b)) states that '*plans are 'sound' if they are justified - – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence*'. The Isley Woodhouse Site Assessment (date unknown), states that '*the land is being promoted for the comprehensive development by a consortium acting on behalf of landowners*' and it also states that '*the infrastructure costs associated with bringing forward a stand-alone settlement will be considerable and it will be important that these are planned and phased so they can be successfully and viably delivered*' [Savills Emphasis].

We have reviewed the Strategic Housing and Economic Land Availability Assessment ('SHELAA') (2021) site analysis and in summary the analysis concludes that the proposed new settlement is potentially suitable, potentially available and potentially achievable. It also states '*it would be necessary to demonstrate that issues relating to flooding and geo environmental factors can be satisfactory addressed*'. Until these issues have been clearly addressed it is considered other allocations should be considered. It is also unclear if all of the landowners are supportive of the proposed allocation and whether there are any agreements in place between the various parties. Having multiple landowners involved can cause delay in the delivery of large sites.

Furthermore, along with allocating IW1 – Isley Woodhouse the consultation plan proposes to allocate a number of sustainable urban extensions (A5 - Money Hill, Ashby de la Zouch and CD10 - Land North and South of Park Lane, Castle Donington) which are all 1,076+ dwellings. Page 18 of the Lichfield Start to Finish Report February 2020 states that '*a number of local plans have hit troubles because they overestimated the yield for some of their proposed allocations...[and] for local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period*'. There is no proposed trajectory currently available for IW1. Until the trajectory is available we consider that additional sites could be needed to accommodate any growth not delivered

within the plan period.

A new settlement is also heavily reliant on new infrastructure and there is currently limited evidence available on this in regards to costs and delivery timescales. The supporting text of Policy IW1 in the Proposed Housing and Employment Allocation for Document draft plan states: *'The overall infrastructure requirements are likely to be significant covering not just transport but also education, health and recreation. These will be identified as part of an overall Infrastructure Delivery Plan which is in preparation. Much of this will need to be funded by the development itself' and 'the Regulation 19 version of the Plan will provide more details regarding what infrastructure is required' [Savills Emphasis]. Allocating smaller sites such as DWH's site (SHELAA reference C18) will ensure that delivery is maintained throughout the plan period and is not held up by significant infrastructure requirements. DWH's Site is circa 17 hectares (42 acres) with a net developable area of circa 10.1 hectares (25 acres) and could deliver circa up to 400 dwellings. The Site offers an immediate development opportunity which could be delivered within the next 5 years.*

Declaration

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Signed:

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Policy S1 - Future Housing and Economic Development Needs (Strategic Policy)

Use this box to set out your response.

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

We **object** to Part 1 of Draft Policy S1 which states: *'the housing requirement for North West Leicestershire is 686 dwellings each year and 13,720 dwellings over the plan period 2020-2040 as set out in the Statement of Common Ground for Leicester and Leicestershire Housing Market Area'*.

The National Planning Policy Framework ('NPPF') (paragraph 60) and Planning Practice Guidance ('PPG') (reference 2a-010-20190220) set out the Government's objective of significantly boosting the supply of homes. North West Leicestershire District Council's ('NWLDC') proposed housing requirement (686 dwellings per annum) has been calculated using the standard method (372 dwellings per annum) in addition to the agreed contribution towards Leicester City's unmet need (314 dwellings per annum). This means that there is no contingency buffer included for the purposes of calculating the District's local housing need. National planning policy and guidance is clear that, the standard method identifies the minimum annual housing need which should be used as a starting point (PPG reference 2a-002-20190220).

Paragraph 6.25 of the Plan states that: *'The HENA concludes there is a need for up to 382 affordable homes of all tenures per year and the equivalent figure in the LHNA is 387 affordable homes. In both cases this amounts to some 56% of our overall annual housing requirement'*. The PPG (Paragraph: 024 Reference ID: 2a-024-20190220) encourages local planning authorities to consider increasing planned housing numbers where this can help to meet the identified affordable need. We therefore consider that the proposed housing requirement for the District should be increased above the minimum standard method figure in order to address affordability needs. The contribution towards Leicester City's unmet needs should then be added.

In addition to the above, at the Hinckley and Bosworth Council ('HBBC') Full Council meeting on the 30 January 2024, HBBC agreed to sign the Statement of Common Ground ('SoCG') but disputed 87 of the 187 dwellings apportioned to them¹. As a result of this decision, there will be a shortfall across the Housing

¹ Hinckley and Bosworth Council Agenda 30 January 2024 <https://moderngov.hinckley-bosworth.gov.uk/ieListDocuments.aspx?Cid=119&Mid=2374>

Market Area ('HMA') which might need to be accommodated by one or more of the HMA authorities should HBBC continue to dispute the contribution. NWL will need to continue to engage with HBBC and the other HMA authorities in order to ensure that the Leicester City shortfall is fully accommodated.

Should a higher housing requirement be pursued, then additional residential sites will need to be identified. David Wilson Homes East Midlands ('DWH') is promoting land to the east of Abney Drive in Measham for residential development (SHELAA reference M14). The Site is approximately 6.53 hectares (16.2 acres) and could deliver circa 199 dwellings. The Site offers an immediate development opportunity which could be delivered within the next 5 years.

An application (18/01842/FULM²) was submitted to NWLDC in October 2018 for 150 dwellings and is pending a decision. The quantum of development (150 dwellings) was informed by the residual amount in the event the Measham Wharf (450 dwellings) site could not come forward due to HS2 as there was also a reserve site *Land off Ashby Road/Leicester Road* for up to 300 dwellings should the route of HS2 prohibit the development of Site H2a *'Land west of High Street'*. Therefore, it was considered that there would be a gap of 150 dwellings in new housing delivery rates in the short-term and, the proposed development, subject to this full planning application, could contribute to filling this.

This application demonstrates that the Site is deliverable in the short term. The Planning Statement submitted concludes at paragraph 8.6 that *'there are no technical constraints to prevent development and the proposed development accords with all other Development Plan policies. The Site can be delivered quickly and will make a significant contribution to maintaining the Council's five-year housing land supply'*. Paragraph 8.7 sets out the key planning benefits which comprise of affordable housing, provision of housing to meet District's housing need and rolling five year housing land supply, publicly accessible open space, improvements to biodiversity, provision of homes in walking distance to key services and the creation of jobs through construction and related supplies.

In the 2021 SHELAA, the Site was assessed as 'potentially suitable, available and potentially achievable'. In the Site Assessment in the SHLEAA (page 405), it concluded that as the Site is outside of the Limits to Development, *'there would need to be change in the boundaries of the Limits of Development for the Site to be considered suitable'*. Paragraph 5.32 of the Planning Statement explains that *'the Site is better related to the settlement of Measham, rather than the surrounding open countryside; it lies adjacent to the identified Limits to Development for Measham and is bounded by existing built development to the north, west and south. It is also visually well-contained to the north and east by the existing mature vegetation within and adjacent the Site, along with the route of the old Ashby Canal, providing a natural barrier to the surrounding countryside'*. Paragraph 5.32 goes on to state that *'the proposed development retains the existing woodland and boundary trees and hedgerows where possible and introduces new planting and a landscape buffer along the western boundary. New housing would not add a discordant element into the landscape setting and would therefore be unlikely to result in any significant harm to the visual character and appearance of the settlement and the wider landscape setting'*.

The Site has no identified technical constraints that cannot be mitigated and we therefore consider that the Site should be allocated for residential development within the emerging plan to contribute towards the increased housing requirement (to address affordable housing needs) and to ensure that a sufficient range of sites of all scales are proposed within the plan.

Furthermore, the draft Local Plan is proposing to allocate a new settlement (IW1 – Isley Woodhouse) and sustainable urban extensions (A5 - Money Hill, Ashby de la Zouch and CD10 - Land North and South of Park Lane, Castle Donington) which are all 1,076+ dwellings. Page 18 of the Lichfield Start to Finish Report (February 2020) states that *'a number of local plans have hit troubles because they overestimated the yield for some of their proposed allocations...[and] for local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period'*. It is therefore considered that there should be further smaller sites identified within the plan, like

² <https://plans.nwleics.gov.uk/public-access/applicationDetails.do?activeTab=documents&keyVal=PG4MV7LRHYA00>

DWH's site adjacent to the sustainable settlement of Measham.

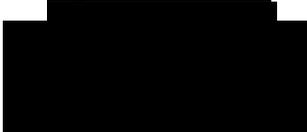
In addition to the above, we do not consider that the current plan period included is appropriate. NWLDC have included a new settlement as a draft allocation (IW1 – Isley Woodhouse) for 4,500 dwellings (1,900 dwellings built by 2040). Paragraph 22 of the NPPF states *'that when the proposed local plan strategy incorporates larger scale developments such as new settlements or significant extensions to existing villages and towns, policies should be set within a vision that looks further ahead (at least 30 years) to take into account the likely timescale for delivery'*. This is also stated in the PPG at Paragraph: 083 Reference ID: 61-083-20211004). Furthermore, Page 6 of Lichfield's Start to Finish Report (February 2020) states that *'The average time from validation of an outline application to the delivery of the first dwelling for large sites [2,000+ dwellings] ranges from 5.0 to 8.4 years dependent on the size of the site'*. We therefore consider that the plan period should be extended to at least 2050 and the housing requirement should be adjusted accordingly.

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Date: 14/03/2024

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1. To which consultation document does this representation relate?	<input checked="" type="checkbox"/>	Proposed policies
	<input type="checkbox"/>	Proposed housing and employment allocations
	<input type="checkbox"/>	Proposed Limits to Development Review

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

Policy S2 – Settlement Hierarchy (Strategic Policy)

Use this box to set out your response.

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

We **object** to Policy S2 and the identification of Measham as a '*local service centre*'. The settlement hierarchy states that the settlement '*provides services and facilities primarily of a local nature meeting day to day needs and where a reasonable amount of new development will take place*' [Savills Emphasis].

In Table 5.1 of the Settlement Study (2021), Measham is ranked the 5th most sustainable settlement in the District scoring '18' (the higher the score the more sustainable the settlement) and the 2nd most sustainable local service centre. Ibstock scored '19' and is the highest ranking local service centre and Kegworth scored '17' which is the third highest ranking. Despite Measham offering a range of services and facilities, no new residential sites are proposed to be allocated. The only new site allocated in the Local Service Centres settlements is in Ibstock (Ib18 – Land of Leicester Road, Ibstock). This is allocated for 450 dwellings. Ibstock is only slightly more sustainable than Measham in the Settlement Study and housing should be distributed across the settlements. As stated in our response to Policy S1, the housing requirement should be increased and therefore additional allocations will be required. Our client's site (Strategic Housing and Economic Land Availability Assessment 'SHELAA' reference M14), is immediately adjacent to Measham with a live application being determined and should be considered for an allocation within the plan.

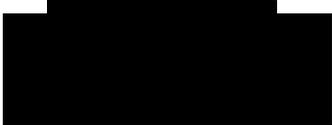
Additionally, as explained in the representation to draft Policy H3, we do not think there is currently enough evidence to support IW1 Isley Woodhouse being allocated as a new settlement and there is no proposed trajectory currently available. Until the trajectory is available we consider that additional sites could be needed to accommodate any growth that will not be delivered in the plan period.

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Policy S4 – Countryside (Strategic Policy)

Use this box to set out your response.

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

We **object** to Draft Policy S4 – Countryside. The policy states *'land outside the Limits to Development, as shown on the Policies Map, is identified as countryside where uses listed (a) to r) below will be supported, subject to the considerations set out in criteria (a) to (d)'*. It is considered that the policy should be amended to be more flexible recognising that sometimes uses beyond those listed (a) to (r) will need be supported to meet the housing need according to the market. Language used should be positive and this is in accordance with paragraph 16 (b) of the National Planning Policy Framework 'NPPF' which states: *'plans should be prepared positively in a way that it is aspirational but deliverable'*.

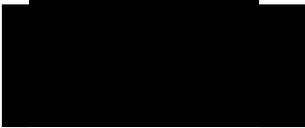
Often land outside or adjacent to the limits to development may be the most suitable location for new development and that existing sites within the development limits of settlements may not be the most appropriate land to deliver the development required (nor the most sustainable option). Paragraph 7 of the NPPF recognises that *'the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner'*. Paragraph 69 of the NPPF also states that *'planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability'*.

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Policy AP1 – Design of New Development (Strategic Policy)

Use this box to set out your response.

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

The principle of Draft Policy AP1 is supported however the Council have not yet drafted a policy in relation to this. It is considered that any District Design Code prepared needs to acknowledge that site specific circumstances are a key consideration and wording within the code should be flexible e.g. 'where possible' rather than applying unrealistic blanket restrictions to all development. This is in accordance with paragraph 16 (b) of the National Planning Policy Framework 'NPPF' which states: *'plans should be prepared positively in a way that it is aspirational but deliverable'*.

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Policy AP4 – Reducing Carbon Emissions (Strategic Policy)

Use this box to set out your response.

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

We **object** to draft Policy AP4 and consider it goes beyond national requirements. The December 2023 Written Ministerial Statement¹ which states that *‘a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continue to decarbonise. Compared to varied local standards, these nationally applied standards provide much-needed clarity and consistency for businesses, large and small, to invest and prepare to build net-zero ready homes’*. It goes on to state that *‘the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations’* [Savills Emphasis]. Therefore, it is considered that the plan should only require development to comply with current or planned building regulations.

¹ <https://questions-statements.parliament.uk/written-statements/detail/2023-12-13/hcws123>

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Policy H1 – Housing Strategy (Strategic Policy)

Use this box to set out your response.

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

David Wilson Homes East Midlands 'DWH' **object** to part 1 of the policy which states that '*provision will be made to address the requirement of 13,720 new dwellings in the period to 31 March 2024*'. A detailed response to the proposed housing requirement is set out in our response to draft Policy S1.

Part 8 of Policy H1 states that proposals for residential development will be supported where they contribute positively towards meeting local housing needs and achieving sustainable development. The Policy also goes on to state that '*applications for major development should demonstrate how they will make an optimal use of land and provide a mix of homes, including size, tenure and specialist adaptations to support people with different needs*'. We consider that it is important that any policy is realistic and ensures that housing delivery will not be compromised or stalled due to overly prescriptive requirements, for example, requiring a specific housing mix that does not consider market demand at the time of the application. This is in accordance with paragraph 16 (b) of the National Planning Policy Framework which states '*plans should be prepared positively, in a way that is aspirational but deliverable*'.

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Policy H4 – Housing Types and Mix (Strategic Policy)

Use this box to set out your response.

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

David Wilson Homes (East Midlands) 'DWH' **object** to policy H4 as currently written. Part 1 of the policy states that '*planning applications for major residential and mixed use schemes should provide a mix of housing types and sizes including custom and self-build plots in accordance with the requirements of policy H7 [to follow]*'. A separate response has been submitted in relation to Policy H7.

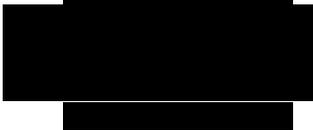
DWH do not support the Local Plan applying a blanket requirement for housing mix and types across the District. Proposed housing types and mix should be determined on a site by site basis at the time of an application and be informed by market demand. This is considered to be the true measure of housing need within the locality. This is in accordance with paragraph 31 of the National Planning Policy Framework which states '*the preparation...of all policies should be underpinned by relevant and up to date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals*'.

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Policy H5 – Affordable Housing (Strategic Policy)

Use this box to set out your response.

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

This policy states that affordable housing will be provided on site as part of major residential and mixed-use developments. However, the percentage requirements and tenure mix have not yet been set and are awaiting whole plan viability testing.

David Wilson Homes (East Midlands) ('DWH') supports the need to address the affordable housing requirements of the District. However, a blanket approach should not be applied for on-site provision, this instead should be considered on a site by site basis. It is considered that this is an approach in accordance with paragraph 35 (b) of the National Planning Policy Framework which states that '*plans are 'sound' if they are justified and are based on proportionate evidence*'. Any affordable housing policy taken forward should be caveated that the provision of affordable housing will be subject to viability.

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Signed:



Date: 14/03/2024

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Policy H7 – Self-build and Custom Housebuilding

Use this box to set out your response.

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

David Wilson Homes (East Midlands) ('DWH') **object** to policy H7 which requires market housing sites of 30 or more dwellings to deliver a minimum of 5% of the site's capacity as serviced plots for self-build and custom-housebuilding. We do not support large sites being required to deliver a percentage of self-build housing. The requirement for custom and self-build housing plots should be determined on a case by case basis and based on the preferences of those on the self-build register.

The Self-Build Topic paper (February 2024) states that the data '*supports a demand of 24 plots a year for self-build and custom housebuilding*'. It is therefore considered unreasonable (and will deliver over the need) for all sites over 30 or more dwellings to provide 5% self-build, the register is purely interest and the Council do not have to provide the means for everyone on the register to build a house.

Furthermore, paragraph 12.136 of the Leicester and Leicestershire Housing and Economic Needs Assessment (2022) states that '*as a first step the local authorities should seek to adopt a general 'encourage' policy for all sites but might consider implementing a further policy on strategic sites*' [Savills emphasis]. Draft Policy H7 goes beyond a 'general encourage policy'. We therefore do not consider that the proposed policy aligns with the evidence provided.

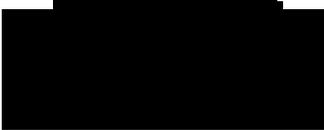
In addition to the above, the very nature of self and custom build housing means that it is difficult to plan for precise locations of delivery. The delivery of such provision can present a number of operational and health and safety issues which has the potential to act as a drag on the progression of development sites. Such requirements should be based on local evidence such as the self and custom build register and local eligibility test (Planning Practice Guidance: Paragraph: 025 Reference ID: 57-025-20210508).

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Policy H10 - Space Standards

Use this box to set out your response.

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

David Wilson Homes (East Midlands) ('DWH') **object** to Draft Policy H10 which states that '*all new housing will be required to meet or exceed the Nationally Described Space Standard ('NDSS') (or any subsequent government update) for gross internal floor areas and storage space*'.

Footnote 52 of the National Planning Policy Framework 'NPPF' states that policies can require NDSS where the need for an internal space standard can be justified. Should NDSS be required then the Council must provide evidence to justify the requirement taking account of the need, viability and timing (PPG Reference ID: 56-020-20150327). If evidence is provided, then the policy should be worded to "encourage" rather than "require" major developments to deliver housing to meet the NDSS. Site specific circumstances and the type of product being produced means that it would be onerous to apply the standards in a blanket fashion.

The Space Standards Topic Paper (February 2024) states that there is evidence that the majority of one, two and three bed homes do not meet the minimum gross internal floorspace standards as set out in the NDSS (paragraph 7.1). The Topic Paper does not provide evidence that these homes have not sold or do not meet the needs of the residents of these homes.

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Policy H11 – Accessible, Adaptable and Wheelchair User Homes

Use this box to set out your response.

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

We **object** to draft policy H11 which requires on housing developments comprising 10 or more dwellings (or on sites more than 0.5 hectares) to provide:

- A) At least 9% of all market homes will be required to meet Part M4(3)(2)(a)
- B) At least 23 % of all affordable homes will be required to meet Part M4(3)

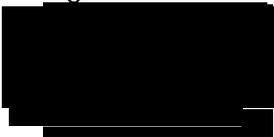
Requirements for M4(2) and M4(3) standard dwellings should only be included when justified by evidence (PPG Paragraph: 009 Reference ID: 63-009-20190626) and should be done on a site by site basis. The Planning Practice Guidance (PPG) states that Councils have the option to “*set additional technical requirements exceeding the minimum standards required by Building Regulations in respect of access*” where there is a justified need (PPG Paragraph: 002 Reference ID: 56-002-20160519. We therefore consider that the requirement outlined in the policy wording should be evidenced and balanced against the need to make the most efficient use of land available and ensure site viability.

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Policy IF1 – Development and Infrastructure (Strategic Policy)

Use this box to set out your response.

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

We **object** to draft Policy IF1 part 1 as it states that ‘*development will be supported by, and make contributions as appropriate to the provision of new physical, social and green infrastructure in order to mitigate its impact upon the environment and its communities*’ [Savills emphasis]. The National Planning Policy Framework paragraph 75 states that ‘*planning obligations must only be sought where they meet all the following tests:*

- a) necessary to make the development acceptable in planning terms;*
- b) directly related to the development; and*
- c) fairly and reasonably related in scale and kind to the development’*

Development should only be required to mitigate its own impact and cannot be required to address existing deficiencies in infrastructure or services. It is therefore essential for the Infrastructure Development Plan (IDP) to clearly show the existing and known deficiencies in the current infrastructure, before reaching any conclusion on the cumulative effects of new development, and any contribution that is needed from new development to mitigate any additional individual and/or cumulative impacts.

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Policy IF2 – Community Facilities (Strategic Policy)

Use this box to set out your response.

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

We **object** to part 3 of the draft policy. This states *‘major residential/residential-led development is required to make provision for new community facilities where no facilities exist or facilities are insufficient for the demand likely to be generated from new development’*. This policy provides no detail in relation to what is regarded as ‘insufficient’. It is considered that this policy needs to be reworded to provide sufficient detail. This is in accordance with paragraph 31 of the National Planning Policy Framework which states: *‘the preparation and review of all policies should be underpinned by relevant and up-to-date evidence.*

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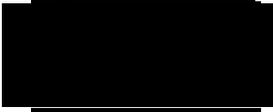
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Policy En1 – Nature Conservation/Biodiversity Net Gain (Strategic Policy)

Use this box to set out your response.

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

Part 1 (a) of Policy EN1 is **supported** which states that the council will seek to conserve and enhance the biodiversity in the district by *'ensuring that development provides net gain in biodiversity consistent with any national policy prevailing at the time a planning application is determined'*. This proposed policy is in accordance with paragraph 35 (d) of the National Planning Policy Framework which states *'plans are 'sound' if they are: consistent with national policy - enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.'* Should the Council pursue a requirement above national standards then this would need to be sufficiently justified and tested against its impact on viability and site yields.

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Policy En2 – River Mease Special Area of Conservation (Strategic Policy)

Use this box to set out your response.

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

Draft Policy En2 states that until such time as wastewater is pumped out of the River Mease catchment, new development will be allowed where there is sufficient headroom capacity available at the named Wastewater Treatment Works (WWTW) and the proposed development is in accordance with the provisions of the Water Quality Management Plan.

The policy states where there is no headroom capacity available or no capacity within the Developer contributions scheme *'development will only be allowed where it is demonstrated that the proposal, on its own and cumulatively with other built and permitted development, will not have an adverse impact, directly or indirectly on the integrity of the River Mease Special Area of Conservation'* [Savills Emphasis]. From what we understand currently North West Leicestershire District Council 'NWLDC' do not have a developer contributions scheme in place and although they are working on producing a new one the timescales are not known.

The Notice of Designation of Sensitive Catchment Areas 2024¹ identifies the River Mease SAC as a phosphorus sensitive catchment area. The notice identifies that *'in designated catchments water companies have a duty to ensure wastewater treatments works serving a population equivalent over 2,000 meet specified nutrient removal standards by 1st April 2030. Competent authorities (including local planning authorities) considering planning proposals for development draining via a sewer to a wastewater treatment works subject to the upgrade duty are required to consider that the nutrient pollution standard will be met by the upgrade date for the purposes of Habitats Regulations Assessments. A limited exemption process will be completed by 1 April 2024, when wastewater treatment works exemptions will be confirmed, which may affect the levels of nutrient mitigation that development must secure for specific wastewater treatment works in some catchments. It is important that planning decisions continue to be taken based on material planning considerations'* [Savills Emphasis].

¹ <https://www.gov.uk/government/publications/notice-of-designation-of-sensitive-catchment-areas-2024/notice-of-designation-of-sensitive-catchment-areas-2024#effect-of-this-notice>

The Council may want to further consider the role of the water industry in the protection of water resources and nutrient neutrality. This policy currently places a lot of emphasis on the development industry to protect water quality whereas most of the actual responsibility for these elements will be reliant on the work of the water industry.

Declaration

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

Signed:

A large black rectangular redaction box covering the signature.A smaller black rectangular redaction box covering the name.

Date: 14/03/2024

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

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

Please complete both Part A and Part B.

PART A – Personal Details

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

	Personal Details	Agent's Details (if applicable)
Title		Miss
First Name		Jessica
Last Name		Graham
Job Title (where relevant)		Associate Director
Organisation (where relevant)	David Wilson Homes (East Midlands)	Savills (UK) Limited
House/Property Number or Name	C/O Agent	■
Street		■■■■■■■■■■
Town/Village		■■■■■■■■
Postcode		■■■■■
Telephone		■■■■■■■■■■
Email address		■■■■■■■■■■■■■■■■■■■■

PART B – Your Representation

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

1. To which consultation document does this representation relate?		Proposed policies
	<input checked="" type="checkbox"/>	Proposed housing and employment allocations
		Proposed Limits to Development Review

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

Money Hill, Ashby-de-la Zouch (A5)

Use this box to set out your response.

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

We **object** to this allocation being included in the emerging plan. This is a historic allocation that has been retained from the adopted Local Plan due to no planning applications being submitted for part of the Site. Paragraph 126 of the National Planning Policy Framework states that '*planning policies and decisions need to reflect changes in the demand for land. They should be informed by regular reviews of both the land allocated for development in plans, and of land availability*'. As part of the Local Plan Review the council should assess whether there is any reasonable prospect of this site being delivered within the plan period. If there is no evidence provided on its deliverability then it should be removed.

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	Personal Details	Agent's Details (if applicable)
Title		Miss
First Name		Jessica
Last Name		Graham
Job Title (where relevant)		Associate Director
Organisation (where relevant)	David Wilson Homes (East Midlands)	Savills (UK) Limited
House/Property Number or Name	C/O Agent	■
Street		■■■■■■■■■■
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PART B – Your Representation

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1. To which consultation document does this representation relate?		Proposed policies
	<input checked="" type="checkbox"/>	Proposed housing and employment allocations
		Proposed Limits to Development Review

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

New Settlement Isley Woodhouse (IW1)

Use this box to set out your response.

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

David Willson Homes (East Midlands) 'DWH' **object** to draft allocation IW1 – Isley Woodhouse being included in the plan. It is considered that the proposed 'new settlement' does not have sufficient evidence to prove it is deliverable. The National Planning Policy Framework ('NPPF') (paragraph 35 (b)) states that '*plans are 'sound' if they are justified - – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence*'. The Isley Woodhouse Site Assessment (date unknown), states that '*the land is being promoted for the comprehensive development by a consortium acting on behalf of landowners*' and it also states that '*the infrastructure costs associated with bringing forward a stand-alone settlement will be considerable and it will be important that these are planned and phased so they can be successfully and viably delivered*' [Savills Emphasis].

We have reviewed the Strategic Housing and Economic Land Availability Assessment ('SHELAA') (2021) site analysis and in summary the analysis concludes that the proposed new settlement is potentially suitable, potentially available and potentially achievable. It also states '*it would be necessary to demonstrate that issues relating to flooring and geo environmental factors can be satisfactory addressed*'. Until these issues have been clearly addressed it is considered other allocations should be considered. It is also unclear if all of the landowners are supportive of the proposed allocation and whether there are any agreements in place between the various parties. Having multiple landowners involved can cause delay in the delivery of large sites.

Furthermore, along with allocating IW1 – Isley Woodhouse the consultation plan proposes to allocate a number of sustainable urban extensions (A5 - Money Hill, Ashby de la Zouch and CD10 - Land North and South of Park Lane, Castle Donington) which are all 1,076+ dwellings. Page 18 of the Lichfield Start to Finish Report February 2020 states that '*a number of local plans have hit troubles because they overestimated the yield for some of their proposed allocations...[and] for local authorities to deliver housing in a manner which is truly plan-led, this is likely to mean allocating more sites rather than less, with a good mix of types and sizes, and being realistic about how fast they will deliver so supply is maintained throughout the plan period*'. There is no proposed trajectory currently available for IW1. Until we the trajectory is available we consider that additional sites could be needed to accommodate any growth we do not consider will be delivered in the plan period.

A new settlement is also heavily reliant on new infrastructure and there is currently limited evidence available on this in regards to costs and delivery timescales. The supporting text of Policy IW1 states: *‘The overall infrastructure requirements are likely to be significant covering not just transport but also education, health and recreation. These will be identified as part of an overall Infrastructure Delivery Plan which is in preparation. Much of this will need to be funded by the development itself’* and *‘the Regulation 19 version of the Plan will provide more details regarding what infrastructure is required’* [Savills Emphasis]. Allocating smaller sites such as DWH’s site (SHELAA reference M14) will ensure that delivery is maintained throughout the plan period and is not held up by significant infrastructure requirements. DWH’s site land to the east of Abney Drive in Measham is approximately 6.53 hectares (16.2 acres) and could deliver circa 199 dwellings. The Site offers an immediate development opportunity which could be delivered within the next 5 years.

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