



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

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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	Bill	
Last Name	Cunningham	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
Street	██████████	
Town/Village	██████	
Postcode	██████	
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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
		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.

### The proposed new housing settlement at Isley Woodhouse (Policy IW1) to the west of Diseworth.

The surrounding areas to postcode DE74 already have ample significant building projects which have consumed large areas of green space. These include Garendon Park, Donington, Shepshed and Ashby. Why is there a need to further destroy the local countryside with an additional 4000 houses, and where is the demand in the region evidenced for this number of new builds verses local, viable employment?

The decision to consolidate all of NWLDC's housing requirements in a single location appears to be **ill-considered**. The existing road infrastructure is simply **not equipped** to handle the increased traffic demand and there is currently **no commuter rail service** available to support such a large settlement. As a result, residents will need to **rely on individual cars**, which could potentially lead to thousands of additional vehicles on the roads and subsequently increase air pollution levels.

#### Flooding Risk:

**Diseworth and Long Whatton** experience the following effects due to excess runoff:

- **Flooding:** Overflowing brooks and excessive runoff can lead to localized flooding.
- **Surface Depression:** A local surface depression exacerbates the situation.
- **Risk to Properties:** Homes and buildings are at risk when runoff exceeds the capacity of drainage systems.



**Physical Health:**

- **Air Quality:** Increased pollution from additional traffic and construction can negatively affect respiratory health. Dust, particulate matter, and emissions from vehicles contribute to poor air quality.
- **Noise Pollution:** Construction noise and subsequent traffic can disrupt sleep patterns, increase stress levels, and potentially lead to long-term health issues.
- **Access to Green Spaces:** Destruction of agricultural land and hedges reduces green spaces, which are essential for physical activity, mental well-being, and overall health.

**Mental and Emotional Well-Being:**

- **Stress and Anxiety:** Noise, disruption, and changes to the landscape can cause stress and anxiety among residents. The uncertainty associated with large-scale development can also impact mental health.
- **Loss of Natural Beauty:** The destruction of ancient hedges and scenic landscapes affects residents' connection to nature, potentially leading to feelings of loss and low mood.

**Community Health:**

- **Social Cohesion:** Overdevelopment can strain community bonds. Increased traffic and noise may disrupt social interactions and neighbourhood cohesion.
- **Access to Services:** If the development leads to overcrowding, existing healthcare facilities, schools, and other services may become overwhelmed.

**Biodiversity and Ecosystem Health:**

- **Hedgerows and Wildlife:** The destruction of 7.5 miles of hedgerows directly impacts local ecosystems. Hedgerows provide habitat for wildlife, including birds, insects, and small mammals.
- **Ecological Balance:** Biodiversity loss affects the delicate balance of local ecosystems, potentially leading to long-term consequences for human health.

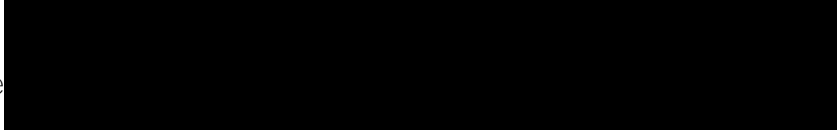
In summary, the proposed development poses multifaceted health risks, ranging from physical well-being to mental and community health. Balancing development with environmental and human health considerations is crucial.

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.

Signature



Date: 17/03/2024

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### **The potential location for the Freeport development (EMP90)**

- The existing road systems are ill-equipped to handle diversions, especially when traffic is redirected through villages. This results in makeshift routes, traffic delays, safety concerns, heightened littering, and parking challenges.
- Loss of village status and negative impact on location appeal and property values.
- The ‘green lungs’ of the village will be destroyed and the impact of development on air, noise and light pollution.
- Significant light pollution in Diseworth is already a reported issue with the airport. The Freeport would further add to this.
- Biodiversity is rich in the agricultural land that EMA and Segro want to destroy.
- Should development occur on this land, no intricate drainage system can fully intercept the water flowing off concrete surfaces, which was once absorbed by the agricultural land. Consequently, it will infiltrate the village and collect in the low-lying area of Diseworth, posing risks to residences, motorists, cyclists, and pedestrians.
- We firmly reject the notion that the development’s impact can be mitigated through buffering, screening, or any other terms implying minimal impact. These measures will not shield or halt the various forms of pollution, including air, noise, and light stemming from traffic, road alterations, and continuous noise and illumination. Such an approach is not conducive to well-being or health.
- There are already numerous warehouses in the vicinity which are lying empty. What is the justification for building more?
- There is no commercial gain for the local area in having a freeport.
- The Local Plan asserts that the potential impacts on Diseworth, especially concerning heritage, landscape, and amenity, are likely to be unacceptable given the current extent of the designated Freeport land. However, it appears contradictory to consider including the very land that is already deemed unacceptable based on the arguments presented. Therefore, excluding this land would be a more reasonable course of action.



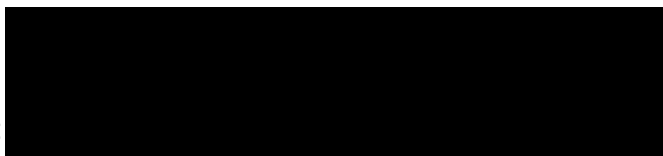
- **Therefore I am asking NWLDC not to include the EMP90 site for potential development.**

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Signed:



Date: 16/03/2024

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	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Annette	
Last Name	Della-Porta	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	■	
Street	■■■■■■■■■■	
Town/Village	■■■■■■	
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Dear Sirs,

I write in response to your local plan to set out my concerns.

The proposed Isley Woodhouse development and allocated industrial development sites either side of Diseworth are so large in scale that they completely dwarf the village of Diseworth sandwiched between the two. The allocation of the land for these sites has come about due to the simple fact that the prospective developers have secured options to buy the land from existing farmers/landowners. The siting of the developments should be based on strategic needs/evaluation and not convenience. As such it represents lazy planning policy. For the Freeport based industrial development, they will have statutory rights of compulsory purchase of land. So the Local Plan should not prescribe the site on the North East border of Diseworth as the only, nor best site for the B8 industrial sheds.

With particular respect to Diseworth, this plan wholly ignores local need, condemning the village to greatly increased light, noise, air, water pollution, increased flood risk and traffic, loss of nature, loss of landscape and productive agricultural land, loss of biodiversity and local countryside amenities. There will be gains; but those gains are synonymous to an urban environment rather than a rural environment. The character of the area will be destroyed from rural to and industrial, urban conurbation.

Most of the housing allocated to Isley Woodhouse is from Leicester City's inability to supply homes for its growing population. The National Planning Policy Framework sets out that a council should assist its neighbouring council to meet housing demand. Last time I looked, Leicester was 25 miles away from NWLDC and is not a neighbour. It's difficult to see the logic to relocate such a significant number of families from where they currently live and work and to break up communities.

Likewise, it seems that the majority of Freeports warehouse demand is being concentrated in a single location bordering Diseworth. This is not rationale, as it will overload the area with high densities of heavy goods traffic with concentrated noise and pollution. The locale is already burdened with noise and pollution from the Airport, Racetrack and Motorway intersections.



This draft Local Plan is poorly thought through and seems to only consider the needs of Freeport, EMAGIC and LCC, ignoring local needs and quality of life.

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Signed: Completed electronically by Annette della-Porta



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Last Name	Cunningham	
Job Title (where relevant)		
Organisation (where relevant)		
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- Loss of village status and negative impact on location appeal and property values.
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- Biodiversity is rich in the agricultural land that EMA and Segro want to destroy.
- Should development occur on this land, no intricate drainage system can fully intercept the water flowing off concrete surfaces, which was once absorbed by the earth. Consequently, it will infiltrate the village and collect in the low-lying area of Diseworth, posing risks to residences, motorists, cyclists, and pedestrians.
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House/Property Number or Name	████	
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### The proposed new housing settlement at Isley Woodhouse (Policy IW1) to the west of Diseworth.

The **DE74** postcode district, situated in the town of **Castle Donington** within the Derby district of England, has indeed witnessed significant building projects in its surrounding areas. These projects have consumed substantial green spaces, including locations like **Garendon Park, Donington, Shepshed, and Ashby**.

However, the decision to further expand housing by constructing an additional **4,000 houses** in this region raises valid concerns. Let's explore some of the reasons why this approach may be problematic:

#### Environmental Impact:

#### Traffic and Infrastructure:

- The existing road infrastructure is not adequately equipped to handle the increased traffic demand resulting from thousands of additional homes.
- Without proper road upgrades, congestion, delays, and safety issues may arise.
- The lack of a commuter rail service further exacerbates transportation challenges.

#### Reliance on Cars:

- With no viable rail alternative, residents would heavily rely on individual cars for commuting.
- This could lead to increased traffic congestion, parking problems, and higher carbon emissions.
- Encouraging alternative transportation modes (such as cycling, walking, or improved bus services) is crucial.

**Public Health and Amenities:**

- The region already faces a shortage of accessible public health services and amenities.
- Adding more housing without corresponding improvements in healthcare, schools, and recreational facilities could strain resources and impact residents' well-being.

**Flooding Risk:**

**Diseworth and Long Whatton** experience the following effects due to excess runoff:

**Flooding:** Overflowing brooks and excessive runoff can lead to localized flooding.

**Surface Depression:** A local surface depression exacerbates the situation.

**Risk to Properties:** Homes and buildings are at risk when runoff exceeds the capacity of drainage systems.

**Physical Health:**

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**Biodiversity and Ecosystem Health:**

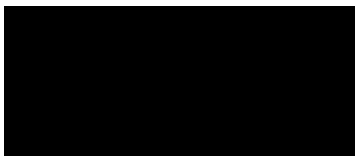
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From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: NW Leicestershire Draft Local Plan  
Date: 17 March 2024 17:48:08  
Attachments: [NWL Local Plan Objections.docx](#)

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Dear Sir,

I attach my comments to the Draft Local Plan. I am particularly concerned about the effect of the new town of Isley Woodhouse and the EMA Freeport on the village of Diseworth where I own a house. Both these developments go against many of the good intentions and policies in the Draft Local Plan and I feel that that they should not be included. There are alternative options for providing the housing needs of NW Leicestershire and a suitable site for the EMA Freeport.

[REDACTED]

Yours faithfully

Kathryn Hutchinson



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Last Name	Smith	
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Organisation (where relevant)		
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Use this box to set out your response.

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

### **Policy IW1-**

- Inappropriate location (in close proximity to Diseworth, the airport, and the racetrack)
- Developing any part of the Freeport land is likely to erode the rural character of Diseworth.
- Expected to exacerbate flooding problems in Diseworth and Long Whatton significantly.
- The runoff poses a genuine threat to Diseworth and Long Whatton, with both villages already experiencing issues from the brook, holding ponds, and recent overflow from fields and The Bowley brook.
- Destruction of 750 acres of farmland and extensive stretches of ancient hedgerows comes at a time when food production is of utmost importance.
- Anticipated increases in air, noise, and light pollution due to excessive development. Surrounding villages may see heightened traffic leading to increased noise and air pollution, along with a rise in littering.
- Concerns about the impact on the health and well-being of current residents.
- How can national biodiversity net gain requirements be met when 7.5 miles of hedgerows are slated for destruction?
- Centralizing NWLDC housing needs in one location reflects poor planning, with inadequate

road infrastructure and funding uncertainties from a strapped Highways department.

- The simultaneous consideration of multiple developments raises questions about the timing and intentions behind these proposals.
- Existing underutilized school capacity in Castle Donington should be tapped into before further development is pursued.
- The conservation village status of Diseworth is at risk of being compromised as it merges with a large housing development.

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

**(EMP90)-**

- Inappropriate site selection, positioned on a slope leading directly to the village. • How will the impact of increased traffic on local roads be assessed? What methodologies and safety considerations will be employed for measurement?
- Concerns arise regarding the potential loss of Diseworth's conservation village status, transitioning it from a rural village to part of a logistics park.
- Existing road infrastructure is ill-equipped to handle diversions, leading to traffic rerouted through villages, resulting in congestion, safety hazards, increased littering, and parking issues.
- Risk of losing village status.
- Destruction of the village's "green lungs" and the adverse effects of development on air, noise, and light pollution.
- Safety concerns for Diseworth School due to heightened traffic, pollution, and the school's location on a blind bend, posing challenges for road crossings.
- Concerns about the democratic process if the government mandates development of this land due to its Freeport status.
- Despite efforts to implement advanced drainage systems, development on this land could lead to water runoff overwhelming the village and its low-lying areas, posing threats to homes, motorists, cyclists, and pedestrians.
- The agricultural land targeted for destruction by EMA and Segro hosts rich biodiversity that cannot be fully offset by proposed measures. Attempts to mitigate through carbon credits would fall short and amount to greenwashing.
- Rejecting the notion that development impacts can be sufficiently mitigated through buffering or screening measures. Such measures fail to shield against or stop various pollutions, including noise, light, and traffic-related disturbances, ultimately compromising well-being and health.
- Anticipated negative impacts on mental health due to increased noise and light levels.
- The Local Plan acknowledges the unacceptable potential impacts on Diseworth, particularly concerning heritage, landscape, and amenity, based on the designated Freeport land. Therefore, the inclusion of this land should be reconsidered, as its own arguments undermine its suitability. Hence, exclusion of this land is imperative.

**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: 17/03/2024

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





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Please complete both Part A and Part B.

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	<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
Title	Dr	
First Name	Emma	
Last Name	Haycraft	
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 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.

What follows reflects my views and concerns relating to BOTH the proposed new housing settlement at **Isley Woodhouse (Policy IW1)** to the west of Diseworth AND the potential location for the **Freeport development (EMP90)** to the east of Diseworth.

My overarching concerns in relation to IW1 and EMP90 are as follows:

1. Irreversible loss of nature, agriculture and food security (due, predominantly, to the loss of productive farmland). I cannot see in the draft local plan any policies or strategies to preserve and protect agriculture and food production in the region.
2. Flood risk will be significantly exacerbated. Diseworth already suffers from flooding and this will be worsened by the replacement of rural land (which soaks up some of the water) with warehouses and houses.
3. The locations are inappropriate for IW1 and EMP90 and will result in no separation around Diseworth. Page 23 of the *Draft North West Leicestershire Local Plan 2020 – 2040 - Proposed Policies For Consultation* document states “The countryside also has an important role in providing the landscape setting to our settlements which contributes to their identity”. The proposals seem completely at odds with this as Diseworth’s identity as a rural, conservation village will be lost.
4. IW1 and EMP90 will both generate increased **pollution** in numerous forms, including: **noise** pollution; 24/7 **light** pollution; **air** pollution resulting from increases in traffic etc; **water** pollution due to run-off into Diseworth Brook; and **traffic** pollution due to increased traffic (deliveries EMP90; commuting IW1). Together this will create a huge cumulative negative impact, affecting both health and wellbeing.
5. The loss of countryside, the increased pollution, the huge disruption while IW1 and/or

**EMP9 are being built will all adversely impact residents' mental health and quality of life.**

6. The local country roads already struggle to cope with traffic and maintenance and upkeep of them is already a challenge (see, for example, the recurrent large holes in The Green recently). The country roads in the area are unsuitable for heavy goods traffic and our roads would not be able to cope with this and/or with an even higher volume of extra traffic (e.g., as people commute to the freeport or away from Isley Woodhouse). I cannot see, in the draft local plan, any strategy to guide and control transport infrastructure. The region's strategic road network is already overstretched and this proposed development will break it completely unless major investment is forthcoming (but who will fund this?).
7. Loss of heritage. The proposed plans will irreversibly destroy farmland and the local landscape, and this loss of heritage will impact current and future generations.

I also have a number of specific concerns about the proposed new housing settlement at Isley Woodhouse (Policy IW1). These include:

- It will destroy 750 acres of agricultural land and huge swathes of hedges, replacing productive land (for food production) with buildings. It is unclear how this proposal aligns with "The achievement of national biodiversity net gain requirements as a minimum" (p64, *Proposed Housing and Employment Allocations For Consultation* document).
- Its creation will add significantly to flooding issues for Diseworth and Long Whatton due to increased runoff of water. Both villages already suffer from flooding from the brook and issues with water released from holding ponds. This development will make this much worse.
- This settlement is in the wrong place (it is too close to Diseworth, the airport and the racetrack; it is not close enough to places like Leicester where jobs can be sourced and where someone I was talking with at one of the drop-in events highlighted was an area where more employees were required).
- There will be increases in air, noise and light pollution as a result of over-development. Surrounding villages will **become 'rat runs'** causing increased noise and air pollution for residents.
- The local road infrastructure cannot cope and public transport has already been identified as a **"weakness", as noted on page 3 of the 'Leicester & Leicestershire 2050: Our Vision For Growth' plan.**
- Diseworth is a conservation village – how will this status be maintained when it becomes adjoined to such a large housing development?
- Overall, I am not supportive of the new town development of Isley Woodhouse (Policy IW1).



I also have a number of specific concerns about the potential location for the Freeport development (EMP90). These include:

- The agricultural land that has been suggested as the location for EMP90 is rich in biodiversity. This will be destroyed forever. Nothing will be able to offset this loss.
- If development is permitted here, there will be flooding issues. Drainage will not be able to capture all the water running off concrete that was previously absorbed by earth. It will find its way into the village of Diseworth, resulting in damage and threats to homes, drivers, cyclists and pedestrians.
- The proposed site is on a slope which leads to Diseworth and the proximity of warehouses would be exceedingly close to residents living in a rural village. This is the wrong site for such a project; building behind the airport (along with the other freight/logistics activities) or on brownfields over the other side of the M1 would both feel a far more sensible location for something as industrial as this.
- The current road systems will not be able to cope with the increased volume of traffic; much of which might use village roads as rat-runs. This will contribute to traffic delays, parking issues, and potentially cause safety issues (e.g., in/around Diseworth School which is on a blind bend).
- I have huge concerns regarding loss of **Diseworth's** conservation village status. It will no longer be the rural village that we all chose to live in, but part of a logistics park which no one opted to reside in.
- Relatedly, **the 'green lungs' of Diseworth** will be destroyed by the warehouses and this will cause significant increase in air, noise and light pollution.
- The development will not be able to be mitigated by buffering/screening/any other term used to suggest the impact of the development can be minimised for Diseworth residents. This will not stop the increased air/noise/light pollution, etc. The vulnerability of the village to light pollution was all too evident recently when EMA changed some of its lighting, resulting in huge volumes of additional light pollution in Diseworth. Such pollution can have immediate impacts (e.g., disrupting sleep) as well as longer-term impacts (e.g., to mental health and wellbeing).
- It would seem a highly undemocratic process if the government imposes the development of this land due to Freeport status, especially when alternative nearby locations could be used.
- It is astonishing, really, that this development is even being mooted given that 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"**. You have said it yourselves; do not include this land.
- Therefore, I am asking NWLDC not to include the EMP90 site for potential development.

## Overall summary of concerns

Taken together, it is disheartening that there are simultaneous plans for IW1 AND EMP90. While the opportunity for individuals to feed into this consultation is valued, it is noteworthy that the process of doing so is exceedingly cumbersome and will have been inaccessible to many due to the number of documents and their sheer length (despite the heroic efforts of local villagers to support others to share their views).

Having reviewed the *Draft North West Leicestershire Local Plan 2020 – 2040 - Proposed Policies For Consultation* document, these plans are utterly at odds with NWLDC's pledge to "address the impact of climate change...whilst also protecting the environment and heritage of our district" and also **protect** "our parks and green spaces" [p2, foreword].

**The same document [4.33, 4.34] states** "We want to maintain, and where possible enhance, the environmental, economic and social value of the countryside consistent with the National Planning Policy Framework...**The countryside also has an important role in providing the landscape setting to our settlements which contributes to their identity.**" **The proposed plans do not support this pledge as countryside will be destroyed, not maintained, and certainly will not be enhanced.**

**The 'Leicester & Leicestershire 2050: Our Vision For Growth' plan identifies (p3) "Our weaknesses" to include "Congestion on our roads and railways" with it noted that this is being tackled "but [that] further investment is needed to continue improvements and support our long term growth". Where is this investment, particularly in the railways to facilitate use of public transport, coming from? A further weakness highlighted in this document is "Gaps in the road and rail network" with it noted that "travelling north-south is relatively easy (albeit congested) but east-west links are slow and unreliable". Again, the proposed plans will exacerbate these traffic issues, not ameliorate them. Given these transport challenges, it is clear that the plans do not align with the stated "development strategy aims [which are] to: Direct new housing growth to locations that provide access to jobs, services, infrastructure and where there are alternatives to the private car, whilst also recognising the need to protect the countryside". And the plan also highlights the "Pressures on existing communities from new development, lack of infrastructure...". Again, the proposed developments will put significant pressure on Diseworth and its surrounding areas.**

It is surprising to all of us living locally that these two proposals are being considered together. This appears ill-thought-through, and the plans do not appear to be joined up in any way. The cumulative impact on the countryside and on Diseworth of either but especially both will be huge and irreversible. The plans do not support a drive for promoting biodiversity net gain; they threaten to ruin the local area for housing which is not in the location where it is needed (cities like Leicester) and warehouses that will generate tax cuts for the businesses that use the Freeport whilst creating no real benefits for the local area.

In summary, the proposed plans feel distinctly at odds with the messages we all received recently from NWLDC, via the flyer accompanying the Council tax notification, to **'Love your**

*neighbourhood. Working together to make our environment better.* Please work with the local communities to ensure that irreparable damage to our countryside is not made and that only appropriate developments are given the go ahead (for the avoidance of doubt, neither IW1 or EMP90 is appropriate). I do not support the proposed development of either the proposed new housing settlement at Isley Woodhouse (Policy IW1) Or the proposed location of the Freeport development (EMP90).

**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: 16 March 2024

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	David	
Last Name	Hawtin	
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)

Objection to Isley Woodhouse development Policy IW1

There are several major aggravating factors as to why this development should not go ahead in the suggested location of Isley Woodhouse.

- 1) Noise and air pollution & destruction of wildlife habitat – The village is already close to the M1 & A42 roads which are always extremely busy and create large scale pollution. This is currently mitigated somewhat by the hedgerows and crops that are grown in the fields between the village and these roads. The proposed new town will take away valuable hedgerows and crop growing land and replace them with mostly hard standing which will do nothing to prevent increased noise and air pollution reaching Diseworth. The planned area of Isley Woodhouse is home to a diverse selection of flora and fauna including Buzzard, Sparrowhawk, Blackcap, Whitethroat, Goldfinch, Pheasant, Partridge, Muntjac, Pygmy Shrew, Fox, Badger, Mole, Rabbit, Hare, Gate Keeper Butterfly and many more besides. Building over this land would displace all of these.
- 2) Flood risk – Diseworth already experiences flooding due to hard run off and water release from holding ponds at the airport overloads the very small local brooks and streams. Building 4500 houses will greatly increase the flow of water through the village as run off from the increased hard standing will increase contributing to greater flood risk. There are already a number of houses that are affected by flooding. The village also gets cut off due to flow of water down the already overloaded waterways. On 02/02/24 Hall Gate, Lady Gate and Grimes Gate were all cut off due to the roads being flooded.
- 3) Infrastructure – the existing road network is on single carriageway roads, that struggle to cope with peak traffic not to mention regular events at Donington Park. Will the developers be required to improve the road network as part of their plans. With an average of 1.2 vehicles per household (Taken from government website figures for 2021), 4500 houses will equate to a further 5400 vehicles on the local single carriageway roads. There will be a proportion of these that will find a way to use Diseworth as a rat run to try and avoid congestion on major roads thereby increasing traffic through the village of Diseworth. The addition of further industrial units will also contribute to the overloading of the local road network with extra commercial traffic. It is disingenuous for the local plan to suggest that the new development would create housing for people with local jobs as the jobs in the surrounding area are mainly low paid warehousing jobs. It is increasingly difficult for people to get on the housing ladder as it is, low paid workers are at an even greater disadvantage in this respect. The status quo is more likely



to be maintained with workers driving or using bus network to get to their place of work. The new housing would more than likely create homes for commuters who would then contribute more pollution.

In conclusion I object to the Isley Woodhouse plan Policy IW1 because of the increased Noise and air pollution, traffic flow, increased flood risk and the threat to Diseworth as a community caused by placing a housing development of roughly 10 times the current village houses in the village. This land should not be included in the local plan.

Objection to Freeport development EMP90

I am objecting to this development on several grounds.

- 1) The increase in noise, air and light pollution – currently the land being earmarked for Freeport use is a haven for wildlife and plantlife. The land is also currently used to provide much needed foodstuffs at a time when prices are increasing and there are scarcities of supply. The plan brings the Freeport boundary right up to the edge of the village. Which will further impact the people that have homes on that edge of the village. Noise and air pollution will be created by an increase in commercial traffic to the local area.
- 2) Increased flood risk to Diseworth and Long Whatton – Creating more hard standing by building more warehousing, which seems unnecessary when there are seven unlet buildings at the Segro Park to the north of the airport, will further increase the risk of flooding in Diseworth. There are already a number of houses that are affected by flooding. The village also gets cut off due to flow of water down the already overloaded waterways. On 02/02/24 Hall Gate, Lady Gate and Grimes Gate were all cut off due to the roads being flooded.
- 3) Infrastructure – the existing road network is on single carriageway roads, that struggle to cope with peak traffic not to mention increased traffic from regular events at Donington Park. The addition of further industrial units will also contribute to the overloading of the local road network with extra commercial traffic. The new freeport would be far better placed away from current housing and agricultural land.
- 4) Loss of habitat - The planned area of for the Freeport is home to a diverse selection of flora and fauna including Buzzard, Sparrowhawk, Blackcap, Whitethroat, Goldfinch, Pheasant, Partridge, Muntjac, Pygmy Shrew, Fox, Badger, Mole, Rabbit, Hare, Gate Keeper Butterfly and many more besides. Building over this land would displace all of these.


In conclusion I object the planned Freeport to the west of Diseworth on the basis that it would have a detrimental affect on the conservation area of Diseworth due to increased noise, air and light pollution. Loss of green space and wildlife habitat. Increased flood risk. Unnecessary building when there are already unlet spaces. There are better locations for this that will have better access to roads and services. It seems to me that the local plan is riding roughshod over residents concerns because there is big money involved. Bringing businesses to a Freeport will by default take employment away from another region and will reduce tax collections due to the tax breaks being offered.



**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: 17/03/24

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	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Patricia	
Last Name	Guy	
Job Title (where relevant)	Trustee and Archivist	
Organisation (where relevant)	Diseworth Heritage Trust	
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
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Use this box to set out your response.

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

### **Policy IW1**

The proposed development of a new settlement at Isley Woodhouse, of both the size initially proposed, and of the final size envisaged, would prove disastrous for the existing historic village of Diseworth.

Diseworth was designated a conservation Village many years ago for very good reasons. The initial settlement dates back nearly 2000 years, as indicated by the finding of Roman coins on a site within the parish. The parish dates from Saxon times – its name is Saxon in origin and it was farmed on the Saxon open field system from before the 9<sup>th</sup> century CE. An early Danish presence is indicated by the naming of the village roads as 'Gates'. The village retains many mediaeval houses, a significant number of which are listed buildings, and the village 'footprint' has remained almost unchanged over the intervening centuries as new builds have taken place on the old plots as the older buildings decayed.

The proposed site would destroy an area of valuable, productive agricultural land at a time when climate change and changing world economic conditions demand that we will need to be far more able to grow our own food supplies. Flooding of lowland areas means that they will become unusable, and we destroy suitable upland areas at our peril. The area is also a haven for wildlife, including brown hares, birds of prey and threatened farmland birds such as linnets and yellow-hammers.

One of the major threats to the village is from increased frequency and levels of flooding from increased drainage into the Diseworth Brook and its tributaries. The present control measures are not adequate to prevent the flooding of many properties on far more occasions than was previously the case. Covering most of the catchment area of the Diseworth Brook with roads and

concrete can only exacerbate the problem, and render significant parts of the village uninhabitable UNLESS the most imaginative measures to control the flow of surface water into it are undertaken from the very start of any development.

As a Trustee of the Diseworth Heritage Trust I have an especial interest in this, as the Heritage Centre is situated beside the Diseworth Brook in the centre of the village. We lost our floor and underfloor heating system as a result of the flooding in 2019/2020 and had to replace them at considerable expense. We have several times since been very close to further incursions of flood water. The loss of this amenity to the village would be considerable. We have extensive collections of historical material concerning the village with nowhere else locally to house them. It would also mean a waste of considerable National Lottery money, plus investment in the project by a number of local industrial firms, and by both LCC and NWLDC over the years, in both training and more tangible assets.

Another most worrying aspect of the proposed development is the effect on traffic volumes locally and further afield. The concentration of so much more housing combined with further industrial developments locally will generate far more vehicle movements than the area can cope with. It is the hope, you say, that workers on the new industrial estates will live locally. This is highly unlikely, judging by recent experience. Local house prices are high and unaffordable for the types of employment likely to be on offer. Also, other people in the wider area looking for cheaper housing are likely to want to compete for what is newly available with the incoming workers, and there will never be enough.

**Only last year, an error in signposting resulted in a widespread local deadlock during 'Download'.**

The A453 will need major improvements BEFORE any of the proposed schemes are commenced. That will mean the destruction of even more miles of now very well-established hedgerows, together with the loss of habitats for local wildlife. Local Village roads are already much overused at peak times, and problems with parking, in Diseworth in particular, of tourists who are unwilling to pay local parking fees, and workers who are discouraged from parking on site at their workplaces, have been greatly exacerbated. What remaining bus services we have, now often find it difficult to get through the village.

Increased traffic volumes also mean increased pollution and a general reduction in the health of the environment in general – to both the inhabitants and the wildlife. The existing local health services are already overstretched and the lack of readily available appointments puts many vulnerable people at risk. Can you be sure that developers will tackle this particular problem?

Issues of sustainability, carbon reduction measures, and the aim of biodiversity net gain and a generally improved environment look totally unachievable given the scale of the plans.



EMP90, the Freeport site

The projected location of a Freeport site on the land immediately to the north-east of the village of Diseworth raises many similar problems to those from the projected new settlement of Isley Woodhouse on land to the immediate west and north-west of the village. The combination of the two developments within much the same time-frame means the destruction of Diseworth as a pleasant country location in which to live.

Together with all the recent developments around Castle Donington and those associated with East Midlands Airport and the adjacent Segro site it feels that far too much is being crammed into one small part of the County.

In particular, the road systems locally, in spite of recent improvements, will not be able to cope with the projected increase in traffic volume. Traffic density at peak times on the M1 is already so great that the slightest disruption causes, not just long delays there, but a state of gridlock on the local village roads over a much greater area, including Loughborough. The increase in traffic then causes increased safety issues for local schools and other institutions.

The increased pollution from all this extra traffic, and the stress will damage the health of both the local population and much of the indigenous wild life. The loss of biodiversity throughout the area will be considerable as large swathes of currently species-rich countryside will be destroyed, and many important wild species will be denied areas in which to feed and breed. In recent years we have compiled species lists of local species (of both plants, mammals, birds and insects) and have found the area to have a far more diverse range of wildlife than we at first supposed.

The loss of valuable and productive agricultural land at this time of world-wide climatic problems and uncertainties about the sustainability of food supplies, both here and abroad, should inform opinion about the wisdom of destroying such a resource.

The biggest problem of all, in Diseworth specifically, but extending far beyond that, is of the increased run-off of rainwater from such large areas of industrial area roofs, and from the concrete and roads on which they stand. Diseworth already suffers from the flooding of many **houses in its centre as a result of what is now relatively 'normal' rainfall as climate change** becomes an undeniable reality.

As both the Freeport site, and the projected Isley Woodhouse site BOTH drain into the same river, which runs through Diseworth and onto Long Whatton and from there into the Soar and on into the Trent – which has flooded so spectacularly further downstream in recent years – it is vital that consideration is given to some much wider mitigation of flood water throughout the whole course of the Trent and its tributaries when new large infrastructure projects are proposed.

The site of the proposed Freeport, on higher ground which slopes down towards the village of

Diseworth, means that, given the stated size, and height, of the units. The complex would totally dominate the village visually. The site comes very close to the village and even with landscaping would still overwhelm the nearest houses. The noise from the 24/7 operation of the site would make life in most of the village quite unbearable. Diseworth has, for many years, been a designated Conservation Village. Planning restrictions in the village have, for years, kept new buildings from dominating the existing structures. Putting a site such as is proposed so close to it now, would render quite pointless the past endeavours of the planners.

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.

■■■■ ■■■■■■■■■■

Date: 17.03.2024

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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	Neil	
Last Name	Curling	
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.

### The Whole New Local Plan:

We currently have a Local Plan which I understand to be 2011 - 2031 Adopted 16 Mar 2021. I understand that there is requirement to review the plan at least every 5 years. To review and propose updates to the Plan by 2024 makes a mockery of, and disrespects, the careful consideration put into the Current Plan and undermines the value of the proposed New Local Plan as I now expect planning has already started on the next version of the New Local Plan. So its not a Plan, but merely a state of the moment statement. I thus express my objection to the waste of spend incurred in overwriting the Current Plan with this unnecessarily early proposed New Plan. At least, any further progress of the New Plan should be stalled until the directives of our imminent next government are declared.

Our Current Local Plan designates the land around my home in Diseworth to be Agricultural Farmland. I stand by the Current Local Plan and believe the land should remain so, in accordance with the Current Local Plan, and in line with the content of the developing Neighbourhood Plan for Long Whatton & Diseworth. Our current Government are very clear that housing and employment development is supported where this has the support of the local community, and strongly favours redevelopment of brownfield rather than concreting currently active agricultural land supporting national security of food production, which is so important as highlighted by recent international troubles. To bully in a New Local Plan including the issues of Isley Woodhouse and Freeport in clear contradiction to local opinion is simply contrary to the repeated words of guidance and assurance of our Prime Minister.

### More specifically regarding Isley Woodhouse (IW1)

I am not currently understanding or accepting the need for this development at all. Our Current Local Plan makes reference (S1) to the future housing needs amounting to 9620 houses which were accommodated within plans for Coalville, Ashby de la Zouch and Castle Donington.



I note the Statement of common ground Housing and Employment 2022 lifted the assessment of housing demand to 12,348 by 2039.

The Current Local Plan (7.4) states that the developments at Coalville, Ashby de la Zouch and Castle Donington already actually provide for 12,553 properties.

So as recently as 2022 the plans for the number of houses needed in the area up to 2039 were already provided for. Thus I see no justification whatsoever for the Isley Woodhouse proposal.

I attended the recent consultation event in Diseworth Heritage Centre where it was declared by NWLDC delegates that the need for Isley Woodhouse arises out of NWLDC grabbing the opportunity to create incoming earning development from the challenge LCC faced in meeting the needs for housing in the city area. Not the words they used but clearly the unspoken advice!

I have read the Infrastructure Study Report which considered various sites for the opportunity. A more remote and seemingly more suitable site south of the A42 was dismissed seemingly simply on the basis that it would be more expensive to provide the infrastructure there. Diseworth and the land of Isley Walton is served by overhead electricity cables that fail in storms, cast iron water mains that fail with increasing frequency, and drainage through a brook that now floods damaging peoples homes with increasing frequency, at least once a year in recent years. The suggestion of Isley Woodhouse can only be all about money rather than appropriateness.

I have friends in Leicester area, who choose to live in Leicester area. They have massive family and cultural connections within Leicester and wouldn't dream of re-locating into the countryside. Any suggestion that challenges to meet Leicester housing needs with a new town on top of an ancient sustainable village 20 miles away is surely a social and cultural nonsense.

Not only do I not accept that there is a need for Isley Woodhouse, the proposal is in direct contradiction to our current Local Plan, (S3 5.26) which states "We want to maintain, and where possible enhance the environmental, economic and social value of the countryside".

For years there has been a Government advised "need" for HS2 to balance up the Country. Alas our Government has now declared the "need" wasn't actually a "need" and indeed our Prime Minister currently advises that it is better to spend the funds supporting local community in development that the local community supports. The "need" for Isley Woodhouse is surely equally false and the proposal should be dropped from any updated or new Local Plan.

If my objections above are not sufficient to persuade abandonment of the proposal I would ask that you consider my concerns over a couple of the inevitable impacts on Diseworth.

Flooding - As you are aware we now suffer frequent flooding in Diseworth (and Long Whatton and beyond) as the brook overflows, simply because its further discharge to the R. Soar is frustrated as that is also usually in a state of overflow at the same time. I have read the assessments regarding the benefits of attenuation infrastructure however I also read that the extent of infrastructure provided is governed by the finances available, and the timing usually follows the development rather than precedes it as indeed there is no justification to precede the development.



However it is commonly argued at later stages that there is no balance of finance available for such infrastructure. NWLDC delegates acknowledged at the consultation meeting in Diseworth Heritage Centre that flood attenuation measures, designed and promised, are not generally enforceable, and the space previously allocated for such is usually built upon with mid-development scheme changes. The process of creating the development will surely deteriorate the site porosity and if Isley Woodhouse proceeds in any manner then it is surely critical that flood attenuation measures are provided at the outset of the development.

Pollution - Diseworth sits at the bottom of the valley and suffers still air and frost hollow scenario. Thus pollution from the development works and the subsequent development will flow down into the hollow and impair the air we breath. The fields that currently surround Diseworth clean the air we breath and should not be developed in contravention of Current Local Plan (S3 5.26)

Biodiversity - The current fields, (worked to produce food security for our Country) are divided by several miles of long established mature hedgerow. No amount of new planting can match the bio-diversity of this nationally important resource.

A453 - The roads around the area simply cannot cope, in particular the A453. The junctions into Diseworth are known fatality spots as the junctions are at high and low points along the fast road. The speed limit has recently been reduced to 50mph reflecting the hazardous nature of the junctions, and the carriageway changes to near car-park at commuting times as traffic approaches the M1 junction. Highways seem not to have funds to invest in this area and thus adding perhaps 10,000 cars to the area and applying a modest fatality accident ratio seems to amount to callous disregard of the safety of those already living in and those introduced to the area.

I do not support, indeed I object, to the new town development, TW1

#### More specifically regarding Freeport development - EMP90

Diseworth is a small village, with conservation status, sat within an area where our current Local Plan says (S3 5.26) "We want to maintain, and where possible enhance the environmental, economic and social value of the countryside". To concrete over the food producing fields can only be considered a complete contravention of the current Local Plan and I must object strongly to this proposed change of use of the land.

Especially when there are alternatives readily available.

There is currently over 1,000,000 sqr ft of Office, Workshop, Warehouse facilities available for rent/lease within 1 mile of the proposed plot. There is endless development of such buildings progressing along the A453 corridor towards Nottingham, available for rent/lease. These areas are served by excellent existing roads, and tram lines from Nottingham. Hundreds of hectares of unused surrounding land beyond the power station could be used the flood risk simply being alleviated by elevated construction from a platform above flood level.



The proposed land sits on elevated land over Diseworth. The inevitable massive structures expected, akin to those of SEGRO at East Midlands Gateway, would tower over the conservation status village and destroy the rural atmosphere, making it become hidden housing area on the edge of a logistics park.

As pointed out in my concerns regarding IW1 the A453 already becomes completely jammed at commuting times. Junctions 23A/24 of the M1 are notorious accident areas and the adding of such traffic to the area seems reckless with regard to the lives/deaths/well-being of those in the area and friends/relations thereof.

Irrespective of the major roads and junctions, Diseworth has narrow twisting lanes - even the main routes through the village are merely narrow twisting lanes. The infant/junior school is on the main route through the village, with 20 mph temporary restrictions at school times, a very tricky situation well respected by villagers. Anything that adds commercial or commuter traffic through the area has to be very carefully considered - I suggest rejected.

The development land adjoins the residential edges of Diseworth, including my home near the top of Clements Gate. The lie of the land is elevated above my home and thus any structure there will be imposing/dominating over my home. It will destroy sunrise for myself and practically all in the village. Sunrise is such an important feature for mental well-being it must not be obscured by any commercial development. One option would of course be to cut the site to at least the height of the development - such may reduce the interference and light, noise, pollution of the development upon the village but the carbon footprint of such massive earthworks could surely be considered criminal damage with regard to climate!


I am extremely concerned regarding the inevitable light and noise pollution, especially those reversing beepers - any promise, restriction or undertaking to use 'banksmen' in lieu of bleeper will surely be abandoned as simply uneconomic. Screening trees around the development deliver little sound and light mitigation and will surely likewise fall foul of lack of maintenance within a few years.

My objection is not about Freeport, but simply the suggestion it should be on this plot when other premises already exist, and less valuable and less intrusive land with enhanced access is readily available within 1 mile.

This is not the appropriate plot and I object to EMP90 being included in the unnecessary New Local Plan 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 publicly available and may be identifiable to my name. I acknowledge that I have read and accept the information and terms specified under the Data Protection and Freedom of Information Statement.

Signed:

Date:





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	Personal Details	Agent's Details (if applicable)
Title	MRS	
First Name	SALLY ANNE	
Last Name	PRICE	
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)

(POLICY LW1)

THE INCREASE OF ACRES OF CONCRETE  
WILL ADD TO FLOODING THREAT

IS THERE A NEED FOR SUCH A LARGE  
DEVELOPMENT? WHERE ARE THE

RESIDENTS GOING TO FIND WORK?

WILL THEY BE "AFFORDABLE" HOUSES?

AFFORDABLE FOR WHOM?



(EMP90)

DISEWORTH IS IN A VALLEY. EXTRA  
CONCRETE WILL RESULT IN MORE  
RUN OFF INCREASING FLOODING IN  
DISEWORTH

BIODIVERSITY WILL AGAIN BE

BADLY HIT.

AIR, NOISE & LIGHT POLLUTION WILL  
BE GREATLY INCREASED IN A RURAL  
VILLAGE ALREADY LIVING WITH AN  
EXPANDING AIRPORT AND A RACE  
TRACK.

I THEREFORE CONCLUDE THAT  
THIS SITE IS TOTALLY UNSUITABLE  
FOR THE PROPOSED 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:

2-03-2024

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



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

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	✓	Proposed housing and employment allocations
		Proposed Limits to Development Review

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Use this box to set out your response.

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

The policy I am commenting on is EMP90. Having lived in the village for forty years, I am not against change and, indeed have seen much over these years. However, I do sincerely believe this is not in the correct place. Being so close to an already busy airport with not just traffic, but also spillover car parks; Doseworth, which is a very small village, down in a dell, which the airport is already a part of helping to give constant floods throughout the year, not just at 'bad weather' times. Also the racetrack is a stones throw away; the build up of track days not helping current traffic flow.

Indeed at this site, we recently could not cope with the Downhead traffic. This caused mayhem just four days of the year. What would traffic flow be like on a day to day basis?

The infrastructure cannot take the amount of change you are proposing. Even new infrastructure



①

Would not be possible to sort this problem. Why? Because quite simply we do not have enough road and land area to be able to cope with what your proposals show. There is one straight road from the airport through to Loughborough. How can you make this into a new infrastructure unless you demolish houses to do so. You actually want to BUILD MORE.

The Freeport you propose is preposterous. You are not only taking 7.5 miles of hedgerows as a minimum. Ancient hedges. They have been there for hundreds of years. People need to sit and think about this for a minute. It's not just the hedges or the fields. Goodness knows, that should be enough but what is in those fields and hedges that no-one is thinking about. Foxes, rabbits, badgers, right down to butterflies, ants and the like. If you start to move the whole of nature, you are taking huge steps to change nature altogether, maybe even not having any.

We already have air pollution being changed from the airport putting new, stronger, intrusive lights up. Instead of helping the planet, we are now putting lights up that shine into the village windows and disturb sleep.

What will happen when you decide to put warehousing just one field away from current housing. Night security lights will fill the sky. This will be the only things full though as we are already surrounded by warehouses that have sat empty for more than five years. What benefit will it be to give a small village more empty concrete blocks, destroying land that we will never be able to get back again.



The litter from the current warehouses on the airport SEARD will then become Diseworths problem as where they will be situated is on 'top' land. The wind up there is constant. The rubbish will be blown over the remaining fields, killing animals that remain.

When they decided to 'drill' in every field a year ago, the countryside could see a flock of wildlife racing desperately from one side to another, terrified.

The bats we used to have (which I thought were endangered) are no more. The Badgers have gone. The Owls (three of them) are no more.

Just doing preparation to put this proposal in has caused widespread terror and havoc.

For a country that is so concerned with saving the planet, you are doing a fantastic job of destroying it.

The planting of trees is fundamental to keeping our world. Diseworth will be losing 750 acres. **750 ACRES**. How many trees is that. How much carbon.

Instead you want to bring the biggest vehicles possible and fit them into a shoe box.

Even now, with this proposal, my mental health has taken a sharp downturn.

I moved to a village for a reason.

I wanted to live in the countryside with nature all around me.

If I had wanted to live on a building site I would have done.

I implore you not to destroy our lives and our village.

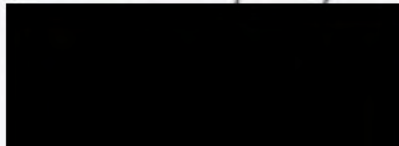


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Signed:



Date:

2/3/2024

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



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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.

Use this box to set out your response.

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

IWI ✓  
 These are my concerns:  
 House to be built, why so many in one place?  
 To close to Desborough.  
 Diseworth won't be a village  
 Any more: Coping with large increase in traffic.

You must not ruin our  
Village!

~~BMP~~ EMP-1490.

Ware Houses belong in city  
NOT DISEWORTH

The entire village and  
surroundings of a lovely village  
There are many other places  
to put Ware Houses. This should  
not be allowed!!

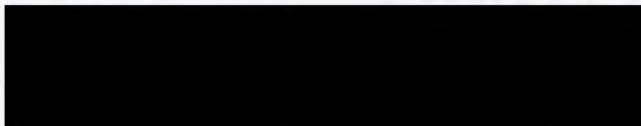


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I acknowledge that I have read and accept the information and terms specified under the Data Protection and Freedom of Information Statement.

Signed:



Date:

2<sup>nd</sup> 3<sup>rd</sup> 22-24  
00.

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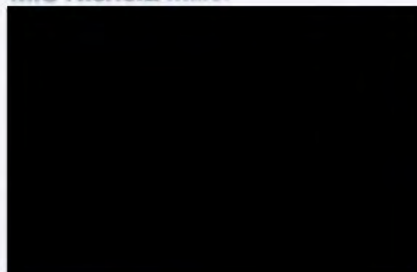
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## Local Plan North West Leicestershire

Mrs Nichola Miller



### Policy IW1

- The proposed site of the Isley Woodhouse new town would completely change the area's nature. The productive agricultural landscape sprinkled with small villages, hamlets, farms, and miles and miles of ancient hedgerows would become overcome by new housing and traffic. In these horrifyingly unstable times, we need all the fertile fields and farms to sustain our food production.
- The Plan is misleading in that it suggests around 640 houses will be built without making it clear from the start that there will be up to 5,000 houses and units by 2040, this is unacceptable.
- Diseworth is a small close-knit community. People who live here (and many families have been here for generations) chose to do so because they did not want to live in a town's hustle bustle and segregated lifestyle. Your plans take away this choice of lifestyle.
- Diseworth sits in a valley. Isley Woodhouse would concrete over acres of land that absorbs the rainfall and mitigates the level of flooding that the housing development would cause, as the water runs down the slopes. I note that the surveys have given it a Level 1 flood risk, which will be true for the new housing NOT FOR DISEWORTH.
- I spoke to a Planning Committee member who tried to assure me that builders have to, by law, put in strategies to deal with water runoff and said there would be holding tanks to release water into Diseworth Brook when appropriate. This is horrifying. EMA already do this from their runway runoff holding ponds. After flooding Diseworth and Long Whatton on several occasions they now have people monitoring the river in the village and keep phone contact as the water is released, telling the person on the other end when to open and shut the sluices. So this is going to be funded by the builders or county council for perpetuity in the case of the New Town and SEGRO?
- The destruction of the woods, old established trees, hedgerows and fields will have a devastating effect on the wildlife. The 1,000 new houses and the



warehousing developments around Castle Donington have already forced badgers and foxes out of their homes and into gardens and even the church graveyard in a desperate effort to find food or onto the roads where they are killed by traffic. We are constantly hearing about the loss of our native flora and fauna. I quote "North West Leicestershire recognises that it has a role to protect and support action on biodiversity in order to improve local environments." (From the District Council's website, under "Biodiversity"). You are certainly not meeting this statement with the New Town and SEGRO/MOTO/EMA developments.

- The road infrastructure struggles when there is an accident or delay on the M1 around Junctions 23, 23a and 24. All the roads around EMA airport come to standstill. Traffic jams can last for hours, as people try to circumnavigate the blockage. Every day, when people leave work for home there is a traffic jam from J23a to the Donington racetrack traffic lights. Add 10,000 more cars from the New Town and it will be impossible.
- With the added fumes from these vehicles plus the pollution from the airport, the noise of the aeroplanes night and day, the lorries loading and unloading from the Freeport warehouses and the light pollution, it will become intolerable to live in our village.
- Diseworth is a village judged by previous bodies to be worth conserving. There are many listed properties and over half the village is designated a conservation area. The community spirit, the care for neighbours and the huge array of activities that happen within our village make it an outstanding place to live. The Conservation area is strictly governed by rules about how we can modernise and upgrade our ancient, historical buildings, always in keeping with their old looks and building methods. The whole village has a building boundary and new builds and extensions must not extend from this. The Local Plan just rides rough shod over this. Towering modern warehouses and thousands of modern, double glazed, insulated houses can be built abutting our beautiful time capsule of a village.
- My mental health is being affected by the Local Plan, suddenly we are being attacked on all sides at the same time, it appears to be on purpose so that we are overpowered by the schemes. I love the countryside and the outstanding beauty of the area, I cannot bear the desecration that the developments will bring.

#### **Freeport Development EMP90**

- What kind of country have we become that our government can dictate over local democracy? That they can look at a map and say: The Freeport goes on that land. No argument, it's got a red line drawn round it, we can rubber stamp it with no local say to the plans. That tiny village of Diseworth means nothing to us compared to the money we see shining from the project.



- The fields have been farmed by conquering Romans, the Viking settlers, the Saxons who built our church and through generations of farmers and small holders through the ages. The farm field tracks gave access to these small holders to their strip farms and still exist today. Long Holden leads off from the end of Clements Gate and Hyams Lane from Grimes Gate. They are dearly loved by Diseworth folks, used every day for dog walking, horse riding, bird spotting and exercise. Ancient hedges of hawthorn, black thorn, wild roses and more line the mud lane. There is no danger from traffic and children can run and play freely. **This is what the warehouses will be built over, England's inheritance.**
- At the moment the small barrier of fields surrounding the village are our green lungs. Half a mile from the busiest commercial distribution airport in the country and the only one allowed (for some reason) to work 24/7, and close to the busy M1/A42 interchange as well as the massive SEGRO warehouse development with it's huge freight train terminal and thousands of container lorries, we desperately need this partition for our health and sanity.
- Why more warehouses? Why put them on green fields? Put them on the Ratcliffe power station site when it's demolished in the near future. I cannot understand the thinking. Once our fields are concreted over they are gone for bad.
- Again, as with the New Town, the concreting over by warehouses will cause catastrophic flooding in Diseworth.
- The visual impact will be completely overwhelming. No amount of bunding will disguise the ugly 40 foot buildings as they march up the hill towering over us.
- The noise, light and pollution caused by the site will go on 24 hours a day. Would you want it in your back garden? It's going to be up to my son's garden fence, he lives in Langley Close.
- Please, please listen to us.

#### 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 by 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.



5.03.2024

**Local Plan North West Leicestershire**

Mr Peter Miller



**IW1**

Diseworth is currently a small conservation area and the proposed development is too close to Diseworth. It would swamp it, affecting both the quality of life and changing the character of the lovely village.

The development is also too close to the airport and race track. combined with the Segro development, both will be too large and intrusive.

There are already considerable flooding issues in the village and this has the potential to significantly affect the number of houses at risk.

I will destroy productive agricultural land and miles of ancient hedgerows and the character of the area negatively.

The increase in air, noise, and light pollution in the village during and after development will be considerable and devastating.

Litter which is already considerable due to moto services and laybys will only increase creating more of a blot on the landscape.

The health and well-being of everyone in the village will be considerably affected as much by the stress of developing the area as the outcome.

Can you please explain how the national biodiversity net gain will be achieved when agricultural land and ancient hedgerows are destroyed?

It seems very much that NWLDC have put all the housing needs in one place, this will be very inconvenient for both those who choose to live there and for those close by,

I do not understand why these developments are happening or why they are so big, sandwiching Diseworth out of existence.

The conservation status of the village will struggle to be maintained.

I do not support this development at all.

**EMP 90**

I have very major concerns over are village status it seems it will become part of a logistics park.

It is proposed to be built on a slope that leads to the village.

This means there will be a substantial increase in noise traffic, and light pollution significantly affect the quality of life throughout the village.

I do not support the process if a free port is imposed.

The risk of flooding an already struggling system is considerable, all fish life if Diseworth Brook has been destroyed.



Biodiversity is rich in the landscape and EMA and Segro will see it destroyed. It is not possible to offset the loss 100%.

I do not accept that the development can be mitigated and the pollution will cause noise, light, and air quality and will significantly damage the quality of rural life in the village and negatively affect my mental health.

**Declaration**

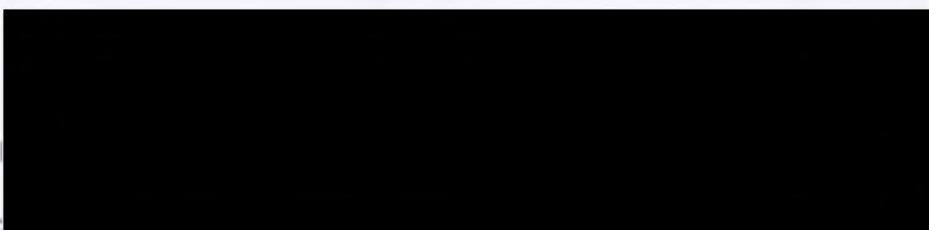
I understand that all representation submitted will be considered in line with this consultation and that my comments will be made publicly available and may be identifiable to my name.

I acknowledge that I have read and accept the information and terms specified under the data protection and freedom of information statement,

Yours Sincerely

Peter Mill

2nd March 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	ELIZABETH	
Last Name	JARRON	
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 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 responding to the new housing settlement at Isley Woodhouse (Policy IW1). It's in totally the wrong area, next to East Midlands Airport and Donington Park. Its edge is only 2 fields away from Diseworth a rural, conservation village, which is threatened with Freeport development too. This development removes 750 acres of agricultural land, when climate change and war in the world, makes producing our own food more critical than ever, to avoid food shortages. 7.5 miles of ancient hedgerow will be destroyed, a massive loss of biodiversity. Water run off from the development will run into the local brooks and increase the risk of flooding in Diseworth and Long Whatton. Properties will be flooded with dishes to get rid of rodents. Diseworth will see an increase in light pollution, more noise and air pollution from the additional traffic from the housing, and cars will use our roads as shortcuts in busy times, increasing litter and danger to pedestrians. I feel that this is inconsiderate and bad planning to lump most of the housing needs of NWLBC, in one place, on a green field site right next to Diseworth. The roads around here get gridlocked easily and the infrastructure doesn't cope now. Who will pay for improvements to roads? Highways councils? Roads don't get funded now due to lack of money. So, I do not support nor wish to see come to pass, the new town development at Isley Woodhouse (Policy IW1)



I am responding to the Potential location for the Freeport development (EMP90). This proposed industrial development, a massive 300 acres, will be in full sight of Doreworth residents. No barriers will screen it from sight, and we will suffer noise, light and air pollution 24/7 365 days of the year. The site is on a slope, and no amount of ponds or drainage systems will contain the runoff water. It will end up quickly in our brook, causing flooding to homes + businesses in low lying areas of the village. The site is agricultural land, producing essential food for our country, at a time when it's important to be producing more food, not less for our country, and its people. Traffic will increase if this development does get built. The local roads can't cope, so queues will build up and cars will use our village roads for short cuts. This will bring added danger to our school children, increase litter and noise. Loss of this green space to the east of Doreworth will mean we lose rural village status, and become an appendage to an industrial development. Night noise will affect my sleep and my mental health will be compromised. It's quite undemocratic for our government to force us to have this industrial development on our door step, due to the imposition of Freeport status on this land. Finally, the Local Plan states this. "We do consider that the potential impact on Doreworth, 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 considering this land for this purpose when you know that doing this is not acceptable. Please don't use this land for this purpose.

Therefore, I am only 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: 2/3/2024

#### DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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	Personal Details	Agent's Details (if applicable)
Title	MR	
First Name		
Last Name	WILLIAM	
Job Title (where relevant)	JARROM	
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 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)

THIS IS MY RESPONSE TO HOUSING SETTLEMENT AT ISLEY WOODHOUSE (POLICY IW1)

IT'S MADNESS TO PUT THIS NEW DEVELOPMENT RIGHT NEXT TO EAST MIDLANDS AIRPORT AND DONINGTON RACE TRACK, WHICH ARE BOTH NOISY AND BUSY. IT'S ALSO TOO CLOSE TO DISEWORTH, WITH JUST 2 FIELDS BETWEEN IT AND DISEWORTH, A RURAL CONSERVATION VILLAGE. THIS DEVELOPMENT WILL ADD TO THE EXISTING NOISE POLLUTION WE SUFFER ALREADY. IT'S ALSO RIDICULOUS TO BUILD NEARLY ALL OF NORTH WEST LEICESTERSHIRE DISTRICT COUNCILS HOUSING NEED IN ONE PLACE, ON DISEWORTH'S DOORSTEP. ROADS AROUND DISEWORTH ARE BUSY NOW, AND DURING EVENTS LOCALLY, OR FOLLOWING ACCIDENTS ON THE M1 OR A42, GRIDLOCK FOLLOWS. TRAFFIC USES THE VILLAGE AS A RAT RUN, SPEEDING AND LITTERING INCREASE, CAUSING POTENTIAL DANGER AND INCONVENIENCE TO DISEWORTH RESIDENTS. WE ARE UNDER THREAT OF A FREEPORT INDUSTRIAL DEVELOPMENT THE OTHER SIDE OF THE VILLAGE. 2 DEVELOPMENTS AT THE SAME TIME IS FAR TOO MUCH AND THREATENS OUR VILLAGE

STATUS AND RURAL WAY OF LIFE. AND WHAT ABOUT FLOODING THIS DEVELOPMENT WILL ADD TO WATER RUN OFF AND INCREASE FLOODING RISK TO DISEWORTH AND LONG WHATTON, BY OVER FLOWING OUR BROOKS. THIS DEVELOPMENT WILL DESTROY 7.5 MILES OF ACHMENT HEDGE ROW AND 750 ACRES OF FARMLAND. HOW SHORT SIGHTED TO PERMANENTLY REMOVE THIS LAND FROM FOOD PRODUCTION AT A TIME WHEN GLOBAL UNREST AND CLIMATE CHANGE INCREASES THE RISK OF FOOD SHORTAGES IN THE UK, DUE TO CROP FAILURES. FOOD DEMAND WILL INCREASE AND SUPPLY DECREASE DUE TO LOSS OF VALUABLE LAND SUCH AS THIS.

SO FOR THESE REASONS, I DO NOT SUPPORT THE NEW TOWN DEVELOPMENT OF ISLEY WOODHOUSE (POLICY IW1)



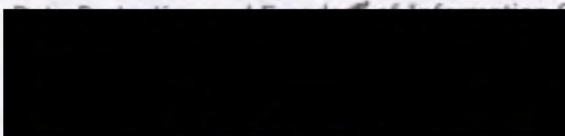
THIS IS MY RESPONSE TO FREEPORT DEVELOPMENT (EMPAQO)  
THIS INDUSTRIAL DEVELOPMENT, TO THE EAST OF DISEWORTH, IS NOT ONLY SITED INCORRECTLY, DUE TO THE SLOPING NATURE OF THE LAND, BUT IT WILL BE AN EYESORE LOOMING OVER DISEWORTH AND LONG WHATTON. NO AMOUNT OF SCREENING/BUFFERING WILL PREVENT A LARGE PORTION OF RESIDENTS SEEING IT. BOTH VILLAGES WILL SUFFER INCREASED AIR/NOISE AND LIGHT POLLUTION. MY SLEEP MAY BE DISTURBED WHICH COULD DAMAGE MY MENTAL HEALTH. IF DISEWORTH IS FORCED TO SIT RIGHT NEXT TO THIS INDUSTRIAL AND LOGISTICAL SITE, HOW CAN IT RETAIN ITS CONSERVATION AND RURAL STATUS, WITH HUGE INDUSTRIAL BUILDINGS BLIGHTING ITS BEAUTY AND SURROUNDING ITS EASTERN EDGE WITH UGLINESS. A LARGE GREEN SPACE WILL BE LOST NEXT TO OUR VILLAGE, ALONG WITH ITS WILDLIFE AND WILDLANTS THAT BREATHE FOR US, ABSORBING CARBON DIOXIDE AND GIVING OUT OXYGEN. ANOTHER CONTRIBUTOR TO CLIMATE CHANGE. VALUABLE AGRICULTURAL LAND NEEDED FOR FOOD PRODUCTION WILL BE LOST FOREVER IF THIS DEVELOPMENT GOES AHEAD. HOW FOOLISH TO NOT CONSIDER THE IMPLICATIONS OF THIS LOSS OF AGRICULTURAL LAND, RELATIVE TO FOOD SECURITY FOR OUR COUNTRY AT A TIME WHEN FOOD IS BECOMING SHORT WORLDWIDE DUE TO WAR AND GLOBAL WARMING. WHERE WILL ALL THE SURFACE WATER ON THE DEVELOPMENT GO? FIELDS SOAK UP WATER BUT CONCRETE JUST CREATES RIVERS OF RUNOFF WATER WHICH WILL FLOW DOWN TO OUR BROOKS THAT PASS THROUGH BOTH DISEWORTH AND LONG WHATTON. AS A RESULT, THEY WILL FLOOD WORSE AND MORE OFTEN, DAMAGING HOMES AND BUSINESSES, CAUSING DISTRESS AND FINANCIAL PROBLEMS TO RESIDENTS. WHAT ABOUT THE EXTRA TRAFFIC MOVEMENTS? WHO WILL LOOK AT THAT AND MONITOR IT? THEN, WHO WILL PAY FOR THE INEVITABLE NEED FOR IMPROVEMENTS TO ROAD INFRASTRUCTURE? BOTH COUNCILS AND GOVERNMENT ARE LACKING IN FUNDS SO WHERE WILL THIS MONEY COME FROM? SAFETY OF THE SCHOOL CHILDREN, PEDESTRIANS AND CYCLISTS WILL BE COMPROMISED IF TRAFFIC TRAVELLING TO AND FROM THIS DEVELOPMENT USES DISEWORTH STREETS AS SHORTCUTS. IT'S A HIGHLY UNDEMOCRATIC MOVE BY THE GOVERNMENT, TO FORCE THIS DEVELOPMENT OF THE LAND BY SEGRIO AND/OR EAST MIDLANDS AIRPORT DUE TO THE INCONSIDERATE DESIGNATION OF FREEPORT STATUS ON THIS LAND, EAST OF DISEWORTH. FINALLY, THE LOCAL PLAN STATES "WE DO CONSIDER THAT THE POTENTIAL IMPACTS ON DISEWORTH, PARTICULARLY IN TERMS OF THE DESIGNATED FREEPORT LAND IMPACTING HERITAGE, LANDSCAPE AND AMENITY, ARE LIKELY UNACCEPTABLE BASED ON ITS CURRENT EXTENT." IF THIS IS TRUE, WHY ARE YOU GOING AGAINST IT AND INCLUDING THIS LAND IN THE FREEPORT ZONE WHEN YOU SAY IT'S UNACCEPTABLE TO INCLUDE IT? SO, PLEASE DO NOT INCLUDE THIS LAND IN THE FREEPORT

THEREFORE I AM ASKING THAT NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL DO NOT INCLUDE THE EMPAQO SITE AS A POTENTIAL DEVELOPMENT IN THE LOCAL PLAN



### 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  statement.

Date: 5/3/2024

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Title	MR.	
First Name	Clement	
Last Name	Craft	
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.

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	✓	Proposed housing and employment allocations
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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.

Use this box to set out your response.

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

- (Policy 1W1)
- Wrong place
  - Destroy nature around village
  - Flooding is a issue already
  - More noise
  - More pollution
  - Diseworth is a conservation village
  - Health and well being to those in the area
  - light & Noise pollution.

- Therefore I do not support the new town Development of Isley Woodhouse (Policy 1W1)

## (EMP90)

- Wrong site on a slope that leads to Villiage
  - Current Road systems cannot cope
  - Loss of Village Status
  - light & Noise pollution.
  - My Mental health will suffer
  - Flooding will increase
  - 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.

Signature: 

Date:

11.3.2024

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	Personal Details	Agent's Details (if applicable)
Title	MR	
First Name		
Last Name	LOUIS CROFT	
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)

Policy IW1

Likely to add more flooding to diseworth  
 Wrong Place as in too close to diseworth,  
 the airport and Race track  
 Increase in noise, light and air pollution  
 Because of the development  
 Therefore I do not support the  
 new town development at Isley  
 Woodhouse (Policy IW1)

## Policy EMP90

Loss of Conservation Village Status

Wrong ~~State~~ site, on slope to village

Diseworth School Safety issues  
With increased traffic

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 designated Freeport land" so considering level you know is unacceptable

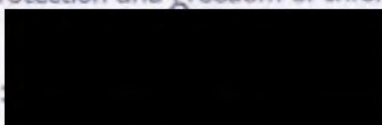
Therefore I am asking not to include the EMP90 site for potential development.



## 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: 11/03/24

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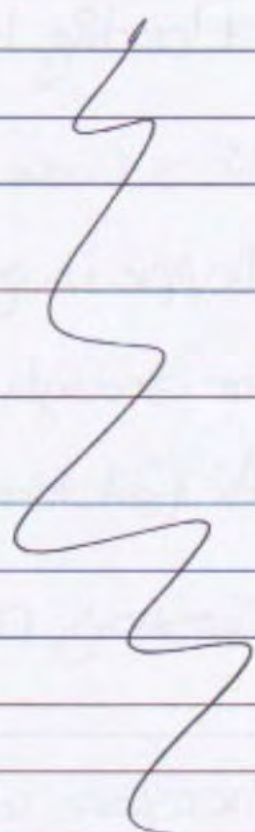
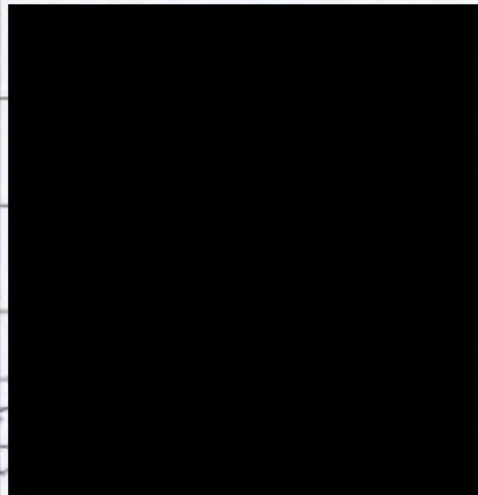

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	Personal Details	Agent's Details (if applicable)	
Title	MR		
First Name	Travis		
Last Name	Craft		
Job Title (where relevant)			
Organisation (where relevant)			
House/Property Number or Name			
Street			
Town/Village			
Postcode			
Telephone			
Email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



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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)

Policy 1W1

- Flooding Issues in Diseworth
- Air & Noise Pollution
- Traffic is going to be bad.
- Not enough schools
- Air Pollution
- Destroy fields & hedges, & wildlife

• Therefore I do not support the new town development of Isley Woodhouse (Policy 1W1)

(EMP90)

- Wrong site
- loss of village status.
- Current Roads cannot cope.
- My Mental health.
- We do not agree with development. eg:  
Air, Noise, light pollution.
- Green lungs of village destroyed.
- 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.

Signe

Date: 11.3.2024.

### DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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Planning Policy Team, NWLDC, PO Box 11051, Coalville LE67 0FW

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



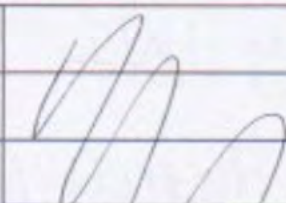
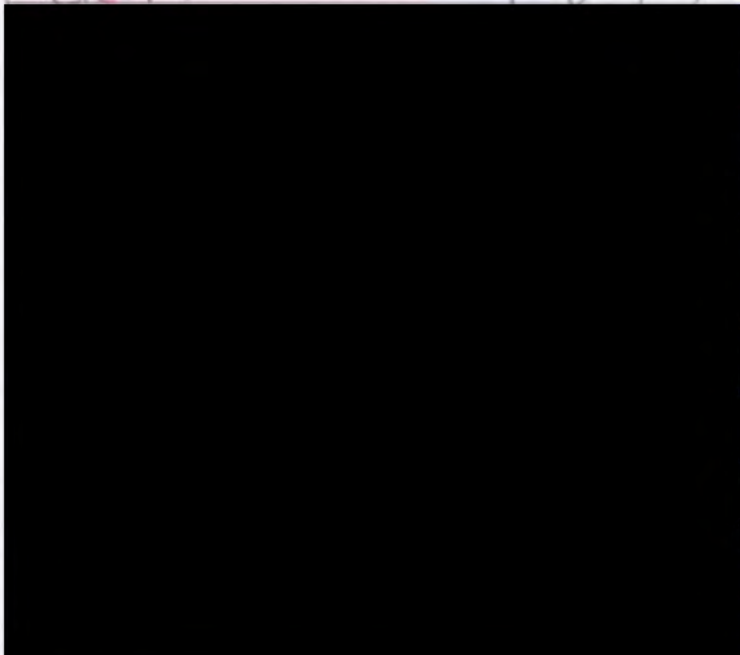
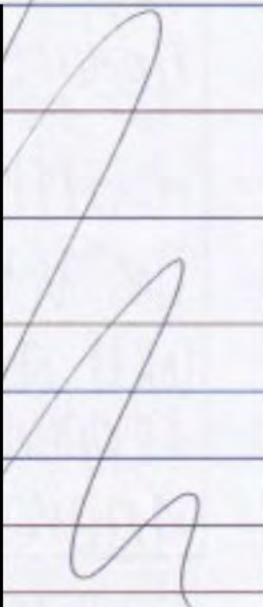
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Please complete both Part A and Part B.

### PART A – Personal Details

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	Personal Details	Agent's Details (if applicable)
Title	MRS	
First Name	TRACY	
Last Name	CROFT	
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

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Use this box to set out your response.

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

Policy IW1

Will destroy Acres of land and Ancient Medges & wildlife will be invaded.

Health & wellbeing of other residents in The Village.

Will add to the flooding issues already happening in Diseworth.

Therefore I DO NOT support the development of Isley Woodhouse.

policy EMP90.

The air quality will be impacted.  
aswell as noise & light pollution.

loss of conservation and no longer  
be classed as a rural village.

Roads cannot cope with the  
increase on the infrastructure.


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.

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Signed: 

Date:

11/3/24

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	Personal Details	Agent's Details (if applicable)
Title	MRS	
First Name	SARAH	
Last Name	GASCOIGNE	
Job Title (where relevant)		
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
	✓	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 comments below refer to Policy IW1

Diseworth is a small, working farm, village of heritage, with a beautiful landscape, a rural setting full of wildlife, green spaces,

To build a new town, a development of such size, in the location proposed - adjacent to Diseworth, would be catastrophic in its impact of Diseworth village.

Images provided with the plans show there is no separation from Diseworth and the proposed new town. This huge development would completely overwhelm Diseworth, destroy its rural setting, landscapes, Diseworth would no longer be a stand alone, small heritage village - this is unconceivable, and unethical - it goes against new development policies considering environment and health. The landscape, integrity of the village, its countryside would be irreversibly destroyed, for the current residents of Diseworth, and its legacy for future generations.

## Continuation 3a.

### Draft North West Leicestershire Local Plan 2020-2040 Consultation (February-March 2024)

As a result of regular congestion on our surrounding main roads, Diseworth is impacted by increased traffic, using the village as a cut through, or diversion, to avoid roadworks, queues, congestion. This affects the safety of residents in the village, our small school and its pupils, noise and air pollution, and a noticeable increase in litter.

A town, and Freeport, in the locations proposed would without any doubt, further increase traffic and pollution to Diseworth.

The Policy IW1 contains the following statements -

- This could erode its legibility as a stand alone historic settlement within its rural context.
- Landscape impacts: the scale of the proposed development would result in harmful impacts which would detract from the rural setting of Diseworth.
- Impacts on the amenity of nearby residential properties
- 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.
- Impacts on Diseworth Conservation Area, particularly if development was to come up to the edge of the village to correspond with the Freeport designation. This could erode its legibility as a stand alone historical settlement within its rural context.
- The traffic generated by these two sites, together with the Potential Location for Strategic Distribution to the east of Diseworth and south of the airport (emP90, the Freeport site) would have a significant impact upon the local and strategic road network.

The above statements from the policy and my responses, the impact it would have on Diseworth, the proposed new housing development, and its location, are unacceptable, and therefore I do not support the new town development of Isley Woodhouse (Policy IW1).



My responses below refer to Policy EMP90 The Potential location for the Freeport development.

The location, size and scale, of this proposed development would have a catastrophic impact on the village of Diseworth.

Diseworth is a small, working farm, heritage village with Conservation Status. We are surrounded by beautiful green landscapes, abundant with wildlife, promoting health and well being for the residents of Diseworth, mental health, a safe close community, active in preserving our countryside and its inhabitants, our environment, a village we chose to live in, for our children to grow up in, for all of these reasons, a village we love.

The development of a Freeport, in the proposed location, would absolutely change this, the effects would be unacceptable, unjustified, and the impact on Diseworth would be devastating.

The Plan states -

- (3) If the site is allocated, matters that will need to be addressed include:  
(c) There being no harmful impact upon Diseworth Conservation Area or its setting.

In the current proposed location, Diseworth would be a village dwarfed and overwhelmed by such a vast development built right next to us.

The images provided, alone show, in no uncertain terms, the sheer size of the development, in comparison to Diseworth, in such close proximity.

The Plan states -

- (h) A satisfactory design and layout which takes account of site's sensitive location, both its landscape terms and its adjacency to Diseworth Conservation Area.

A proposed location, that has been acknowledged as a site that is sensitive, its impact to landscape, to it being adjacent to Diseworth Conservation village, is not a suitable location and is unacceptable.

The Freeport development, being adjacent to Diseworth would have a serious impact and substantive increase in pollution - noise, light, air. With East Midlands Airport and Donington race track close by, the surrounding main roads, motorway and motorway junctions already have high levels of traffic and are regularly congested.

These roads are regularly affected by closures, diversions, delays, and sheer high levels of traffic, often creating congestion backing up to the entrance/exit roads into Diseworth. This already impacts Diseworth, motorists using the village as a cut through, creating an increase in volume of traffic, inconsiderate driving, making our village roads less safe, and there has been more and more, a noticeable increase in litter.

The Freeport, located adjacent to Diseworth, would create a vast increase in traffic, noise, light and air pollution which would impact Diseworth severely.



The Plan states-

- d) The provision of an appropriate landscaping scheme which includes both extensive boundary treatment and also internal planting, so as to minimise the impact of development on the wider landscape and the setting of Diseworth.

It is quite clear ~~for~~ from the plans, the sheer scale of the Freeport, in such close proximity to Diseworth, peoples homes, no amount of landscaping is going to minimise the impact it would have on Diseworth and its landscape. There is no appropriate landscaping scheme that will minimise the natural landscape around us, eradicate the levels of light, noise, pollution the Freeport, operating 24/7 would create. These would be constant impacts, affecting day to day life, well being, health, mental health, peoples homes, for the rest of their lives, which is unjustified and unacceptable.

The proposed site would also involve the destruction of a vast area, 250 acres, of agricultural land, established hedgerows, trees and green spaces. This will affect the abundance of wildlife we have, displaced or destroyed, irreversibly lost, and affecting the environment and countryside.

This does not represent the achievement of biodiversity, it has a devastating negative impact on biodiversity.

This land and its location is not suitable, and would be unacceptable to develop.

The levels of flooding in Diseworth has noticeably increased over the last few years. Due to increased severity, Diseworth now has a volunteer Flood Committee. Roads in the village, entrance, exit roads have been unpassable and flood damaged resulting in roadworks and diversions. Houses, premises have been flooded, damaged, even walls falling down. East Midlands Airport have a future court hearing in relation to water pollution, including Diseworth brook - affecting our existing farms and animals.

To destroy 250 acres of agricultural land and replace it with concrete would ~~severely~~ severely impact and increase flooding within Diseworth.

All of the above impacts on Diseworth, should a Freeport be built in this location, show the catastrophic, devastating effect it would have on the village, and peoples lives, and therefore such proposal is unjustified, unacceptable.

This site, EMP 90 should not be included as a site for potential development.



The location of the new housing settlement would have a serious effect on Diseworth residents - their lives, their home, well being, mental health, and the community we love.

The current proposal would involve the destruction of 780 acres of farmland, established hedgerows, having an unbelievable impact, displacement, destroying the wealth of wildlife, the environment, detrimental to biodiversity. Such huge reduction of green spaces, nature, will impact peoples health and well being and quality of life.

Diseworth has been affected, significantly more, in the last few years, with flooding. We now have a Flood Committee in place as a result, due to the seriousness and impact of flooding in the village. The brook, roads, homes have recently been subject to more extreme flooding than ever.

The destruction of farmland, on such a massive scale, being replaced with a development of such size, would increase flooding as a result. This would create more damage to our homes and roads, disruption, affecting the safety and well being of residents. Diseworth brook would not be able to cope. East Midlands Airport are currently facing a court case for water pollution, which includes Diseworth brook.

Diseworth also already suffers from light pollution, and noise pollution. Even in the last few weeks the increase has been so noticeable, residents have had to report it.

The proposed new town, should it be situated next to Diseworth, would further increase the impact of light and noise pollution on our village.

With East Midlands airport and Donington race track on our doorstep, a large new town, adjacent to Diseworth, bearing in mind also, the proposed Freeport, the location also, with no separation, adjacent /right next to, Diseworth, would without doubt, lead to over development and result in an unacceptable increase in noise, light and air pollution.


Roads around Diseworth, the A453, A50, M42, M1 are already over congested and notorious for long delays, closures, especially Junction 23A, J24 where we are located.



### Declaration

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Signed: 

Date: 11.3.2024.

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	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Kath	
Last Name	Taylor	
Job Title (where relevant)	[REDACTED]	
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)

ISLEY WOODHOUSE (Policy IW1)

- \* Run off water from flooded brooks, airport holding ponds, is already a massive threat to Diseworth & Long Whatton. The new development will add to this issue.
- \* I moved to live in Diseworth for its village nature. Air, noise & light pollution will become a further issue, plus Ladygate which is already a "rat run" will become a very busy "cut through"
- \* Why has all NWDC housing needs been put in one place? The roads cannot withstand the increased traffic with no Highways money available to tackle it.
- \* Diseworth has a conservation village status which must be protected and not eroded.
- \* 750 acres of agricultural land destroyed plus loss of 7.5 miles of hedgerows when food production is vital.
- \* People have chosen to live in this rural area and their (our) health and well-being should be taken into consideration.

For the above reasons I do not support the new town development of Isley Woodhouse.



## Reference EMP90

- \* Diseworth has a conservation village status, but will no longer be a rural village. It will be part of a logistics park!
- \* Wrong place! - on a slope leading to Diseworth - traffic will be massively increased - light, air and noise pollution will increase RIGHT NEXT to our village.
- \* Will safety be a major factor when measuring the impact of increased traffic? At the moment when a diversion is in place, vehicles use our village as "rat runs".
- \* Litter and parking will be added concerns.
- \* This development should have been part of a democratic process, but instead it was government imposed by an undemocratic process!
- \* Homes and road users will be at risk by increased flooding due to so much land being concreted over. Diseworth, being in a dip, already suffers from flooding - overflowing brooks.
- \* EMA and SEGRO want to destroy the land that offers such biodiversity. Offsetting simply cannot be done ensuring BNG is achieved on site.
- \* I do not accept that the development can be mitigated or softened, by buffering, screening, hiding, shielding. Pollution from noise, light, poor air quality will be prevalent and all at a 24/7 rate.
- \* 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 <sup>the</sup> current extent of the designated Freeport land"  
How can you consider the proposed inclusion of said land when you know it is unacceptable? It cannot be justified. Therefore, do not include this land!!
- \* I am asking NWLDC not to include the EMP90 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:

2nd March 2024

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

## 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.

Use this box to set out your response.

Reference policy 1W1

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

- \* DISEWORTH ALREADY HAS MASSIVE FLOODING ISSUES AND THIS PROPOSED DEVELOPMENT WILL EXTENSIVELY INCREASE THESE PROBLEMS.
- \* INCREASED HOUSING RESULTS IN FURTHER POLLUTION OF OUR PRECIOUS AIR, INCREASED NOISE, LIGHT AND LITTER POLLUTION. OUR VILLAGE WILL BE A BUSY "CUT-THROUGH" FOR TRAFFIC.
- \* NWLDC HAVE LUMPED ALL THEIR HOUSING NEEDS INTO ONE PLACE - WHY? EASY WAY OUT?
- \* DISEWORTH HAS A CONSERVATION VILLAGE STATUS. HOW CAN THAT BE SUSTAINED WITH A LARGE HOUSING PROJECT ATTACHED?
- \* NATIONAL BIODIVERSITY IS AT THE FORE AND THE DESTRUCTION OF AGRICULTURAL LAND (750 ACRES) PLUS 7.5 MILES OF HEDGEROWS DO NOT MATCH UP WITH THIS.
- \* THIS RURAL AREA SHOULD BE PROTECTED, AS WELL AS THE HEALTH AND WELL-BEING OF EVERYONE ALREADY LIVING HERE.

AS REFERENCED ABOVE I DO NOT SUPPORT THE NEW TOWN DEVELOPMENT OF ISLEY WOODHOUSE.



Reference EMP 90.

CONSERVATION

1. RURAL DISEWORTH WITH A VILLAGE STATUS WILL NO LONGER EXIST. IT WILL BE PART OF AN INDUSTRIAL SET-UP.
  2. THIS PROPOSED FREEPORT DEVELOPMENT IS IN THE WRONG PLACE, <sup>ie</sup> ON A SLOPE TO THE VILLAGE, WILL MASSIVELY INCREASE TRAFFIC TO THE AREA, WILL INCREASE AIR, NOISE AND LIGHT POLLUTION TO OUR PRECIOUS BUT FRAGILE VILLAGE.
  3. THE IMPACT OF INCREASED TRAFFIC TO THE AREA MUST BE MEASURED AND HOPEFULLY WITH SAFETY IN MIND, CURRENT DIVERSIONS INCREASE TRAFFIC THROUGH THE VILLAGE (RAT RUNS).
  4. THERE WILL BE MORE CONCERNS AROUND LITTER AND PARKING.
  5. IF THIS DEVELOPMENT IS GOVERNMENT IMPOSED IT WILL BE DONE SO BY AN UNDEMOCRATIC PROCESS.
  6. DISEWORTH ALREADY HAS FLOODING ISSUES, BEING IN A DIP. THE LAND CONCRETED OVER BY THIS DEVELOPMENT, WILL EXACERBATE THIS THREAT TO HOMES, LAND AND ROADS.
  7. THE LAND OF THE PROPOSED DEVELOPMENT BY EMA and SEGR0 OFFERS SO MUCH BIODIVERSITY. SADLY, THIS CANNOT BE OFFSET, THIS LOSS WILL NEVER BE RETURNED.  
AND
  8. POLLUTION FROM LIGHT, NOISE AND AIR QUALITY <sup>24/7</sup> CANNOT BE SOFTENED OR MITIGATED. MY MENTAL WELL-BEING WILL SUFFER. I DO NOT WANT TO LIVE OUT MY DAYS IN A LOGISTICS PARK.
  9. THE LOCAL PLAN STATES "WE DO ~~NOT~~ 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 CURRENT DESIGNATED FREEPORT LAND," SO HOW CAN YOU CONSIDER THE PROPOSED INCLUSION OF SAID LAND WHEN YOU KNOW IT IS UNACCEPTABLE? IT CANNOT BE JUSTIFIED. THEREFORE, DO NOT INCLUDE THE LAND.
- 3
10. I AM ASKING NWLDC NOT TO INCLUDE THE EMP90 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

Signature

Date:

2/3/2024

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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: Fwd: House Building on Broom Leys Farm  
Date: 17 March 2024 14:07:22

---

----- Forwarded message -----

From: [REDACTED]  
Date: Fri, 15 Mar 2024 at 15:55  
Subject: House Building on Broom Leys Farm  
To: [REDACTED]

Good afternoon,

Thank you for making me aware of this.

I do not think the house building is a good idea as the area floods. The Rugby Club improved the drainage of their pitches some time ago, that water now collects to the right hand side of the track to the bridge over the A511.

The track floods easily during heavy rain, and I have seen the fields flooded and the properties on Broom Leys Road affected.

Where will all that water go if they build on the farm?  
We certainly do not need other homes in the area being flooded, and that may effect more than Broom Leys Road.

Broom Leys Road is already very busy traffic wise, would these new houses make things worse.

Air pollution would be worse than it is now, as you state.

The track is a pleasant walk with a variety of wildlife, that I assume will all disappear.

I am against the development for these reasons.

I do appreciate people need to live somewhere, but I think they need to chose a more suitable site, and ensure that all the services will be expanded to cope, such as drainage and sewerage.

Also that local facilities such as Doctors, Schools etc. could cope with the increased population.

With kindest regards,

Keith Andrews

From: [REDACTED]  
Subject: [PLANNING POLICY](#)  
Date: EXTERNAL: Fwd: Objection  
17 March 2024 14:07:45

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----- Forwarded message -----

From: [REDACTED]  
Date: Sat, 24 Feb 2024 at 15:49  
Subject: Objection  
To: [REDACTED]

Hello, I live close to Broomleys farm and I can't quite believe what is being considered for the land. They say they will plant more trees, just plant them in the fields to help with the drainage. No need to build and then plant. They say they will create footpaths and walking routes. There is a lovely footpath there already, its a lovely walk along from the bridge to the playing field and beyond. 266 houses could bring 432 cars assuming every house has 2 cars, some will have more ! Where might 100 or so children go to school or to a doctors? The ones nearby are all full. The air quality is already bad enough having been proved by studies at broomleys traffic lights. This must not go ahead. Concerned resident.

Sent from my Galaxy






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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	Ann	
Last Name	Hawtin	
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.

**Potential Locations for Strategic Distribution: Land south of East Midlands Airport (EMP90)**

I am not opposed to the Freeport but object to this development on the land south of East Midlands Airport which is on a slope that leads to the beautiful conservation village of Diseworth.

This would be the wrong site for many reasons including, but not limited to, the following:

Traffic - Impact on the road network, including both J23a and J24 of the M1 and the A453. The current infrastructure struggles to cope with the level of traffic. Even if entry to and from the warehouses is restricted to the A453 I fear that the village would become a rat-run for people working at the units.

Diseworth Conservation Status would be at risk if development was to come up to the edge of the village to correspond with the Freeport designation.

The proposed development would result in harmful impacts which would detract from the rural setting of Diseworth.

Flooding & Drainage – Both Diseworth and Long Whatton are prone to flooding. A number of residential properties have flooded multiple times in recent years. To concrete over this land would exacerbate the problem with a detrimental result for both villages. New drainage systems could fail to capture the water running off the concrete that is currently absorbed naturally by the earth.

Loss of wildlife (and their habitats), hedgerows and countryside in a rural area such as this is totally unacceptable and appears to contradict Government policy.

Paragraph 6.10. of the Draft Local Plan actually 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'**.

**THEREFORE I OBJECT AND DO NOT SUPPORT EMP90**



**New Settlement: Isley Woodhouse (IW1)**

Another policy in the Draft Local Plan that is detrimental to Diseworth!

With Isley Woodhouse (IW1) to the west and warehousing (EMP90) to the east of the village, in addition to the M1/A42 and East Midlands Airport, we would be hemmed in from all sides. Our beautiful countryside is being destroyed when the housing and warehousing could easily be accommodated elsewhere in our county.

With up to 4,500 houses and 23,000 sqm for industry and warehousing infrastructure needs to be put in place to serve the new development and surrounding areas. Transport, education, health, recreation, flooding, drainage, sewerage and utilities all need to be taken into consideration.

This would add to the flooding issues currently experienced in Diseworth and Long Whatton.

THEREFORE I OBJECT AND DO NOT SUPPORT 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: 16<sup>th</sup> March 2024

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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: Fwd: House building  
Date: 17 March 2024 14:07:07

---

----- Forwarded message -----

From: [REDACTED]  
Date: Sat, 16 Mar 2024 at 18:11  
Subject: House building  
[REDACTED]

Dear Sirs,

It makes no sense to build in that area.

Where is the infrastructure, Doctors, schools etc. has the pollution been taken into consideration, it is already at dangerous levels.

The roads cannot suppoero extra traffic. The issues now with parking when children are being dropped of and collected from the school in Broomleys Road is an issue now let alone when 266 extra houses are being build.

Where is the promise of a divide between Coalville and Whitwick?

NO TO HOUSE BUILDING ON BROOM LEYS FARM - ABSOLUTLEY RIDICULOUS!!!!

Martin and Linda Quilley  
[REDACTED]  
[REDACTED]





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	Personal Details	Agent's Details (if applicable)
Title	MRS	
First Name	JANET	
Last Name	MOORHOUSE	
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? <u>EMP 90</u>		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)

With regard to the Draft Local Plan, I write to make my comments + objections about the 'freoport' development + how it will drastically alter the conservation village of Wiseworth, decimating productive farm land + traditional hedge rows, which impacts on wild life + the health + well being of the community.

1. Warehouses will greatly impact on the village, by being up to the village boundaries.

2. The area covered by concrete / tarmac will greatly impact the village by water run off, as the freoport will be built on sloping ground down to the village, + as a result will lead to further flooding.



## EMP 90

large balancing ponds would need to be constructed & perhaps a wildlife haven around them, this would act as a barrier for the village.

3. With this development, the water running away from it will be a toxic mix of oil, chemicals, tyre particles & brake lining particles, these will all flow into the brook, suffocating any life within the waterway.

4. The drainage around the village will not withstand this form of excessive development, the pipe work is old, & when it floods it can't cope & sewage also floods the area. Long Wharton will also be impacted by water levels, over the years we have been affected more & more by the development up at the airport complex, & several houses can no longer get affordable insurance through being flooded several times.

5. This development will bring light pollution to both villages, there will be No night sky. The lights will greatly impact on Wisenorth as the Freepoint sits directly over it; the impact of lights cannot be minimised due to the terrain being on a slope.

The lights will impact on people's well being & mental health, preventing restful deep sleep, this is unacceptable in every way.

Houses on Clements Cote already suffer from bright airport lights.

6. Noise pollution is going to be a major factor in Wisenorth, & to a lesser degree Long Wharton. Workings at the Freepoint



are going to be operational 24 hours a day, therefore, the noise associated with it is going to be continual day & night, this again, especially at night, will impact on people's quality of life, disturbed nights & affect their mental health. So close to the village is totally unacceptable, there is no way you can mitigate the noise levels

4. The air quality from the airport will be greatly affected, by continual traffic movement day & night, this will affect people's health & well being, with people suffering with respiratory problems suffering the most. There are primary schools in both villages which will have an impact on their health too.

8. The road infrastructure cannot deal with a development of this size, it will lead to a much greater volume of traffic, it is a busy road anyway which will become far more congested, getting out of Wiseworth onto the A453 is difficult now at the best of times, it is also a fast road. Whenever there are hold ups on any of the major roads around us, people use the villages as a rat run, during recent flooding we had trouble getting out of our drives; the country roads, (Whatten Rd) those without curbs have been badly affected as lorries, buses & larger vehicles have had to up onto grass verges so that they can pass each other, this has made deep, dangerous gullies either side of the road. To put signs up to say no



heavy vehicles will have no impact at all as people ignore them.

We have speed bumps in Long Whetton which are not adhered to by many & people speed through the village anyway. When lorries go through & over the bumps this adds to the noise levels.

9. To lose greenfield sites is unacceptable, both for food production, biodiversity & animal habitat, - 16% of species are under threat now with extinction, this will not help; we, as a country, are one of the most depleted countries in the world & this plan is making things worse. Developers are now required to protect the habitat on any new developments, also to boost diversity by 10%, there is no way this can be achieved by this proposal.

10. Losing our green fields will deplete our ability to produce crops & animal grazing, farmers should be encouraged to grow more, losing this will make our food more expensive as we will have to import more.

11. We have no further need for more warehouses, there are many that have been built in the area that still remain empty on the Castle Yorington Industrial estate, with more room to build more, there are also plans for more warehouses near the airport side of Castle Yorington. Other brown field options should be considered over valuable farm land & the ruination of a conservation village.

12. The jobs on offer at the Airport I doubt



will be high end jobs, so perhaps not paid particularly well, these workers may come in from other areas, leaving them short of staff, you are merely moving workers around. Although new jobs will be created initially, I suspect automation & robots will be introduced thus not creating as many jobs as was specified.

These are my objections to the Freeport development, it will strangle the life out of the village & will make it a not very desirable place to live anymore.

Please consider the impact this will have on the Conservation village & village life & the heritage of it.

[REDACTED]

MRS J MOORHOUSE.  
12th March 2024.

[REDACTED]



### 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.

Signature

Date:

14-3-2024.

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	Personal Details	Agent's Details (if applicable)
Title	MRS	
First Name	JANET	
Last Name	MOORHOUSE	
Job Title (where relevant)		
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? NW1	<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)

Response on following pages.



Policy 1W1

Proposed settlement at Isley Woodhouse

With regard to the new development of the above mentioned new settlement, I have grave concerns as given below.

1. This new settlement is a development to put in this area, 686 houses on 750 acres of productive green fields, both arable & grazing pastures is an abomination, 4.5 miles of hedgerows - & some ancient hedgerows - & trees will be destroyed, & at a time when climate change is having a total impact on us all, we need MORE trees, not less; the government is pressuring us all to do more to protect the countryside, this goes against their objective.

If this development goes ahead MATURE trees should be planted NOT saplings, as they will not be effective until mature.

2. The loss of animal & bird habitat is scandalous, hedgerows are particularly important for nesting birds & their food source, they are also pathways & a refuge for animals. 16% of our countries species are threatened with extinction. Developers are now required to protect habitats on any new development, they need to boost biodiversity by 10%, can

this development, achieve this criteria?



3. Food production in this country is in decline due to these sorts of building proposals, food prices are rising as a consequence because we are having to import more, surely this doesn't make economic sense.
4. The road infrastructure is not capable of sustaining this new extreme development, the A453 gets very congested & deadlocked when the Powerload Festival weekend is on, & any large events happening at Yorington Park Race track; we have great problems getting out into the stream of traffic, it is also a fast road.  
The villages of Long Whetton & Risborough will be used as a 'rat run' to the new settlement, our roads cannot cope with the increase of traffic this will create.
5. The government is trying to get people off the roads & to use public transport, in order to obtain clearer air quality, this cannot be achieved by such a large development as there will be considerably more traffic, also, public transport is dire in the area, a bus not running directly through the villages to Loughborough was a dreadful decision, as a pensioner it has made my life more difficult.
6. This development will create further flood risks in the area, through Risborough & Long Whetton, due to the amount of tarmac & hard surfaces that will be created.
7. All houses built in this settlement, should it go ahead, should be made to have solar panels



on their roofs as renewable energy requirements

The over development of this area is suffocating the life out of the conservation village of, Yiseworth, strangling it.

Both proposed developments are in the wrong place, in my opinion, swallowing up our heritage, our countryside & farmland & local waters; this could lead to all manners of health issues due to air, light, noise & water pollution, it is altogether too much in one area, destroying the village & surrounding area.

I believe that corporate interests & central government are trampling over our views & well being.

[REDACTED]  
/ MRS JANET MOORHOUSE

16th March 2024.

[REDACTED]



### 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.

Signe

Date:

14-3-2024.

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	STEPHEN	
Last Name	MACIVER	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	[REDACTED]	
Street		
Town/Village		
Postcode		
Telephone		
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?  IWI EMP90		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 response is in two sections:-

- The potential location for the Freeport development (EMP90)
- The proposed new housing settlement at Isley wardhouse (IWI)

I have responded to each section <sup>individually,</sup> however, the effects of both these proposals being granted will compound the impact on Duseworth, its conservation Village Status, its residents and their way of life. This could result in their health & wellbeing being affected.



This response refers to the potential location of the Freepat development (EMP90)

1. I am concerned that there will be an increase in the volume of traffic entering & leaving Doseworth. Over the years I have seen traffic volumes increase which is adding to the pollution caused by the airport by way of noise, ~~gases~~<sup>air</sup> and light.

Any increase to traffic puts residents of Doseworth <sup>increased</sup> at risk as currently there are no safe walking routes to exit Doseworth and increased volumes of traffic will only make this worse.

2. Doseworth is located within a dip and as a Conservation Village floods in certain areas. We have problems coping with the current situation and this proposal will only worsen the flood risk with the proposed Freepat development situated on the top of a hill, ~~and~~ taking up green fields which helped to reduce flooding runoff.

I believe there are other locations that are more suitable for Freepat consideration and this proposal will cause more problems than benefits to the community of Doseworth and puts at risk our status as being a Conservation Village

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



Mr Stephen MacT...

This response refers to the proposed new housing Settlement at Isley Woodhouse (IW1)

1. I am concerned that by building the <sup>750 ACRE housing</sup> Settlement at Isley Woodhouse will cause irreparable damage to the hedgerows and the wild life living within it and threatening the Status of Disewath being a Conservation Village as it will be joined to such a large development.
  2. Disewath is located within a dip and suffers from flooding already. By building this <sup>4,500</sup> housing settlement will increase the <sup>risk</sup> flooding as there will be 750 acres of land less to ~~take~~ absorb water. The balancing ponds used to try to mitigate the risk of flooding will be constantly full and the brook in Disewath will not be able to cope with any increase in volume resulting in more flooding and stress for residents.
  3. The proposal to build 4,500 homes at Isley woodhouse is too close ~~to~~ to The Airport, Dunnington park and Disewath. on days where there are racing events & Music festivals coupled with an additional 9,000 vehicles (2 per home) will cause gridlock, not to mention the additional traffic from the Airport and local businesses. The A453 will not be able to cope with this increased capacity.
  4. with the potential of having an additional 9000 vehicles within a square mile of Disewath this will increase air, light & noise pollution we already suffer from and put the safety & wellbeing of Disewath residents at risk. with increased traffic volumes using Disewath as a rat run there is no option but to walk on the highway to get out of Disewath.
- I Do not Support the new town development of Isley woodhouse (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:

4/3/2024

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	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Dawn	
Last Name	MACIUGR	
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?  IWI EMP90		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)

THIS RESPONSE REFERS TO THE POTENTIAL LOCATION OF THE FREEPORT DEVELOPMENT (EMP90)

I WOULD LIKE NWLDC TO CONSIDER MY CONCERNS WHEN DECIDING IF OR NOT TO INCLUDE THE EMP90 FOR FURTHER DEVELOPMENT.

- = INCREASED TRAFFIC IN OUR VILLAGE (DISEWORTH) AND ALL THE SURROUNDING AREAS AND ROUTES TO VITAL SERVICES. ACCESS IN AND OUT OF THE VILLAGE IN A VEHICLE IS DIFFICULT AT THE BEST OF TIMES AND ALMOST IMPOSSIBLE BY FOOT.
- = DISEWORTH UNFORTUNATELY ATTRACT INCONSIDERATE AIRPORT HOLIDAY PARKERS AND I SUGGEST THIS WILL INCREASE AS THE FREEPORT WORKFORCE MAY CONSIDER DISEWORTH A CONVENIENT PLACE TO PARK.
- = INCREASED NOISE, LIGHT POLLUTION, DUST, NOXIOUS SMELLS, WATER FOULING, WHICH WILL HAVE A NEGATIVE IMPACT ON MENTAL HEALTH AND OUR VARIED WILDLIFE.
- = OVER THE PAST SEVERAL YEARS DISEWORTH HAS EXPERIENCED REGULAR FLOODING EVENTS AND THIS WILL SURELY INCREASE IF WE CONTINUE TO SWAP GREENFIELD SITES FOR 2 CONCRETE FOOTINGS, PADS AND STRUCTURES.

I REJECT THIS PROPOSAL AND ASK NWLDC TO DO THE SAME.



THIS RESPONSE REFERS TO THE PROPOSED NEW HOUSING SETTLEMENT OF ISLEY WOODHOUSE (IW1) -

I WOULD LIKE NWLDC TO CONSIDER MY CONCERNS WHEN DECIDING IF OR NOT TO BUILD NEW HOUSING SETTLEMENT ISLEY WOODHOUSE (IW1).

- INCREASED TRAFFIC IN OUR VILLAGE (DISEWORTH) AND ALL THE SURROUNDING VILLAGES. THE A453 IS BUSY ENOUGH.
- INCREASED NOISE, LIGHT POLLUTION, DUST NOXIOUS SMELLS CAUSED BY THE INEVITABLE INCREASE IN TRAFFIC. DISEWORTH BECOMES A RAT RUN WHEN ANY PROBLEM OCCURS. AT M1 JUNCTION, DONNINGTON PARK, A453.
- OVER THE PAST SEVERAL YEARS DISEWORTH HAS EXPERIENCED REGULAR FLOODING EVENTS AND THIS WILL SURELY BE INCREASED IF THE DEVELOPMENT IS BUILT.
- I BELIEVE THAT THE AGRICULTURAL LAND SHOULD BE USED FOR IT'S INTENDED PURPOSE - GROWING FOOD AND FEEDING PEOPLE. ~~Food Production~~
- THIS DEVELOPMENT WILL DESTROY BOTH A RURAL VILLAGE, A CONSERVATION VILLAGE AND WILL HAVE A NEGATIVE EFFECT ON THE HEALTH, WELL BEING AND MENTAL HEALTH ON THE RESIDENTS OF DISEWORTH
- THIS DEVELOPMENT WOULD DESTROY SEVERAL MILES OF HEDGEROWS A WILL HAVE A NEGATIVE IMPACT ON OUR WONDERFUL VARIOUS WILDLIFE.

I DO NOT SUPPORT THE NEW TOWN DEVELOPMENT OF ISLEY WOODHOUSE. (IW1)

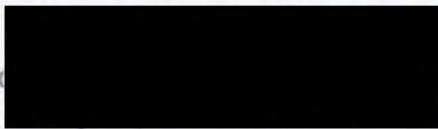


**Declaration**

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: 3/3/2024

**DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT**

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**Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk) or Planning Policy Team, NWLDC, 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

Details of what we are consulting on, and why, can be found on the Council website at [www.nwleics.gov.uk/localplanmysay](http://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	SUE	
Last Name	ORME	
Job Title (where relevant)		
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
	✓	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)

EMP 90 – SEGRO/EMA

- ① Increase of traffic to the proposed Freeport - especially heavy lorries would cause further problems on an already busy A453 - especially when there are events at Donington Park - when often the roads are at a stand-still.
- ② Ties, in turn, would increase pollution of all kinds.
- ③ The loss of green fields to Diseworth - i.e open countryside & loss of habitat for birds & animals - reducing areas to walk & exercise.
- ④ Possible increase in flooding - to Diseworth brook from development & areas in village were recently flooded.
- ⑤ Local Plan recognizes that Freeport would affect Diseworth in many ways - are you taking this into consideration?
- ⑥ For these reasons, I object to the building of a Freeport EMP90 development.



## IW1


- ① The A453 is an extremely busy road. When Donington Park has events eg. bikes, track days or Download - there is congestion & disruption for local people. This huge development will only add to this, making it ever more difficult to get to work, school, appointments etc.
- ② On top of this added congestion, the pollution caused by extra traffic will not be good for the environment - affecting humans & wild life & flora & fauna. I have personally noticed the absence of swiffts, swallows & house martins because of house building in Diseworth.
- ③ Connected to house building comes flooding. Diseworth has experienced worse flooding this year - partly due to building more houses & run off from E.M.A area.
- ④ Diseworth has already become an 'island' with very few areas to walk safely i.e. no footpath to airport or Long Whetton. The lack of a regular bus service doesn't help with this situation.
- ⑤ If the development goes ahead - will Diseworth still have Designated Conservation sites?
- ⑥ 750 acres of good agricultural land along with hedgerows & habitats will be destroyed.
- ⑦ In conclusion I DO NOT support Isley Woodhouse development. (Policy IW1)



### Declaration

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

Signed: 

Date: 

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(2020 – 2040) Consultation - Response Form**

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	Personal Details	Agent's Details (if applicable)
Title	Miss	
First Name	anneliese	
Last Name	hunt	
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?	<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)

IW1 (isleywoodhouse)

I will never support building of any kind on them fields those fields are ~~absolutely~~ absolutely ~~gorgeous~~ gorgeous so obviously you have never seen these fields if you want to destroy them, not to mention, you already have over 5,000 buildings under going construction in ashby de la zouch and coalville which makes it even more unjustified to build more buildings. Also, the wildlife and trees, you already have kicked wildlife out of their homes and there is so much wildlife in the village and in the fields, the trees that you are planning on cutting down help us breathe and if build more buildings that means more people and more cars, then more people the more Co2 and no trees there will be more Co2 which



is staying in the air, and the more cars there is that means more pollution, not just air pollution, light pollution and noise pollution too. the best part of my day is coming home from school on the bus (in the winter) and looking out the window seeing the gorgeous sunset over the fields, it's absolutely beautiful and I will never understand why you would want to ruin that.

### EMP-90 - freeport

\* the current drainage system can't cope as it is

I am completely against ~~with~~ this, there are so many reasons this is a bad idea, to start the village already has bad floods in certain areas and the fields trees etc. soak up the water. getting rid of the fields trees etc. will increase flood risks throughout the village\*. this freeport will have a negative effect on the village as it will reduce the quality of life. firstly the pollution, air pollution will be really bad as there will be lorries 24/7 polluting the village. light pollution, this will be quite bad as there most likely be flood lights and the lights from the lorries once again be 24/7. finally noise pollution the noise pollution will be 24/7 the lorries, the ~~are~~ reversing ~~veho~~ vehicles will create bad noise pollution as they will be beep most of the time, the wildlife will be kicked out of their homes, what right have we got to kick them out of their homes. lastly the freeport ruins the view, I can see all the sheep and animals through my bedroom window, I love waking up and seeing



the fields and animals when opening my curtains I would hate to wake up and see warehouses and lorries. we moved here because it is more peaceful and more rural, you are ruining the village and my future. this is my future that you are sat around a table discussing this is supposed to be a nice peaceful and low crime area and you are ruining it all. I can't understand why you would want to ruin the futures of the children in the village, and ruining the wildlife.



## 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: 11.3.24

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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: Local Plan Consultation  
Date: 17 March 2024 18:13:01

---

## Planning

As a resident of Whitwick, I wish to object to building on the Broom Leys Farm site contained within the current Local Plan consultation. This site includes the area of separation between Coalville and Whitwick which it is important to retain. Whitwick is a village in it's own right with its own identity and history and it would be a shame to see it reduced to an annex of Coalville.

I further wish to comment that recent developments local to us (such as Hugglescote) in NWLeics have failed to adequately consider growth requirements to local infrastructure and services before the housing has been put in place and teamed with austerity, local services are severely strained.

I realise that building does need to meet the needs of a growing population but I am concerned about this location in particular.

Kindly feed these comments into your consultation.

Thanks

Aimee Rennocks  
[REDACTED]

Sent from my iPhone



From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: Fwd: EXTERNAL: Fw: Land off Oaks Rd Oaks in Charnwood  
Date: 17 March 2024 18:14:56  
Attachments: [IMG\\_4190.jpeg](#)

---

Sent from [Outlook for Android](#)

---

**From:** [REDACTED]  
**Sent:** Sunday, March 17, 2024 1:45:12 PM  
**To:** [REDACTED]  
**Subject:** EXTERNAL: Fw: Land off Oaks Rd Oaks in Charnwood

----- Forwarded message -----

**From:** [REDACTED]  
**To:** [REDACTED]  
**Sent:** Sunday, 17 March 2024 at 13:18:28 GMT  
**Subject:** Land off Oaks Rd Oaks in Charnwood

Dear Mr Nelson

[REDACTED] **[Personal Information Redacted]**. Please attached photo of area concerned. It currently is not used for residential but it did have a fully functioning farmhouse along with a barn and silo a number of years ago.

We would like to make sure the area is marked within the local plan so we can obtain permission to return the site to a family unit in the future.

I have spoken to Cllr Michael Wyatt about this issue and he's advised me to contact direct.

Many thanks

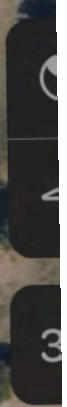
Michael Bowley

Sent from [Outlook for iOS](#)



ABBEY ROAD

OAKS ROAD







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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Kevin	
Last Name	Walker	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
█	██████████	
██████████	██████████	
██████████	██████████	
██████████	██████████	
██████████	██████████████████	



**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.

**Policy S1**

Para 4.8 specifies the number of houses that a “standard method” thinks appropriate for an area. A figure of 372 is itself speculative and is not based on any evidenced local requirement. Moreover, the location of where this allocation is built is speculative. It has been quoted by NWLDC on previous occasions that much of our perceived demand is based on Leicester City overspill. It must then be questioned as to whether the far north of the area is really the most appropriate location for this housing demand. For those with existing family and employment within the city, moving to the NWLDC area will entail long commutes back to Leicester, most likely by private transport. The uplifted figure of 686 houses is again speculative and reasoned by an speculated increase in employment in the area.

Para 6.4 later in the Local Plan states; “Planning for a sufficient amount of housing growth in North West Leicestershire is essential, but it is vital that the housing development addresses the needs of the area.” I would suggest that the suggested housing requirement is addressing the housing development need of other areas, not our own.

Para 4.15 refers to a requirement for “strategic distribution”. This is being taken in isolation for NWLDC area. A brief drive around the new distribution depots around Castle Donington show that many of the warehouses already built are still unoccupied. There is also a lot of new warehousing development around the A453 into Nottingham, a proposed development based around the Ratcliffe Power Station Site, and more provision north of the A50 around the new Aldi distribution centre. I have to ask, how much strategic distribution does our area need?

With these other areas also assigned to strategic distribution, all in commercial areas away from residential areas, is it really necessary to build more units right up to the Diseworth village boundary?

I would advocate ‘**inappropriate location**’ to the proposed warehouse development between East Midlands Airport and Diseworth village. There are other, more appropriate, packets of land



available for this type of development and the Local Plan should be amended to reflect this. Also see EC1 response below.

#### Policy S2

The villages of Diseworth, Long Whatton and Breedon on the Hill are all defined as "Sustainable Villages". Tonge and Isley Walton are classed as "Hamlets".

Para 4.24 refers to a completely new settlement of Isley Woodhouse.

The policy treats all these settlements as independent. There is no mention of what effect the new settlement of Isley Woodhouse will have on the existing settlements. Removing the greenspace agricultural land that separates the settlements will undoubtedly have an effect on the settlements and their inhabitants.

This new proposed settlement was a surprise to most people within the area. It was not mentioned in any previous plans or policies. Where did this proposal for a new settlement originate from and why has there been no public consultation (that we are aware of) regarding it? And yet it now appears in the draught local plan as if it is a done deal and will happen.

#### Policy S3

Policy S3 is based, quite correctly, around proving a need for a development within a parish. Paras 4.27 to 4.32 set out these requirements.

And yet the new settlement of Isley Woodhouse completely goes against Policy S3. There is no requirement within the villages mentioned in Policy S2 that would require a completely new settlement to be built.

#### Policy S4

Policy S4 and para 4.33 describes our situation well. I quote; **"The areas that separate our towns and villages consist of largely undeveloped countryside. Although major infrastructure, urban and industrial influences are rarely far away, there remains substantial areas of open, mainly arable, farmland. We want to maintain, and where possible enhance, the environmental, economic and social value of the countryside..."**

The proposed settlement of Isley Woodhouse would go totally against this policy. Its situation would remove this separation zone, effectively combining the settlements of Diseworth, Isley Woodhouse, Tonge and possibly parts of Breedon. Para 4.34 says **"The Local Plan has an important role to play by guiding development."** It should do this. Isley Woodhouse is a proposed development in the wrong place. Its existence will destroy the existing villages in the region. The Local Plan should be amended to move it to a more suitable and sustainable location.



#### Policy AP2

It would seem unbelievable that the strategic warehousing proposed to the east of Diseworth village would not contravene all the elements of AP2. The proposed development should be relocated to somewhere where it would not contravene AP2.

#### Policies AP7 & AP8

Diseworth already suffers from repeated flooding due to land run-off from a large catchment area plus discharges from East Midlands Airport holding ponds. This is already well documented with LCC Flood Management team.

Any proposed development in the catchment area (not just the village boundary) should help eliminate this risk by design.

#### Policy H1

As with policy S1, I would argue that the allocation of 686 new houses p.a. is not justified for the North West Leicestershire area.

Para 6.2 is especially worrying as it implies that this 686 figure is more than likely to be exceeded given the present trend in our region.

The effect of the new Isley Woodhouse development on the existing rural communities in the vicinity would be devastating. If the figure of 686 *can* be justified, the proposal to put them all in one new development of Isley Woodhouse is not acceptable and goes against many of the other policies in the local plan. The new development of Isley Woodhouse is not a suitable solution to S1 or H1 and other alternatives should be sought. The proposed Local Plan should be amended accordingly. Para 9.51 already suggests a suitable location for 426 new homes.

#### Policies EC1 to EC5

With reference to East Midlands Freeport (para 7.7); I accept that is not the purpose of this Local Plan to discuss the validity of freeports, but with regard to the undeveloped land to the south of East Midlands Airport, is not necessary or suitable to develop this land for industrial / commercial use for the reasons set out in the response to policy S1. Para 7.29 already suggests areas more suited to this type of development. The Local Plan should acknowledge and support this stance, regardless of the Freeport designation.

#### Policies EC8 & EC11



The importance of both East Midlands Airport and Donnington Race Track are noted and appreciated.

Para 7.56 refers to; "... East Midlands Airport result in high levels of noise disturbance, particularly at night when background noise is generally lower."

Para 7.69 refers to; "Motorsport is a noisy activity which, whilst part of the enjoyment for many racing enthusiasts, can give rise to complaints in the local area."

With these references to the nuisance of noise from the two activities, it seems unwise and non-sensible to build the whole new residential development of Isley Woodhouse adjacent to the two operations. The noise from both operations can be clearly heard from Diseworth, Castle Donnington, Wilson, Melbourne and other surrounding settlements, which are further away from the operations than the proposed Isley Woodhouse.

Para 5.9 in policy AP2 states; "**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...**". And yet the plan proposes a new development in a very noisy location, the race track during the day and the airport at night.

A similar argument could be put forward for light pollution from the airport.

Again, I suggest that the proposed location for the new settlement of Isley Woodhouse is inappropriate and the Local Plan should be amended to reflect this and move any proposed residential development to a more suitable location.

Environment; Policies EN1, EN5, EN6 & EN7

Diseworth is a relatively small village situated in the north of NWLDC area. Its origins can be traced back to Roman times (Roman coins having been found in surrounding fields). It was thriving during the Medieval period and is still thriving today. The history of the village warrants it being classed as a conservation area with many old buildings dating well back into history, and ridge-and-furrow being visible in the surrounding farmland.

It also has a rich biodiversity. Foxes, badgers, hares and many other mammals live in and around the village. Kingfisher, jay, goldfinch, buzzard and red kite can all be seen flying around the village together with many more common garden birds. Colonies of bats reside in the Church of St Michael, and the Heritage Centre, and use the surrounding field hedgerows for flight navigation corridors.

Diseworth exists as a rural oasis in North West Leicestershire, surrounded by East Midlands Airport to the north, the M1 to the east, the M42 to the south and Donnington Racetrack to the north west.

But we are not against change. There have recently been several house building schemes and also infilling within the village boundary. The site of TeaKettle Hall will undoubtedly be



developed soon.

But the heritage and character of Diseworth has still been retained.

Policy EN1 says that biodiversity should show a net gain (1a), and that change should in the first instance be avoided (1b).

Policy EN5 states in para 10.63; **“It is important to ensure that individual settlements retain their own character and identity.”**

Policy EN7 2c states; **“Ensuring that buildings, settlement patterns, features and spaces which form part of the significance of heritage assets and their settings are retained”.**

Not only this, but the countryside, greenspace, wildlife, natural surroundings, and calmness of the land surrounding the village is paramount to the wellbeing of the residents. And whether it be dog walking, jogging, cycling or just out for a stroll, a trip up Hyams Lane or Long Mere Lane can de-stress a cluttered mind, maintaining our physical and mental health in a stressful world.

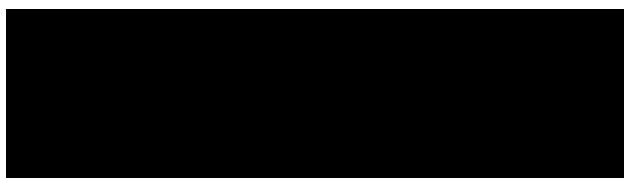
Regardless of the need for economic growth, housing needs, Freeports or improved infrastructure, the land surrounding the village of Diseworth is just not the place for such development. Whether it be the warehousing development to the east of the village, or the Isley Woodhouse settlement development to the west, there are better sites within NWLDC area that are more suited to such developments. I would commend that the Draught Local Plan is amended accordingly, such that the landscape of North West Leicestershire, and especially that around Diseworth and its surrounding villages, is preserved for future generations to enjoy.

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 area.

Date: 17/03/2024



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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: Broad Location West Whitwick . C47, C77, C78,C81,C86 C48  
Date: 17 March 2024 18:33:29  
Attachments: [20240212\\_155043.jpg](#)  
[20240312\\_161727.jpg](#)

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To the planning department,

We are writing to voice our concerns with regards to the proposals to develop the land for housing in relation to the areas included within C47,C48 C77,C78,C81,C86.

We live within the local area. The fields proposed retain alot of flood water. Please see attached pictures 3/2/24 and 14/3/24. The lanes we live on are unsuitable for heavy traffic. The school in New Swannington takes children from the local area but also from outside areas too. The lane is extremely busy and also dangerous at school drop off and collection times. The lane is a 30 mile zone and not a 20 mile zone despite the school raising concerns on numerous occasions due to the fact the lane is not on a bus lane. Traffic travels along the lane far faster than the speed limit. The current infrastructure will not support 500 additional homes with an extra 300 proposed in C48. The lanes surrounding the areas are flooding on a regular basis, so already having an impact on the existing homes. Where will this excess water go if 500+homes and a further 300 in C48 area are built on already flooding areas.

This email will be forwarded to local councillors and parish council.

We look forward to your response.

Kind regards

Deb Unwin





















**From:** [REDACTED]  
**To:** [PLANNING POLICY](#); [REDACTED]  
**Subject:** EXTERNAL: Broad location west whitwick (c47,c48,c77,c81,c86)  
**Date:** 17 March 2024 18:38:52  
**Attachments:** [20240212\\_155043.jpg](#)  
[20240312\\_161727.jpg](#)

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To the planning department,

We are writing to voice our concerns with regards to the proposals to develop the land for housing in relation to the areas included within C47,C48 C77,C78,C81,C86.

We live within the local area. The fields proposed retain alot of flood water. Please see attached pictures 3/2/24 and 14/3/24. The lanes we live on are unsuitable for heavy traffic. The school in New Swannington takes children from the local area but also from outside areas too. The lane is extremely busy and also dangerous at school drop off and collection times. The lane is a 30 mile zone and not a 20 mile zone despite the school raising concerns on numerous occasions due to the fact the lane is not on a bus lane. Traffic travels along the lane far faster than the speed limit. The current infrastructure will not support 500 additional homes with an extra 300 proposed in C48. The lanes surrounding the areas are flooding on a regular basis, so already having an impact on the existing homes. Where will this excess water go if 500+homes and a further 300 in C48 area are built on already flooding areas.

This email will be forwarded to local councillors and parish council.

We look forward to your response.

Kind regards  
Mr R Unwin

[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](http://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	Sylvia	
Last Name	Slevin	
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)

With regards to the development EMP90

We bought this house in Diseworth Village in 2020 to be closer to our daughter and to get away from Leicester city. We had lived in our last house for 42 years and the noise and mess had become unbearable. We wanted more green space, cleaner air and a better way of life as we had lived right next to an industrial estate for many years. My husband suffers from Asthma and this has greatly improved since we have lived in Diseworth, we were even able to have a cat again.

Traffic will be horrendous around the village, my husband still drives and this worries me as he will lose confidence with more and more traffic. The views will be ruined on our little walks around the village and we are often told by our visitors how beautiful it is here.

As a person who has suffered with nerves and mental health issues over the years, living here has improved and how I feel each day. This development will not bring us peace at an age where we shouldn't have to worry about these things.

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



In regards to **Policy IW1**

I can't believe you want to squash 4500 houses into this area.

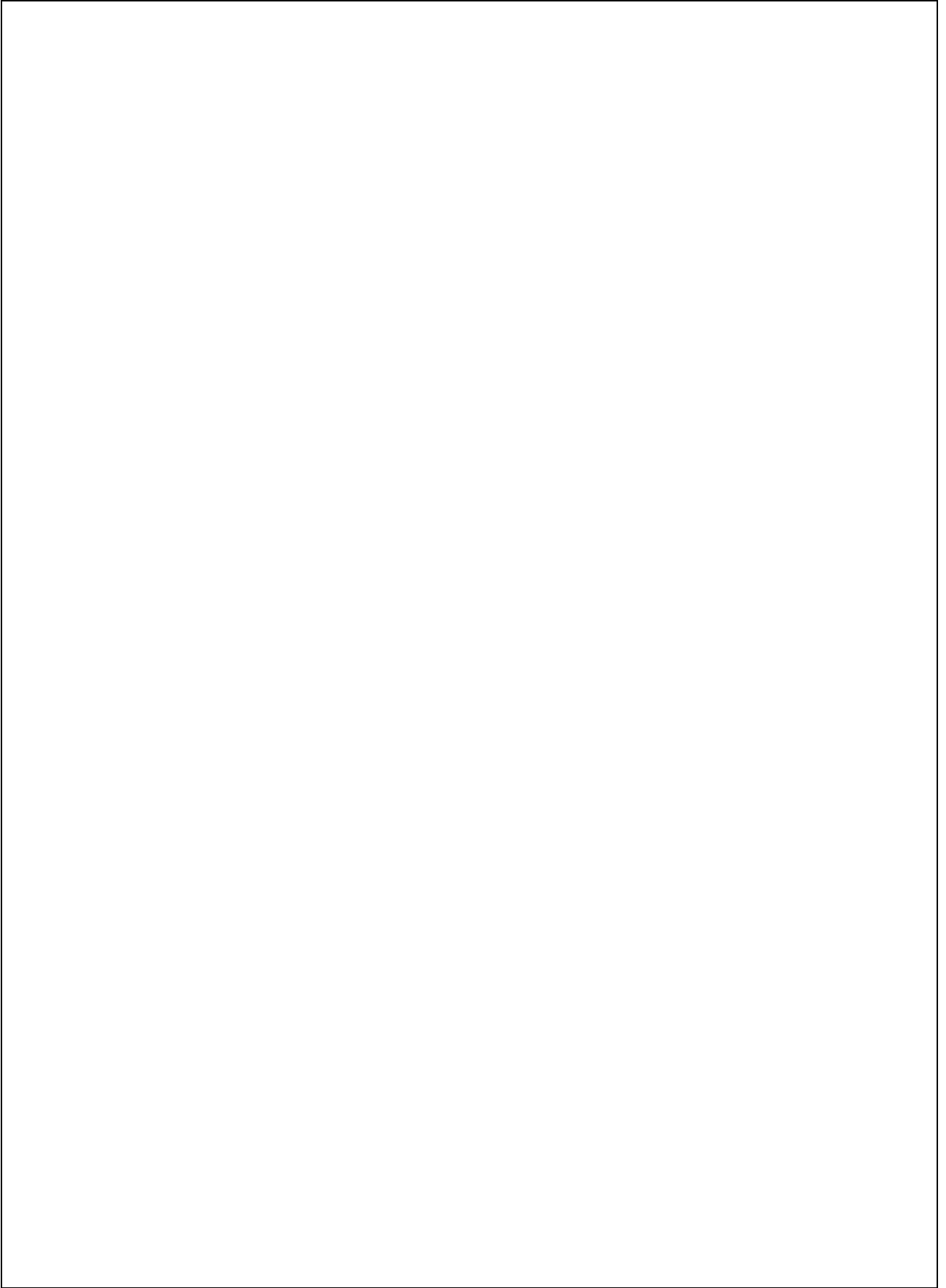
Will we still be in a village? What happens to our house prices and the inheritance we get to leave to our family. Will we have any to leave?

One of the things we love to do is drive over to Loughborough and Castle Donington, this site will only increase all of the traffic around us. We will have to stop going out so much, we will become prisoners in our own home.

I worry about the increase in litter, the effect on wildlife and the potential flooding at the back of our garden as the brook runs behind us.

**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:

**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](mailto:planning.policy@nwleicestershire.gov.uk).

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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: Local plan  
**Date:** 17 March 2024 18:40:23

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Hi

From the draft local plan consultation we would like to raise our objections to

- 1, the proposed building on agricultural land which we see as against government guidelines.
- 2, the proposed building of 500 houses off Church Lane Whitwick. Church Lane itself is almost a single track Road and Whitwick already has all the traffic it can cope with.

Your sincerely

Michael & Anita Fletcher

[REDACTED]





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

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Tim	
Last Name	Smith	
Job Title (where relevant)	Strategic Planning Manager	
Organisation (where relevant)	Leicestershire County Council	
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

## **Proposed Policies**

### **Overarching comments**

1. The County Council highlights the value of developing a comprehensive Local Plan that integrates stakeholder engagement, sustainable development, housing affordability, economic diversification, transport connectivity, infrastructure development and preservation and enhancement of the environment.
2. Through active collaboration with the community, businesses and interest groups there is an opportunity to ensure that the Plan provides a balanced approach to growth. Strategies for diverse, affordable housing, alongside initiatives to broaden employment sectors can help deliver community resilience.
3. Additionally, prioritising a multi-modal transport system and planning essential infrastructure in line with development will help support sustainable growth. Protecting natural landscapes and promoting green and blue infrastructure are key to maintaining the district's character and broader ecological diversity of Leicestershire.
4. The Local Highway Authority (LHA) is supportive of the Development Plan process; whilst providing for the future population and economic growth of Leicester and Leicestershire will be challenging in many regards (including in respect of highways and transport), a Plan-led approach offers the greatest opportunities to address those challenges as compared to seeking to deal with the impacts of speculative, 'unplanned' growth. The LHA would therefore wish to see the successful adoption of a new North West Leicestershire Local Plan (the Plan) and remains committed to working with North West Leicestershire District Council (NWLDC) to achieve such.
5. The proposals as being consulted on include a new settlement to the south of East Midlands Airport (Isley Woodhouse - IW). Whilst it is recognised that the Plan itself is not being consulted on at this time, nevertheless the concept of



such a new settlement is presented here without any context and the consultation material and proposals give little or no real sense of the key role that the Plan will have in the transition of the Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan. This matter is taken up in more detail in response to the consultation questions.

6. The proposal for IW is being brought forward against the backdrop of other very significant development proposals in this area, including those part of the East Midlands Freeport and those being promoted by the DevCo, and in a strategic land-use / transport planning policy vacuum. The new Plan appears to provide an opportunity to, in at least part, fill that vacuum, including through embedding requirements for an International Gateway Transport Strategy (IGTS) and an approach towards securing developer contributions towards its delivery. To further support this, and in recognition that a new settlement will come forward in phases over the lifetime of the Plan (and in all likelihood its successor(s)), it may be appropriate to consider whether a separate Supplementary Development Plan (SDP) document is required, providing a strategic framework that sets out the overall vision and strategic masterplan for the International Gateway (IG) area. Within the framework provided by any such SDP, the new Local Plan and its successor(s) could then bring forward allocations and policies that deliver their own respective elements of the overall IGTS. Whilst such an approach would not fully address the risk of early phases of development in the **IG area perhaps not being as 'sustainable' and 'self-contained' as might** ultimately be possible (in the interests of minimising, in particular, external carborne trips), nevertheless it would provide a robust platform:
- for the identification of the overall service and infrastructure needs of the IG area;
  - **for seeking to deliver the required infrastructure in 'one go' wherever possible;** and
  - for maximising opportunities for securing developer contributions and ensuring their most effective use in combination with any available public funding streams.
7. Allied to the above comment, the Strategic Road Network (SRN) in the vicinity of the IG currently performs poorly, especially M1 Junction 24. Considerable further development pressures are coming forward in the form of East Midlands Freeports, Rushcliffe Local Development Order and East Midlands Gateway, and yet its capacity appears to have been maximised to the extent that it is reasonably, safely and practicably possible to do so; further deterioration in the **junction's performance will exacerbate traffic conditions and obstruct access to** East Midlands Airport, which is of national importance as an international gateway for the movement of freight, goods and people. Accepting that work is **ongoing to develop the Plan's evidence base, nevertheless it is the LHA's view** that unless the SRN issues can be addressed it has very significant doubts that a Plan of a nature as being proposed through this consultation will be effective, **i.e. deliverable over the Plan period, and thus 'sound'. In this context, the close**



and proactive involvement and support of National Highways will be essential if the Plan is to be successfully adopted and delivered.

8. The approach to securing developer contributions towards highway infrastructure to enable growth in Coalville (The 'Section 106 policy for the delivery of infrastructure in Coalville' (the Policy), which was established by resolutions of NWLDC's Cabinet in 2013) has been successful in securing funding towards the delivery of the A511 Growth Corridor Major Road Network Project. To complement NWLDC's Policy, in September 2021 the County Council's Cabinet approved an Interim Coalville Transport Strategy (ICTS) to ensure that, inter-alia, the LHA continued to use the most up-to-date evidence and information when seeking developer contributions and to help to provide a transparent framework for determining decisions on transport priorities, ensuring co-ordination of investment and support for NWLDC's (as current) Local Plan. With the advent of a new Local Plan, it is suggested that it would be appropriate to revisit NWLDC's Policy and the ICTS to ensure that they remain relevant in scope, including geographically. (For example, might it be appropriate to extend its scope to include, at the least, Ashby-de-la-Zouch (Ashby)? However, for the avoidance of doubt it is not suggested that it would be appropriate to conflate it with any IGTS.)
9. Whilst the reopening of the Ivanhoe rail line to passenger traffic, either in part or in full, is subject to ongoing business case development and Ministerial funding approvals, nevertheless it is suggested that the Plan could perhaps go further on this matter than is currently being proposed. In particular, should the Plan be seeking to secure developer contributions, if not to works on the line/reinstatement of services themselves, but then at least to the provision of supporting infrastructure, e.g. at stations? If so, this could be something written into proposed Policy IF6, or alternatively perhaps picked up as part of a wider range of transport measures through an area Strategy approach (i.e. through a joint or separate transport Strategies for Coalville and Ashby).
10. To seek to proactively move matters forward in the light of these overarching comments, the County Council (including as the LHA) would welcome the opportunity to have follow-up discussions with NWLDC to help inform the drafting of the Plan itself.

## Strategy

### 1 Plan Objectives (pages 12-13)

Leicestershire County Council responded to the North West Leicestershire District Council Development Strategy and Policy Options Regulation 18 Local Plan Consultation in March 2022 and it is welcomed that some of the Objectives have been amended in light of comments from the County Council and other consultees. Overall, the Plan objectives are seen as being



appropriate and capable meeting the general requirements of the NPPF in delivering a positively prepared policy compliant plan addressing all the key requirements detailed at para 20. However it is still felt that the objectives could be developed further.

Broadly speaking there are no particular issues with the proposed objectives as set out from a strategic transport perspective. However, given that this Local Plan has a key part to play in the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, it is surprising that there is no Strategic Objective relating to achieving this transition and what that entails.

Additionally, it would be beneficial to include a further objective related to ensuring the coordinated delivery of infrastructure across districts required to support growth, but most particularly in respect of the various significant growth proposals coming forward in the International Gateway area, including those part of the East Midlands Freeport, those being promoted by the DevCo and the proposal for a new settlement (Isley Woodhouse) as set out in the consultation proposals. E.g. ***"Ensure the coordinated delivery of infrastructure required to enable the delivery of new development, including to help to mitigate the cumulative impacts of growth (which may in some cases be cross-boundary)."*** (See also response to question Q3). It is suggested that the objectives should be stronger in respect of the climate emergency and decarbonisation agenda, and there is a notable absence of objectives related to the expansion of East Midlands Airport and Freeport proposals.

The County Council noted in its previous consultation response that the Local Plan could be more aspirational in its objective around enabling health and **wellbeing of the district's population. We still believe wording could be strengthened in objective 1 and it may be better to use 'support better health and wellbeing....' Or 'enhance health and wellbeing.'**

On Objective 7, there is potential for NWL Local Plan to recognise the role which minerals sites play in combatting climate change and acknowledge the role of the District in helping wider schemes. This links to both the Climate Emergency and strategic green infrastructure ideas.

Regarding Objective 8, this might usefully reference *historic* townscape and landscape character. Historic character is a recognition of the cumulative contribution that heritage assets (designated and non-designated) and the wider historic environment can provide. Historic character looks beyond individual heritage assets, bringing together an understanding of complementary landscape and townscape



forms.

We welcome Objective 10 and the positive amendments made since the previous consultation, however would suggest further changes to mention the use of waste as a valuable resource and contributing to a circular economy.

Amended wording (see underline) as follows – **'10. Ensure the efficient use of natural resources, in particular brownfield land, control pollution and facilitate the sustainable use and management of minerals and the prevention and minimisation of waste. [Ensuring the efficient use of natural resources]'**.

Regarding Objective 11 – reference to maintaining access to services and facilities relating to education is supported.

From a Growth Service perspective, focus could be on ensuring that the local plan supports regional growth strategies, particularly in areas such as housing, employment, transport and education.

The document's policies aimed at fostering economic development should enable the district to attract investment, support new and existing businesses and promote innovation. While the policies may outline general directions for economic enhancement, it would be valuable to specify incentives or mechanisms to drive significant economic growth. A recommendation would be to focus on working with key partners from the earliest possible stage to develop more detailed strategies to attract high-value industries, improve competitiveness and ensure economic sustainability.

See also response to Q2 - we would welcome the following key objectives from an economic growth perspective:

- To support the retention of existing allocations for high quality employment land
- To maximise the allocation of new land for employment uses (particularly use classes B1, B2, B8) to accommodate growing businesses

The document has the potential to recognise and align more closely with broader regional or national strategic objectives, such as those related to economic recovery, technological advancement and the transition to a green economy. The objective could be to ensure that local development is cohesive and contributes to wider economic and social objectives.

A robust mechanism for implementing the proposed policies and monitoring their outcomes would be welcomed. Are there adequate resources, both financial and human, dedicated to bringing these policies to fruition? Clear



	<p>metrics and benchmarks could be identified to assess progress towards the document's objectives, ensuring that it is possible to adapt to change.</p>
2	<p>Policy S1 - Future Housing and Economic Development Needs (Strategic Policy) (Page 16-17)</p>
	<p>Broadly speaking, from a strategic transport perspective a policy that seeks to provide from the outset for meeting the unmet housing need of the City of Leicester is welcomed. From a point of view assessing requirements for and planning for the delivery of future highways and transport needs it is easier to develop transport evidence and to identify required infrastructure and <b>measures based on figures that provide for the City's unmet need from the outset</b>, relative to undertaking assessment and planning work on an initial set of housing numbers which, at some future date, have to be updated to provide for the unmet need. This appears to have been fed into the new consultation document.</p> <p>In conjunction with our comments above on potential additions/changes to the <b>plan's objectives, within section 5 of the policy, it would be useful to include</b> further points relating to:</p> <ul style="list-style-type: none"> <li>• Supporting the transition to the new HMA-wide spatial distribution proposed through the SGP.</li> <li>• Where relevant, ensuring the coordinated delivery of infrastructure across districts required to support growth to mitigate the cumulative impacts of growth</li> </ul> <p>We would support enhancing local sustainability. This approach considers not just the housing needs of the immediate occupant but also the generations to come by considering the wider social, economic and environmental sustainability criteria to help to improve the mix of homes and to better meet the long terms needs of local people.</p> <p>From an inward investment perspective, it is welcomed that the Local Plan aims to:</p> <ul style="list-style-type: none"> <li>• Take account of the Strategic Growth Plan for Leicester and Leicestershire which identifies the Leicestershire International Gateway (focused on the northern parts of the A42 and the M1, around East Midlands Airport) as one of several locations for growth across Leicester and Leicestershire.</li> <li>• Take a balanced approach to the location of new employment development. This involves making provision at the higher order settlements where historically the market has been strongest, capitalising on the existing Mercia Park development and the excellent</li> </ul>



transport links at J11 of the A42 and making some provision for new employment land in the more rural parts of the district.

There is strong demand for land and premises for both freehold and leasehold, and across a range of unit sizes and tenures, although the size band for industrial premises leans towards the mid-to-large box. According to the latest Market Insight 2024 by Innes England, the industrial market across Leicester and Leicestershire continues to deliver strong results, with good occupier demand, rising rents, generating the confidence for developer and investor support with new supply. Take-up in the Leicester and Leicestershire industrial market remained above the 10-year average for the fourth successive year in **2023, with total activity of 2.7m sq ft. The 'Big Box' market continued to see good levels of activity, with six deals totalling 1.25m sq ft. Much of this growth is driven by our area's strong connectivity to road, rail and air. Available Grade A space fell slightly to 1m sq ft, although there are several large-scale units coming forwards in the south of Leicestershire. As such, the protection of sites for employment uses across NWL is particularly important in this context, especially industrial.**

*Invest in Leicester* have built up anecdotal evidence from prospective inward investors, as well as existing companies, all sighting the lack of available land and premises severely hampering their expansion plans or their ability to set up in the city and county. The team also manage a commercial property database, which supports this narrative. As of February 2024, the database shows there are currently 526 commercial properties available for lease or sale across Leicester and Leicestershire with only 10% available within NWL Leicestershire – 50% of these are offices. Of the enquiries the team received for NWL Leicestershire, over 53% of these were for industrial premises, of which 47% were for premises over 50,000 sq ft.

Policies could focus on meeting the projected housing needs whilst aligning with sustainability principles. This could include assessing the balance between new housing developments and the protection of green spaces, as well as how the plan addresses affordable housing and diverse housing types to meet the needs of all community members.

There is an opportunity to clearly demonstrate how policies support economic growth and employment opportunities within the district and how they align with county-wide economic strategies. The County Council is interested in the provision for employment land, support for local businesses and the integration of new developments with existing infrastructure to foster



	<p>economic resilience and growth.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>It is noted that the OAN figure of 686 dwellings per year represents the local housing need assessed using the standard method together with the agreed <b>proportion of Leicester City's unmet need as detailed in the Statement of Common Ground</b> and includes a 10% buffer, based on as yet undelivered housing numbers to provide flexibility in achieving delivery. This figure falls short of the housing numbers that would be required to the deliver the affordable housing needs of the district and should therefore be regarded as a minimum. Given the strong economic growth forecast for the area a 15-20% buffer, based on the total housing needs figure, might be more appropriate and assist in delivering additional affordable homes whilst providing flexibility in meeting assessed needs.</p> <p>Whilst the approach to the estimation of employment land needs is logical the evidence supporting the overall requirements for employment land over the plan period is based on historic data and may have over-estimated the requirement for office space given the changes in working practices and subsequent downturn in demand post-COVID. However, if the overall employment land requirement is maintained (excluding strategic distribution) the opportunity will be provided to respond to future changes in market conditions and future increased economic activity. Further, the approach in respect of strategic B8 is seen as appropriate and takes account of the market and demand across the wider economic area.</p> <p>In addition, the link between the future housing and economic development needs of the district with the wider objectives of the plan outlined in (5) is entirely proportionate and meets the expectations of national policy.</p> <p>Provision should also be made for start up and business development space to be provided in order to stimulate the local economy. As occupiers are often unable to provide a significant track record this sector relies on niche providers willing to deliver dedicated schemes for the delivery of smaller starter units as well as a requirement within larger schemes.</p>
3	Policy S2 - Settlement Hierarchy (Strategic Policy) (Page 19- 20)
	<p>It is noted that the Policy as currently proposed does not seek to distribute housing requirements across the specific components/settlements within the hierarchy.</p> <p>Given that this Plan has a key part to play in the transition of the Housing</p>



Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, it is surprising that there appears to be no alignment of **the proposed hierarchy with the Strategic Growth Plan (SGP) 'International Gateway' (IG).**

Indeed, the concept of a new settlement appears in the supporting text to and table in Draft Policy S2 without any context and rationale being provided as to which this location is considered appropriate for development – i.e. within the SGP IG, proximity to existing/planned strategic employment opportunities within the Gateway Area, and the potential to deliver at sufficient scale to **make this location 'sustainable'.**

Considering a particular site in isolation (whatever its scale) will otherwise make it challenging to assess likely levels of sustainability and self-**containment other than based on its current locational context (e.g. it's assessed as a 'remote' location because in the present circumstances there is** a lack of nearby jobs, services and facilities and/or sustainable transport provision) and is likely to result in a fragmented and disjointed approach to the identification and delivery of transport measures and infrastructure (and potentially wider infrastructure requirements, too). In other words, a site that might be considered to be unsuitable from a transport perspective when viewed in isolation, might be considered more favourably when viewed in the context of an overall strategy for growth in or across a particular area, such as an overall strategy for growth in the IG area (as referenced in the overarching comments).

Development in the IG area is likely to transform the nature of the area and the economic /transport connectivity relationships within in it and likewise such relationships more widely across Leicestershire and south Derbyshire and Nottinghamshire. (The relationship with place of living and place of work being one example.) From a transport infrastructure/service provision and connectivity perspective, the understanding of economic and wider relationships is critical from a planning point of view as is the understanding as to how the roles of settlements might transition throughout the lifetime of the Plan. In that regard, it would be helpful for the policy and supporting text to articulate where the new settlement would be envisaged to sit in the settlement hierarchy once complete – i.e. would the scale be large enough to **classify as a "local service centre", "key service centre" or even "principal town".**

It is also suggested that consideration is given as to whether Ashby-de-la-



	<p>Zouch has a higher role in the settlement hierarchy in the future – i.e. <b>considered as a 'Principal Town'</b> - given the high level of services and facilities that exist in Ashby, and its accessibility off J13 of A42 and linked ability to access key services and facilities in Tamworth, Derby and Nottingham.</p> <p>Also, and for the avoidance of doubt, where a settlement is classed as a <b>'Sustainable Village'</b> this does not necessarily mean that it is a location suitable for all types of development from a highways and transport perspective, nor that developer contributions would not be required towards the enhancement of sustainable transport measures.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>Whilst appreciating that the Settlement Hierarchy, as drafted, seeks to achieve the regeneration of Coalville, as the principal town, by focussing development within its wider conurbation it fails to address two fundamental points, namely, the influence of the proposed strategic development area south of East Midlands Airport and the role of Ashby-de-la Zouch as a market town offering a full range of services (greater than that of Castle Donington) and the ability to deliver future sustainable development; the lower tiers of the hierarchy more accurately reflecting the ability of settlements to sustain and deliver essential services.</p>
4	<p>Policy S3 - Local Housing Needs Villages (Strategic Policy) (Page 22)</p>
	<p><u>Comments from an LCC Landowner Perspective</u></p> <p>The principle of permitting limited amounts of development in local needs villages is welcomed. However, the policy should not restrict the development of small sites within the built form which enhances or compliments the attractiveness of the area, including the reuse of former agricultural barns or previously developed land.</p>
5	<p>Policy S4 - Countryside (Strategic Policy) (Page 24)</p>
	<p>Suggest the policy should include an additional bullet point (2)(e) along the lines of: <b><i>"does not prejudice the delivery of wider planned development and/or infrastructure including (but not necessarily limited to) those types referred to under points (1(q)) and (1(r)) above"</i></b>.</p> <p>Minerals and waste safeguarding are important considerations on this issue.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The policy in seeking to deliver on the objectives of protecting and enhancing</p>



	heritage and environmental assets finds a balance with the economic role of the countryside and its ability to support the delivery of other strategic objectives and is therefore seen as appropriate.
<b>6</b>	<b>Policy S5 - Residential Development in the Countryside (Page 26)</b>
	Minerals and waste safeguarding are important considerations on this issue.  <b><u>Comments from an LCC Landowner Perspective</u></b>  Policy S5 incorporates the advice given in the NPPF and is thus compliant with national policy.
<b>Creating Attractive Places</b>	
<b>7</b>	<b>Policy AP1 – Design of New Development (Strategic Policy) (Page 28)</b>
	It is suggested that this policy should be expanded to include appropriate reference to the need for subsequent maintenance/upkeep to be considered in the design process to ensure that new developments/places remain “beautiful and safe” over the long-term.  We welcome that health is a key focus of new developments and also references to the importance of healthy placemaking for new developments and how these impacts on existing developments (as per 5.2)  We would like to see new schools located at the heart of their communities with good transport and facility access. School design and the aesthetic should complement the design of the surrounding community. Schools are inclusive and need to ensure the communities they serve support people with protected characteristics.  <b><u>Comments from an LCC Landowner Perspective</u></b>  There would be an expectation that Design would conform to National Design Guide requirements with developments maximising their potential to meet Building for Healthy Life standards. Further, it is anticipated that the policy will take full account of the advice given in NPPF Section 12.
<b>8</b>	<b>Policy AP2 – Amenity (Page 30)</b>
	It would be useful to have something in the policy that suggests that the development should be well connected by sustainable transport means as appropriate.



	<p>Regarding 'Draft Policy AP2 – Amenity' is there an opportunity to consider vibrancy of place and connectivity of place within this section - although it is in covered within Policy TC1 Town and Local Centres it would be a key inclusion within this section as well. <b>The TCPA '20 Minute neighbourhoods: creating healthier, active, prosperous communities' guidance might be helpful to</b> include it as it provides recommendations on planning of healthy neighbourhoods such as well-connected paths, streets, space access to community facilities and vibrancy of amenities where possible which will enable new developments to be integrated into the existing businesses as per 5.9.</p> <p>Minerals and waste safeguarding are important considerations on this issue. Extant minerals and waste operations and infrastructure should also not be prejudiced by non-waste and non-mineral development in proximity.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The policy is seen as forming an integral part of overall design policy and should be incorporated within a broader Policy AP1.</p>
9	<p>Policy AP3 – Renewable Energy (Strategic Policy) (Page 33)</p>
	<p>It might be appropriate to cover accessibility to a site for construction <b>(including for 'abnormal loads' as necessary) and future maintenance and replacement/upgrading ('re-powering') purposes in the proposed criteria</b> especially in respect of sites for wind turbines. Where existing/life-expired renewable energy infrastructure is proposed to be replaced by new generation/more powerful infrastructure, which may be of a significantly larger scale (again, especially with regards to wind-turbines), there should not be an automatic assumption that this will be acceptable in transport-terms, at least in terms of transportation to/from the site.</p> <p>The local plan policy wording needs to ensure that it works well for all types of renewable energy development. We will support this because new school places have a focus on renewable energy.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The policy should be aligned with guidance given in NPPF paras 160 -163. The target for the generation should be regarded as a minimum level of delivery over the plan period notwithstanding the need to upgrade strategic infrastructure to achieve new grid connections to many areas. Additionally, being a strategic policy the local plan should define those areas where the generation of renewable energy is acceptable in planning terms and not rely</p>



	on delivery through Neighbourhood Plans (other than for the identification of additional local opportunities) nor should local opinion determine or constrain the ability to deliver otherwise acceptable renewable energy developments.
10	Policy AP4 – Reducing Carbon Emissions (Strategic Policy) (Page 37)
	<p>Within policy AP4 there would be some benefit to having an additional criteria within AP4 and/or cross-reference(s) to relevant policies elsewhere in the draft Plan with respect to promoting sustainable travel as a key component in reducing carbon emissions.</p> <p>Our schools have a focus on the climate agenda from both the teaching and learning perspective as well as new schools designed to be low carbon. Schools need to be energy efficient to support the climate agenda and minimise revenue costs so more of their budget can focus on teaching and learning.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The policy needs to be clear that all development should meet minimum statutory requirements. It also fails to include reference to the provisions of NPPF para 164.</p>
11	Policy AP5 – Health and Wellbeing (Strategic Policy) (Page 39)
	<p>In general terms, a Health and Wellbeing policy is supported from a strategic transport perspective. In that regard in terms of the proposed wording, it is suggested that it would be beneficial to explicitly reference provision of walking and cycling infrastructure designed where appropriate to LTN 1/20 as part of new development, both in terms of on-site and off-site provision. It is also suggested that the policy should be expanded to reflect mental health, in e.g. in respect of social isolation.</p> <p>From a Public Health perspective, the draft health and wellbeing policy AP5 is supported. The draft policy identifies the importance of wider determinants including housing design and access to employment on health outcomes.</p> <p><b>Within draft policy point 1 'Development that maintains and improves the health and wellbeing of our residents, encouraging healthy lifestyles by tackling the causes of ill health and inequalities will be supported. Health considerations will be embedded in decision making and the Council will support the creation of a high quality, accessible and inclusive environment.'</b>  <b>would it be possible to change the word 'lifestyles' and instead of 'encouraging healthy lifestyles' the wording becomes 'enable healthier choices' and in 5.46</b></p>



	<p><b>bullet point 'healthy lifestyles' becomes 'healthier choices'.</b></p> <p>There is an emerging public health evidence base to suggest the word <b>'lifestyles' is a problematic word because it implies their individual choices and</b> behaviours solely responsible for health outcomes this perspective overlooks the influence of social economic and environmental factors on health. Public <b>Health would advocate for more inclusive language such as 'health choices' or 'health practices' which would emphasise the broader context in which</b> individual choices are made.</p> <p>See - <a href="https://www.adph.org.uk/2019/04/the-lazy-language-of-lifestyles-lets-rid-this-from-our-talk-about-prevention/">https://www.adph.org.uk/2019/04/the-lazy-language-of-lifestyles-lets-rid-this-from-our-talk-about-prevention/</a> and <a href="https://www.health.org.uk/what-we-do/a-healthier-uk-population/thinking-differently-about-health">https://www.health.org.uk/what-we-do/a-healthier-uk-population/thinking-differently-about-health</a></p> <p>The local plan has a key role in helping to create healthy places. The local plan should require health impact assessments for large scale developments, i.e., developments which are greater than 700 homes where a new primary school would be required and will form an important part of the new community.</p> <p>We support the point regarding quality of life can be improved through better access to education and skills.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The policy aspires to meet the guidance given in NPPF the at section 8. It would give greater clarity if it referred specifically to development being required to meet those standards.</p>
12	Policy AP6 – Health Impact Assessments (Page 40)
	<p>The approach is agreed with and Public Health look forward to continuing working closely with North West Leicestershire Health team and planners on the HIA approach to achieve a streamlined straightforward process. As per 5.55, once arrangements are in place, we are happy to support our North West Leicestershire Colleagues once at draft policy stage.</p> <p>As per 5.52 we have developed a screening tool to provide clarity over when and how it would be used, and it would be objectively applied to reduce bureaucracy.</p>
13	Policy AP7 – Flood Risk (Strategic Policy) (Page 43)
	No comment on the paragraphs preceding the policy test.



Part 1 - This policy mimics national policy.

Part 2a - The listed source of flood risk should include surface water and be worded to state that all potential sources should be considered.

Part 2b - No comment

Part 2c - In relation to greenfield sites, the volume of discharge is no considered within the policy.

In relation to brownfield sites, the policy requires a discharge rate no greater than the pre-developed site. This is unclear. Predeveloped as in greenfield, or pre-developed as in the existing rate before redevelopment?

Regardless, this should be changed to require all development to discharge at greenfield rates and volumes where viable, in line with the DEFRA Non-statutory technical standards for sustainable drainage systems (March 2015). Where it is not possible to maintain reduce discharge volumes to the existing rate, mitigation in line with national industry guidance should be provided (for example DEFRA Rainfall runoff management for developments Report SC030219 and the SuDS Manual CIRIA C753).

We would strongly recommend any policy which discusses discharge rates and volume use the DEFRA Non-statutory technical standards for sustainable drainage systems as the basis. This could be summarised as follows:

*The peak runoff rates and volumes from all development for events up to the 1 in 100 year rainfall event should never exceed the peak greenfield runoff rates and volumes. For brownfield sites, where it is adequately demonstrated to not be reasonably practicable to discharge at greenfield runoff rates and volumes, the proposed discharge should be reduced as much as reasonable possible but should not exceed the pre-developed rates. Where it is not viable to reduce discharge volumes to greenfield rates, the runoff volume must be discharged at a rate that does not adversely affect flood risk.*

While policy S1 mentions climate change, consideration should be given to including climate change within Policy AP7 Part 2c, for example:

While policy S1 mentions climate change, consideration should be given to including climate change within Policy AP7 Part C.

Flood Risk Management believe NWLDC should consider the opportunity to require that development offers betterment on existing runoff rates. NWLDC may be able to request that all, or large-scale development must provide a



	<p>betterment (e.g. 20% reduction or more on greenfield discharge rates).</p>
<p>14</p>	<p>Policy AP8 – Sustainable Urban Drainage Systems (Page 45)</p>
	<p><b>Paragraph 5.69 states “Leicestershire County Council is the Lead Local Flood Authority (LLFA) and is the lead organisation for providing advice and guidance on surface water runoff and run off rates”. This should be strengthened to include the need to seek pre-application advice from the LLFA.</b></p> <p>It appears that the report has not been updated to reference that latest version of NPPF (December 2023). All references throughout the report should be updated. For example, paragraphs 5.70 and 5.71 reference NPPF paragraph 167 however the correct paragraph is now paragraph 175.</p> <p>Paragraph 5.71 suggests that minor development is not required to use SuDS. All development must consider flood risk and water quality, and as such, SuD should always be considered for development of any size. Consideration should be given to amending this test the reflect this.</p> <p>Paragraph 5.74 is out of date. It is currently unclear if and when Schedule 3 will be implemented.</p> <p>Part 1 - <b>Consideration should be made to amending “All major development proposals will include Sustainable Drainage Systems” to remove the word major</b> as it is relevant for all development including minor.</p> <p>Part 1a - The statement relating to not being financially deliverable makes SuDS sound more optional than it is. SuDS in the form of attenuation must be implemented in order to comply with Policy AP7. The wording should ensure that it is clear that cost constraints do not impact on the ability to meeting Policy AP7 and to provide adequate treatment to the run-off. It is unclear what NWLDC considers to be SuDS and this falls below the standards set by national policy and draft policy AP7. SuDS attenuation in the form of below ground tanks and treatment though mechanical means should still be implemented at a minimum.</p> <p>Part 2 - <b>Consider removing the words “with the inclusion of SuDS” in line with our recommendations against Part 1a above.</b></p> <p>Part 3 - No comment</p> <p>Part 4 - Maintenance should include all drainage on-site that is not adopted by the third party (i.e. highway drainage of water company adopted drainage). This will also include existing drainage retained on-site such as ditches. Consider rewording to something along the lines of:</p>



	<i>Arrangements must be put in place for the management and maintenance of the proposed surface water drainage system and any retained existing surface water drainage features over the whole period during which they are needed.</i>
<b>15</b>	<b>Policy AP9 – Water Efficiency ( Page 48)</b>
	<p>Part 1 - No comment</p> <p>Part 2 - Consider including BREEAM WAT02 to this requirement as this provides a credit for the installation of water butts which can reduce the amount of rainfall entering the surface water drainage system and potentially reducing flooding risk.</p> <p><b><u>Comments from an LCC Landowner Perspective</u></b></p> <p>It is considered that the measures relating to water efficiency could be included within a wider Climate Change policy.</p>
<b>Housing</b>	
<b>16</b>	<b>Policy H1 - Housing Strategy (Strategic Policy) ( Page 50)</b>
	<p>See comments on draft Policy S2.</p> <p><b><u>Comments from an LCC Landowner Perspective</u></b></p> <p>In addition to the comments in housing relation to policy S1 it is noted that without making an allowance for “windfalls” and sites brought forward from neighbourhood plans there is likely to be a shortfall in housing numbers measured against an OAN of 686 dwellings per year plus a more realistic buffer of 15%; the greatest potential shortfall being in the Coalville Urban Area. Accordingly, consideration should be given both to increasing the overall housing numbers to provide resilience over the plan period and distributing additional numbers across the settlement hierarchy in order to fully meet housing needs.</p> <p>It is noted that housing will be distributed across the district by reference to the settlement hierarchy; an approach which is supported as it enables development to be located in the most sustainable locations and both take advantage of existing infrastructure and services but support their ongoing provision.</p>
<b>17</b>	<b>Policy H2 – Housing Commitments ( Page 51)</b>
	<b><u>Comments from an LCC Landowner Perspective</u></b>



	As the plan emerges the deliverability of existing commitments should be tested to ensure that they continue to represent a viable option for inclusion within overall numbers. Further it is noted that the Money Hill housing numbers are included within both commitments and allocations. To provide clarity Table 2 should be adjusted to ensure there is no opportunity for double counting.
18	Policy H3 - Housing Provision – New Allocations (Page 51)
	<p>Further to the overarching comment, please see our more detailed comments around specific sites within the Proposed Housing and Employment Allocations sections within this document.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The methodology for site selection is supported as is the distribution across the various tiers of the settlement hierarchy. The allocations of sites D8 Ramscliffe Avenue, Donisthorpe and R12 Heather Lane, Ravenstone being strongly supported. Being both available and deliverable they would provide much needed housing in two sustainable villages where their allocation will support the ongoing provision of infrastructure and services to the community. A further, more detailed, response in respect of both sites is included elsewhere in this response.</p> <p>Given the likely shortfall in numbers coupled with the inability of strategic sites to deliver houses in the early years of the plan consideration should be given <b>to the allocation of further sites. By allowing the potential shortfall to “trickle down” through the settlement hierarchy by the allocation of selected</b> additional sites in Local Service Centres and Sustainable Villages its balance can still be maintained whilst allowing housing needs to be met in full. Accordingly, Consideration should be given to the allocation of sites SHELAA ref Ib23 Land at Station Road, Ibstock and H1 Land off Newton Lane, Heather. Both sites are potentially available and deliverable and in the case of the site at Newton Lane, Heather, as demonstrated in application 16/01149/OUT (withdrawn) there are no over-riding constraints that would prevent this site, sustainably located towards the centre of the village and offering the opportunity of enhanced open space, being brought forward at an early date.</p>
19	Policy H4 – Housing Types and Mix (Strategic Policy) (Page 55)
	A policy is supported that seeks to ensure that housing types and mix better reflect local need, including in respect of matching the local labour market/job opportunities, on the basis that this will help to promote more sustainable



patterns of travel demand (i.e. co-location of jobs and homes in areas that can be connected via walking, cycling and/or passenger transport). Albeit such needs are likely to vary across different areas of the Borough and may require a more bespoke approach than outlined in Policy H4 as currently proposed – e.g. to ensure the housing types and mix at strategic sites within the International Gateway area aligns as closely as possible with the proposed job growth in this area e.g. through the EM Freeport proposals. Conversely, if **allowing 'the market to decide' is likely to lead to continued excesses and deficits of particular house types/sizes** (as suggested in paragraph 6.9 of the policies document), this is in turn likely to encourage less sustainable patterns of travel demand – e.g. people living and working further apart, requiring journeys that are less likely to be achievable via walking, cycling and passenger transport.

**The proposed approach to older people's housing (as set out in paragraph 6.22 of the policies document) is supported in-principle. It is suggested that the 'criteria-based' element of the proposed approach should include 'proximity to existing and proposed LTN 1/20 compliant cycle/wheeling infrastructure'** amongst the specific criteria, on the basis that such infrastructure would serve modes of travel aimed at older people with limited mobility (mobility scooters etc.) - **i.e. the 'wheeling' part of cycling and wheeling. Additionally, provision of older people's housing within larger sites would similarly benefit from being located in proximity to any onsite LTN 1/20 facilities that are to be provided.**

Housing mix needs to be clear as it impacts the quantity of additional pupil places required.

With regards specialist housing, each opportunity needs to be individually assessed as proximity to other community assets/resources and transport links are essential to understand before sites can be selected. Additionally demand does fluctuate over extended periods of time.

All dwellings should be required at a minimum to meet the M4(2) standard (accessible and adaptable dwellings) and 10%-25% of homes be required to meet the M4(3) standard (wheelchair user dwellings). The approach to accessibility standards should be no be different for market housing and affordable homes.

#### Comments from an LCC Landowner Perspective

The general approach that housing types and mix being based on the latest HENA evidence is supported. The recognition that there needs to be flexibility to take account of local market demand is also seen as appropriate as it will



	enabling developers to bring forward sites with greater confidence.
20	Policy H5 – Affordable Housing (Strategic Policy) (Page 62)
	<p>The need to consider varying affordable housing requirements in different parts of the district (as proposed through Paragraph 6.30) is acknowledged, including a bespoke approach to the International Gateway area for the reasons and in line with the principles set out through paragraphs 6.31 and 6.32. And furthermore such an approach should be applied to housing types and mix more generally (as per our comments regarding policy H4 above).</p> <p><b>The proposed ‘Local connection criteria’ outlined through paragraphs 6.49-6.50 and forming part (6) of the draft Policy H5 is supported, as this will provide a further lever to encourage greater co-location of homes and jobs in key areas such as the International Gateway.</b></p> <p>Additionally, it is suggested that point (4) of the draft policy H5 should be modified to state along the lines that <i><b>“the location of affordable housing provision within sites shall have regard to any existing or proposed active travel or passenger transport provision within or surrounding the site”</b></i>, given that affordable dwellings are less likely to have access to a private car than market housing and therefore will be more reliant on such modes to provide essential access to key jobs and services/facilities.</p> <p>Clarity over affordable housing numbers impacted by this policy will provide greater understanding when calculating pupil yield which can often be greater with affordable housing. Affordable housing may impact viability which may have a detrimental effect on the provision of pupil places. Therefore, the quantity of affordable housing may impact education infrastructure.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The level and tenure split of affordable housing should have regard to the latest evidence provided by the HENA and the guidance provided by the NPPF; the level being regarded as a maximum, subject to the provisions of H5(3).</p>
21	Policy H6 – Rural Exceptions Sites ( Page 64)
	<p><u>Comments from an LCC Landowner Perspective</u></p> <p>The approach to rural exception sites is supported and in particular H6 (3) which recognises the need for some sites to be supported by an element of market housing in order to secure delivery.</p>



22	Policy H7 – Self-build and Custom Housebuilding (Page 67)
	<p>If significant quantities of custom/self-build plots are to be included as part of wider allocations/permitted development sites (as proposed through the draft policy), it will be important to ensure that this is taken into account in setting trigger points for infrastructure delivery and/or contributions – i.e. if reaching a trigger point is reliant on delivery of at least some self/custom build housing, there could be an increased risk that this will never happen? Conversely exclusion of self/custom build housing from the setting of trigger points could mean a considerable number of new homes coming forward without the delivery of the necessary infrastructure/contributions being triggered for the site as a whole.</p> <p>From an education perspective, self-build housing has no impact on how we calculate education infrastructure.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The delivery of self-build and custom houses is accepted. It is noted that the draft policy appears positive in its approach but importantly incorporates the provisos that deal with both viability and a lack of demand on larger sites enabling market housing to be delivered after a suitable period of marketing</p>
23	Policy H8 – Houses in Multiple Occupation in Kegworth ( Page 70)
	No comment.
24	Policy H9 – Provision for Gypsies & Travellers and Travelling Showpeople (Strategic Policy) (Page 74)
	<p>Para 6.95 – requiring Gypsy and Traveller provision as part of other large housing allocations has worked well in Charnwood for delivering socially rented sites and as such is strongly supported.</p> <p>Para 6.99 – There is scope and agreement in principle for the costs of setting up and ongoing management of Gypsy and Traveller Transit sites to be shared amongst the other District and Borough councils in Leicestershire in the same way that the Multi Agency Travellers unit is funded, Transit sites anywhere in the county would be to the benefit and use of all district authorities in that area (we would be able to direct unauthorised campers from anywhere in the county), especially as there are existing joint agreements for the management of unauthorised encampments in place, currently it is still possible to apply for grant funding for the provision of Transit sites from Homes England.</p>



	<p>Para 6.101 – is it really necessary (or equitable) to require that all applications <b>are required to ‘provided evidence of why the accommodation is needed’</b> if the application meets the policy criteria and is within the scope of identified need, matters such as the availability of pitches and personal circumstances of the intended occupants should only be required where applications do not fully meet the criteria of planning policy or are in addition to identified need, this guidance could prevent the commercial development of sites that are sold on the open market, although if unsold and undeveloped sites like these can in themselves cause issues.</p> <p>Draft Policy H9 – 1 (a) This statement leads the reader to assume that just because a plot or site is empty it is available, the majority of sites in this area (as well as most other parts of the county) are privately owned and occupied by extended family units, therefore if plots are empty it is down to the individual family that own them if they would like to allow others to occupy or for them or if they would like to sell it, the days of large privately owned sites with rented pitches on them is long gone, the only certain way of providing pitches for rent is for further social provision (supporting para 6.95 again), it may be useful to have a plan of how to manage vacant plots or bring old sites <b>back into use. It would be better to state that ‘there is evidence that need cannot be met elsewhere’ as this would cover vacancies on local authority sites in the region not just the District and prevent unnecessary public comments about private pitches being empty (as families may be away travelling intending to return to them)</b></p> <p>We support Draft Policy H9 (3) as there has been sizable loss of Gypsy and Traveller Pitches in the last 10 years where sites have been converted to conventional mobile home sites with rented caravans being occupied by the general population rather than Gypsies and Travellers specifically.</p> <p>Of further note, Gypsy and travellers groups are identified as a population of concern in the recent Health Inequalities Joint Strategic Needs Assessment as a group more at risk of experiencing health inequalities In Leicestershire. COVID-19 has exacerbated health inequalities experienced by vulnerable groups. Evidence indicates the COVID-19 pandemic had a disproportionate impact on vulnerable groups including Traveller communities.</p>
25	Policy H10 - Space Standards ( Page 77)
	The Local Plan should include a requirement to use the nationally described space standard as a minimum.



	<p><b><u>Comments from an LCC Landowner Perspective</u></b></p> <p>It is agreed that housing should meet NDSS Standards as a minimum subject to the proviso that any impact on the viability of the scheme does not act as a constraint on delivery. Equally, the introduction of space standards could be phased in a way that allows market forces to determine land values that take account of their introduction.</p>
<p><b>26</b></p>	<p><b>Policy H11 – Accessible, Adaptable and Wheelchair User Homes (Page 79)</b></p>
	<p>For those sites that are eligible to accommodate a proportion of dwellings that meet Part M4(3) of the building regulations (in accordance with part (2) of draft Policy H11), it is suggested that the policy stipulates the need for consideration of the location of such dwellings within the site for transport/accessibility purposes, namely:</p> <ul style="list-style-type: none"> <li>• Proximity to existing/proposed passenger transport and/or LTN 1/20 compliant cycle infrastructure (on the basis that such infrastructure would serve modes of travel aimed at target occupants of such dwellings (mobility scooters etc. - i.e. the 'wheeling' part of cycling and wheeling).</li> <li>• Potentially grouping such dwellings together/in close proximity on the basis that occupants of such dwellings are more likely to have wider supported transport and/or social care needs – grouping together may have logistical/operational efficiency and carbon reduction benefits (e.g. potential to combine pick-ups/drop-offs for supported transport).</li> </ul> <p><b><u>Comments from an LCC Landowner Perspective</u></b></p> <p>The policy of ensuring all housing meets current Building Regulation standards is logical as is the need for a proportion of the dwellings to be wheelchair friendly. In respect of market housing the proportion of housing that is required to meet M4(3)(a) should be aligned with the level of need identified within the housing needs assessment for the District and take account of the level of provision delivered through affordable housing and supported housing.</p>
<p><b>The Economy</b></p>	
<p><b>27</b></p>	<p><b>Policy Ec1 – Economic Strategy (Strategic Policy) (Page 84)</b></p>
	<p>We would support the framing of policy EC1 in accordance with those key principles and locations defined through Strategic Growth Plan of relevance to North West Leicestershire, as set out within paragraph 7.6 of the draft policies</p>



document.

As previously mentioned, given that this Local Plan has a key part to play to transition the Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, employment land provision should be considered in that context (regardless of whether it is to meet solely **the district's needs or to meet wider HMA needs**).

Additionally, the drive to decarbonise transport will, to some degree, be an influencing factor on delivery and sites, too. The electrification of Light, Medium and Heavy Goods vehicle fleets during the lifetime of the Local Plan could, potentially, render some existing employment locations as obsolete (e.g. because of an inability to provide sufficient power supply/charging **facilities and/or the 'last mile' is too long for an electric HGV once it has left the Strategic Road Network**) or temporarily redundant (e.g. whilst issues of **power supply, 'last mile' HGV operation are addressed**).

How the provision of appropriate power infrastructure is provided to enable growth may need to be a consideration in the new Local Plan in this regard.

In addition, it is not clear how the Freeport proposals have influenced thinking in respect of the new Local Plan?

Additionally, as a general comment given that the East Midlands Gateway Strategic Rail Freight Interchange (SRFI) facility is now complete and open for business, it would seem sensible to consider whether a policy approach should be adopted that supports the further expansion of employment provision in that area that is genuinely able to be served by the SRFI as part of its logistic chain. This would help to maximise sustainability/ minimise additional HGV trips on the wider highway network. Should further growth in this area be considered, then the comments in respect of the Strategic Growth Plan International Gateway (IG) made in response to Q5 apply, i.e. It will be important to ensure an overall, coordinated strategy-led approach to the consideration of and planning for growth in the IG.

#### Comments from an LCC Landowner Perspective

The employment strategy needs to be consistent with paras 85-87 of the NPPF and guided by the most up to date evidence. It is recognised that a lack of demand exists for office accommodation as a result of recent changes to working practices following the COVID pandemic. In the event that future evidence indicates that, having regard to existing commitments, there is an



	<p>over-supply of offices in the period to 2040 consideration should be given to permitting alternative employment uses compatible with the general locality in order to continue growing the local economy.</p> <p>Further, the strategy needs to encourage the provision of high-quality employment opportunities that meet the current needs of the market across all settlements of Sustainable Village and above to maintain the sustainability of settlements and encourage the use of non-vehicular modes to transport to get to work.</p> <p>Overall the quantum of proposed allocations is welcomed.</p>
28	<p>Policy Ec2 – Employment Commitments (Strategic Policy) (Page 84)</p>
	<p>It is presumed that the actual Local Plan will clarify how the Freeport sites will be considered, i.e. will they be treated as part of the baseline/existing commitments that the Local Plan will need to work alongside/be accommodated on top of?</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>Comments incorporated elsewhere in economy section.</p>
29	<p>Policy Ec3 – New Employment Allocations (Strategic Policy) (Page 84)</p>
	<p>Further to the overarching comments, please see our more detailed comments around specific sites within the Proposed Housing and Employment Allocations sections within this document. (Please also see response on draft policy Ec1.)</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The allocations of site EMP60 Burton Road, Oakthorpe is strongly supported. Being both available and deliverable the site would provide much needed employment opportunities in a sustainable location with excellent infrastructure links to the wider national network. The site has the capability of meeting local demand for start-up and grow-on/business development space together with an element of non-strategic B8 to support continued growth within the local economy. A further, more detailed, response in respect of the site is included elsewhere in this response.</p>
30	<p>Policy Ec4 – Employment Uses on Unidentified Sites (Page 85)</p>
	<p>Within paragraph C (II) of the policy, a minor change to the proposed wording is suggested (see underline): <b><i>"Has good access to the strategic highway</i></b></p>



	<p><i>network (M1, M42/A42 and A50) and an acceptable impact on the capacity of that network, including any junctions; (subject to mitigation where necessary)”</i></p> <p>It also questioned whether good access to the strategic highway network is relevant in the case of all types of employment (it seems most applicable to Strategic B8 type developments)?</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>Whilst the policy is somewhat restrictive in that it seeks, where possible, to direct employment to established, committed and allocated sites it does provide limited opportunities to establish addition employment opportunities in the district which is to be encouraged. This may be especially true in respect of the re-use of uneconomic agricultural buildings which would support both the individual farm business and the wider economy as recognised by NPPF para 88.</p>
31	<p>Policy Ec5 – Existing Employment Areas (Page 89)</p>
	<p><u>Comments from an LCC Landowner Perspective</u></p> <p>The approach to the protection of established employment is appropriate in that it recognises the need for sites/assets that are no longer capable of reasonable economic use can be devoted to suitable alternative uses.</p>
32	<p>Policy Ec6 – Start-up Workspace (Page 91)</p>
	<p><u>Comments from an LCC Landowner Perspective</u></p> <p>A policy encouraging the development of start-up space would be entirely appropriate give the high proportion of small and micro businesses based in North West Leicestershire. However, it should be recognised that the delivery of start-up space within larger and strategic employment areas would be unattractive to developers and investors given the higher risk associated with fledgeling enterprises compared to occupiers of established good covenant.</p>
33	<p>Policy Ec7 - Local Employment Opportunities (Page 93)</p>
	<p>The document's approach to enhancing the local workforce's skills and ensuring the creation of quality jobs is crucial. A helpful focus could be to help align local education and training opportunities with the needs of an evolving job market. Support direct policies or initiatives aimed at workforce development, including collaboration with local businesses, educational institutions and training providers to tailor education and training programmes</p>



	<p>that meet the specific needs of the local economy.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>This policy could be incorporated within the overall strategic employment policy</p>
34	<p>Policy Ec8 - East Midlands Airport (Page 95)</p>
	<p>It is suggested that the policy would benefit from explicit reference to the <b>provision of onsite 'clean' fuel infrastructure such as EV charging to encourage</b> the uptake of such vehicles, given that a significant proportion of people are likely to continue to arrive at the airport by car.</p> <p>In addition, it is surprising that there is no reference to the Freeport proposals in the draft Policy, noting that they are directly and indirectly associated with the airport site and its operations.</p>
35	<p>Policy Ec9 - East Midlands Airport: Safeguarding (Page 96)</p>
	<p>No particular comments from a strategic transport perspective. (As an observation, point (e)(i) could result in conflicts with wider aspirations/requirements for development in this area (in particular the proposed strategic sites at Isley Woodhouse and Castle Donington) - e.g. in terms of seeking to create "beautiful" developments in accordance with the NPPF and/or measures to achieve biodiversity net-gain.</p>
36	<p>Policy Ec10 - East Midlands Airport: Public Safety Zones (Page 98)</p>
	<p>No comments.</p>
37	<p>Policy Ec11 – Donington Park Circuit (page 101)</p>
	<p>The policy would benefit from explicit reference to the provision of onsite <b>'clean' fuel infrastructure such as EV charging to encourage the uptake of such</b> vehicles, given that a significant proportion of people are likely to continue to arrive at the circuit by car, for example by amending 3B of the policy (see underlines):</p> <p><i>"3 (b) Provide improvements in public transport accessibility, where viable, and/or other appropriate transport measures <u>including improvements to zero-carbon infrastructure such as EV charge points</u> that will reduce the impact of event and operational traffic on the local and strategic network; <u>and on the climate</u>"</i></p>



<b>38</b>	<b>Policy Ec12 – Tourism and Visitor Accommodation (Strategic Policy) (Page 104)</b>
	<p><b><u>Comments from an LCC Landowner Perspective</u></b></p> <p>At NPPF para 88c) guidance advises that policy should seek to enable sustainable tourism and leisure developments in the countryside. As North West Leicestershire remains a largely rural area the approach in this policy is therefore broadly aligned with the NPPF and ,additionally, gives protection to existing tourism assets although further thought may need to be given to the period of non-viability in finalising the proposal.</p>
<b>Town and Local Centres</b>	
<b>39</b>	<b>Policy TC1 Town and Local Centres: Hierarchy and Management of Development (Strategic Policy) (Page 110)</b>
	<p>In relation to Policy TC1, it is noted that there is an inconsistency/contradiction in how Ashby is treated through draft Policy S2 (i.e. the spatial hierarchy) vs its identification as a town centre of equivalent level to Coalville within draft Policy TC1. The basis for this difference is unclear at present.</p> <p>The TCPA '20 Minute neighbourhoods: creating healthier, active, prosperous communities' guidance provides recommendations on planning of healthy neighbourhoods/town centres such as well-connected paths, streets, space access to community facilities and vibrancy of amenities where possible which will enable new developments to be integrated into the existing businesses.</p> <p>Schools being part of a local centre can bring about benefits for both, such as customer footfall and car parking for school drop off.</p> <p>It is suggested that there is a strengthening of the reference to waste infrastructure (page 116) (see underlined text) - (f) <u>Utilities and waste collection and disposal infrastructure such as Household Waste and Recycling Centres (HWRCs)</u></p>
<b>40</b>	<b>Policy TC2 Hot Food Takeaway Uses (Page 112)</b>
	<p>Public Health are happy to continue working with our colleagues at North West Leicestershire on this Hot Food Takeaway Policy and associated work that arises from it.</p> <p>We would support the proximity of education buildings being considered when</p>

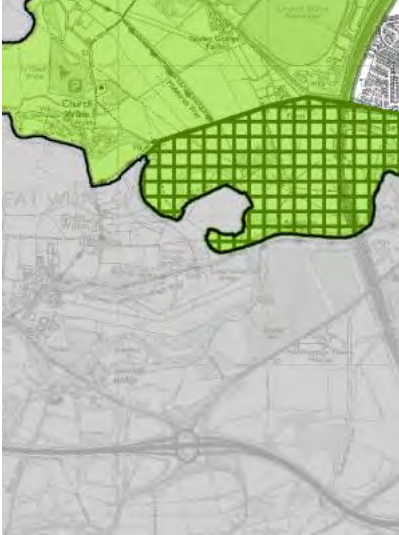


	<p>determining hot foot takeaway planning applications.</p> <p><b><u>Comments from an LCC Landowner Perspective</u></b></p> <p>The policy lacks any mention of roadside retail outlets which are more likely to be promoted in the current market.</p>
<p><b>Infrastructure and Facilities</b></p>	
<p><b>41</b></p>	<p><b>Policy IF1 – Development and Infrastructure (Strategic Policy) (Page 116)</b></p>
	<p>Infrastructure is the backbone of economic growth. The document outlines intentions to develop or improve transportation, digital connectivity and utilities. There is an opportunity to focus on the importance of strategic infrastructure investments that support growth areas and address existing and future transport challenges, considering the broader impact on the county. The County Council is engaged with NWLDC on the Infrastructure Delivery Plan development process and welcome the opportunity to input meaningfully from an early stage.</p> <p>The overall position on this draft policy from a highways perspective is reserved at this time pending the outcomes of the ongoing on the Plan’s transport evidence base. Notwithstanding that, the policy would benefit from explicit reference to the matter of delivering transport infrastructure and measures required to address cumulative / district-wide and cross-boundary highway impacts, including through the likely need to pool developer contributions (See also comments in respect of IF5).</p> <p>It is important to improve facilities for all the community and provide the new infrastructure needed to support our growing population. The provision of education infrastructure is created by the expansion of existing schools or the creation of new schools. Schools and their families must have access to high quality broadband infrastructure to support learning at school and at home, especially important if there were to be further periods of lockdown.</p> <p>Digital Connectivity is a County Council priority, our ambition is for a Digital Leicestershire. This includes the ambition for everyone to have access to fast, accessible, inclusive, reliable digital infrastructure and we are working to support government targets to achieve gigabit capable, lightning-fast broadband connections to 85% of Leicestershire by December 2025, increasing to 100% by 2030.</p> <p>Please note that the plan makes reference to Superfast broadband whereas</p>



	<p>government targets are aimed at the provision of ultrafast, gigabit capable fibre to the premise connections. This is further strengthened by amendments, in December 2022, to the Building Regulations 2010 to ensure that new homes constructed in England will be fitted with infrastructure and connections capable of delivering gigabit broadband - the fastest internet speeds on the market.</p> <p>Where a developer is unable to secure a gigabit-capable connection within the cost cap, developers must install the next fastest connection available.</p> <p>And even where a gigabit-capable connection is not available within the cost cap, gigabit-ready infrastructure, such as ducts, chambers and termination points, still needs to be installed. This will ensure that homes are fit for the digital age but may not be connected straight away.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>The policy sets out a logical approach to the overall provision of new infrastructure required to support development.</p>
42	<p>Policy IF2 – Community Facilities (Strategic Policy) (Page 118)</p>
	<p>It is agreed that community facilities are crucial for health and wellbeing of our residents across the life course, as this policy indicates throughout.</p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>In addition to the provisions outlined in the policy prior consideration needs to be given to permitting additional sustainable development within a settlement in order to support the continued economically viable use of existing community facilities.</p>
43	<p>Policy IF3 - Green and Blue infrastructure (Strategic Policy) (page 120)</p>
	<p>There are some concerns that the plan does not appear to have regard to broader strategic approaches which have been adopted by neighbouring authorities. NW Leics borders both Nottinghamshire and Derbyshire at its northernmost extent and local authorities (Erewash BC in Derbyshire and Rushcliffe in Notts) in both Counties have recently either adopted or produced emerging plans which seek to adopt a strategic approach to green and blue infrastructure. In both instances this is based on the Greater Nottinghamshire Blue-Green Infrastructure Strategy</p> <p><a href="https://www.gnplan.org.uk/media/1xyd102k/blue-green-infrastructure-">https://www.gnplan.org.uk/media/1xyd102k/blue-green-infrastructure-</a></p>



	<p><a href="#">strategy-final.pdf</a> . The Erewash BC local plan review in particular proposes a new policy: Strategic Policy 5: Green Infrastructure which designates a number of strategic green infrastructure corridors one of which - the Trent Strategic Green Infrastructure Corridor – forms part of the shared County/LPA boundary (shown in green hatched). Considering the challenges relating to climate change/flood risk/ local nature recovery experienced in the River Trent/River Soar corridor, this does appear shortsighted.</p>  <p>Specifically identifying green spaces is a benefit for the whole community and <b>will have a positive impact on children and their families’ lives.</b></p> <p><u>Comments from an LCC Landowner Perspective</u></p> <p>To policy confirms the need for delivery of green and blue infrastructure in all major developments.</p>
44	<p>Policy IF4 – Open Space, Sport and Recreation Facilities (Strategic Policy) (page 121)</p>
	<p>There are recommendations made in the Make Space for Girls – safer parks guidance that would be useful to include within this section – the recommendations support creating recreational spaces that are feel safer and more inclusive to girls and women as well providing spaces across the life course for different age groups</p> <p><a href="https://www.makespaceforgirls.co.uk/resources/safer-parks-for-women-and-girls-guidance">https://www.makespaceforgirls.co.uk/resources/safer-parks-for-women-and-girls-guidance</a></p> <p>There may be opportunities for schools to use this type of space for teaching and learning as well as the possibility of schools managing such spaces.</p>



	<p><u>Comments from an LCC Landowner Perspective</u></p> <p>The policy needs to outline the expected levels of delivery which should be in accordance with recognised standards and provide justification for exceeding that requirement due to factors such as local demand. The policy fails to recognise the need to designate areas of local green space in accordance with national policy.</p>
<p>45</p>	<p>Policy IF5 – Transport Infrastructure and New Development (Page 125)</p>
	<p>The final content of this policy (and supporting text) will be influenced by the ongoing and planned Local Plan transport assessment work. However, we would envisage the need for a more bespoke approach to dealing with cumulative and cross-boundary transport impacts and requirements in certain areas of the district, most likely in the form of area transport strategies.</p> <p>It is likely that one such area would be the International Gateway (given the scale/nature of growth proposed in this area through the Local Plan as well as interrelated proposals for the area including the EM Freeport. Others are likely to include Coalville and Ashby (either as an extension to Coalville or on a standalone basis) areas.</p> <p>We support the principle of including safeguarding provisions within the draft policy, albeit in practice this may need to be widened out to include other forms of transport infrastructure (i.e. not just the LCWIP corridors), subject to the outcomes of the ongoing/planned transport evidence.</p> <p>Within section 3 of the policy, it would be good to include that development will maximise accessibility by sustainable modes including providing green infrastructure such as EV charge points where residents have no choice but to use a private vehicle, to help encourage the transition to EV vehicles and enable the infrastructure to be in place.</p> <p>It is also considered that the transport strategy will impact where future housing development occurs which will in turn dictate where future school places are needed. A good transport network around schools is required to ensure there are various travel options for staff, pupils and their families. School travel plans must ensure that there are safe options for getting to and from schools and good transport accessibility will support this.</p> <p>The County Council will need to understand how the plan proposes to coordinate infrastructure delivery (such as schools, libraries and healthcare</p>



	facilities) with new development, ensuring that growth is sustainable and supported by necessary services.
<b>46</b>	<b>Policy IF6 – Leicester to Burton Rail Line (Page 126)</b>
	See overarching comments.
<b>47</b>	<b>Policy IF7 – Ashby Canal (Page 128)</b>
	No comments.
<b>48</b>	<b>Policy IF8 – Parking and New Development (Page 130)</b>
	<p>Suggest modifying point (1) of draft policy IF8 along the following lines (new text <u>underlined</u>):</p> <p><i>"development which will generate vehicle trips must provide appropriate levels of vehicle and cycle parking <b><u>(and associated facilities – e.g. electric vehicle charging points)</u></b> having regard to the latest guidance published by Leicestershire County Council and by the District Council, <b><u>as well as the relevant sections of the building regulations</u></b>".</i></p> <p>With regards to point (3) of the draft policy – there may be circumstances where developers can be conditioned to provide an offsite cycle parking schemes rather than seeking a financial contribution. Suggest this part of the policy is modified accordingly.</p> <p>Paragraph 9.56 references the ban on sale of new petrol on diesel cars being introduced in 2030, however the Government has now deferred this until 2035.</p>
<b>Environment</b>	
<b>49</b>	<b>Policy En1 – Nature Conservation/Biodiversity Net Gain (Strategic Policy) (Page 133)</b>
	<p>This is a key policy in demonstrating NWLDC’s approach to environmental conservation and mitigating and adapting to climate change.</p> <p>Biodiversity provides good education opportunities and an understanding of how it can contribute to a child’s local community.</p> <p><b><u>Comments from an LCC Landowner Perspective</u></b></p> <p>The approach reflects current statutory requirements and best practice guidance but fails to consider the securing delivery through S106 agreements</p>



	or conservation covenants.
50	Policy En2 – River Mease Special Area of Conservation (Strategic Policy) (Page 135)
	No comments.
51	Policy En3 – The National Forest (Strategic Policy) (Page 138)
	There are no concerns with this policy and appears to reflect the current state of thinking in the Heart of the Forest area.
52	Policy En4 – Charnwood Forest Regional Park (Strategic Policy) (Page 140)
	There are no concerns with this policy and appears to reflect the current state of thinking in the CFRP.
53	Policy En5 – Areas of Separation (Page 142)
	No comments.
54	Policy En6 – Land and Air Quality (Page 144)
	No comments.
55	Policy En7 – Conservation and Enhancement of the Historic Environment (Strategic Policy) (Page 147)
	<p>It is considered that there should be some additions (in italics) to the supporting text should this be taken forward into the Draft Local Plan.</p> <p>10.81 A heritage asset is a building, monument, area or historic landscape that merits consideration in planning decisions because of its heritage interest. Listed buildings, conservation areas, registered parks and gardens and scheduled monuments are known as designated heritage assets, as they are designated under the relevant legislation. The term heritage assets also covers assets identified by the council, including those on our local lists, <i>and by local communities in their preparation of Neighbourhood Plans.</i></p> <p>10.83 Leicestershire County Council manage and maintain the Leicestershire and Rutland Historic Environment Record (HER). It is a public record and holds detailed information about the historic environment of Leicestershire and Rutland, <i>providing a comprehensive register of known designated and non-designated heritage assets, as well as holding information of historic urban and landscape character.</i></p> <p>10.85 <i>Archaeological investigation has revealed extensive evidence of prehistoric</i></p>



*and later settlement within the district, including an Iron Age hill fort at Breedon-on-the-Hill ('The Bulwarks'), and the Bronze Age barrow cemetery, Iron Age village and Roman villa near Lockington.*

## **Proposed Housing and Employment Allocations**

### **Overarching comments**

1. The Local Highway Authority (LHA) is supportive of the Development Plan process; whilst providing for the future population and economic growth of Leicester and Leicestershire will be challenging in many regards (including in respect of highways and transport), a Plan-led approach offers the greatest opportunities to address those challenges as compared to seeking to deal with the impacts of speculative, 'unplanned' growth. The LHA would therefore wish to see the successful adoption of a new North West Leicestershire Local Plan (the Plan) and remains committed to working with North West Leicestershire District Council (NWLDC) to achieve such.
2. The proposed policy wording for each site around contributions to offsite transport infrastructure will need to be reviewed and likely revised based on the findings of the ongoing and planned Local Plan transport assessment work. As a minimum, it is assumed the relevant parts of the site-specific policies should be cross referencing to the relevant "IF" policies in each case, which will themselves be subject to review as per earlier comments.
3. The draft policy wording for the various employment sites does not appear to include reference to the need for S106 financial contributions to deal with wider cumulative/cross-boundary issues, unlike the draft policies for housing site allocations. This will need to be incorporated as the supporting transport evidence develops.
4. Whilst it is acknowledged that a range of matters and considerations can inform the content of a Local Plan, nevertheless in line with previous advice given to NWLDC by the Local Highway Authority (LHA) during the SHELAA process some of the sites as currently proposed to be allocated pose particular challenges from a highways perspective, e.g. in terms of achieving safe site access. Additionally sites are included on which the Local Highway Authority has not been consulted on previously and it has not been possible to provide comments on such at this time; accordingly the LHA reserves its position.
5. The extent to which this might ultimately impact on the Plan's effectiveness is a matter for NWLDC to assess, but it should be noted that highway issues may arise in taking sites forward through the development management process. This matter is taken up in more detail in response to consultations on the particular proposed allocations.
6. To seek to proactively move matters forward in the light of these overarching comments, the LHA would welcome the opportunity to have follow-up discussions with NWLDC to help inform the drafting of the Plan itself.



7. From an education perspective and in relation to the proposed Housing and Employment Allocations document, all developments will be assessed as to whether there is a requirement for additional school places, this would be in relation to negotiating s106 contributions. This could be on an individual site basis or cumulative basis and will also impact the request, for instance extensions to existing schools or the creation of new schools. It is noted that some of the allocations include the land for a new school. School Organisation would want to be involved in any discussions regarding school place planning.
8. Highway Development Management (HDM) have commented on six sites. They have been graded as red (delivery unlikely to be possible), amber (may be possible but challenges), or green (likely to be deliverable in highway terms).

### Representations on the Proposed Housing Allocations

#### 56 Coalville

##### **Comments as the Highways Authority:**

**South of Church Lane, New Swannington (C48)** - This site is adjacent to (opposite side of Church Lane) the West Whitwick 'broad location' (C47 etc.) for which separate comments are provided below. On this basis, it is queried why this site is not included as part of the wider West Whitwick broad location, and associated masterplanning/joint infrastructure requirements etc. Were this site to be included and subject to comprehensive masterplanning requirements, it may help to overcome some of the transport infrastructure challenges (specifically including site access arrangements) relating to the wider West Whitwick broad location.

**Jack's Ices, North of Standard Hill, Coalville (C50)** - As part of the SHELAA comments, concerns were highlighted with the vertical alignment of Standard Hill to achieve a safe and appropriate form of access. Access from the existing consented site would raise potential capacity concerns with the site access and the need for a secondary emergency access given the cumulative quantum of development. It would be unlikely that any roads within the site would be adoptable given levels issues.

**Church View, Grange Road, Hugglescote (C61)** - The LHA and the Lead Local Flood Authority (so far as we are aware) have not been consulted on this site, and it would need to be involved going forward to ensure that a safe access can be achieved, and the issue of flooding can be resolved as only part of the site will be able to be developed due to the flood zone.

**Land at Lily Bank, Thringstone (C74)** - As part of the SHELAA comments, it was noted that the supporting information to the site showed that the speed survey was out of date. There were concerns over the lack of pedestrian and cycle provision on Lily



Bank, and it remained unclear if safe and appropriate access could be achieved.

Land at 186, 188 and 190 London Road, Coalville (C83) - As part of the SHELAA comments, concerns were raised at the lack of information, which has still to be provided to the LHA, to demonstrate how safe and appropriate access to the site can be achieved given the constraints of the railway bridge.

Land at junction of Wash Lane and Coalville Lane, Ravenstone (R17) - **The LHA's previous SHELAA comments highlighted that Access from Wash Lane may be contrary to the Leicestershire Highway Design Guide Policy IN5, 'Our Access to the Road Network Policy', if actual design speeds are above 40mph. A speed survey would** therefore be required, and if speeds were higher, consideration given to whether design speeds can be constrained to 40mph by traffic management / calming measures.

Broad Location, West Whitwick (C47, C77, C78, C86, C81) - **The LHA's previous SHELAA comments highlighted concerns with all potential points of access.** It was suggested that the sites could potentially come forward as one comprehensive master planned site, however, it remains unclear if safe and appropriate access can be achieved and will need more detailed assessment going forward if the broad area is to remain.

As per our comment for C48 above, we are surprised that this hasn't been combined into the West Whitwick broad location to create a larger comprehensive development area that may help overcome some of the challenges relating to this site/location as it stands, particularly with regards to access arrangements.

Comments from a Planning perspective:

C46 – Broomleys Farm – no substantive comments to make.

C48 - South of Church Lane, New Swannington – the site is within a Mineral Safeguarding Area for coal. Any allocation would need to take account of the viability of the extraction of the mineral resources in line with policy M11 of the LMWLP.

C50 - **Jack's Ices, North of Standard Hill, Coalville** – no substantive comments to make. More distant safeguarding areas over 200m away.

C61 - Church View, Grange Road, Hugglescote – no substantive comments to make. More distant safeguarding areas over 200m away.

C47, C77, C78, C86, C81 - These sites lie entirely within an MCA for coal, other than C77 where the western half of the site lies within a coal MCA. As such, we recommend that a Minerals Assessment is undertaken in line with Policy M11 of the Leicestershire



<p>Minerals and Waste Local Plan (LMWLP) to support any allocation of these sites in new policy, ensuring that the mineral is not needlessly sterilised by future development. Furthermore, whilst it is out of our remit to comment specifically on the matter, we do encourage you to consider the potential issue of land instability associated with coal mining works that could be present at the site.</p> <p>There are no concerns from a waste safeguarding perspective.</p> <p>C74 Land at Lily Bank, Thringstone – no substantive comments to make.</p> <p>C83 - 186, 188 and 190 London Road, Coalville – no substantive comments to make.</p> <p>R17 - Land at Coalville Lane/Ravenstone Road – the site is in a Mineral Safeguarding Area for both sand &amp; gravel and brick clay so would require a minerals assessment. Policy M11 outlines that mineral, including Sand and Gravel and Brick Clay, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.</p> <p>C92 - The site does not lie within an MCA and thus does not require a Minerals Assessment. Furthermore, there are no concerns from a waste safeguarding perspective</p> <p>TBC - It does not appear that any specific site layout plans have been provided for this allocation. However, should any individual sites come forward at any stage we would be happy to provide comments from a minerals and waste safeguarding perspective once these are identified.</p> <p><i><u>For Information</u></i> - The recent Health Inequalities Joint Strategic Needs Assessment reviewed the evidence base for health inequalities across Leicestershire looking at the local evidence of inequalities using key measures such as life expectancy and healthy life expectancy. It also examined the different measures of poverty and deprivation and who experiences these in Leicestershire to identify the groups most at risk of health inequalities' in Leicestershire and geographical locations neighbourhoods as high risk in terms of potential health inequalities. The areas of Agar Nook MSOA and Coalville MSOA are indicated as areas of concern as being high risk of potential health inequalities.</p> <p><u>Church View, Grange Road, Hugglescote (C61)</u></p> <p>Amber - May be challenge to delivery of a safe and suitable access due to proximity of</p>
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	<p>railway bridge.</p> <p><u>Land at 186, 188 and 190 London Road, Coalville (C83)</u></p> <p>Red - Access does not appear to be achievable based on the red line shown, given the narrow highway frontage and close proximity of the railway bridge.</p>
57	<p>Ashby de la Zouch</p> <p><u>Comments from a Planning perspective:</u></p> <p>Money Hill, Ashby-de-la-Zouch (A5)</p> <p>The allocation site is located within a Mineral Safeguarding Area for Coal as identified within the Leicestershire Minerals and Waste Local Plan (2019-31) (MWLP) and supporting documents. Policy M11 outlines that mineral, including Coal, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The full text to Policy M11 can be found on Page 38 of the Leicestershire Minerals and Waste Local Plan (2019-31) on the following link:  <a href="https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf">https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf</a>.</p> <p>We have no comments from a waste safeguarding perspective.</p> <p>A27- South of Burton Road, Ashby-de-la-Zouch</p> <p>The identified site is located just outside of a Mineral Safeguarding Area for coal and as such the County Council has no objection to the proposal from a mineral sterilisation perspective. There appear to be no concerns from a waste perspective and as such the County Council would have no objections to the proposal.</p>
58	<p>Castle Donington (Land North and South of Park Lane)</p> <p><u>Comments as the Highways Authority:</u></p> <p>Land North and South of Park Lane, Castle Donington (CD10) – The commissioned transport modelling to assess the cumulative impact of the three sites in the area (EMP90, CD10 and IW1) in conjunction with planned development outside the district, including at Ratcliffe Power Station, is welcomed.</p> <p>In principle, the components of the draft Policy CD10 are a good starting point but will need to be reviewed in light of the emerging transport evidence (as per comment 2 of the overarching comments) and likely made more bespoke in places.</p>



	<p>The suggestion of a Supplementary Planning Document (SPD) (as per the overarching comments in respect to the policies consultation) for the International Gateway area as a whole would also likely have implications for the policy wording, if this an approach that the district council are minded to adopt. Regardless, the Plan should recognise that this site would form a significant element of further development in the International Gateway Area (or immediately adjoining), including EMP90, IW1 and the wider Freeport, thus it cannot be considered in isolation as it is possible to do so with other proposed site allocations elsewhere in the district.</p> <p>The LHA reserves its position to comment further once we have seen the outputs from the transport modelling and the Infrastructure Delivery Plan.</p> <p><u>Comments from a Planning perspective:</u></p> <p>CD10: Land North and South of Park Lane, Castle Donnington</p> <p>The MPA notes that, with the exception of a small (approximately 50m) strip of land just inside its northernmost boundary, which falls within the Mineral Safeguarding Area for sand and gravel as set out in the LMWLP, the majority of the land to the north and south of Park Lane is not located within a Mineral Safeguarding Area. Dependent on the proposed phasing, there may be the potential to utilise the sand and gravel in this area as part of the construction process. Whilst it is noted that drawing no CD10: Parameters Plan indicates that the land falling within the safeguarding area would be designed as open space, which in itself would not directly sterilise the mineral resource, the effect of built development taking place immediately south of this, would prevent future access to the mineral reserve. A mineral assessment should be required for any application on land located to the north of Park Lane.</p> <p>The MPA is also aware that there is consented mineral extraction associated with Shardlow Quarry (code ref: CM9/0811/53) located within 500m of the proposed site allocation north of the River Trent, within Derbyshire. Dependant on the remaining working life of the quarry and the likely timescales for this site to come forward, there may be the potential for impacts associated with mineral extraction in this location. You are advised to consult Derbyshire County Council, the relevant MPA in respect of the Shardlow Quarry site, at the earliest opportunity for further information.</p> <p>There are no safeguarded waste sites close to the site and it is not considered that the proposed allocation would affect the waste safeguarding interest.</p>
59	Ibstock (Land off Leicester Road)
	<p><u>Comments as the Highways Authority:</u></p> <p>Land off Leicester Road, Ibstock (Ib18)- <b>As per the LHA's previous SHELAA</b></p>



	<p>comments, IN5 policy concerns were raised in respect of any proposed site access to the A447.</p> <p><u>Comments from a Planning perspective:</u></p> <p>Ib18 - Housing allocation site (Policy H3).</p> <p>Within a Mineral Safeguarding Area for Brick Clay, Coal and Sand &amp; Gravel. Mineral assessment required for all development. Coal Mining Risk Assessment also required. Ibstock brickworks located close to the site, development will have to consider impact on the operations of the brickworks.</p> <p>No comments from waste perspective.</p>
60	<p>Appleby Magna (Land at Old End and 40 Measham Road)</p>
	<p><u>Comments from a Planning perspective:</u></p> <p>AP15 &amp; AP17 - Housing allocation site (Policy H3).</p> <p>Not located in Mineral Safeguarding Area or close to Waste sites.</p> <p><u>Comments from LCC as LLFA:</u></p> <p>This allocation is located within an LLFA area of known severe flooding and could have a significant impact on flood risk. The LLFA would welcome designs that include additional flood compensation and as such early engagement from the developer with the LLFA would be requested.</p>
61	<p>Donisthorpe (Land off Ramscliff Avenue)</p>
	<p><u>Comments from a Planning perspective:</u></p> <p>D8 - Housing allocation site (Policy H3)</p> <p>Within a Mineral Safeguarding Area for Coal. Coal Mining Risk Assessment and Minerals Assessment required for new development.</p> <p>No comments from waste safeguarding perspective.</p> <p><u>Comments from an LCC Landowner perspective:</u></p> <p>The proposed allocation of the Land off Ramscliffe Avenue, Donisthorpe is strongly supported.</p> <p>The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable; deliverability having previously been demonstrated by a previous outline consent 04/01162/OUT (now lapsed) and confirmed by the initial</p>



	<p>due diligence work that has been undertaken to date in respect of those matters detailed in the draft policy. In particular work is ongoing in respect of access design, foul and storm water strategy and land stability to give further confidence as to the potential of the site to deliver a viable policy compliant development opportunity of a minimum 32 residential units within a sustainable village location. Whilst the site is being promoted by the County Council rather than a housebuilder it is the County <b>Council's normal practice to bring sites to the market immediately on the grant of an</b> outline planning permission in much the same manner as a private sector land promoter. This model has a successful track record having previously brought forward sites within North West Leicestershire notably at Snibston Discovery Park and Heather Lane, Ravenstone as well as elsewhere across the county.</p>
62	<p>Ellistown (Land between Midland Road and Leicester Road)</p>
	<p><u>Comments as the Highways authority:</u></p> <p>It would be preferable for the principle set out in the final sentence of paragraph 4.87 of the sites document (i.e. concerning need for complementary approach to the adjacent employment site allocation) to be incorporated into the draft policy for site E7, particularly (but not necessarily just) in respect of site access arrangements.</p> <p><u>Comments from a Planning perspective:</u></p> <p>E7 - Housing allocation site (Policy H3).</p> <p>Not located in Mineral Safeguarding Area. 1.2km from nearest waste site.</p>
63	<p>Heather (Land adjacent to Sparkenhoe Estate)</p>
	<p><u>Comments from a Planning perspective:</u></p> <p>H3- Land Adjacent to Sparkenhoe Estate, Heather</p> <p>The development site is located within a Mineral Safeguarding Area for sand and gravel. However, the proposed development of 32 houses is of a reasonably small scale and sits within an existing residential development area which would make future mineral extraction unlikely and as such the County Council has no objections to the proposal.</p> <p>There are no objections from a waste perspective.</p>
64	<p>Moira (Land off Ashby Road)</p>
	<p><u>Comments as the Highways authority:</u></p> <p>Land off Ashby Road, Moira (Mo8) – The LHA can find no record of having been</p>



	<p>previously consulted on this site. There may be concerns over access onto Ashby Road.</p> <p><u>Comments from a Planning perspective:</u></p> <p>Mo8- Land off Ashby Road, Moira</p> <p>The development site is located within a Mineral Safeguarding Area for coal. However the proposed development is located with residential development sitting to either side and as such the County Council has no objections to the proposed land use of 49 residential properties.</p> <p>There are no objections from a waste perspective.</p> <p><u>Comments from a Highway Development Management perspective:</u></p> <p><u>Land off Ashby Road, Moira (Mo8)</u></p> <p>Green - Access likely to be achievable subject to careful positioning and existing 85th percentile speeds.</p>
65	Oakthorpe (Land at School Lane)
	<p><u>Comments as the Highway authority:</u></p> <p>Land at School Lane, Oakthorpe (Oa5) - <b>As per the LHA's previous SHELAA</b> comments, access from School Street appears to be difficult on the basis of available corridor width and potential visibility issues. The new proposal recommends access through the residential development at Home Farm to the north, but at this time the LHA has not had an opportunity to assess whether or not this would be appropriate.</p> <p><u>Comments from a Planning perspective:</u></p> <p>Oa5 - Land at School Lane, Oakthorpe</p> <p>The development site is located within a Mineral Safeguarding Area for coal. However the proposal sits adjacent to residential development currently under construction and would seek to effectively link the residential development to existing. Due to the nature of the mineral and the proximity of nearby residential development County Council has no objections to the proposed land use for around 47 homes.</p> <p>There are no objections from a waste perspective.</p> <p><u>Comments from LCC as LLFA:</u></p> <p>This allocation is located within an LLFA area of known severe flooding, surface water during and post construction will impact, as such early engagement from the developer</p>



	with the LLFA would be requested.
66	Packington (Land South of Normanton Road)
	<p><u>Comments from a Planning perspective:</u></p> <p>P4 Land South of Normanton Road, Packington (P4)</p> <p>The allocation site is located within a Mineral Safeguarding Area for Coal, Sand and Gravel as identified within the Leicestershire Minerals and Waste Local Plan (2019-31) (MWLP) and supporting documents. Policy M11 outlines that mineral, including Coal, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The full text to Policy M11 can be found on Page 38 of the Leicestershire Minerals and Waste Local Plan (2019-31) on the following link:  <a href="https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf">https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf</a>.</p> <p>We have no comments from a waste safeguarding perspective.</p> <p><u>Comments from LCC as LLFA:</u></p> <p>This allocation is located within an LLFA area of known severe flooding, surface water during and post construction will impact, as such early engagement from the developer with the LLFA would be requested.</p>
67	Ravenstone (Land at Heather Lane)
	<p><u>Comments as the Highways authority:</u></p> <p>Land at Heather Road, Ravenstone (R12) - LCC have not been consulted on this site, and it would need to be involved going forward to ensure that a safe access can be achieved.</p> <p><u>Comments from a Planning perspective:</u></p> <p>R12 Land at Heather Road, Ravenstone (R12)</p> <p>The allocation site is located within a Mineral Safeguarding Area for Coal, Sand and Gravel as identified within the Leicestershire Minerals and Waste Local Plan (2019-31) (MWLP) and supporting documents. Policy M11 outlines that mineral, including Coal, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The full text to Policy M11 can be found on Page 38 of the Leicestershire Minerals and Waste Local Plan</p>



	<p>(2019-31) on the following link:  <a href="https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf">https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf</a>.</p> <p>We have no comments from a waste safeguarding perspective.</p> <p><u>Comments from an LCC Landowner perspective:</u></p> <p>The proposed allocation of the Land at Heather Lane, Ravenstone is strongly supported.</p> <p>The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable. This has been confirmed by the initial due diligence work that has been undertaken to date in respect of those matters detailed in the draft policy. In particular work is ongoing in respect of access (for which provision was made in the release of the earlier development fronting Heather Lane), foul and storm water strategy and air quality to give further confidence as to the potential of the site to deliver a viable policy compliant development opportunity. In addition, preliminary masterplanning of the site will be commissioned to demonstrate the capability of the site to deliver in excess of the 50 house allocation without breaching the requirement not to extend development further into open countryside than the existing built form of the village. Whilst the site is being promoted by the County Council rather than a <b>housebuilder it is the County Council's normal practice to bring sites to the market</b> immediately on the grant of an outline planning permission in much the same manner as a private sector land promoter. This model has a successful track record having previously brought forward sites within North West Leicestershire notably at Snibston Discovery Park and previously at Heather Lane, Ravenstone as well as elsewhere across the county.</p> <p><u>Comments from a Highway Development Management perspective:</u></p> <p><u>Land at Heather Lane, Ravenstone (R12)</u></p> <p>Red - Whilst access could be possible via Beesley Lane, the site does not appear to abut the adopted highway.</p>
68	New settlement at 'Land to the South of East Midlands Airport' (Isley Woodhouse)
	<p><u>Comments as the Highways Authority:</u></p> <p>Isley Woodhouse (IW1) - The commissioned transport modelling to assess the cumulative impact of the three sites in the area (EMP90, CD10 and IW1) in conjunction with planned development outside the district, including at Ratcliffe Power Station, is</p>



welcomed.

In principle, the components of the draft Policy IW1 are a good starting point but will need to be reviewed in light of the emerging transport evidence (as per our overarching comments in this document) and likely made more bespoke in places, e.g. in terms of specific employment sites we are looking to secure connectivity to.

The suggestion of a Supplementary Planning Document (SPD) (as per the overarching comments in respect to the policies consultation) for the International Gateway area as a whole would also likely have implications for the policy wording, if this an approach that the district council are minded to adopt. Regardless, the Plan should recognise that this site would form a significant element of further development in the International Gateway Area (or immediately adjoining), including EMP90, CD10 and the wider Freeport, thus it cannot be considered in isolation as it is possible to do so with other proposed site allocations elsewhere in the district.

Notwithstanding any proposals or otherwise for an SPD, amongst the changes we would anticipate to the, the draft policy wording would be to include reference to the need for S106 financial contributions to deal with wider cumulative/cross-boundary issues, unlike the draft policies for other site allocations.

Additionally, it is noted that the supporting text for site IW1 also includes much of the context/ rationale for the site that was missing from the main consultation/policies document (e.g. in relation to Policy S2) and it is suggested would need to be added to any future draft/submission version Local Plan.

The LHA reserves its position to comment further once we have seen the outputs from the transport modelling and the Infrastructure Delivery Plan.

Comments from a Planning perspective:

IW1: New Settlement at Isley Woodhouse

The site is not located in any Mineral Safeguarding Area and, as a consequence, a mineral assessment would not be required. However, the MPA wishes to bring to your attention the permitted current and future operations at Breedon and Cloud Hill quarries both of which are located close to the south west boundary of the proposed allocation. Breedon Quarry currently operates under the terms of planning permission 2003/0701/07. At its closest point, the planning permission boundary would be less than 400 metres from the land the subject of this scoping request. Planning permission 2003/0701/07 has also recently been subject to two applications - an Environment Act 1995 Review of Mineral Permission to update environmental controls as well as a Section 73 application to extend the lifetime of the quarry from 2042 until 2078. Following a meeting of the Council's Development Control and Regulatory Board



(DCRB) in July 2022, there is now a resolution to approve both applications subject to a S106 legal agreement. Whilst work on the S106 is still progressing, it is anticipated that this process will be resolved during 2024, following which the new permissions will be issued.

Cloud Hill Quarry operates under a number of planning permissions and has, in part, consent to operate until 22 February 2042 (code ref: 1996/0139/07). Planning permission (code ref: 2009/0940/07) for a southern extension to the site was granted in 2009 with mineral extraction permitted until 31 December 2025, although it is anticipated that an application to extend the duration of mineral working in the extension area will be submitted to the MWPA prior to that date.

Mineral operations of the type undertaken at Breedon and Cloud Hill quarries can give rise to impacts associated with, amongst other things, landscape and visual impacts, noise, dust and blast vibration, light pollution, extended hours of operation, HGV movements and hydrological issues associated with dewatering. The MWPA has concerns that the proposed development would impact on the ability of the existing and permitted mineral operations to continue to operate without being compromised. In this respect, it is considered that if brought forward, any masterplan or subsequent application(s) should have regard to Breedon and Cloud Hill quarries as part of any baseline assessment. The MWPA further considers that the proposed new settlement should be designed in such a way as to ensure that it would not prejudice the continued operation of the quarries in this location or that there would be impacts to amenity arising from inappropriate design and layout. It is suggested that paragraph 3(f) of the supporting text could be amended to also make reference to ongoing mineral extraction operations associated with Breedon and Cloud Hill quarries. This approach is supported by policy M12: Safeguarding of Existing Mineral Sites and Associated Minerals Infrastructure of the adopted Leicestershire Minerals and Waste Local Plan 2019-2031 (LMWLP) which forms part of the development plan for the area.

There are no safeguarded waste sites in the immediate vicinity of the proposed allocation, however, noting the scale of the proposed new settlement, the MWPA would strongly recommend that paragraph 3(b) of the supporting text be amended to make reference to the need to identify appropriate infrastructure to support the waste management needs of the new settlement and any impacts it is likely to have on existing waste management infrastructure within the County.

Comments from a strategic waste perspective:

Due to the scale of the proposed development at Isley Woodhouse, the strategic waste team at LCC would like to be kept informed of progress as planning continues to be developed, i.e. including in respect to the Master Plan / Infrastructure Study and



	<p>Phasing Plans.</p> <p><b><u>Comments from LCC as LLFA:</u></b></p> <p>Given the positioning of this site within a catchment sensitive to flooding, the LLFA requires that any developer seeks early engagement with the LLFA to agree principles of discharge of surface water. Given the site sits across multiple sub-catchments, the developer should seek to discharge surface water across the sub catchments, mimicking the pre-development drainage conditions. The discharge rate should not exceed 80% of the pre-development discharge rate for any sub-catchment of the site.</p> <p>The Applicant will need to consider the requirements of East Midlands Airport relating to bodies of open water within proximity to the airport site.</p>
<p><b>Representations on the Employment Allocations</b></p>	
<p><b>69</b></p>	<p><b>Ellistown (East of Midland Road)</b></p>
	<p><b><u>Comments as the Highways Authority:</u></b></p> <p><b>Land to the east of Midland Road, Ellistown (EMP24)-</b> As per the LHA’s previous SHELAA comments, as land to the west is being allocated to housing, this should take the form of a roundabout which should be noted in the policy, albeit as per the previous comments it was suggested that options to access from Beveridge Lane/Moore Lane should be explored as a preference. Also, as per comments on adjacent draft housing allocation site E7 It would be preferable for the principle set out in the final sentence of paragraph 5.6 of the sites document (i.e. concerning need for complementary approach to the adjacent site E7) to be incorporated into the draft policy for site EMP24, particularly (but not necessarily just) in respect of site access arrangements.</p> <p>It could be possible to mitigate impact at the double mini roundabout junction going forward, and the impact would potentially be less if access was taken from Moore Road with routeing to/from the A511/Beveridge Lane.</p> <p><b><u>Comments from a Planning perspective:</u></b></p> <p><b>EMP24 Land to the east of Midland Road, Ellistown (EMP24)</b></p> <p>The allocation site is not located within a Mineral Safeguarding Area. We have no comments from a waste safeguarding perspective.</p>
<p><b>70</b></p>	<p><b>Castle Donington (West of Hilltop)</b></p>
	<p><b><u>Comments from a Planning perspective:</u></b></p>



	<p>EMP89: Land West of Hilltop Farm, Castle Donington</p> <p>The site is not located in a Mineral Safeguarding Area and it is not considered that it would affect the mineral safeguarding interest.</p> <p>The site is not located close to any safeguarded waste sites and would not affect the waste safeguarding interest.</p>
71	Kegworth (North of A6 Derby Road and North of A543 Remembrance Way)
	<p><u>Comments as the Highways Authority:</u></p> <p>Land North of Derby Road (A6), Kegworth (EMP73 (part)) - In line with the <b>LHA's previous SHELAA comments, the ability for further growth to be able to come forward</b> in Kegworth is interlinked with proposals for growth across the wider area, including the Freeport and in the International Gateway (IW1, CD10 and EMP90) and any associated approach to addressing the transport cumulative impacts of such, particularly at M1 J24.</p> <p>The HS2 safeguarding has not yet been removed and could theoretically be retained (or reinstated) by any future government that emerges from the next general election, which is quite likely to be close to NWLDC's envisaged publication of their submission/Reg 19 Local Plan.</p> <p>On a more detailed point, both the draft policies and supporting text for EMP73 variously reference access/frontage onto the "A6 Derby Rd", when in fact this is actually just "Derby Rd (former A6)" following completion of the Kegworth Southern Bypass.</p> <p><u>Comments from a Planning perspective:</u></p> <p>EMP73 (Part) Land North of Derby Road (A6), Kegworth (EMP73 (part)).</p> <p>The allocation site is located entirely within a Mineral Safeguarding Area for Sand and Gravel as identified within the Leicestershire Minerals and Waste Local Plan (2019-31) (MWLP) and supporting documents. Policy M11 outlines that mineral, including Sand and Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. This is considered especially pertinent in this case given the close proximity of known sand and gravel resources currently extracted and worked at Lockington Quarry and the wider context in that there will be a potential shortfall of sand and gravel reserves within Leicestershire over the period to 2031 of some 7.67 million tonnes based on the production guideline, as detailed within the Leicestershire County Council Local Aggregate Assessment published September 2023. The full text to Policy M11 can be</p>



	<p>found on Page 38 of the Leicestershire Minerals and Waste Local Plan (2019-31) on the following link:  <a href="https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf">https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf</a>.</p> <p>We have no comments from a waste safeguarding perspective.</p> <p><u>Comments from LCC as LLFA:</u></p> <p>The northern part of the site is located within Flood zone 3, the LLFA would advise engagement with the EA in relation to this development.</p>
72	Oakthorpe (Burton Road) EMP60
	<p><u>Comments as the Highways Authority:</u></p> <p><b>The information related to the site states that LCC Highways Authority 'report that access on to Burton Road may be possible subject to the form of junction and due consideration of the proximity of the accesses to Winfields Outdoors opposite.' This is contrary to what LCC fed back during the last round of SHELAA, where it was advised that 'Burton Road is a high speed (50mph speed limit) road with minimal pedestrian walkways [there is a footway in the Measham direction]. Creating a new access onto this road is contrary to LCC Highways policy.'</b></p> <p><u>Comments from a Planning perspective:</u></p> <p>The allocation site is located within a Mineral Safeguarding Area for Coal as identified within the Leicestershire Minerals and Waste Local Plan (2019-31) (MWLP) and supporting documents. Policy M11 outlines that mineral, including Coal, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. The full text to Policy M11 can be found on Page 38 of the Leicestershire Minerals and Waste Local Plan (2019-31) on the following link:  <a href="https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf">https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/10/3/Leicestershire-Minerals-and-Waste-Local-Plan-Up-to-2031-Adopted-2019.pdf</a>.</p> <p>We have no comments from a waste safeguarding perspective.</p> <p><u>Comments from LCC as LLFA:</u></p> <p>The LLFA would encourage early engagement from the developer prior to the submission of this site for planning. As a part of the development, the LLFA would require the applicant to provide a 20% betterment on the greenfield runoff rate due to the risk of flooding downstream of the site. It should be noted that part of this site has</p>



	<p>already been put forward for nature restoration and rewilding to alleviate flooding to Oakthorpe, the LLFA would expect any future development to incorporate this into the masterplan of the site.</p> <p><u>Comments from an LCC Landowner perspective:</u></p> <p>The proposed allocation of the Land at Burton Road, Oakthorpe for employment uses is strongly supported.</p> <p>The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable. This has been confirmed by the initial due diligence work undertaken to date. In particular, work is ongoing in respect of access design in consultation with the LHA, as is the development of both a landscape and a foul and storm water drainage strategy to give further confidence as to the potential of the site to deliver a viable policy compliant development opportunity of a minimum 12,100 square meters of B2 and B8 employment space in a sustainable location easily accessible to the adjoining Local Service Centre of Measham and the strategic transport network. Whilst the site is being promoted by the County Council rather than a frontline <b>developer it is the County Council’s normal practice to bring sites to the market</b> immediately on the grant of an outline planning permission or develop them out as part of its investment portfolio; the latter option successfully developing much needed start-up and business expansion opportunities such as Atlas Court in Coalville at other locations across the county thereby supporting local business and generating economic wellbeing.</p> <p><u>Comments from a Highway Development Management perspective:</u></p> <p><u>Land at Burton Road, Oakthorpe (EMP60)</u></p> <p>Amber - Whilst it appears that an access to an employment development on the site may be possible, key issues which need further consideration include the form of junction and the close proximity of the Winfields Outdoors accesses opposite.</p>
73	<p>Potential Location for Strategic Distribution at Land south of East Midlands Airport</p>
	<p><u>Comments as the Highways Authority:</u></p> <p>Land South of EMA (EMP90)- The commissioned transport modelling to assess the cumulative impact of the three sites in the area (EMP90, CD10 and IW1) in conjunction with planned development outside the district, including at Ratcliffe Power Station, is welcomed.</p> <p>In principle, the components of the draft Policy EMP90 are a good starting point but</p>



	<p>will need to be reviewed in light of the emerging transport evidence (as per our overarching comments in this document) and likely made more bespoke in places.</p> <p>The suggestion of a Supplementary Planning Document (SPD) (as per the overarching comments in respect to the policies consultation) for the International Gateway area as a whole would also likely have implications for the policy wording, if this an approach that the district council are minded to adopt. Regardless, the Plan should recognise that this site would form a significant element of further development in the International Gateway Area (or immediately adjoining), including IW1, CD10 and the wider Freeport, thus it cannot be considered in isolation as it is possible to do so with other proposed site allocations elsewhere in the district.</p> <p>Notwithstanding any proposals or otherwise for an SPD, amongst the changes we would anticipate to the, the draft policy wording would be to include reference to the need for S106 financial contributions to deal with wider cumulative/cross-boundary issues, unlike the draft policies for other site allocations.</p> <p>The LHA reserves its position to comment further once we have seen the outputs from the transport modelling and the Infrastructure Delivery Plan.</p> <p>Additionally, we note that the consultation document/draft policy envisages this site coming forward specifically in response to identified need for further strategic distribution, whereas in practice the Freeport vision for this site may demand more of a mixed-use (from discussions with EM Freeport, understanding of likely DLUC aspirations for the freeport). Not clear how the current draft policy would respond to such a proposal.</p> <p><u>Comments from LCC as LLFA:</u></p> <p>Given the positioning of this site within a catchment sensitive to flooding, the LLFA requires that any developer seeks early engagement with the LLFA to agree principles of discharge of surface water. Given the site sits across multiple sub-catchments, the developer should seek to discharge surface water across the sub catchments, mimicking the pre-development drainage conditions. The discharge rate should not exceed 80% of the pre-development discharge rate for any sub-catchment of the site.</p>
74	<p>Potential Location for Strategic Distribution at Land to the north of J11 A/M42</p>
	<p><u>Comments as the Highways Authority:</u></p> <p>J11 A/M42 (SHELAA site EMP82) - As per the LHAs previous SHELAA comments, there appear to be significant challenges in achieving access to this proposed site. The site shares a common boundary with the M42 motorway, which is under the control of</p>



	<p>Highways England and from which direct access would not be possible. A444 Burton Road is an A classified Road with a speed limit of 50mph along the development frontage; access from it would be contrary to Leicestershire Highway Design Guide Policy IN5, 'Our Access to the Road Network Policy'.</p> <p>Without prejudice to and notwithstanding the above, were it possible to achieve a safe and suitable access then otherwise the components of the draft Policy EMP82 would be a good starting point but would need to be reviewed in light of the emerging transport evidence and likely made more bespoke in places.</p> <p>Amongst the changes we would anticipate, the draft policy wording does not appear to include reference to the need for S106 financial contributions to deal with wider cumulative/cross-boundary issues, unlike the draft policies for other site allocations.</p> <p><b><u>Comments from a Highway Development Management perspective:</u></b></p> <p><b><u>J11 A/M42 (SHELAA site EMP82)</u></b></p> <p>Amber - May be possible to deliver a safe and suitable access subject to existing 85<sup>th</sup> percentile speeds, careful access design and positioning, and consideration of local transport policy.</p>
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## **Proposed Limits to Development Review**

<b>Representations on the changes to the Limits of Development</b>	
<b>75</b>	<p><i>Please specify location(s) if you have any comments</i></p> <ul style="list-style-type: none"> <li>• Coalville Urban Area and Ellistown</li> <li>• Ashby de la Zouch</li> <li>• Castle Donington</li> <li>• Ibstock</li> <li>• Kegworth</li> <li>• Measham</li> <li>• Appleby Magna</li> <li>• Belton</li> <li>• Blackfordby</li> <li>• Breedon on the Hill</li> <li>• Diseworth</li> <li>• Donisthorpe</li> <li>• Heather</li> <li>• Long Whatton</li> <li>• Moira</li> <li>• Oakthorpe</li> </ul>



	<ul style="list-style-type: none"><li>• Packington</li><li>• Ravenstone</li><li>• Swannington</li><li>• Woodville</li><li>• Worthington</li></ul>
	<p>It would be worthwhile listing those settlements without Limits of Development and ensuring policies likely to affect such settlements e.g. Rural Exception Sites reflect this in their narrative.</p> <p>It is not entirely clear what the proposed changes to the Limits to Development are for Hugglescote and Donington le Heath (specifically with reference to LtD/CUA/04 which already appears to be within the Limits to Development within the made Hugglescote and Donington le Heath Neighbourhood Plan).</p>

### Any other Comments

The Draft District Wide Policies Map could be improved to specifically number each housing and employment site for ease of reading and relation to the consultation document. it would **make the map clearer for people who don't know the area.**

#### 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: [REDACTED]

Date: 17/03/2024



**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](mailto:planning.policy@nwleicestershire.gov.uk).

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

Details of what we are consulting on, and why, can be found on the Council website at [www.nwleics.gov.uk/localplanmysay](http://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	Bill			
Last Name	Slevin			
Job Title (where relevant)				
Organisation (where relevant)				
House/Property Number or Name				
Street				
Town/Village				
Postcode				
Telephone				
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?		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.

I am commenting below about the location of the Freeport development (EMP90).

The huge warehouses will spoil the whole village, this is a conservation village and this should be maintained.

I moved to the village in 2020 from Leicester city and my asthma has greatly improved, I am worried the Freeport will result in more pollution and this will affect my health.

This development will result in more traffic and the roads cannot cope with the increase in both lorries and commuter traffic.

The wildlife will disappear from our village, I enjoy watching the birds in and around my garden and can't get out as much as I used to.

The brook runs behind my house, I am worried about flooding, this will only get worse if the development goes ahead.

There must be a better location for this Freeport!

Due to the above, I am asking NWLDC not to include the EMP90 site for potential development.



I am commenting below on the new housing settlement at Isley Woodhouse (Policy IW1).

Building so many houses practically in our back garden will be a nightmare! There will be more **pollution and traffic. Diseworth won't be a village any more and it will be a different way of life-** much less peaceful. The peace is the reason we moved here.

The roads are in bad repair currently and this will only get worse with the increase in traffic!

Losing so much green space is bad for my mental health and I worry about the loss of habitat for all the wildlife.

I am against the new town development of Isley Woodhouse (Policy IW1)

#### 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: 17/03/24



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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	Miss	
First Name	Alison	
Last Name	Millard	
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 response relates to Policy EMP90 (the EMA / SEGRO industrial / warehousing development to the East of Diseworth) and IW1 (Isley Woodhouse new settlement to the West of Diseworth).**

Having lived in the village for more than two decades, I believe I am well-equipped to provide insights on the policies mentioned above. My feedback will address shared concerns and considerations relevant to both developments.

**IW1 Isley Woodhouse new settlement to the West of Diseworth:**

In my view, the construction of this new town near Diseworth will profoundly impact both the village and its surrounding areas. Specifically, I find it concerning that this proposal suggests locating 80% of the district's new housing within a 1-mile radius of EMA.

This contradicts the goal of distributing housing needs evenly across the district, resulting in the concentration of both housing and employment in one area rather than being dispersed. Consequently, this will likely lead to increased commuting and overall travel for work and daily life, especially for families relocating to this particular region.

This also contradicts the requirement to develop Brownfield sites and regenerate town and city centres – for example Leicester, Coalville, Loughborough etc.

This will necessitate the development of additional infrastructure to cater to the area's needs, rather than depending on existing infrastructure in different areas. This includes improving roads and public transportation, which are currently lacking. Moreover, there will be a need for additional services such as police and healthcare facilities, which are inadequately addressed in the plan.

The location of these houses near major airport safety zones and runway thresholds raises concerns about safety and health.



**EMP90 Freeport development east of Diseworth:**

I believe this development will lead to 75% of the region's new employment being concentrated within a one-mile radius of EMA in the medium term.

Utilizing Greenfield land, though convenient and cost-effective, will raise notable environmental and health concerns, as elaborated upon later in this response.

Diseworth and the surrounding area will suffer significant air, noise, and light pollution.

This will worsen the strain on the already stretched local infrastructure, posing significant challenges without substantial improvements. How can any enhancements be sustained, or will they merely result in additional traffic on our local road networks? This will also intensify pressures on other services like drainage, sewage, and other essential utilities.

This does not help create a balanced employment offer for the area around surrounding EMA.

There has been no consideration of the views of the local community in granting the Freeport status by the government, this appears to be simply a top down approach with no opinion sought by government or local authority.

Diseworth sits in a conservation area, with many Grade 2 and Grade 1 listed buildings, the photo below shows the fields which the Freeport is planned for. I fail to see how anyone can think that this is an appropriate place to site a Freeport.

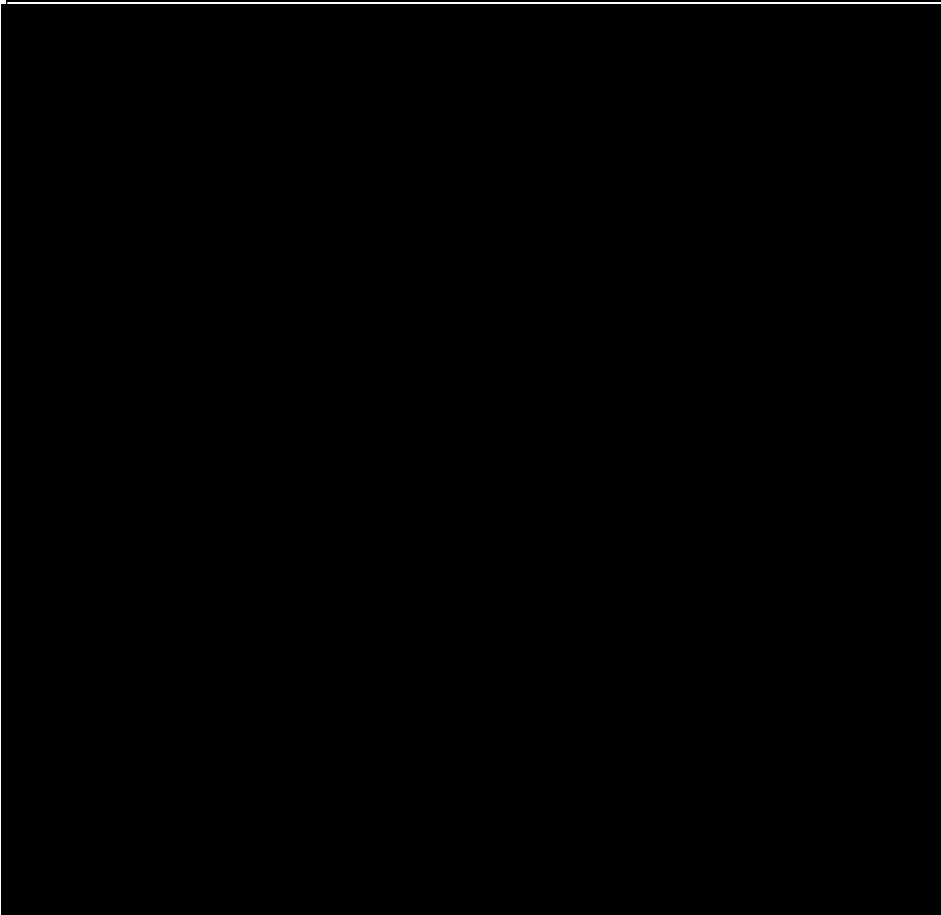


**In general:**

The environmental repercussions will be substantial. At a time when we're all striving to reduce our environmental footprint, how can it be deemed acceptable to convert hundreds of acres of farmland into paved surfaces and structures?

This will elevate the flood risk for Diseworth, which already contends with recurrent flooding problems. Instances of flooding occurred in November 2019, February 2020, August 2020, October 2023, and January 2024. Here is a recent image captured outside my house: **[Personal Information Redacted]**





Is it financially viable to fully mitigate the flood risk? How can we ensure this is achievable? If mitigation efforts fail, who will bear the burden of increased flood defense and insurance expenses? I don't have any confidence that either of these developments will ensure that the flood risk to Diseworth is not increased.

The environment and pollution will suffer, with extensive agricultural land, hedgerows, wildlife habitats, and historical sites being lost. As we strive for net-zero emissions to minimize our environmental impact, is it justifiable to let developers do the opposite by choosing cheaper and more convenient greenfield sites over brownfield locations? This will additionally diminish the capacity of our countryside to serve as a crucial carbon sink.

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Signed: [REDACTED]

Date: 17/3/24

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**From:** [REDACTED]  
**To:** [PLANNING POLICY](#)  
**Subject:** EXTERNAL: Draft Local Plan Consultation  
**Date:** 17 March 2024 19:08:53

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From:- Martin Cooper,



#### **4. Housing Allocations**

##### **New Settlement**

IW1 Land at Isley Woodhouse. 4,500 properties on agricultural land.

We should not be building on good quality agricultural land. Whenever possible the best quality agricultural land should be protected. Development should occur on mostly non-agricultural land. We need food security and it is incumbent upon us to become more self sufficient and grow our own food. Once agricultural land is built on it is lost forever.

see SA12 and SA14 a New Settlement would lead to permanent and irreversible loss of greenfield land which is currently classified as Good Quality Agricultural Land. A New Settlement also has the potential to have an indirect negative effects on Local Wildlife Sites and Ancient Woodland nearby (SA12), which may have adverse impacts on the current landscape character in small neighbouring villages nearby (SA13).

At the moment the farmland of the proposed settlement forms a natural buffer between the built environment at the top of the Hill ie Airport and Race Tack and small neighbouring villages below.

A total of 1,400 new homes proposed for Castle Donington just to the North of the Airport. Together with the proposal 4,500 In the New Settlement would mean a total of 5,900 homes in close proximity.

The road network simply will not cope with the traffic. Since there are unlikely to be enough local jobs, many people will have to commute to work.

Development should be dispersed around the district, rather than concentrating in only one or two settlements.

I therefore do not support the housing allocations which include the new settlement - Isley Woodhouse.

Martin Cooper





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	Personal Details	Agent's Details (if applicable)
Title	Mr	Mr
First Name	A	A
Last Name	Gooding	Thomas
Job Title (where relevant)		
Organisation (where relevant)		Thomas Taylor Planning Ltd
House/Property Number or Name		Castle House
Street		South Street
Town/Village		Ashby de la Zouch
Postcode		LE65 1BQ
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.**

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	X	Proposed Limits to Development Review

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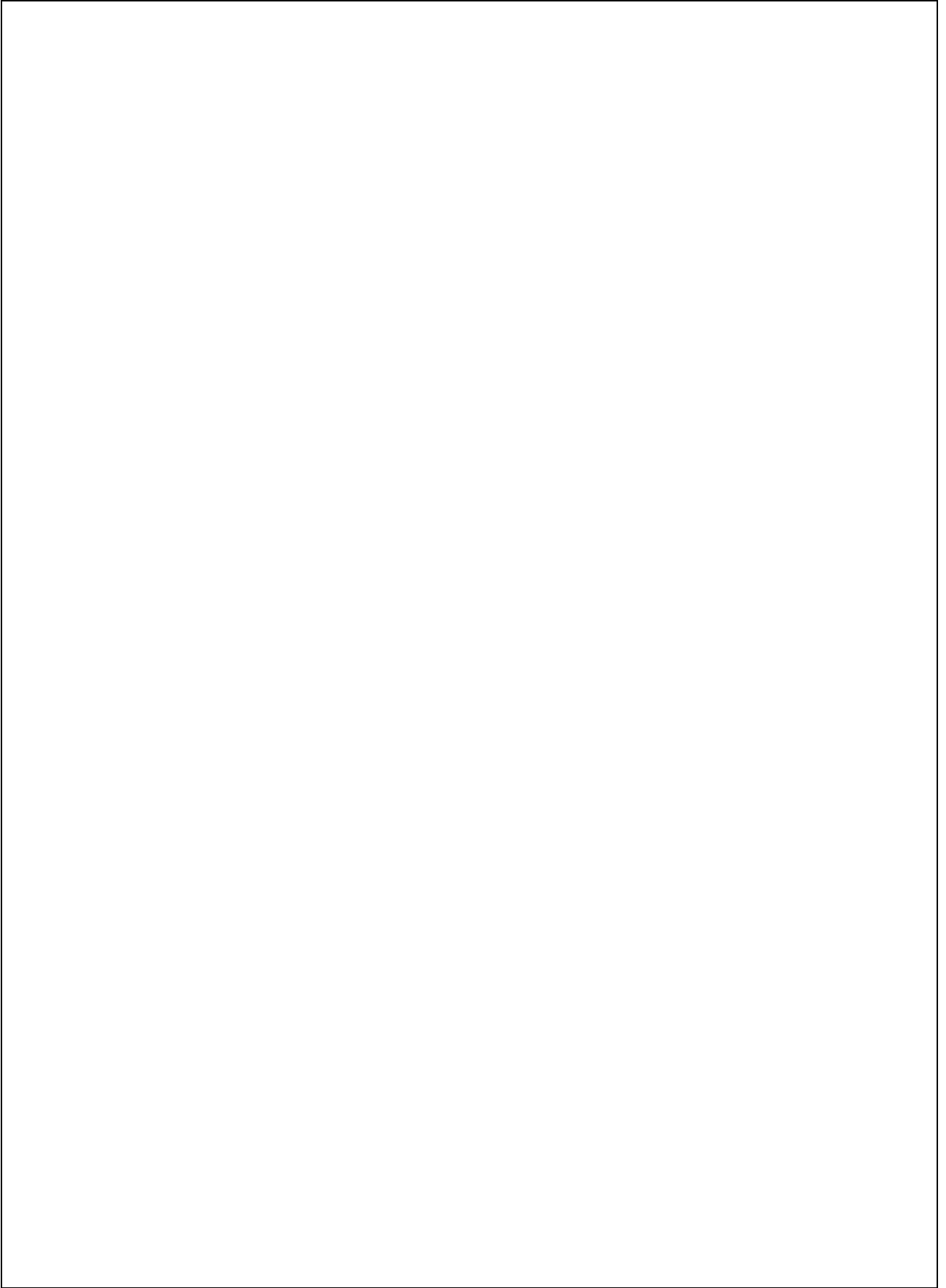
Use this box to set out your response.

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

LtD/CUA/08 - Fully supported. Also note that the proposed boundary is also logical and follows well defined features that are visible on-site and contains land that does not appear to be part of the open countryside surrounding the settlement.

See attached 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: Andrew Thomas

Date: 17th March, 2024

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	Personal Details	Agent's Details (if applicable)
Title	Mr	Mr
First Name	A	A
Last Name	Gooding	Thomas
Job Title (where relevant)		
Organisation (where relevant)		Thomas Taylor Planning Ltd
House/Property Number or Name		Castle House
Street		South Street
Town/Village		Ashby de la Zouch
Postcode		LE65 1BQ
Telephone		
Email address		



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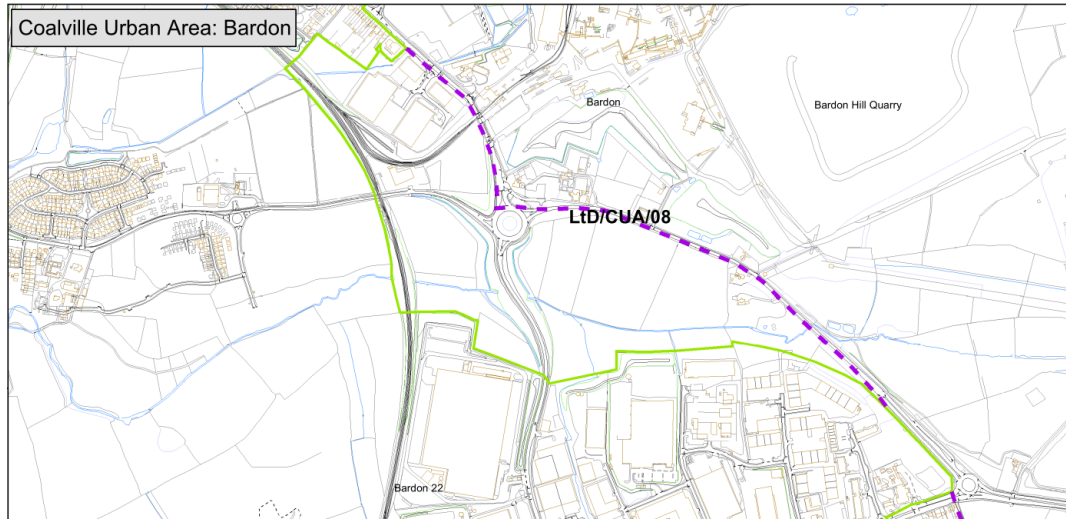
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(Continue on a separate sheet /expand box if necessary)

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See attached plan.







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Signed: Andrew Thomas

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	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		A
Last Name		Thomas
Job Title (where relevant)		
Organisation (where relevant)	Harlow Bros Ltd	Thomas Taylor Planning Ltd
House/Property Number or Name		[REDACTED]
Street		[REDACTED]
Town/Village		[REDACTED]
Postcode		[REDACTED]
Telephone		[REDACTED]
Email address		[REDACTED]



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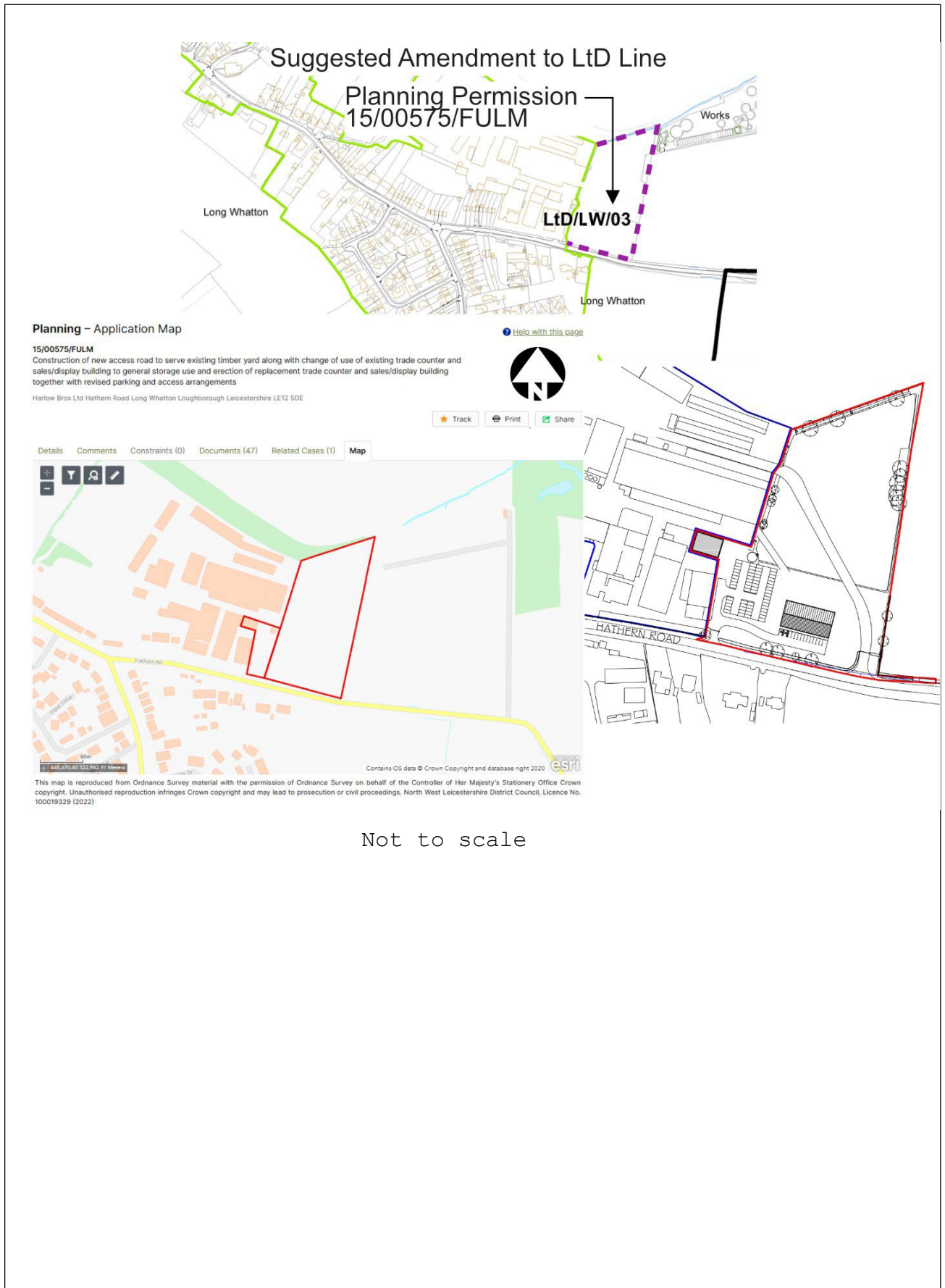
Use this box to set out your response.

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

LtD/LW/03 - Needs to be amended to reflect historic planning permission 15/00575/FULM for Construction of new access road to serve existing timber yard along with change of use of existing trade counter and sales/display building to general storage use and erection of replacement trade counter and sales/display building together with revised parking and access arrangements.

See attached plan.





Not to scale



## Declaration

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	Personal Details	Agent's Details (if applicable)
Title	Mr & Mrs	Mr
First Name	S	A
Last Name	Musson	Thomas
Job Title (where relevant)		
Organisation (where relevant)		Thomas Taylor Planning Ltd
House/Property Number or Name		[REDACTED]
Street		[REDACTED]
Town/Village		[REDACTED]
Postcode		[REDACTED]
Telephone		[REDACTED]
Email address		[REDACTED]



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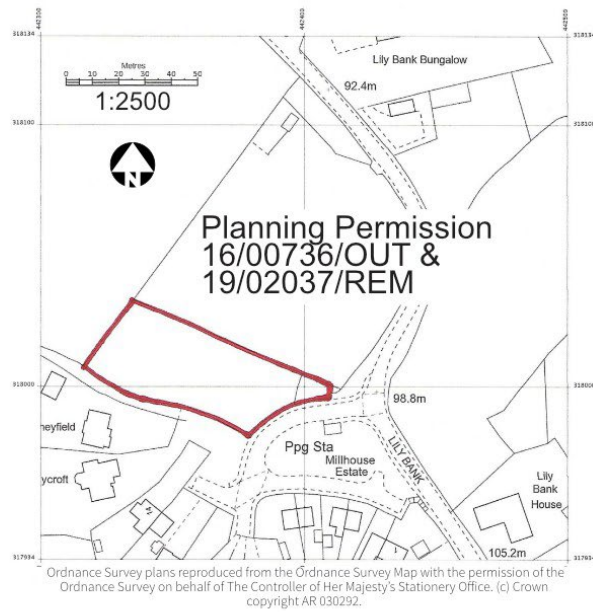
(Continue on a separate sheet /expand box if necessary)

LtD/CUA/01 - Needs to be amended to reflect historic planning permission 16/00736/OUT & reserved matters 19/02037/REM for the erection of a two-storey dwelling with attached garage. Also note that the proposed boundary shown below is also logical and follows well defined mature hedgerows & features that are visible on-site and contains land that does not appear to be part of the open countryside beyond surrounding the settlement. It is relevant to note that at the time when planning permission was granted, the Council considered that the principle of residential development on the site was acceptable and distinguished this small area of land from the countryside beyond and confirmed that the approved development would not be prominent within the rural landscape - see extract from officer report 16/00736/OUT:

*"This site is a paddock with open countryside to the north at present although there are residential properties to the south and south east of the site. Given the low density proposed and position adjacent to existing residential development, it is considered that harm to the character and visual amenities of the countryside would be limited as the development would not appear prominent within the rural landscape and would be well screened by existing trees and shrubs to the site boundary and on land adjoining the site."*

See attached plan.





Not to scale



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Signed:



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	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		A
Last Name		Thomas
Job Title (where relevant)		
Organisation (where relevant)	David Stanley Transport Ltd	Thomas Taylor Planning Ltd
House/Property Number or Name		
Street		
Town/Village		
Postcode		
Telephone		
Email address		



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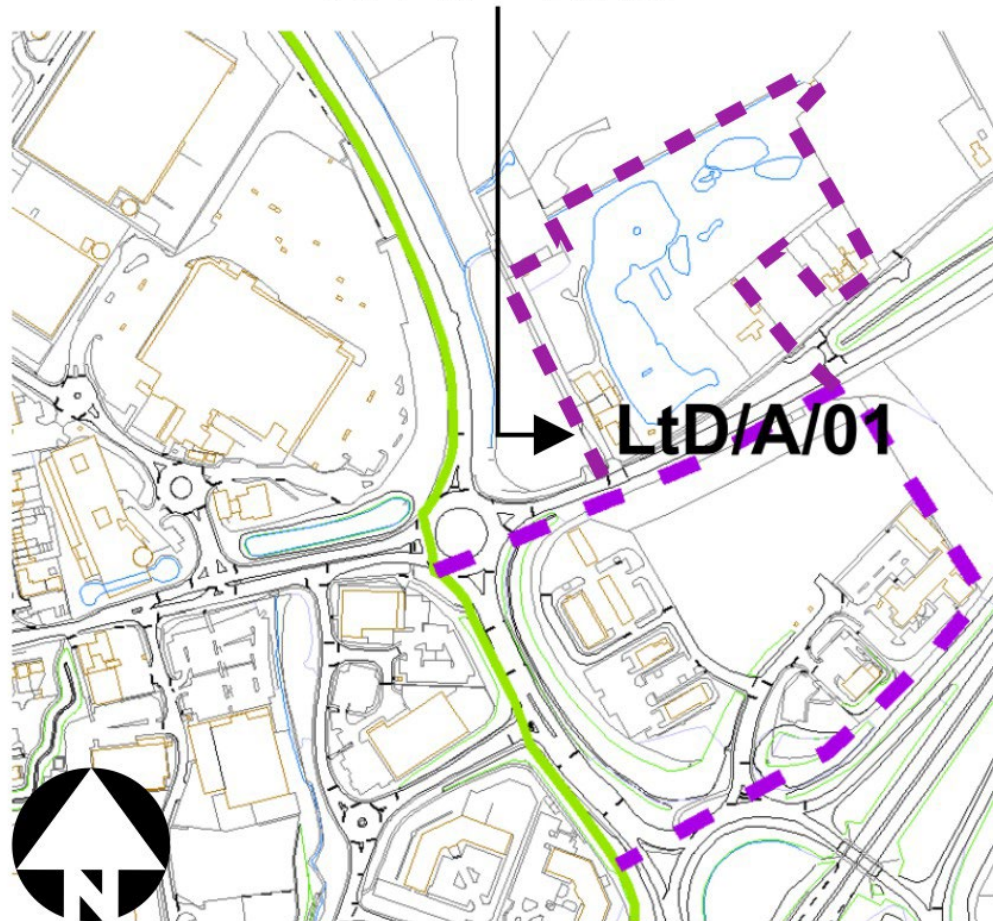
LtD/A/01 - Needs to be amended to reflect the pattern of development on the northern side of Nottingham Road - opposite Flagstaff Island. Suggested LtD line would include previously developed land including 163 Nottingham Road, polytunnels and shop associated with aquatics business and unauthorised engineering works (ponds and banks) together with adjoining access drive and nearby group of dwellings.

Suggested boundaries is logical and follows defined features that are visible on-site and on the Ordnance Survey plan and does not represent isolated or sporadic development given it's close association with the extensive development directly opposite at Flagstaff Island and nearby retail and housing development to the west and east respectively.

See attached plan.



# Suggested Amendment to LtD Line



Not to scale



## 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: 17th March, 2024

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	Personal Details	Agent's Details (if applicable)
Title		Mr
First Name		A
Last Name		Thomas
Job Title (where relevant)		
Organisation (where relevant)	David Stanley Transport Ltd	Thomas Taylor Planning Ltd
House/Property Number or Name		
Street		
Town/Village		
Postcode		
Telephone		
Email address		



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

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		Proposed housing and employment allocations
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(Continue on a separate sheet /expand box if necessary)

**Policy Ec4 – Employment Uses on Unidentified Sites**

We support the inclusion of a policy which seeks to ensure flexibility and choice over the plan period to meet a range of employment needs that might not otherwise be supported on existing or allocated employment sites or within existing Limits to Development.

However, as presently worded, Policy Ec4 is too restrictive. We suggest some minor changes which would ensure that appropriate control is maintained whilst still providing flexibility for the provision of new employment on new, unallocated sites outside Limits to Development.

This is especially relevant to proposals for the provision of road-related transport, haulage and associated small-scale storage uses which cannot compete with high-value industrial land-uses and are seldom welcome or suitable on land allocated for business park or strategic distribution (B8) use. There is already evidence of pressure for haulage and road-related development on unidentified sites within the District. Despite the critical role these uses play in supporting the distribution of goods and services within the local and wider economy, the Local Plan does not identify road-related transport, haulage and associated small-scale storage uses as a particular employment sector .

We consider that they should be recognised as forming part of the “general employment” uses set out at paragraph 7.8 – 7.13 or else if not, then supporting text to The Economy section (and policies) should explicitly state that these support services serving the distribution sector do not form part of the General Needs or Strategic Distribution floorspace/land needs set out in the Local Plan.



We suggest that the third criteria of draft Policy Ec4 is amended as follows -

(3) Exceptionally, to provide the degree of flexibility required by the NPPF, proposals for employment development on unidentified land outside of the Limits to Development will be supported where the following criteria are met:

(a) It is demonstrated to the satisfaction of the Council that there is;  
(i) an immediate requirement for the employment land of the type proposed in North West Leicestershire; and  
(ii) either the development will be occupied by named end-user/s and this will be secured by Section 106 legal agreement where appropriate; or the development is required to accommodate needs not anticipated in this Plan; or to allow for new and flexible working practices; or else it is needed because of changes in economic circumstances.

And,

(b) The applicant has demonstrated that the immediate requirement cannot reasonably be satisfied on any other available land/buildings within the relevant search area and within the following categories -

(i) previously developed land;  
(ii) an Existing Employment Area as identified in Policy Ec5; or  
(iii) land allocated for employment development in the Local Plan; or  
(iv) on land with planning permission for employment development of the type proposed

For general employment proposals, the search area is the district and for strategic B8 proposals, the search area is the relevant Area/s of Opportunity.

And,

(c) The development -

(i) Is 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

(ii) Has 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

(iii) Will not be detrimental to the wider environment or the amenities of any nearby residential properties as a result of loss of privacy, excessive overshadowing or an overbearing impact, activity levels, noise, vibration, pollution or odours.



## 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: 17th March, 2024

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**PART B – Your Representation**

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

**Policy Ec3 New Employment Allocations**

We consider that land at 163 Nottingham Road, Ashby de la Zouch should be allocated specifically for a haulage and transport depot providing road-related transport, haulage and associated small-scale storage use.

The site is subject to a current planning application 18/00679/FULM which is the subject of negotiations with the LPA and statutory consultees although there are no expected fundamental obstacles to a permission being issued.

Road-related transport, haulage and associated small-scale storage uses cannot compete with high-value industrial land-uses and are seldom welcome or suitable on land allocated for business park or strategic distribution (B8) use. There is already evidence of pressure for haulage and road-related development on unidentified sites within the District. Despite the critical role these uses play in supporting the distribution of goods and services within the local and wider economy, the Local Plan does not identify road-related transport, haulage and associated small-scale storage uses as a particular employment sector . We also consider that they should be recognised as forming part of the

“general employment” uses set out at paragraph 7.8 - 7.13 or else if not, then supporting text to The Economy section (and policies) should explicitly state that these support services serving the distribution sector do not form part of the General Needs or Strategic Distribution floorspace/land needs set out in the Local Plan.



As acknowledged in the Stantec study, North West Leicestershire is highly attractive for strategic logistics, due to its location in the 'golden triangle' centred on the M1, M6 and M69, which is recognised as the most efficient location for national distribution across the UK. It also contains East Midlands Airport, which is the second largest freight handling airport in the UK after Heathrow and has attracted a thriving transport industry and international logistics operators. Outside the distribution sector, the district is also attractive to a wide range of manufacturing activity, largely due to its strategic road connections via the M1 and the M42/A42.

The site identified on the plan below is extremely well-related to the M42/A42 and M1 Strategic Road Network and has excellent connectivity for specialised haulage and the road-related transport services sector.

### Planning – Application Map

[Help with this page](#)

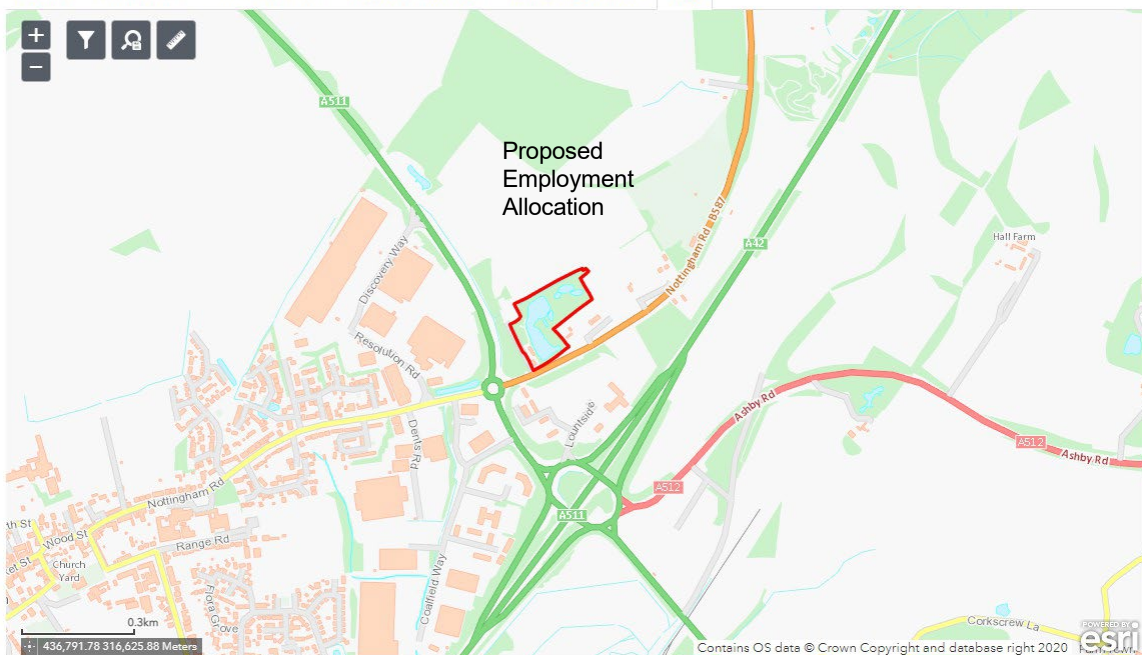
18/00679/FULM

Erection of workshop and office building, washing facility and formation of vehicle parking and hardstanding area for use as haulage and transport depot together with formation of new access, erection of acoustic barrier, lighting and landscaping

163 Nottingham Road Ashby De La Zouch Leicestershire LE65 1DP

[Track](#) [Print](#) [Share](#)

Details Comments Constraints (0) Documents (153) Related Cases (1) **Map**



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Not to Scale



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	Personal Details	Agent's Details (if applicable)
Title	Ms	
First Name	Amy	
Last Name	Dunmore	
Job Title (where relevant)	[REDACTED]	
Organisation (where relevant)		
House/Property Number or Nam		
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.**

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I am commenting below about the location of the Freeport development (EMP90).

I lived in Diseworth for several years and frequently return to visit friends and family and to enjoy scenic walks in and around the village. During Covid the walk up to the services was a complete lifeline and if the Freeport goes ahead, this walk will be lost.

I enjoy walking and watching wildlife in the surrounding area and I am very concerned that this will disappear if the hedgerows and fields are concreted over. We should be protecting green spaces.

Diseworth is a small conservation village and this should be protected. The roads around the village cannot cope with any increase and traffic and the amount of litter already is shocking, this will only get worse.

The increase in air pollution, light pollution and noise pollution will be unbearable for those in the local area.

How will flooding in and around the village be controlled? It is already getting steadily worse every year.

I am asking NWLDC not to include the EMP90 site for potential development and to find a more suitable location, maybe near Ratcliffe power station, which benefits from better road links and a train station!



I am opposed to the new housing settlement at Isley Woodhouse (Policy IW1).

The area surrounding Diseworth is beautiful and I love to visit and walk for miles around the village. The loss of hedgerows, fields and trees will destroy the local area and will result in the death of many small creatures, birds and insects that thrive in the fields.

The amount of houses proposed is ridiculous, the area cannot cope with the increase in traffic and Diseworth will no longer be a village.

I have friends in the village that have been affected by flooding and after heavy rain the roads are impassable. How will water run off be controlled?

Therefore I am against the new town development of Isley Woodhouse (Policy IW1)

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



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**Location of the proposed new development**

The location of the proposed new development is not in the right place. The need for further housing in the county is largely in the city boundaries of Leicester, not here and you have to ask the question, where will people work? Although there is some potential work available at the airport and surrounding industrial parks, the large majority of jobs will be in the larger urban areas in the county, resulting in people having to commute away from the new houses. Re. section 3.7 it's not logical to put so much proposed housing in the north of the county. There is a designated Freeport in the area at the moment but for how long? Once tax incentives are removed in the near future, what then?

Regardless of the notion of Freeports, there is ample room for development of other areas such as the power station site on the A453 and industrial areas around Clifton in Nottingham and the big industrial units at the back of Castle Donington. Why build on a greenfield site?

With regard to sections 5.1 to 5.4 it is not logical to build so many industrial units in the north of the county either.

Furthermore, there isn't the infrastructure to support large scale development like there is within the established urban areas.

NWLDC has already been exceeding the proposed quotas for housing in previous years (re. AP7 6.2) thus if it is quoted that there is a need for X number of further houses per year, how can we be reassured that you're not going to go well over the quota?



## Environment

### Section 3.5

The proposed developments do not reflect the alleged concern with the need to improve biodiversity, in fact the proposed developments would lead to fragmentation of the local ecological network, breaking up habitats. In order for nature to recover and flourish, biodiversity needs to be enhanced/ supported.

Not only is this vital for nature but it's also essential for wellbeing, mental health and maintaining the rural character of the region. With reference to section 4.3, it is vital that we conserve and enhance our natural environment.

Re. 4.32/4.33 There is the need to maintain and enhance the environment and realise/maintain the potential environmental, economic and social value of the countryside. There would be a reduction in land used for food production and the irreversible damage/loss of fertile agricultural land. Why is a greenfield site proposed, rather than land that's already been built on/brownfield sites? As in 4.39, agriculture remains an important part of the local economy and is part of the heritage and character of the region. There is a real risk of damage to the local communities/ quality of life and levels of mental health. With this potential loss, there is a risk that the legacy for future generations is lost too.

In 9.1- green infrastructure is sited as being especially important. It must be noted that it's not just about creating new elements of green infrastructure but to leave the elements of green infrastructure which already exist. 9.18 in IF3 (2) states that 'existing trees, woodlands and hedgerows should be retained wherever possible' but the proposed development threatens the existence of these essential features.

In 10.23 of The National Planning Policy Framework (NPPF) recognises the need to ensure that planning contributes to conserving and enhancing the natural environment, including valued landscapes and areas of biodiversity and geodiversity importance but also the historic environment (paragraphs 174 and 190). These very valuable landscapes are in danger of being lost.

In 10.28, it is emphasised that there is a need to boost the levels of bio diversity and yet the proposals are highly likely to diminish these levels of biodiversity.

In 10.97, it is quoted that there is 'the need to protect the rural character and landscape, including the historic landscape features such as ancient or mature woodland and ridge and furrow field patterns' and yet there is the real risk that these will be lost if the proposed development were to go ahead.

In addition, as in 5.48, it is stated that there is a requisite to provide and increase access to/to protect and improve green and blue spaces. Green spaces are essential.



### **Noise/light pollution/flooding**

As in 5.8 and 5.9 it is mentioned that noise levels and light levels should be at an acceptable level. However, the location of the proposed new developments mean that residents would be at increased risk of being exposed to unacceptable levels of noise and light, due to such close proximity to the airport and racetrack. 5.48 (F) emphasises the negative impact on residential amenity and wider public safety from noise, vibration etc. The proposed development puts future and existing residents at risk of exposure to extreme levels.

10.72 addresses the fact that 'new or existing development shouldn't contribute to or be at risk of unacceptable levels of air and noise pollution.'

The area is already prone to flooding too and the proposed new development is only going to add to the problem by decreasing the natural ability of the land to absorb water.

### **Traffic**

It is stated in 5.26 that greenhouse gas emissions will need to be reduced but there will be huge additional demands as regards traffic and this will just add to the emissions of greenhouse gases, as well as causing increased congestion. Although there is the thought proposed that more people might live within cycling distance of their jobs, it is unlikely that they will do so and in fact it is likely that, many people with existing jobs, are likely to have established connections in other urban centres and would prefer to remain living there and to drive into the proposed/local area. People won't necessarily be in a position to work in close proximity to their home in the proposed new development. Re. IF5 paragraph 9.31, the impact upon the highway network is an important consideration when determining planning applications.

### **Safety zones**

Is it safe and wise to build a large scale development so near to a very busy airport?

The safety zones are very small and are unlikely to protect the people living within/under the flight path, should an accident occur.



**Separation Zones**

Diseworth and Breedon are named as sustainable developments and yet the proposed new development would be sandwiched between them, thus having an adverse effect on the character and make up of these two places. The needs of both settlements is very important. As outlined in section 6.4 of part AP7, it is vital that housing development addresses the needs of the area. However, there isn't a need for additional housing in Diseworth and Breedon but the proposed new development is satisfying a proposed need for further housing elsewhere in the county, in particular, Leicester city.

Sections 10.23 and 10.26 of the The National Planning Policy Framework (NPPF) recognises the need to ensure that planning contributes to conserving and enhancing the natural environment, including valued landscapes and areas of biodiversity and geodiversity and also the historic environment. As stated above, the local distinctiveness and local attractiveness of each village is likely to be adversely affected as well as there being a loss of biodiversity and a negative effect on quality of life and people's mental health. In fact, in 10.26 it is stated that any new development must ensure that the natural and built environment is maintained and wherever possible, enhanced.

Also, just because the boundaries of Diseworth are set on a map, it doesn't mean that it is not affected by development nearby. There is a huge risk of overwhelming development around Diseworth in particular.

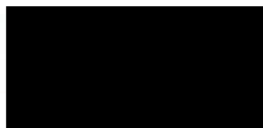
NWLDC has already been exceeding the proposed quotas for housing in previous years (re. AP7 6.2) thus if it is quoted that there is a need for X number of further houses per year, how can we be reassured that you're not going to go well over the quota?

**Declaration**

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Signed:



Teresa Walker 

Date: 17/03/2024



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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Tony	
Last Name	Wilson	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name		
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Town/Village		
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**This response relates to Policy EMP90 (the EMA / SEGRO industrial / warehousing development to the East of Diseworth) and IW1 (Isley Woodhouse new settlement to the West of Diseworth).**

I have been a village resident for over 20 years and so feel qualified to comment on the above policies.

Many of my thoughts and concerns are appropriate to both developments and these will be highlighted at the end of my feedback.

### **IW1 Isley Woodhouse new settlement to the West of Diseworth:**

In my opinion the development of this new town adjacent to Diseworth will have a significant on the village and the surrounding area.

In particular, I believe, that this proposal implies that 80% of the district's new housing will be within a 1 miles radius of EMA. This:

- Contradicts a housing requirement spread across the district. Meaning housing and employment will be concentrated in one area rather than spread across the district. This will drive commuting and general travel for work and life in general to families relocating to this area.
- Contradicts the requirement to development Brownfield sites and regenerate town and city centres – for example Loughborough, Leicester, Coalville etc.
- Drive a requirement for further infrastructure to service the area rather than relying on existing infrastructure in other locations. This will mean roads and public transport that is currently minimal. Other services will also be required, for instance Police, Doctors etc. but are under stated in the plan.



- Families in particular want to live conveniently close to amenities, not in the countryside where additional journeys and inconvenience will have to be endured.
- The placement of these houses next to a major airport safety zones and runway thresholds also appears less than optimal for safety and health.

**EMP90 development east of Diseworth:**

This development will I believe contribute to concentrating 75% of the regions new employment of the medium term within a 1 miles radius of EMA.

- This will further exacerbate the impact on the local infrastructure which is stretched currently and without significant improvement will be s significant issues. How will any improvement be made sustainable or we simply drive further traffic on to our local road networks. This will include pressures on other services such as drainage, sewage and supply of other services.
- Diseworth and the surrounding area will suffer significant noise, air and light pollution.
- The use of Greenfield land, whilst convenient and 'cheap' will have significant environmental and health issues (discussed later in this response).
- This does not help create a balanced employment offer for the area around surrounding EMA.
- There has been no consideration of the views of the local community in granting the Freeport status by the government, this appears to be simply a top down approach with no opinion sought by government or local authority.
- It would be appropriate to share the business case behind the decision to designate this area a Freeport and the subsequent development proposal with the local stakeholders, to help us to understand the basis that the decision has been made. However, any requests through FOI requests have not been met for commercial reasons. Is this all that is important?

**In general:**

The impact on the environment will be significant. In a time when we are all making personal sacrifices to mitigate our impact on the environment, how can it be acceptable to replace hundreds of acres of farmland with hard standing and buildings:

- This will increase the flood risk for the village of Diseworth, which currently suffers regular flood issues. There has been flooding in Nov 2019, Feb 2020, Aug 2020, Oct 2023 and Jan 2024. These are recent pictures from outside my house: **[Personal Information Redacted]**





- Will it be considered economic to mitigate 100% of the flood risk? How can this be proven to be done? Who will pay for our increased need of flood defence and insurance costs if this is not successful? I have a feeling it would be me.
- The environment and pollution will be impacted, many hectares of agricultural land will be lost, hedgerows, wildlife and history. As we drive to net zero to limit our impact on the environment, is it acceptable to allow developers to do just the opposite because it is cheaper and more convenient for them to do so on a greenfield rather than brownfield location.
- This will also reduce our local countryside's ability to act as a much needed carbon sink, with the consequential impact on all our health.

### **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: 17/3/24



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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?	<b>X</b>	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.

**3.5. The NPPF sets out three dimensions to sustainable development:**

In relation to the proposed developments (Freeport & Isley Woodhouse) on either side of Diseworth; both are too large and too close to the village resulting in a loss of not only valuable agricultural land, but biodiversity, green space as well as inhibiting the move to a low carbon economy. The proposed developments fail to meet any of the three objectives:

1. **Economic** – both proposed developments fail regarding “*ensuring that sufficient land of the right types is available in the right places*”.
2. **Social** – both clearly fail in the supporting “*communities’ health, social and cultural well-being*”.
3. **Environmental** – it completely fails to meet any of the supposed criteria. It doesn’t contribute to protecting and enhancing our natural, built and historic environment. It doesn’t make effective use of land, and certainly doesn’t improve biodiversity. Neither the Freeport nor the housing development will help mitigate climate change and certainly won’t help in the move to a low carbon economy. I suspect that in both the short and medium term the carbon footprint of the area will increase significantly.

**3.23. The Leicester and Leicestershire Strategic Growth Plan**

I would argue that too much emphasis has been placed on the area around the East Midlands Airport for future development. The SGP is non-statutory, as is the Neighbourhood Plan (currently under review for Long Whatton and Diseworth Parish). Paragraph 1.2 states that the development plan for NWL should include both the Local Plan and any Neighbourhood Plans. Therefore, it would appear reasonable for the Neighbourhood Plan to take precedence over the SGP.

**4.3 Our development strategy....**

As 3.23 above.



4.11/4.12

I believe that taking up a portion of the shortfall in the projected housing deficit for Leicester City is a mistake, particularly as North West Leicestershire does not adjoin the city boundary. It will increase the carbon footprint with increased vehicular movements, as presumably there will be a requirement to be travel to/from Leicester City, otherwise Leicester City would not have a requirement for additional housing.

4.17 - Draft Policy S1- Future Development Needs (Strategic Policy)

1. As 4.11/4.12

4.26 - Draft Policy S2 – Settlement Hierarchy (Strategic Policy)

2. Isley Woodhouse should not be made an exception. It is in the wrong place.

5.4 - Section 12 of the National Planning Policy Framework (NPPF)

- Defining a policy which includes beauty, although laudable, is a mistake. Going on the experience of both recent and current house building in North West Leicestershire, I question whether any of it can be described as beautiful, although others may well disagree.
- I also query the use "*well designed*" for similar reasons.
- The NBS website has two "*widely-accepted definitions of what constitutes sustainable development*":
  - The first "*meets the needs of the present without compromising the ability of future generations to meet their own needs*".
  - The second provides "*a better quality of life for everyone, now and for generations to come*".
- Do either of these cover the intent of "*sustainable buildings and places*"?

5.33 - Energy hierarchy

- I am not aware of any large-scale housing developer who can deliver carbon neutral residences to scale. Therefore, external energy sources will be required and the use of renewable energy sources should be made mandatory. As all non-residential sites across North-West Leicestershire appear "*potentially suitable for small scale wind energy*" (re. Local Plan – "*Map showing areas potentially suitable for small scale wind energy*"), perhaps a policy of incorporating wind farms into the development should be considered: perhaps replacing the proposed warehousing fronting onto the A453, with a wind farm. In addition, it would seem sensible to insist that the use of solar roof tiles is obligatory.

7.19

- See 3.5 above.



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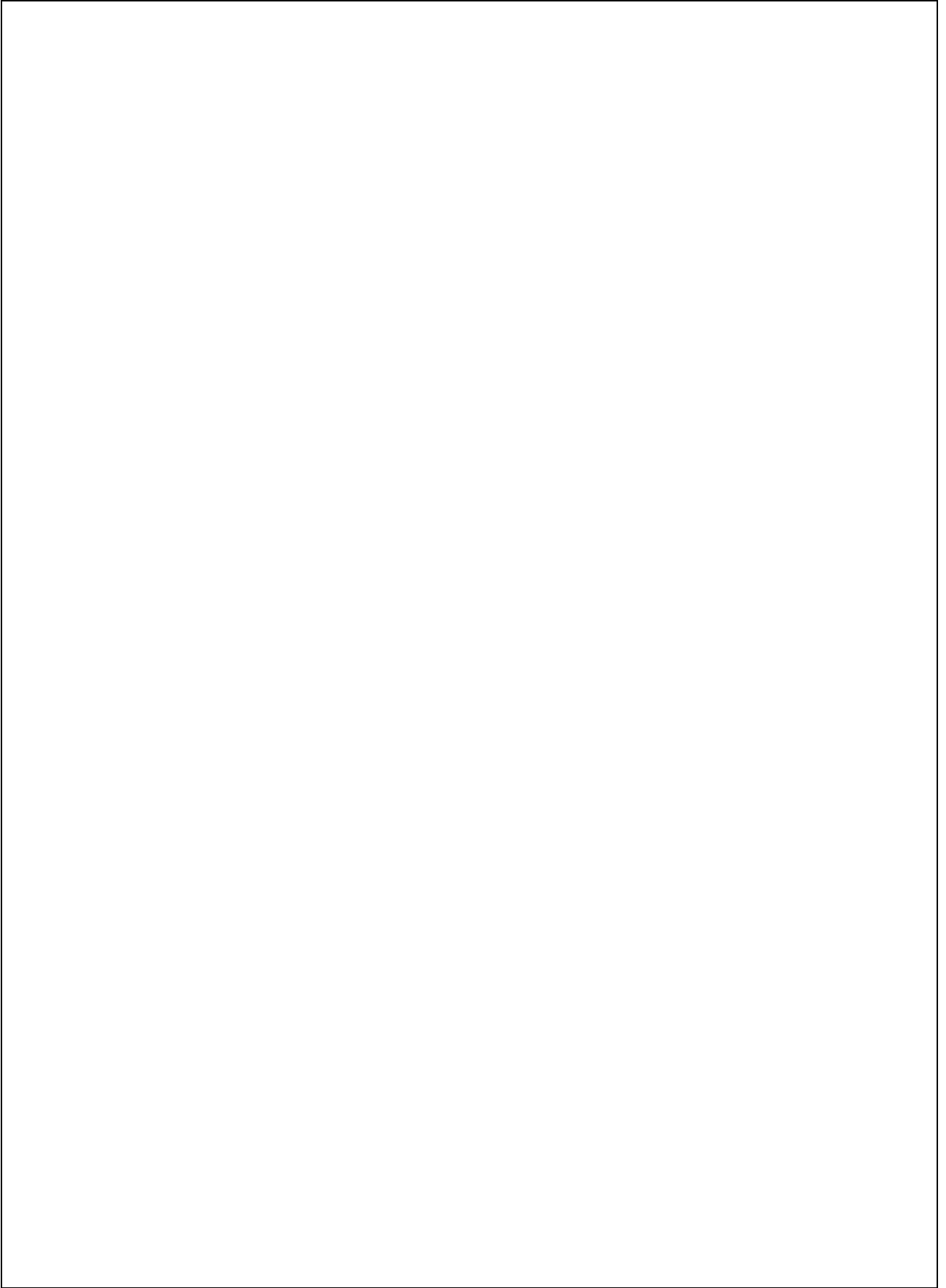
1. To which consultation document does this representation relate?		Proposed policies
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	<b>X</b>	Proposed Limits to Development Review

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

### Diseworth

- **General**
  - It appears that the limitation plan is simply catching up with reality. Surely any proposed development should reflect the plan, not the other way round. Cart and horse comes to mind.
  - This limits the development of the village, whilst not protecting it from external development encroaching upto the boundary of the village limitation zone.
  - Methodology item 9 states that "*Peripheral playing fields, environmental space, allotments, community gardens, cemeteries and schools are excluded*". There appears to be an inconsistency, with the Primary School included and the allotments excluded.
- **LtD/Dis/02** – should reference methodology item 2.







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### General

- The site allocation plan places too much emphasis on the north of the county, with too much development (both industrial and residential) concentrated in the vicinity of East Midlands Airport.
- Both the Freeport and Isley Woodhouse proposed developments are too large and too close to Diseworth village, resulting in a loss, not only of valuable agricultural land, but biodiversity, green space, whilst also inhibiting the move to a low carbon economy.
- The plan does not address either the potential or the consequence of over-development around East Midlands Airport, assuming that all the proposed site allocations are approved and acted upon. Neither does it address the infrastructure implications of such developments in such as small area.

### 3.7

I believe that taking up a portion of the shortfall in the projected housing deficit for Leicester City is a mistake, particularly as North West Leicestershire does not adjoin the city boundary. It will increase the carbon footprint with increased vehicular movements, as presumably there will be a requirement to travel to/from Leicester City, otherwise Leicester City would not have a requirement for additional housing.

### 3.8

Section 3 - should read - Section 4.

### 4.5

The distribution appears to be unfairly concentrated in the north of the county, close to the East Midlands Airport. A significant portion of the projected housing requirement upto 2040 is



the result of the shortfall in Leicester City and not in the north of the district, where there is probably a more limited requirement.

#### 4.110 - New Settlement: Isley Woodhouse (IW1)

These lists appear to be, at best, aspirational with no underlying detail. What will actually be delivered, if the settlement does go ahead, will, as hinted at in 4.111, be at the mercy of the major stakeholders, i.e. the developers. I suggest that their interest in signing-up to and delivering a significant number of these items will come at a cost, which may be unbearable.

#### 4.113

This proposal together with the Freeport continues to promote a low wage/low skill work environment, which typically has a high turnover. Is it really likely that these workers would or could want to live so close to what would probably be a transitory place of work.

#### 5.2

Attempting to concentrate so much warehousing space in such a small area in the north of the county is a mistake. It not only concentrates too many low paid/low skilled jobs in one area, it also risks endorsing a low skilled mentality. If the plan is successful and the majority of these low skilled workers live within a short distance of their workplace, then the normal mix of housing in Isley Woodhouse would undoubtedly be skewed.

#### 6. Potential Locations For Strategic Distribution

This is yet another large site in the north of the county apparently to be designated for warehousing, encouraging a low skilled and low paid workforce.

#### 6.7

If the Freeport was to utilise all its designated land, then it **WOULD** not could "*erode its legibility as a standalone historic settlement within its rural context.*"

#### 6.9

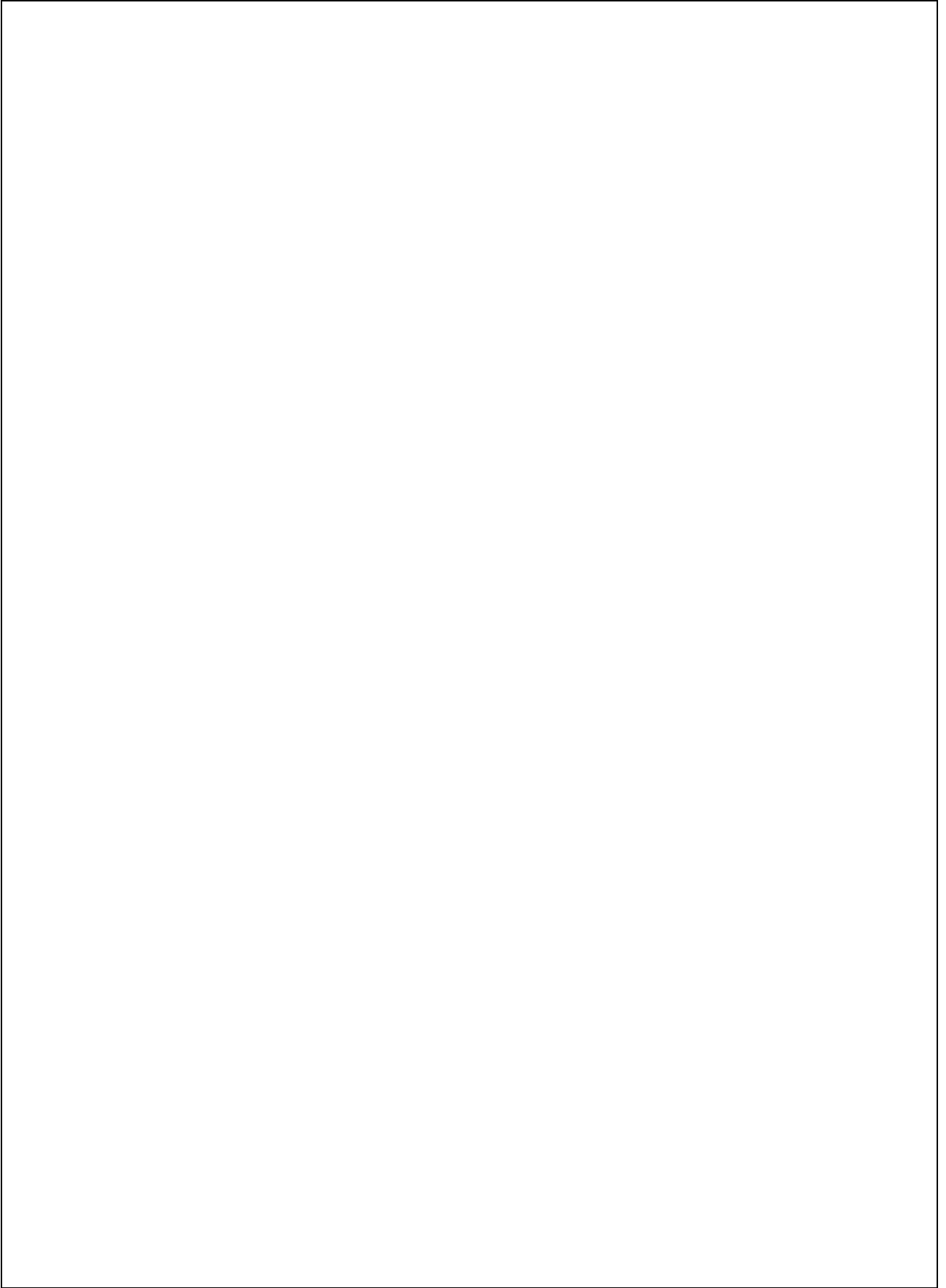
When do you intend to reach a firm decision?

#### 6.10

Even with the potential of a revised footprint, the development is still too close to Diseworth, particularly with the additional threat of Isley Woodhouse on the other side. The village is in danger of being engulfed.

If the Freeport, together with Isley Woodhouse, go ahead, I suggest that you will need an alternative/additional village category to '*sustainable*'; may I offer the following - swamped, subjugated, encircled and enveloped.







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39810

David M Dale

My Ref: SP/DMD/North West Leicestershire Draft Local Plan

Your Ref:

Date: 17 March 2024

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

Dear Madam/Sir

## **Localism Act 2011 – Strategic Planning Comments**

### **North West Leicestershire Draft Local Plan**

Thank you for consulting Derbyshire County Council (DCC) on the North West Leicestershire Draft Local Plan. The comments below are DCC's Officers' technical comments with regard to the climate change, public transport, strategic distribution sites, and footpaths aspects of the Plan.

#### **Officer Comments**

#### **Proposed Policies**

#### **5. Creating Attractive Places**

The Plan appears to have a thorough strategic consideration of climate change, both mitigation and adaptation. This is highlighted clearly as one of the main points of emphasis for future development needs.

#### **Draft Policy AP3 – Renewable Energy (Strategic Policy)**

DCC welcomes and supports the policy. It is encouraging to see targets for wind and solar generation and that a mapping exercise has been completed to identify areas potentially suitable for small and large-scale wind turbines. The support of onshore wind developments, providing they meet conditions, is also a positive feature of the draft Plan.

#### **Draft Policy AP4 – Reducing Carbon Emissions (Strategic Policy)**

The policy rightly highlights the role of the planning system in supporting the transition to a low-carbon future. It is unfortunate that the requirement to conduct Whole Life Cycle (WLC) carbon assessments (paragraph 5.29) has been removed, but the reasoning for this is understood. It is encouraging that the plan still references the use of WLC as a useful tool. Use of the Energy Hierarchy is a positive way to encourage developers to take a holistic view to design low energy buildings.



DCC welcomes the reference to a carbon offset fund as a last resort (paragraph 5.44) where low carbon construction cannot be met.

DCC also supports and welcomes:

- “pollution and climate change” referenced as an important consideration for health and wellbeing (paragraph 5.46)
- The process of updating the Strategic Flood Risk Assessment in the light of climate change (paragraph 5.62ff)
- A presumption for SuDS as part of new development unless inappropriate (Draft Policy AP8 – Sustainable Drainage (singular, not plural) Systems (paragraph 5.75))
- The consideration of the impact of climate change on water availability (paragraph 5.76)
- Climate change referenced as relevant to green and blue infrastructure and open space (Draft Policy IF3 – Green Infrastructure (Strategic Policy) (paragraph 9.19))

### **East Midlands Airport**

It is encouraging that the new plan explicitly recognises climate change (and not just noise and air quality) relating to the airport (paragraph 7.55), and that it now includes the requirement for new development that increases capacity / capability to “Maximise opportunities to achieve net zero carbon in respect of proposed buildings and non-aircraft operations” (Draft Policy Ec8 3c – East Midlands Airport). It is also welcomed that the plan maintains the requirement to improve public transport access (Draft Policy Ec8 3d – East Midlands Airport).

## **9. Infrastructure and Facilities**

### **Public Transport**

#### Paragraph 9.34

DCC would suggest that the paragraph should be strengthened to say that: ‘we will require public transport routes and a funding contribution to the development rather than ‘may’.

## **Proposed Housing and Employment Allocations**

### **6. Potential Locations for Strategic Distribution**

#### **Potential Locations for Strategic Distribution: Land north of J11 A/M42 (EMP82)**

DCC, as Local Highway Authority, has reviewed the North West Leicestershire Draft Local Plan housing and employment allocations. There are no objections from the Highway Authority’s perspective concerning the proposed development site allocations.

In the case of most proposed site allocations, it is unlikely that they would result in any identifiable safety or operational impact on the Derbyshire local road network. Most traffic is likely to route via the strategic road network through Derbyshire and to have become dissipated by the time it enters the local road network. It would also be



expected that a mitigation package would be required with transport improvements secured by way of an infrastructure delivery plan at the implementation stage.

In addition to the physical infrastructure required, it would be expected that in relation to large employment sites, to ensure that traffic impacts are adequately mitigated, appropriate travel plans, and freight and logistics plans would be required as development obligations. These would be subject to ongoing monitoring.

In that regard, DCC would express concern with the proposed allocation for strategic distribution north of J11A/M42 adjacent to the existing Mercia Park development, situated on the A444 corridor close to Derbyshire's border (**site proposal EMP82**).

As currently proposed, the associated wording of the proposed housing and employment allocations for consultation sets out the following:

**Potential Locations for Strategic Distribution: Land north of J11 A/M42 (EMP82)**

(1) Land east of A444 and west of A42 Stretton le Field is identified as having potential for strategic distribution purposes.

(2) Allocation of the site in the Regulation 19 Plan will only be supported where there is a demonstrable need for further strategic distribution in North West Leicestershire.

(3) If the site is allocated, matters which will need to be addressed include:

(a) The provision of a safe and appropriate vehicular access to the road network to the satisfaction of Highways England and Leicestershire Highways Authority.

(b) The site being accessible via a range of sustainable transport options including effective walking and cycling connections.

(c) The provision of an appropriate landscaping scheme which includes both extensive boundary treatment and also internal planting, to limit the impact of development on the wider landscape in particular in views from the north.

(d) The provision of evidence that assesses and addresses the impact of development on biodiversity and the achievement of biodiversity net gain in accordance with national requirements.

(e) Assessment of the impacts of development on heritage assets and measures to address any harm identified.

(f) The provision of a Flood Risk Assessment.

(g) Provision for the discharge of wastewater into the River Mease catchment in accordance with the provisions of draft Policy En2 (River Mease Special Area of Conservation).

(h) A surface water drainage strategy which demonstrates how pollutants and sediments from the proposed development will be prevented from reaching the



River Mease. This should include a Construction Environment Management Plan (CEMP).

(i) A satisfactory design and layout.

(j) Demonstration of the functional connection between this site and Mercia Park e.g. shared facilities, sustainable transport links etc.

(4) Proposed development will need to satisfy all other relevant policy requirements in the draft Local Plan.

Whilst DCC generally endorses the above, nevertheless it is aware of amenity issues raised by residents along the A444 corridor. These concern the volumes of HGV traffic using this route, particularly during night-time periods. DCC would expect that at the appropriate stage in the development process, transport studies will be undertaken to assess the impacts and mitigation provided.

However, given the proximity to the Derbyshire border, and that the A444 already carries significant volumes of night-time HGV traffic causing amenity issues along the corridor, DCC would request that the proposal is amended to include the following modified wording:

3(a) The provision of a safe and appropriate vehicular access to the road network to the satisfaction of Highways England, Leicestershire Highways Authority, *and cross border liaison with Derbyshire Highways Authority.*

DCC would also suggest additional wording at (k).

(k) *any future development on this site would be supported by planning obligations that will include travel plans, freight and logistics plans inclusive of routeing agreements and subject to ongoing monitoring of such plans.*

## **Proposed Housing and Employment Allocations, and Draft Policies Maps**

From the Draft Policies Maps indicating the areas potentially suitable for development, there are five areas that meet or are close to the border with DCC. They are listed below, including the implications for footpaths adjoining the DCC boundary:

- Albert Village (Inset Map 1) – Not proposing housing allocations currently (Housing and Employment Allocations, paragraph 4.77).
- Ashby de la Zouch (Inset Map 3) Proposed development could potentially affect Smisby FP 15 which crosses into NW Leics. (see Plan 2 attached).
- Castle Donington (Inset Map 8) No footpaths are close to this border.
- Moira (Inset Map 18). Development could potentially increase footfall on surrounding paths in the countryside including Overseal FP 29 and FP 27 (see Plan 1 attached)
- Blackfordby (Inset Map 6) is close to the border. There are 2 footpaths in residential areas within 500metres of the red line limit to development, Woodville FP 1 and FP 9.



Should development occur in the given areas, on consultation DCC might request consideration to be given to funding to improve paths surrounding a development that would receive increased use. This could potentially apply to Smisby FP 5 and Overseal FP 29 and FP 27.

### **Maps showing Areas Potentially Suitable for Small-Scale and Medium/Large Scale Wind Energy**

Wind energy developments could potentially be over a vast area and close to several DCC footpaths. In such circumstances, DCC would wish to be consulted on any effects on footpaths and amenity issues such as spoiling of views. The general guidance is:

- The footpath must remain open, unobstructed and on its legal alignment.
- There should be no disturbance to the path surface without prior authorisation from the Rights of Way section.
- Consideration should be given to the safety of members of the public using the path during the works. A temporary closure of paths will be permitted on application to DCC where the path(s) remain unaffected on completion of the development.
- There should be no encroachment of the path, and no fencing should be installed without consulting the Rights of Way section.

Please contact me if you wish to discuss the comments further.

Yours faithfully

David M Dale  
Strategic Planning Team and Joint Chair: CLIP: Planning Sub-group





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Title	Mrs		
First Name	Vanessa		
Last Name	Johnson		
Job Title (where relevant)	[REDACTED]		
Organisation (where relevant)			
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Use this box to set out your response.

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

**Policy IW1 Comments**

Isley Walton development creates a town the size of Castle Donington which has masses of housing built recently. The provision of facilities in CD has not increased (doctors, dentist, schools etc) and with the forward sale of land this aspect is no longer is of interest to developers. Original Planning permission now appears null and void. Another town of 15000+ people will make the whole area of NW Leicestershire be unable to function properly without these facilities being provided. There are examples in Diseworth where Planning Permission was granted but made null and void by the sale of land to other builders. The original permission included provision to build houses for first time buyers.

Diseworth is a Conservation village which will be completely swamped by the two developments, the Freeport and Isley Walton housing. The whole area will become a complete mass of warehouses, new houses and no longer be a rural community.

Traffic from the will increase on all the main roads in the area resulting in increased congestion with associated increase in "rat runs" through both Diseworth and Long Whatton. There is the probability of even more on street parking which already has a detrimental effect in both villages.

Both Diseworth and Long Walton are subject to flooding problems with houses becoming swamped inside when it rains moderately hard for a reasonably long time.

Noise, air, water and light pollution will increase if the new town is built anything like as big as explained on the plans. No amount of tree planting, double glazing and noise banks will in any real way act to reduce the overall effects as the buildings are to be constructed on a hillside.

Recently light pollution has increasing with EMA altering of onsite lighting and this has made the night views from the village far brighter.



It is my opinion that the two projects shown in the draught Local Plan, Isley Woodhouse and the Freeport, are effectively one joint item. It will be impossible to find work for people locally with 5000 houses being built and therefore people will need to travel to Leicester, Nottingham, Derby or even Birmingham to find work. The proposal must increase traffic fuel consumption, amounts of pollution and the risk of accidents. There will be nowhere near enough work available in the Freeport or at the airport for the people at Isley Woodhouse.

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



Policy EMP90 Comments.

The decision to make this area into a Freeport is not democratic and has been imposed on the village. No consultation of any description has taken place until the revision of the Local Plan emerged.

There are already empty warehousing/commercial units on the existing airport area, in Castle Donington in and around Trent Lane and Willow Park. Some of these properties have remained empty for years. It is quite wrong to build more in the area likely to remain empty. Building on the Freeport designated land unreasonable on this area. The proposals will devastate the eastern side of Diseworth completely dominating this conservation village.

The local road system is frequently used as a "rat run" when either the M1, A50 and / or A42 is congested. These roads will receive even more traffic serving the Freeport or more especially Isley Woodhouse.

The proposed tin sheds will dominate the eastern side of the village and no amount of mitigation measure will hide this. Noise and light will dominate the area that already has to cope with the existing effects of East Midlands Airport.

As with the Isley Woodhouse development will increase the water flow to the brooks in Diseworth and Long Whatton. Both villages already experience flooding in houses after heavy rain as has occurred at least 5 times since last October.

**The Local Plan states "We consider the impacts in terms of heritage landscape and amenity are likely to be unacceptable based on the current extent of the designated Freeport land". So don't include this land.**

This proposal will have a huge impact on the village but especially the people living directly next to the site. Some have lived here for many years with super views over the countryside these will be completely destroyed forever as will the agricultural land and the flowers and animals in the fields and hedgerows .

Therefore, I am asking North West Leicestershire District Council 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: 17/03/2024

### **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](mailto:planning.policy@nwleicestershire.gov.uk).

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

The proposed plan is based on a National Planning Policy Framework from before December 2023. It has not been updated to reflect any changes to the National Planning Policy Framework.

### Proposed Policies

The following objectives are included in the North West Leicestershire Local Plan (adopted March 2021) which are no longer proposed objectives in the new local plan:

- Enhance community safety so far as practically possible and in a way which is proportionate to the scale of development proposed whenever allocating sites for development or granting planning permission.
- New developments need to be designed to use water efficiently, to reduce flood risk and the demand for water within the District, whilst at the same time taking full account of flood risk and ensuring the effective use of sustainable urban drainage systems (SUDs).

No explanation has been provided for why these are no longer objectives for the purposes of the new local plan despite them being worthwhile matters to consider when determining the plans for the county.

Additionally, the objective regarding the need to achieve high quality developments has now removed references to the need to ensure that any new development "*reflects the local context and circumstances*".

Finally, the current objectives, which were intended to run until at least 2031, refer to the development of tourism which is not included in the objective relating to the supporting of the district's economy.



Proposed housing and employment allocations

Sites C47, C48, C77, C78, C81 and C86 currently fall within or adjoining land designated as Countryside. The current Local Plan states in Policy S3 – Countryside that:

*Land outside the Limits to Development is identified as countryside where those uses listed (a) to (s) below will be supported, subject to those considerations set out in criteria (i) to (vi) below.*

*(a) Agriculture including agricultural workers dwellings;*

*(b) Forestry including forestry workers dwellings;*

*(c) The preservation of Listed Buildings;*

*(d) The re-use and adaptation of buildings for appropriate purposes including housing in accordance with the Settlement Hierarchy (Policy S2);*

*(e) The redevelopment of previously developed land in accordance with Policy S2;*

*(f) Flood protection;*

*(g) Affordable housing in accordance with Policy H5;*

*(h) The extension and replacement of dwellings;*

*(i) Expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well-designed new buildings;*

*(j) Sites for Gypsies and Travellers and Travelling Showpeople in accordance with Policy H7;*

*(k) Small-scale employment generating development or farm diversification;*

*(l) Community services and facilities meeting a proven local need;*

*(m) Development by statutory undertakers or public utility providers;*

*(n) Recreation and tourism;*

*(o) Renewable energy;*

*(p) Development at East Midlands Airport in accordance with Policy Ec5;*

*(q) Development at Donington Park Racetrack in accordance with Policy*

*(r) Transport infrastructure;*

*(s) Employment land in accordance with the provisions of Policy Ec2.*

The proposed policy S4 in the new proposed local plan contains similar policies. Additionally, the new proposed local plan includes policy S5 – Residential Development in the Countryside. This



policy provides for residential development only in the following circumstances:

- Permanent rural workers dwellings;
- Temporary rural workers dwellings;
- Loss of rural workers dwellings; and
- Replacement of residential dwellings.

The proposed development of sites C47, C48, C77, C78, C81 and C86 do not fall within the exceptions provided for in policy S3 of the existing Local Plan or within policy S5 of the proposed new local plan.

Paragraph 4.40 of the Draft North West Leicestershire Local Plan 2020-2040 Proposed Policies **for Consultation refers to "paragraph 80" of the National Planning Policy Framework as setting** out a range of circumstances where homes may be acceptable in the Countryside. They go on to state that there is a presumption against new residential developments in the countryside except **in a limited number of circumstances which is stated to include "to meet a local need (Policy S3)".**

It is, in fact, paragraphs 82, 83 and 84 of the current National Planning Policy Framework which deals with rural housing (paragraph 80 relates to the Housing Delivery Test). Paragraph 82 of the National Planning Policy Framework states:

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

Policy S3 makes no reference to when or where developments within the Countryside are or should be acceptable. The reference to policy S3 in policy S4 is, therefore, unacceptable as no criteria have been set out as to when it is appropriate to carry out developments in the Countryside in support of a local need.

In advance of the existing Local Plan, extensive assessments of this nature were carried out such as the North West Leicestershire Settlement Fringe Assessment dated March 2010. No new assessment appears to have taken place to assess the suitability of the landscape value of the Countryside around settlements. Therefore, consideration must be given to the last version of the assessment which states the following in respect of development sites C47, C48, C77, C78, C81 and C86 (which all fall within Urban Fringe 1 for Coaville):

*"This land is a distinctive river valley on the edge of Thringstone and New Swannington, with distinctive views of linear development on higher ground with the wooded high ground on the fringe of Charnwood Forest a prominent feature above. The landform in combination with the wooded river valley and extensive longer views across the landscape are distinctive features. The land has a rural character and also the settlements appear as one continuous development; they*



*are narrow and linear in form which is characteristic of the settlements within the wider landscape. The land becomes slightly less distinctive towards the south of the fringe close to the edge of New Swannington, however, the land is important in providing separation between New Swannington and Swannington. As the land is a slight plateau at the at this southern end intervisibility between the two settlements is limited, which reinforces the sense of separation between the settlement. Any development along the side should ensure that it retains a sense of separation and the linear characteristics of the settlement when viewed from the wider landscape to the west. It should also ensure that the distinctive character of the river Valley is retained. This would be difficult to achieve through the implementation of development which would urbanise the river valley, potentially reduce the sense of separation between settlements and make the urban fringe more prominent within the wider landscape."*

It is also noted in the assessment of Urban Fringe 1 for Coalville that the Ivanhoe Way crosses the landscape (as shown red on the plan below):



The Summary of the Fringe Judgements contained at table 9.1 of the North West Leicestershire Settlement Fringe Assessment dated March 2010 found that Urban Fringe 1 had the highest score for Landscape Quality and Visual Quality (and the joint highest score for each of those factors individually) and it was therefore ranked as the least suitable place for development of all fringes of development around Coalville. It was noted in Table 9.2 that the potential to achieve **mitigation for this site was "low"**.

The new proposals to include sites C47, C48, C77, C78, C81 and C86 within the Limits of Development do not take into account any of the factors previously highlighted as reasons for excluding development within Urban Fringe 1.

Paragraph 74 of the National Planning Policy Framework which states that:

*"The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities (including a genuine choice of transport modes). Working with the support of their communities, and with other authorities if appropriate, strategic policy-making*



*authorities should identify suitable locations for such development where this can help to meet identified needs in a sustainable way. In doing so, they should:*

*a) consider the opportunities presented by existing or planned investment in infrastructure, the **area's economic potential and the scope for net environmental gains**;*

*b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns to which there is good access;*

*c) set clear expectations for the quality of the places to be created and how this can be maintained (such as by following Garden City principles); and ensure that appropriate tools such as masterplans and design guides or codes are used to secure a variety of well-designed and beautiful homes to meet the needs of different groups in the community;*

*d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation (such as through joint ventures or locally-led development corporations); and*

*e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size."*

None of these factors appear to have been taken into account when considering sites C47, C48, C77, C78, C81 and C86 given that the Quantitative Assessment for the sites note that there are serious infrastructure issues with the following:

- Local services (which are all based in Coalville over 2 km away);
- Primary Schools (given that there is limited capacity at New Swannington Primary School and no capacity to extend);
- Secondary Schools (given that there is no capacity at Castle Roack High School);
- GP Surgery (given that Whitwick Health Centre is over 1.3km away);
- Employment (which is closest at Hermitage Industrial Estate in Coalville and the A511 acts as a barrier to walking access);
- Pharmacy (which is closest at Masons Chemists in Whitwick which is over 1.3km away)

There are also constraints with the possibility of development given that:

- There are various public rights of way through sites C47, C48 and C81;
- There are tree preservation orders on trees in sites C47 and C77;
- There are mineral safeguarding issues for coal mining in sites C47, C48, C77, C78, C81 and C86;



- There is the loss of soil resources if sites C47, C48 and C81 are developed;
- There are potential biodiversity or geodiversity issues if sites C47 and C48 are developed (particularly the possibility of badgers and great crested newts on the sites).

Given the infrastructure issues identified and the constraints to the development sites C47, C48, C77, C78, C81 and C86 are not appropriate for the supply of a large number of homes and do not meet the requirements for such as set out in the National Planning Policy Framework.

It is proposed that sites C47, C77, C78, C81 and C86 are assessed together but various concerns for the sites have been raised as outlined below and no mitigation has been recommended in respect of these concerns.

The site assessment for site C47 for about 342 dwellings states (amongst other matters):

- *The site undulates and provides an attractive countryside fringe to the development to the east and south. Development of the site would remove this setting and given the undulating nature of the site and the important landscaping within; it would be difficult to develop the site without resulting in significant harm to the rural nature of this land. Furthermore, the site is not particularly well related to the built-up part of the settlement with fields on most boundaries and the site projects significantly to the west of the main settlement.*
- *LCC Highway Authority stated the site does not appear to share a common boundary with the public highway and therefore it is doubtful whether a satisfactory access can be provided. Two points of access would be required for developments over 150 dwellings. If access were to be provided via Church Lane significant off-site works would be required. Most appropriate access would be via the residential estate roads to the east of the site.*
- *The site is not particularly well related to the built-up part of the settlement with fields on most boundaries and the site projects significantly to the west of the main settlement. The north-eastern boundary does not adjoin the existing built settlement*
- *The Highway Authority considers that it is doubtful whether a satisfactory means of access to the site could be achieved.*
- *On its own the site is not considered developable, particularly as it lacks a direct means of access. This could be addressed if the site was considered in conjunction with a number of adjoining sites.*

The site assessment for site C77 for about 91 dwellings states (amongst other matters):

- *The site comprises three fields which are well landscaped along all boundaries. The site undulates and provides an attractive countryside fringe to the development to the east and south. Development of the site would remove this setting and given the undulating nature of the site and the important landscaping within; it would be difficult to develop*



*the site without resulting in significant harm to the rural nature of this land.*

- *"In landscape terms, the site is in a wider parcel of land (01COA-A) assessed as being medium landscape sensitivity and medium-high in respect of visual sensitivity. Within this parcel the central area has more distinctive landscape which is more vulnerable to change and where there are longer distance views of higher scenic quality. There is also a dense network of public rights of way."*
- *"LCC Highways considers that an access of Talbot Lane appears achievable with a secondary access from School Lane."*

The site assessment for site C78 for about 22 dwellings states (amongst other matters):

- *There is an important group of trees in the northern part of the site.*
- *The front part of the site is narrow and could not accommodate housing; as such, housing could not be located to the site frontage to respond to the prevailing linear character of development.*
- *Within this parcel the central area has more distinctive landscape which is more vulnerable to change and where there are longer distance views of higher scenic quality. There is also a dense network of public rights of way.*
- *LCC Highways considers that access to the site from Church Lane appears to be undesirable due to the likely proximity of the access to the junction between Church Lane and Thornborough Road. If possible, an access from Robinson Road would alleviate this **potential issue although this would appear to involve land outside of the applicants' control.***
- *On its own the site is not considered developable, particularly as it lacks a direct means of access. This could be addressed if the site was considered in conjunction with a number of adjoining sites.*

The site assessment for site C81 for about 50 dwellings states (amongst other matters):

- *The site borders a group of dwellings to the east and to the west and development of the front part of the site would continue this pattern of linear development. However, the site has far greater depth and development of the whole site would not respond to the prevailing character of the area. The site forms a group of fields and neighbours agricultural land to the north and south. The area is characterised by sporadic development set in a rural environment and development of even the front part of the site would erode this rural character. Development of the site would result in an unacceptable encroachment into the countryside.*
- *The site has an access serving the existing field. However, an enhanced access would be required to serve further residential development on the site and evidence is needed to demonstrate this can be achieved. Church Lane is narrow and has a high level of on street parking during school drop off and collection times. It is therefore not clear that a*



*suitable access could be provided or that the local highway network could satisfactorily accommodate the additional traffic to be generated.*

- *Within this parcel the central area has more distinctive landscape which is more vulnerable to change and where there are longer distance views of higher scenic quality. There is also a dense network of public rights of way*
- *LCC Highways has concerns about access on to Church Lane which is narrow and the subject of parking associated with the nearby primary school.*
- *On its own the site is not considered developable, particularly as it lacks a direct means of access. This could be addressed if the site was considered in conjunction with a number of adjoining sites.*

The site assessment for site C86 for 17 dwellings states (amongst other matters):

- *Development of the site would erode this character and evidence would be needed that the loss of some of this open space would be visually acceptable.*
- *The site shares a common boundary with Howe Road, Whitwick, which is an adopted unclassified road with a 30mph speed limit. Visibility would be achievable from an access on Howe Road and junction spacing is likely to be achievable with the nearby junctions of Valley Road and Robinson Road subject to a speed survey and careful positioning. Due to the curvature and residential nature of the road, the LHA would not expect speeds to be excessive and therefore a safe and suitable access is likely to be achievable.*
- *Within this parcel the central area has more distinctive landscape which is more vulnerable to change and where there are longer distance views of higher scenic quality. There is also a dense network of public rights of way.*
- *The land drops away quite steeply to the rear of the site which may restrict the amount of development that could be achieved.*
- *The site is also an Asset of Community Value.*

The 2021 SHELAA assessment of the sites indicates as follows:

- Site C47 states that it is not currently achievable and that any timeframe for development is likely to be in 11-20 years. It is therefore not appropriate for the site to be included in the proposed new local plan and certainly not without an up to date re-assessment;
- Sites C48, C77, C78, C81 and C86 have a timeframe for development in 11-20 years and therefore, it is not appropriate for the site to be included in the proposed new local plan and certainly not without an up to date re-assessment.

Whilst there are sites within sites C47, C77, C78, C81 and C86 (which are proposed to be assessed together) which potentially have suitable access to highways (specifically sites C81 (for 50 houses) and C86 (for 17 houses)) no assessment appears to have been carried out for the suitability of highways access for 500 homes across the entire site. It is noted in the assessment



of site C47 that at least two points of access are needed for a development with more than 150 houses; however, it is noted that *"If access was to be provided via Church Lane significant off-site works would be required."* Church Lane provides the most direct access to the combined site but is wholly unsuitable for access to any development let alone a development of 500 new homes. Leicestershire County Council have expressed concerns about access from Church Lane for any development (including site C81) given the narrowness of the road and the parking associated with New Swannington Primary School which essentially turns Church Lane into a narrow single track road.

Notwithstanding the numerous issues with sites C47, C77, C78, C81 and C86 individually, no assessment of the sites as a whole appears to have been carried out to consider whether they are suitable and appropriate for development. It is completely premature to seek to include the sites within a new local plan for housing allocation without a proper assessment having been carried out to consider whether it is achievable (particularly when the individual assessments of the sites indicate that the largest land area is not suitable for development).

#### Proposed Limits to Development Review

It is proposed that the limits of development will be moved to include sites C48 and C47. This will encroach into areas designated as:

- Countryside
- National Forest;
- Charnwood Forest; and
- Green Wedge.

Site C48 has not been referred in any way in relation to the area of separation (policy En5). This is because the land is currently outside the limits of development and, therefore, has not been assessed with regards to whether it should form part of the Area of Separation between Coalville and Whitwick. If it was assessed then it would be found to form part of the Area of Separation **given that any development of that site would inevitably result in the *"physical coalescence of Coalville and Whitwick and the loss of the separate identity of the two settlements"* (paragraph 10.65 of the Proposed Policies for Consultation).**

If the limits of development are amended to include site C48 then it must be assessed with regards to whether it forms part of the Area of Separation. If it is found to be an Area of Separation (as well as already being designated as countryside and National Forest) then the existing Area of Separation must be re-assessed for proposed housing and employment allocations given the loss of site C48 as an Area of Separation.

Paragraph 10.66 of the Proposed Policies for Consultation already notes that the Planning Inspector who examined the current Local Plan stated that there *"is scope for reconsideration of the detailed boundaries and land uses of the AoSs [Areas of Separation], 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”.*

The existing Area of Separation would be more appropriate locations for proposed housing and employment allocations given that a Planning Inspector has already stated that the site should be re-assessed if there are increased development needs and, more importantly, it already falls within the limits to development.

Site C47 falls outside the current limits of development and the boundaries should not be moved to include this given that it is already designated as countryside and National Forest and part of it falls within Charnwood Forest. It is noted in the assessment of site C47 that this site ***“provides an attractive countryside fringe”*** to the existing developments (which are within the limits of development) to the east and south of the site. The natural entry point to the countryside from the west of Whitwick should be maintained and preserved rather than risking new and future encroachment into the countryside.

Any development of site C47 would disregard the following objectives of the existing Local Plan:

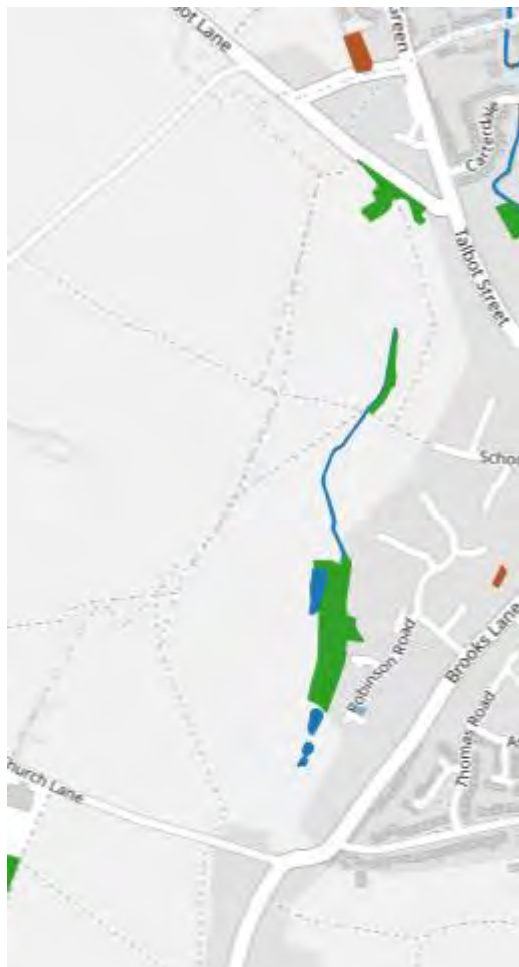
- Objective 1 – **as it would not support the health and wellbeing of the district’s population** given the loss or interference with existing public rights of way through the countryside which would be replaced with rights of way alongside roads and houses;
- Objective 3 – as noted in the site assessment *“The site undulates and provides an attractive countryside fringe to the development to the east and south. Development of the site would remove this setting and given the undulating nature of the site and the important landscaping within; it would be difficult to develop the site without resulting in significant harm to the rural nature of this land. Furthermore, the site is not particularly well related to the built-up part of the settlement with fields on most boundaries and the site projects significantly to the west of the main settlement.”* **As such the development of the site would not reflect the local context and circumstances and the quality of the design and layout is likely to be compromised by the undulating nature of the site.**
- Objective 4 – as the development of the site would remove access to existing green space.
- Objective 5 – as the development of the site impact tourism in the area given that Swannington Village Walks are listed as a visitor attraction on North West Leicestershire **District Council’s website** (<https://www.nwleics.gov.uk/atoz/733>) and the footpaths within the site are used for walks on the Swannington Heritage Trust website (<https://swannington-heritage.co.uk/visits-events/walks/>).
- Objective 7 – the development of the site will not enhance community safety given the risks associated with the increased traffic on a transport infrastructure which is not suited for any more dwellings let alone up to 500 more dwellings.
- Objective 10 – as the development of the site would not enhance the natural and rural heritage of the site and the surrounding area.
- Objective 11 – as there woodland and water features within the site which are Green and



Blue Infrastructure and any development would not protect or enhance those natural environments.

- Objective 12 – expects the National Forest and Charnwood Forest to be enhanced and protected and a development of up to 500 houses on this site which is all National Forest **and part of which is Charnwood Forest would not enhance or protect the district's landscape.**

The assessment of site C47 states that “*although there are other fields to the east, south and west the site does not form part of any wider green network*”. **This is incorrect.** An extract of Natural England’s Green Infrastructure map (taken from <https://designatedsites.naturalengland.org.uk/GreenInfrastructure/Map.aspx>) is shown below:



Green and blue infrastructure are clearly located within and adjoining the site. Moreover, it is **claimed in the assessment of site C47 that “Most appropriate access would be via the residential estate roads to the east of the site” as a solution to the significant issue of access to the road network.** The proposed solution appears to be to access the site through existing green infrastructure which will undoubtedly have an impact on the same.



**The assessment of site C19 states that** *"The site comprises a series of fields which cover a large area and provide a green wedge between settlements. Development of the site would fundamentally affect the character and appearance of the site, to the detriment of the townscape."*

The assessment of sites C47 and C48 make no mention of the fact that both of these sites are part of the Green Wedge which is intended to provide a green boundary between settlements. In respect of these sites it is the separation of Whitwick from Swannington. Moving the limits of development into the green wedge will create an unhelpful and unwelcome precedent and risk all of Swannington, New Swannington, Whitwick, Thringstone and Coalville coalescing into a single settlement and the subsequent loss of identity of each.

The Green Wedge Background Paper dated May 2012 carried out by North West Leicestershire District Council made the following comment about the Green Wedge within which sites C47 and C48 are located:

*"This is a relatively prominent site when viewed from the landscape to the west. The setting of the existing built form is a narrow linear settlement with Charnwood Forest providing a prominent backdrop. It would be difficult to mitigate new development across this site without increasing the prominence of urban edges. New development would also alter the rural character of both Spring Lane and Church Lane reducing the sense of separation between Thornborough/New Swannington and Swannington. Woodland and tree planting could help to screen development although the character of the roads would alter as they would become more enclosed by woodland planting and existing characteristic long views across farmland towards Charnwood Forest would be prevented."*

Therefore development of these sites would not meet the current objectives of the existing Local Plan or the proposed objectives of the proposed local plan so any proposals to change the limits of development in this location should be resisted particularly as there does not appear to have been any further studies carried out in relation to the Green Wedge, the Areas of Separation or the encroachment onto the Countryside.

Moreover given the numerous issues with the potential development of sites C47, C48, C77, C78, C81 and C86, no assessment of the sites as a whole appears to have been carried out to consider whether they are suitable and appropriate for development of up to 800 new homes. The closest assessment carried out was with regards to the planning application for site C48 which was made under application number 16/01407/OUTM. This application was refused and the subsequent appeal was withdrawn. The application was for up to 270 new houses but was refused on various grounds relating to the fact that the proposal would not be a sustainable development within the meaning of the National Planning Policy Framework. No evidence has been submitted as to how the development of sites C47, C48, C77, C78, C81 and C86 could be made sustainable and, therefore, it is inappropriate to move the Limits of Development to include these sites before any assessment has been made to ensure that they are suitable, sustainable and achievable.



## 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: [REDACTED]

Date: 17 March 2024

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





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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	Thomas	
Last Name	Onyon	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	[Redacted Address Information]	
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. *POLICY IW 1*

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

- Diseworth has many listed buildings and a large conservation area that will be swallowed as developments expand inevitably*
- Biodiversity will be lost as ancient hedgerows are torn out.*
- Roads are narrow through the village and cannot support such a big increase in traffic.*
- Few jobs near development so all residents will have to commute.*

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



POLICY EMP 40

- The location or the slope down towards the village will cause a number of issues, from flooding from rainwater run-off of all the roofs and roads to noise and light.
- Roads through the village are not suitable for large goods vehicles and footpaths are often narrow and single sided.
- Old established hedgerows cannot be replaced and provide unique ecosystem for many animals


Therefore I am asking NWLDC not to include the EMP 40 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: 17/03/2024

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Historic England

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

Direct Dial: [REDACTED]

Our ref: PL00762423

17 March 2024

Dear Sir/Madam,

**NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW: POLICIES,  
ALLOCATIONS AND SETTLEMENT BOUNDARIES/LIMITS TO DEVELOPMENT  
CONSULTATIONS 2024**

Historic England welcomes the opportunity to respond to this consultation. As the Government's adviser on the historic environment Historic England is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the Local Plan process. We refer also to our advice of 13 March 2022 in relation to the Development Strategy and Policy Options 2022 consultation.

Our response below comprises general comments regarding the site assessment methodology and then sets out comment on the proposed policies, allocations and settlement boundaries consultations.

**GENERAL COMMENTS: SITE ASSESSMENT METHODOLOGY**

We note the site assessment methodology included as part of the evidence base for the plan and the example site pro forma set out in Appendix D. Whilst, the information includes a section relating to 'historic and cultural assets' there is very limited information available to indicate the significance of heritage assets and how any impacts on that significance, as a result of development proposed, have been considered in NPPF terms.

This is of concern where sites shown as having uncertain or negative impacts on heritage are taken forward as allocation sites. We recommend that further work is undertaken on sites where this arises - or if that information is already available to include it as part of the evidence base. It would be helpful for clarity around that aspect in terms of NPPF requirements for a positive approach to the historic environment in plan making.

In our comments on site allocations further down we have highlighted some sites



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where it is unclear if non-designated heritage assets have been considered or not. These relate to archaeological features. We note the Council's Conservation Officer has provided advice as part of the assessment work but the methodology is unclear whether advice has been sought from Leicestershire County Council's archaeological advisers. Again, it would be helpful for clarity around that aspect in terms of NPPF requirements for a positive approach to the historic environment in plan making.

## **LOCAL PLAN REVIEW: PROPOSED POLICIES FOR CONSULTATION**

### **Draft Policy S2 - Settlement Hierarchy (Strategic Policy)**

From the 2022 consultation we understood that a new settlement option was ruled out at that time. We note that the current consultation advises the Council took the decision in September 2022 to agree Option 7b as the preferred development strategy and that option includes a new settlement.

From the information available in the current consultation documents we understand a new settlement is being proposed and is referred to as Isley Woodhouse. Historic England has concerns about the potential harm of the proposed settlement on the significance of heritage assets contained within the site and nearby as a result of setting impacts.

The site would comprise much of the monastic landscape associated with the outstanding St Mary and St Hardulph Priory Church, Breedon on the Hill (GI listed building and associated hill fort scheduled monument) and Langley Priory (GII\* listed building). Nearby Conservation Areas and various nearby Listed Buildings would, potentially, also be affected by the proposed settlement.

It is unclear from the information available how this settlement option has been taken forward as a preferred option. Nor is it clear how the anticipated level of development could be achieved - is the Council satisfied that the proposal is developable and deliverable?

### **Draft Policy AP3 - Renewable Energy (Strategic Policy)**

We note that Part 3 criteria b refers to the need to ensure there is no unacceptable impact on landscape character with reference to National Character Areas. The draft Policy also links with draft Policy S4 - Countryside (Strategic Policy).

Historic England would submit that criteria b of draft Policy AP3 should be extended to incorporate the need to ensure there is no unacceptable harm to the significance of heritage assets or setting, or include that reference as a separate criteria.



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We welcome the text relating to heritage assets that is included on the Maps showing areas potentially suitable for small scale or medium/large wind energy.

### **Draft Policy H3 - Housing Provision (Information in separate consultation document)**

Historic England's comments on the separate housing provision consultation document are provided further down in this response.

### **Draft Policy H10 - Space Standards**

Should the Plan pursue such a requirement it is recommended that existing built fabric, including heritage assets (designated or non-designated), be excluded from any policy requirement since it may preclude conversion and repurposing schemes such as barn conversions. As a result the policy would have the potential to conflict with other policies coming forward through the Plan Review eg Draft Policy AP4 Reducing Carbon Emissions (Strategic Policy) criteria 1c which seeks to maximise opportunities for the reuse of materials - by virtue of the wording, repurposing existing fabric could be said to constitute the reuse of materials.

### **Draft Policy Ec3 - New Employment Allocations (Strategic Policy) (Information in separate consultation document)**

Historic England's comments on the separate employment consultation document are provided further down in this response.

### **Draft Policy Ec12 - Tourism and visitor Accommodation (Strategic Policy)**

The reference to the historic environment and associated local distinctiveness in Policy criteria 1c is supported. Tourism can take many forms, from visits to specific heritage attractions, engaging in heritage activities during broader trips, to visitors exploring local historic high streets and local heritage sites. In this respect, heritage plays an important role in attracting people to place, and in contributing to local economies.

### **Draft Policy IF7 - Ashby Canal**

Historic England welcomes the continued support within the draft Plan for the restoration of the Ashby Canal.

### **Draft Policy En7 - Conservation and Enhancement of the Historic Environment (Strategic Policy)**

Historic England generally welcomes the approach of the draft policy for the historic environment. The draft policy embraces the rich and varied heritage within the District.



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However, 'setting' is not clearly emphasised in the draft wording and we recommend the following revisions, or a similar alternative (underlined only to highlight suggested alteration):

- The opening sentence of Criteria 2 be revised to read as follows: 'The Council has a key role to play in the protection, conservation and enhancement of the heritage assets that exist throughout the district, and their setting, and will do so by:'.
- Criteria 2(a) be revised to read as follows: 'Supporting proposals for planning permission and listed building consent where ~~the historic environment~~, heritage assets and their setting are conserved or enhanced in line with their significance; and'.

Criteria 2(c) could be perceived as too restrictive by requiring retention of various elements and not aligned with NPPF provisions for managing change. It may be that the intentions of the particular criteria could be addressed through the suggested changes to Criteria 2(a) and we would be happy to discuss this further with you ahead of the next iteration of the Plan.

### **LOCAL PLAN REVIEW: PROPOSED HOUSING ALLOCATIONS FOR CONSULTATION: Draft Policy H3 - Housing Provision**

Broad Location, West Whitwick - area C47, Land at Redhill Farm, New Swannington - It is not clear how the ridge and furrow earthworks field system has been considered in the site assessment work. The site assessment information indicates a Sustainability Assessment (SA) outcome of 0 (neutral) for SA15 Historic Environment which we disagree with as there would be some harm to non-designated heritage in NPPF terms. It is not clear whether the Council's archaeological curators have provided advice as part of the assessment work. From the information available, it is not clear whether the site could be developed or delivered in the way the Council anticipates.

Money Hill, Ashby-de-la-Zouch - A5 - The north part of the site contains a possible cropmark enclosure of unknown prehistoric date. It is not clear how this asset has been considered in the site assessment work or whether the Council's archaeological curators have provided advice as part of the assessment work. From the information available, it is not clear whether the site could be developed or delivered in the way the Council anticipates.

Land North and South of Park Lane, Castle Donington - CD10 - The allocation would result in harm, potentially at a high level, to the significance of Donington Hall, a Grade II\* listed building, along with various Grade II listed buildings, the associated former medieval deer park which the land south of the park would be located in, and other listed buildings further afield. The site assessment information refers to a heritage



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assessment being commissioned by the Council but it has not been possible to find this online so we are unsure whether this will form part of the evidence base for the Plan or not.

Criteria (l) of the policy for the site sets out potential mitigation measures to address harm but it is unclear whether the landscape buffer concept would be an appropriate one for the parkland area. The CD10 Parameters Plan does not assist as the open space landscaping and planting buffer seem to merge together.

From the information available, it is not clear whether the site could be developed or delivered in the way the Council anticipates.

Land off Leicester Road, Ibstock - Ib18 - The northern section of the proposed allocation site has a potential Roman cropmark situated in it but it is not clear how this asset has been considered in the site assessment work or whether the Council's archaeological curators have provided advice as part of the assessment work. From the information available, it is not clear whether the site could be developed or delivered in the way the Council anticipates.

Land at 40 Measham Road, Appleby Magna - AP17 - It is not clear how the ridge and furrow earthworks field system has been considered in the site assessment work. It is not clear whether the Council's archaeological curators have provided advice as part of the assessment work. From the information available, it is not clear whether the site could be developed or delivered in the way the Council anticipates.

Land at Heather Road, Ravenstone - R12 - It is not clear how the Conservation Area has been considered in the site assessment work. From the information available, it is not clear whether the site could be developed or delivered in the way the Council anticipates.

Isley Woodhouse - IW1 - There are several areas of consideration for this site, two of which relate to the complex multi-phase and high grade assets at Breedon-on-the-Hill. First is the significance of the Iron Age hill fort, and the impact of the proposed development on the significance it derives from its setting. Secondly, the site would comprise a large part of the monastic landscape associated with the outstanding St Mary and St Hardulph Priory Church, Breedon on the Hill (GI listed building and associated hill fort scheduled monument) and Langley Priory (GII\* listed building). It is not clear how the significance of the assets has been considered, or the significance derived from their setting. There is the potential for the allocation to result in high levels of harm to significance of the heritage assets.

Nearby Conservation Areas and various Listed Buildings would, potentially, also be affected by the proposed settlement. We note the site assessment information refers to these but, again, it is not clear how any harm has been considered in NPPF terms,



or how Criteria 3e of the site policy could be achieved.

The Landscape Sensitivity Study referred to in the draft Plan does not appear to be available online so it is not possible to provide advice on its findings. Would any proposed mitigation measures be harmful to the significance of heritage assets or significance derived from setting?

It is unclear from the information available how this settlement option has been taken forward as a preferred option. Nor is it clear how the anticipated level of development could be achieved - is the Council satisfied that the proposal is developable and deliverable in the manner that it anticipates?

At present the Plan information does not show a positive approach to the historic environment in respect of this site allocation. We would welcome opportunity to discuss this site further with you ahead of the next iteration of the Plan.

**LOCAL PLAN REVIEW: PROPOSED EMPLOYMENT ALLOCATIONS FOR CONSULTATION: Draft Policy Ec3 - New Employment Allocations (Strategic Policy)**

Land south of East Midlands Airport - EMP90 (part) - It is not clear from the information how any harm to Diseworth Conservation Area and nearby listed buildings has been considered in the assessment work. From the information available, it is not clear whether the site could be developed or delivered in the way the Council anticipates.

**LOCAL PLAN REVIEW: SETTLEMENT BOUNDARIES/PROPOSED LIMITS TO DEVELOPMENT FOR CONSULTATION**

As a general comment, the Plan will need to consider the proposed changes to limits to development in respect to impacts on heritage assets and their setting, whether positive, neutral or harmful.

Our main concern relates to the proposed extension to limits to development at Castle Donington where land to the north and south of Park Lane is proposed. We have provided advice on the proposed allocation CD10 and would recommend that further work in respect of the site allocation and proposed limits to development is undertaken to establish whether the site is developable and deliverable in the manner anticipated and whether the proposed limits to development would need to be smaller as a result of any such work.

We have set out concerns in relation to a number of issues which could affect the soundness of the Plan moving forward. We would welcome opportunity to discuss the



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issues raised above with you in due course and would be happy to meet in person if that would be helpful. Do not hesitate to get in touch should you have any queries.

Yours sincerely,

Rosamund Worrall

Rosamund Worrall  
Team Leader (Development Advice)



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	Personal Details	Agent's Details (if applicable)
Title	MRS	/
First Name	JENNIFER	
Last Name	ONYON	
Job Title (where relevant)	-	
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. POLICY 1W1

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

1 I object to the size and placement of this proposed settlement. We do not need that many houses, who is going to be able to buy and live in them? Where are they going to work?

2 It will change the landscape forever, for what benefit? We lose valuable agricultural land which is needed to be able to continue to feed us.

3 The road structure cannot cope with uncreated traffic. It will have a big impact on the village, more noise, air pollution and rubbish. Already the 40 mph on The Green is largely ignored as cars just speed through the village. We only have pavements on one side of the road, so large vehicles especially are already getting very



POLICY 1W1 - cont.

close to the pavement

Therefore I do not support the new town development of Isley Woodhouse (Policy 1W1)

POLICY EMP 90

1 This is in totally the wrong site, we are an ancient historic village. There are sites close by that wont be affected, and there are no communities there to destroy

2 The village cannot cope with any more concrete around it, the amount of new building is already causing flooding. We are in a dip and all the water runs off into the village to the point where the defences that have been put in cant cope.

3 We live in a conservation area, and are prepared to abide by the rules and regulations to protect and preserve the village, but these rules and regulations don't seem to apply to the Freepart Development

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

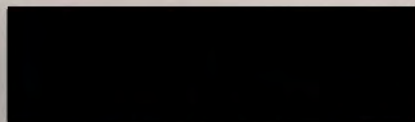


## Declaration

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:



Date:

17.3.24.

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From:   
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: New planning policy  
Date: 17 March 2024 20:03:17

---

I am fully aware of the requirements instructed for housing from the government but I personally believe that hugglescote and donington le heath cannot take anymore.

The schools are up to maximum, u Carnt get into the doctors etc.

The amount of traffic on the roads is too much.

The ques at hugglescote crossroads, down grange road and the crossroads at raven stone are ridiculous. You can wait at least 20 mins during busy times. Outside of hugglescote school is an accident waiting to happen.

We've lost so much nature including trees, hedges, bushes and birds and animals.

We don't want any houses on the green in donington le heath, let's keep the identity of each village hugglescote, donington le heath, Ellistown, ibstock.

I'm born and bred Coalville, my parents would turn in their grave if they were to know The Grange has become a housing site and not long til it joins the new development on standard hill.

There's no where to go in Coalville. The market has been moved to a little unit in Marlborough square. No fresh fruit,veg meat or fish. Marlborough square is a complete mess and where r people going to park to go to the market ?.

Regards John and Jayne stainesj

Sent from my iPad



From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: Proposed housing  
Date: 17 March 2024 20:08:32

---

I am objecting to the proposed housing development on Thornborough Road.  
The traffic is horrendous on Thornborough Road now without any more houses being built. The cars are queuing from the island at McDonald's past the allotments everyday. The field where the proposed house plans are for, floods now. There use to be a stream running through that field years ago. Where is it now? 283 houses. 2- 3 cars per house. Wheres all this traffic going.  
Where are all the children going to school. Our schools are full to capacity .  
The doctors surgeries are full. You can't get appointments now.  
The houses built at Hugglescote ,they were promised school, doctors, where are they?  
Our green fields are being taken away from us and the animals habitats too..  
When is this going to stop.

Sent from my Galaxy





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First Name	RONALD	
Last Name	MEARNS	
Job Title (where relevant)		
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		Proposed Limits to Development Review

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1 W 1

Use this box to set out your response.

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

Due to the size of the proposed development I have real concerns relating to the impact on the existing infrastructure, amenities and facilities of the area and in particular to the village of Duseworth.

Inevitably there will be a substantial increase in noise and pollution and congestion with the additional traffic which would have an adverse impact on the wellbeing of the existing population. It is difficult to see how Duseworth can exist in its present form subject to conservation status regulations when it is virtually surrounded by the huge increase in residential



IWI Continued

and industrial development including  
airport expansions.

Therefore I do not support the new  
town development of Isley Wood house  
(POLICY IWI)



### Declaration

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Signed:

Date:

17/3/2024

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	<input checked="" 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.

EMP 90

Use this box to set out your response.

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

My major concern with the proposed development adjacent to Doreworth is the effect it will have on our way of life within a rural village community and cannot see how the conservation village status can be maintained when the village itself will basically be an enclave surrounded numbers of very large industrial units requiring their own infrastructure at the expense of green agricultural land and open spaces

There will be further issues with the increase in traffic through and around the village with associated noise and pollution.



EMP 90 Continued

I believe that there will be a real problem with flooding in the village due to the development on this land.

Therefore I am asking NWLDC not to include the EMP 90 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.

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Signed:



Date:

17/3/2024

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	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Susan	
Last Name	Beech	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
█	██████	
██████	██████████	
█	██████	
█	██████	
██████	██████████	



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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
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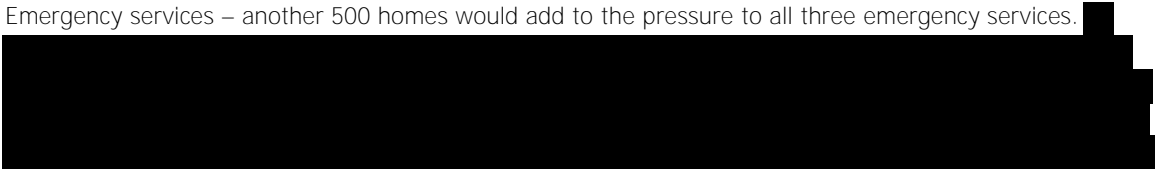
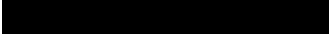
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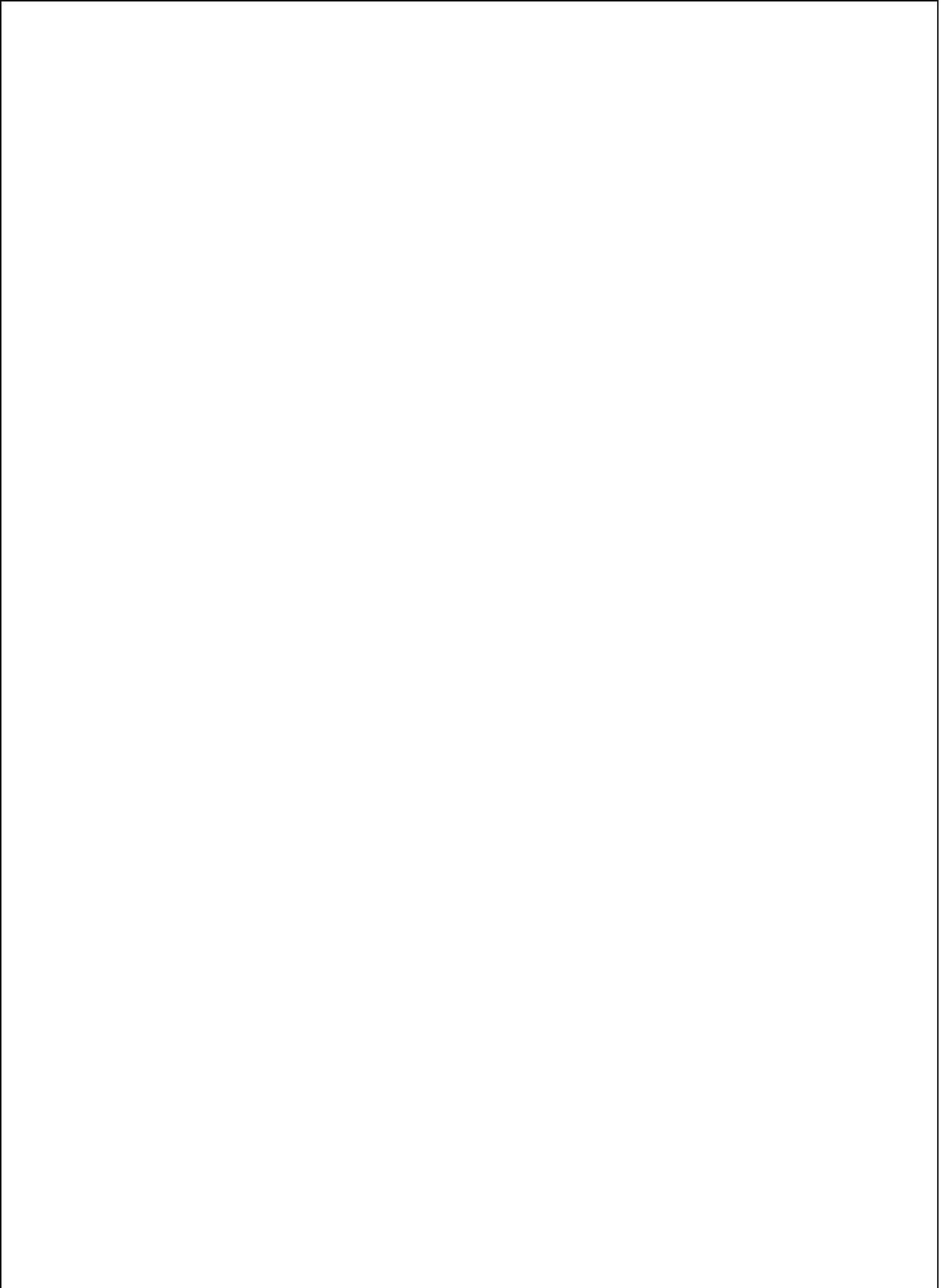
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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	John	
Last Name	Beech	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name	█	
█	██████████	
██████████	██████	
██████	██████	
██████	██████████	
██████████	██████████████████	



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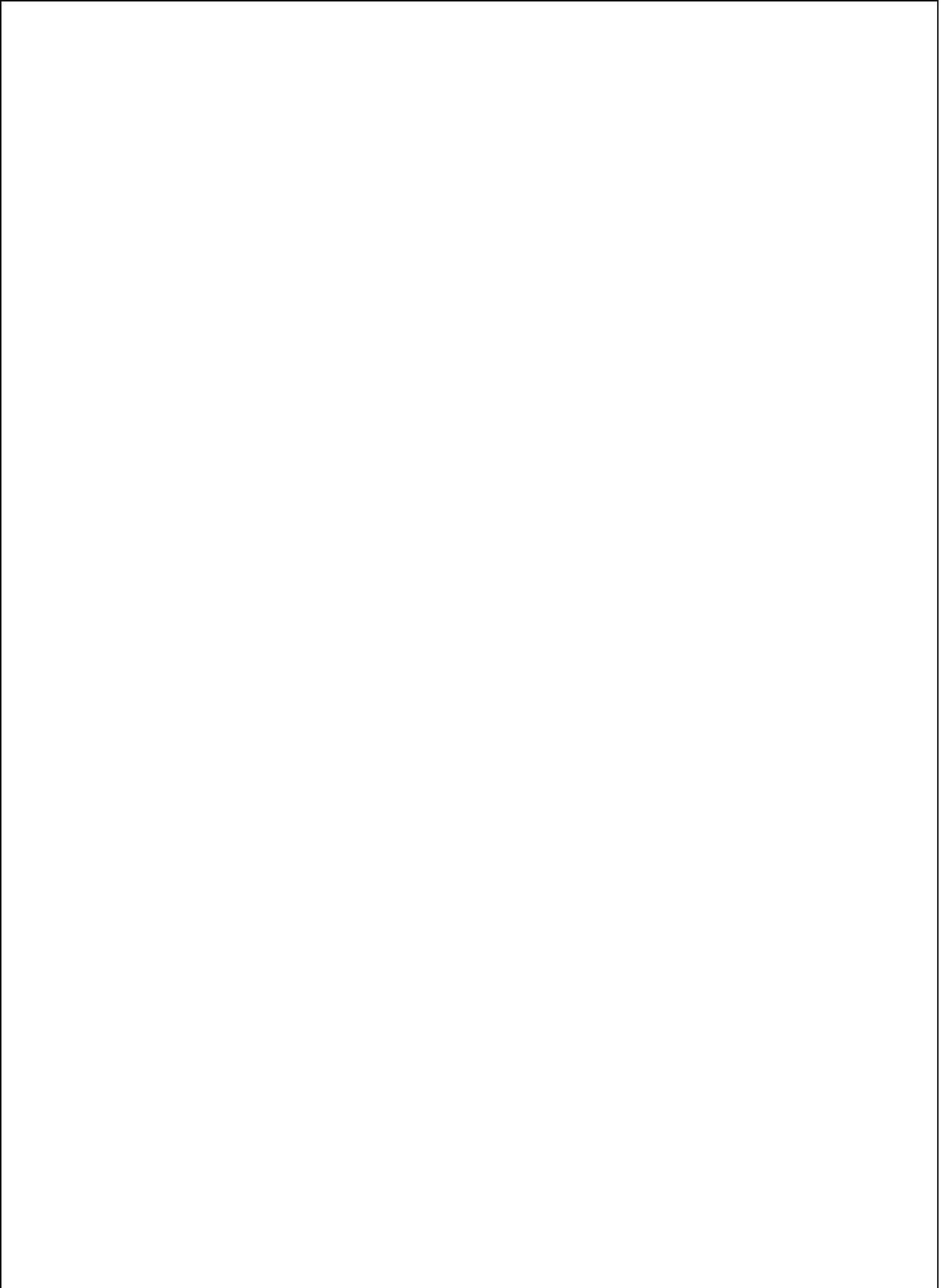
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**Mr. Paul Sewell**

[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**

I Strongly support Draft Policy H8. The high number of HMOs in the village needs tighter control and I believe this policy will assist in the planning process to reduce the numbers.

I welcome the car parking provision of one parking space per occupant of an HMO, as parking is a problem in the village already. There are already concerns and disruptions with cars parked blocking view of drivers at junctions in the village. If we continue to add more HMO residents without parking spaces, this will add to the issue.

### **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 the employment land allocations, above, as they are situated right at the entrance to Kegworth from the M1 J24 into the village of Kegworth.

This will change the entrance to the historic village of Kegworth and it will add to a ribbon effect of employment warehousing from the Airport, SEGRO and into Kegworth.



With planned development in the Rushcliffe Borough along the A453 it will be a continuous urban sprawl.

This land is partly on flood zone 3 and spreads across the Trent Valley Washlands. The worry is that flood water with nowhere to go will gravitate towards the lower lying areas of Kegworth village. As a result of climate change, it is unlikely that this will become a drier area.

Kegworth, as a village is a small population and I don't believe there is a desire or need for further employment opportunities on such a large scale. This will only increase further demand for HMO's and risk Kegworth becoming standstill with traffic and cause unsafe areas for residents. Village as a whole will lose its appeal and characteristics it is known for.

## **PROPOSED HOUSING ALLOCATIONS:**

### **Local Service Centre**

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) •

This land already approved for housing would benefit from having additional services nearer than the 'town' centre of Kegworth and I would like to see the **Computer Centre Site** (Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth) allocated for retail and leisure. The site itself should have a mix of housing, especially to cater for older people as the provision in Kegworth is poor, with new estates recently building no bungalows.

I would like to see the original plan of sports pitches, a pavilion and allotments maintained in any new plans.



**Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site,  
Kegworth**

I oppose the limits of development to include EMP73, as this will result in loss of greenspace and be detrimental to the entrance to the historic village of Kegworth.

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**Mrs. Sophie Sewell**

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From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: Objection to plans  
Date: 17 March 2024 20:39:17  
Attachments: [image0.jpeg](#)  
[image1.jpeg](#)  
[image2.jpeg](#)  
[Video.MOV](#)

---

Hello, I am writing to full oppose the plans to build 500 house in the area shown below.



The area is a biodiversity hotspot attracting, and home to, a wide range of species, including a variety of flora and fauna.

The area is prone to flooding and there are a number of mine shafts in the area which will put lives at risk.

The local infrastructure of the area cannot support an increase in population. The local amenities including the New Swannington primary school and the local surgery cannot support an increase in population of this level.

Species using the natural lake which has formed and the trees and areas in the fields include...

A variety of geese and duck species; a number of insects species such a dragon flies, damsel flies, butterflies and moths. Small mammals including, muntjacs, foxes, hedgehogs and badgers frequent the area. Red list species including the house martin return from long migrations to breed in the atea. I have seen swallows, tit species, birds of prey including the red kite and tawny owls.

The area needs to be protected as land for wildlife where local people with access to the footpaths can enjoy.

I fully reject the proposals of which o feel are criminal and unlawful. I will continue to collect evidence to prove the area is not appropriate for building houses of a scale like this.

Regards  
Jenny smith



Sent from my iPhone





## 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	MRS	
First Name	JEAN	
Last Name	MEARNS	
Job Title (where relevant)		
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 type="checkbox"/>	Proposed housing and employment allocations
	<input checked="" 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.

ETIP 90

Use this box to set out your response.

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

I strongly object to the proposed development around the edge of the village of Diseworth. Diseworth would be completely swamped by the huge warehouses coming up to the very perimeter of the village.







### 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:

17/3/24

#### DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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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	Mrs	
First Name	Lesley	
Last Name	Birtwistle	
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.

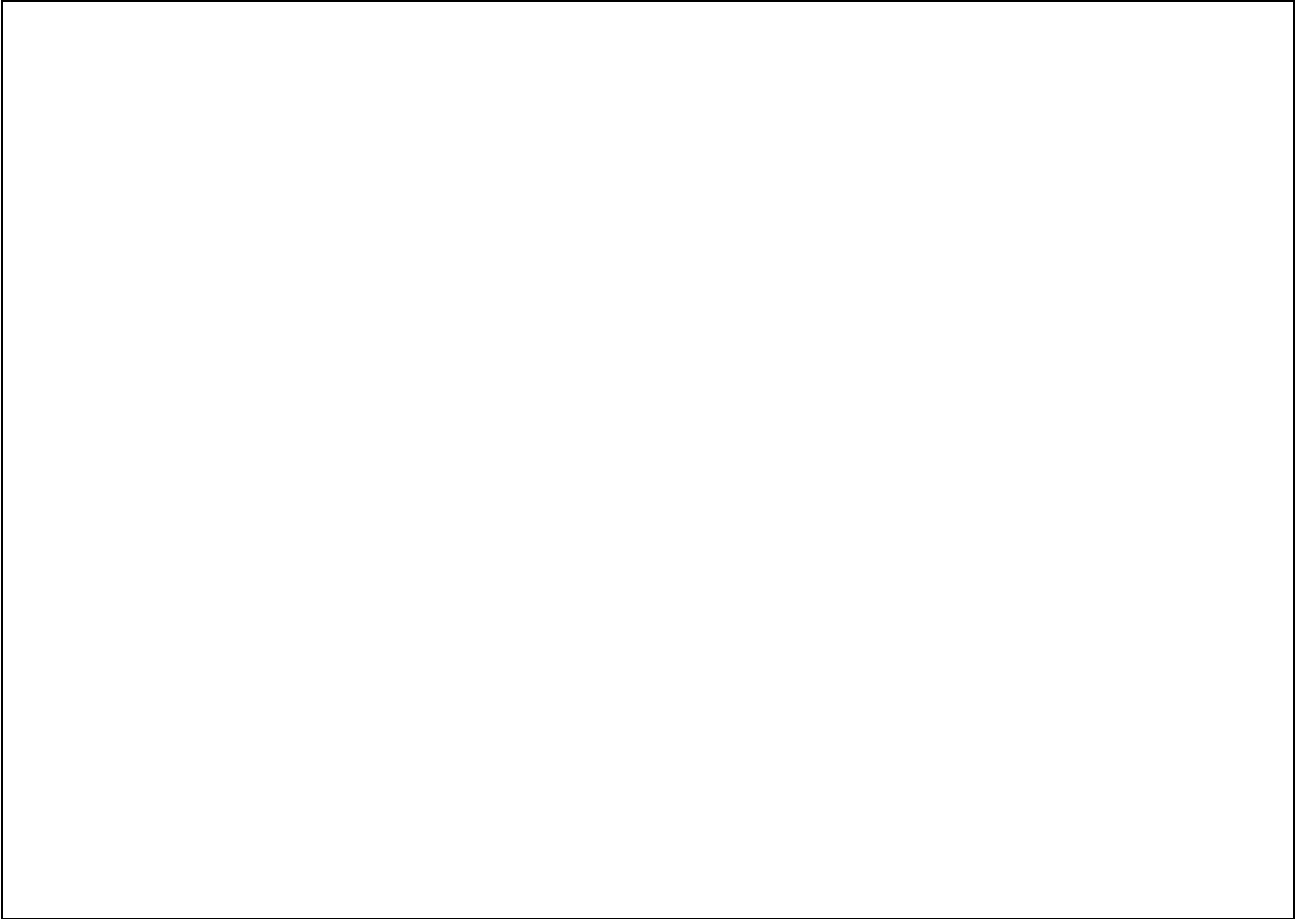
(Continue on a separate sheet /expand box if necessary)

4.96 page 58 Packington

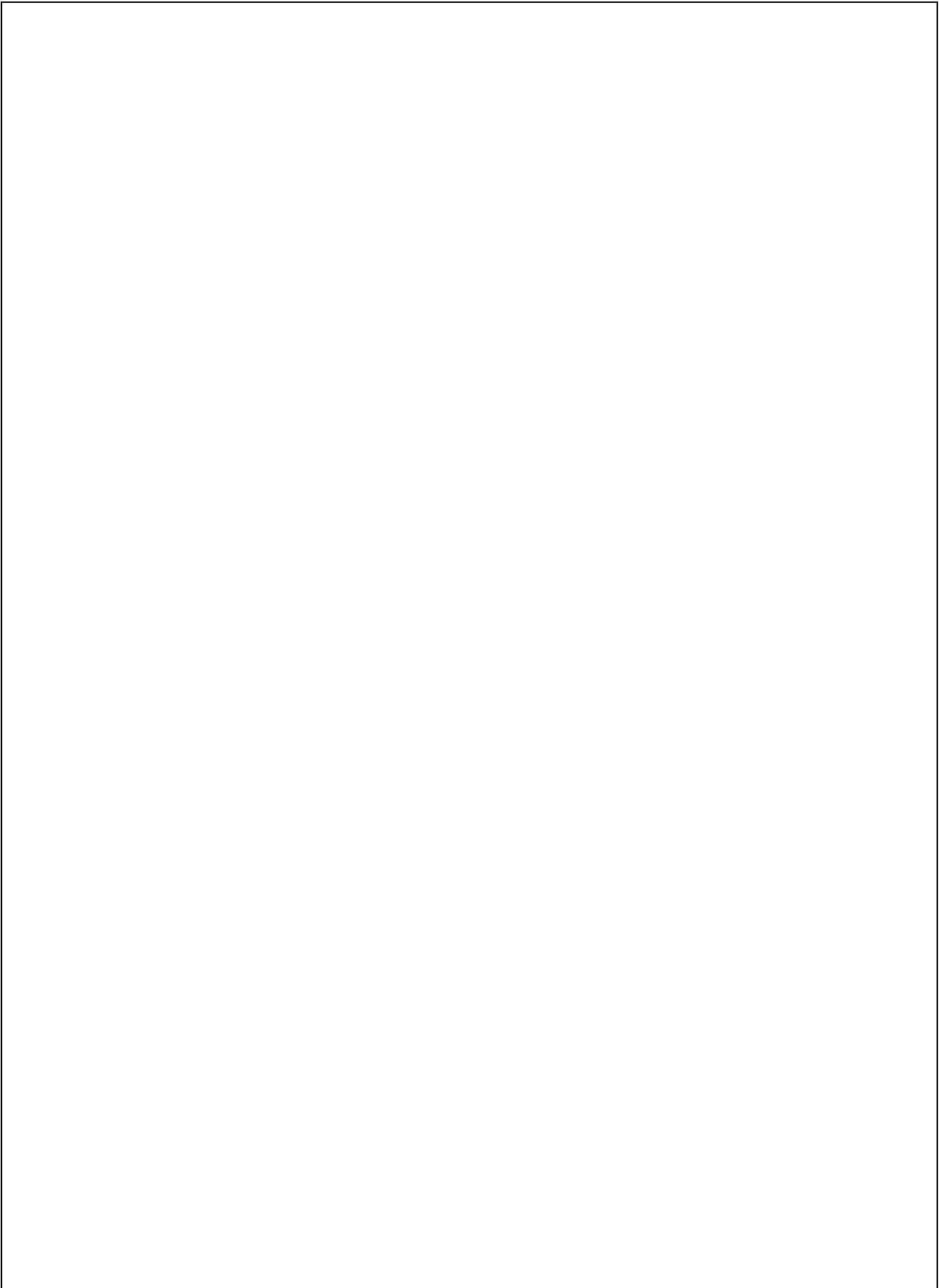
This is a proposed extension of the limits to development. Further residential development in the village of Packington is inappropriate.

- (i) Draft Policy AP7 Flood Risk (1) page 43, states that flood risk will be managed by directing development to areas with the lowest probability of flooding. This cannot be said of Packington which has been subject to severe flooding several times over the past few months and any measures to counteract this have clearly been failing. The introduction of yet more houses and consequent concreting over of yet more land, is going to worsen the situation.
- (ii) In the Policy Plan objectives page 13 4.4. one stated objective (no. 4) is to reduce the need to travel including by private car. Any residential development in small villages with limited public transport services will increase not reduce the use of private cars not only for business and recreational use but to access services such as doctors, supermarkets, banks.
- (iii) Policy AP2 Amenity p.30 5.9 indicates that decisions should create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users. Building more houses will result in a higher volume of traffic along High Street and increased use of the village shop where on-street parking is becoming very problematic and where negotiating the highway, with frequent flow of traffic in both directions and cars parked on either side of the road is far from safe – rather it is becoming increasingly dangerous.











## Declaration

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

Signed:

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Jamie	
Last Name	Smith	
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.

<p>1. To which consultation document does this representation relate?</p> <p><b>The proposed new housing settlement at Isley Woodhouse (Policy IW1) to the west of Diseworth.</b></p> <p><b>The potential location for the Freeport development (EMP90) to the east of Diseworth.</b></p>		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)

### Policy IW1-

- Unfavorable positioning (in close proximity to Diseworth, the airport, and the racetrack).
- Any development on the Freeport land is poised to diminish the rural essence of Diseworth.
- Likely to worsen flooding issues significantly in Diseworth and Long Whatton.
- The runoff presents a genuine hazard to Diseworth and Long Whatton, both already grappling with problems stemming from the brook, holding ponds, and recent overflow from fields and The Bowley brook.
- Loss of 750 acres of farmland and extensive stretches of ancient hedgerows comes at a critical juncture when food production is paramount.
- Projected increases in air, noise, and light pollution due to excessive development. Nearby villages may experience heightened traffic, resulting in elevated levels of noise and air pollution, as well as an uptick in littering.
- Concerns regarding the impact on the health and well-being of current residents.
- How can the requirements for national biodiversity net gain be fulfilled when 7.5 miles of hedgerows are earmarked for destruction?• Centralising NWLDC housing needs in one location reflects poor planning, with inadequate road infrastructure and funding uncertainties from a



strapped Highways department.

- The conservation village status of Diseworth is at risk of being compromised as it merges with a large housing development.

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



**(EMP90)-**

- Unsuitable site selection, positioned on a slope directly overlooking the village.
- How will the effects of heightened traffic on local roads be evaluated? What methodologies and safety considerations will be utilized for assessment?
- Current road infrastructure is inadequate for handling diversions, resulting in redirected traffic through villages, leading to congestion, safety risks, increased littering, and parking problems.
- Possibility of village status being compromised.
- Destruction of the village's vital green spaces and the adverse impact of development on air, noise, and light pollution.
- Safety concerns arise for Diseworth School due to increased traffic, pollution, and its location on a blind bend, posing challenges for road crossings.
- Despite efforts to implement advanced drainage systems, development on this land could cause water runoff to overwhelm the village and its low-lying areas, posing threats to homes, motorists, cyclists, and pedestrians.
- The agricultural land targeted for destruction by EMA and Segro harbors diverse biodiversity that cannot be adequately compensated for by proposed measures. Attempts to mitigate through carbon credits would be insufficient and may constitute greenwashing.
- Refuting the idea that development impacts can be effectively mitigated through buffering or screening measures. Such strategies fail to adequately protect against various pollutants, including noise, light, and traffic-related disturbances, ultimately compromising well-being and health.
- Anticipated adverse effects on mental health due to increased levels of noise and light.
- The Local Plan acknowledges the unacceptable potential impacts on Diseworth, particularly concerning heritage, landscape, and amenity, attributed to the designated Freeport land. Consequently, the inclusion of this land should be reassessed, as its own arguments undermine its suitability. Therefore, the exclusion of this land is essential.

**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: 17/03/2024

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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Carla	
Last Name	Smith	
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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### **Policy IW1-**

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- The runoff poses a genuine threat to Diseworth and Long Whatton, both already grappling with problems stemming from the brook, holding ponds, and recent overflow from fields and The Bowley brook.
- The loss of 750 acres of farmland and extensive stretches of ancient hedgerows occurs at a critical time when food production is paramount.
- Expected increases in air, noise, and light pollution due to excessive development. Surrounding villages may face heightened traffic, resulting in elevated levels of noise and air pollution, as well as an increase in littering.
- Concerns regarding the impact on the health and well-being of current residents.
- How can the requirements for national biodiversity net gain be met when 7.5 miles of hedgerows are targeted for destruction?



- Concentrating NWLDC housing needs in one location reflects poor planning, with insufficient road infrastructure and funding uncertainties from a strained Highways department.
- The conservation village status of Diseworth is jeopardized as it integrates with a large housing development.

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



**(EMP90)-**

- Inappropriate site choice, situated on a slope directly overlooking the village.
- How will the impact of heightened traffic on local roads be assessed? What methodologies and safety considerations will be employed for evaluation?
- Existing road infrastructure is insufficient to handle diversions, resulting in redirected traffic through villages, leading to congestion, safety hazards, increased littering, and parking challenges.
- Risk of compromising the village's status.
- Degradation of the village's crucial green spaces and the adverse effects of development on air, noise, and light pollution.
- Safety concerns emerge for Diseworth School due to increased traffic, pollution, and its location on a blind bend, posing obstacles for road crossings.
- Despite efforts to install advanced drainage systems, development on this land could lead to water runoff overwhelming the village and its low-lying areas, posing threats to homes, motorists, cyclists, and pedestrians.
- The agricultural land targeted for destruction by EMA and Segro contains diverse biodiversity that cannot be adequately compensated for by proposed measures. Attempts to mitigate through carbon credits would be insufficient and may constitute greenwashing.
- Rejecting the notion that development impacts can be effectively mitigated through buffering or screening measures. Such strategies fail to adequately protect against various pollutants, including noise, light, and traffic-related disturbances, ultimately compromising well-being and health.
- Expected negative impacts on mental health due to heightened levels of noise and light.
- The Local Plan recognizes the unacceptable potential impacts on Diseworth, particularly concerning heritage, landscape, and amenity, attributed to the designated Freeport land. Consequently, the inclusion of this land should be reassessed, as its own arguments undermine its suitability. Therefore, the exclusion of this land is crucial.

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

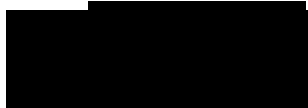


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Signed



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



Draft North West Leicestershire Local Plan 2020-2040 Consultation (February -March 2024)

Title	MRS.	
First Name	SALLY	
Last Name	SIMPSON	
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 housing and employment allocations		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)

Comments on 1.1.1

①

This development will cause major disruption to Diseworth. The flooding in this area has been particularly bad this year and another "village" will only make it worse. What about doctors and schools for another village. The doctors and schools can't cope now!

②

The wild life will be very badly affected by the disruption and lack of hedge rows etc.

③

The affect on Diseworth will be devastating with the pollution, noise, village will become a rat run with



Use this box to set out your response.

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

Comments on 1.1

①

This development will cause major disruption to Diseworth. The flooding in this area has been particularly bad this year and another "village" will only make it worse. What about doctors and schools for another village. The doctors and schools can't cope now!

②

The wild life will be very badly affected by the disruption and lack of hedge rows etc.

③

The affect on Diseworth will be devastating with the pollution, noise, village will become a rat run with extra traffic.



~~Policy IW1~~ FREEPORT EMP90

We live at the top of  
[REDACTED] and the

water runs down past our  
house. The warehouses will  
just make things worse.

There are a lot of warehouses  
at the back of Castle

Downington that are still  
empty?

The noise of the warehouses  
and traffic to them

will impact greatly on us  
all.

How can this be happening  
with no consultation and no choice

We as a village<sup>4</sup> had no  
consultation about becoming  
a free port area!



### 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:

17.3.2024

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	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Susan Dorothy Mary	
Last Name	Smith	
Job Title (where relevant)		
Organisation (where relevant)	social services	
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? <i>Isley Woodhouse</i>		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. *Policy IW1*  
(Continue on a separate sheet /expand box if necessary)

*I feel concerned that this is a new town ① will it have social housing? too? ② will it have appropriate facilities / support, schools, doctors for the population?  
③ will this massive development increase the risk of flooding to Thise worth?  
Therefore I do not support the new town development of Isley Woodhouse (Policy IW1)*



## Freeport proposal (EMP 90)

I feel concerned about this because of.

- ① Dramatic increase in flood risk
- ② Risk to village from construction traffic particularly to school and elderly residents
- ③ The noise and light pollution <sup>of environmental standards</sup> lowering
- ④ The loss of agricultural land so close to our village
- ⑤ It will increase light sound and air pollution not only for our village but also villages close by.
- ⑥ Questionable business practice
- ⑦ Loss of workers rights.

Therefore I am asking NWLBC not to include the EMP 90 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: 12/3/2024

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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

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	Personal Details	Agent's Details (if applicable)
Title	MR	
First Name	JOSEPH GEORGE	
Last Name	SMITH	
Job Title (where relevant)	LANDLORD	
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)

ON POLICY I W I .

- Its a stupid place to build a new village. - too close to Diseworth + Aughton.
- It will ruin the character of Diseworth
- Its a bad idea to build such a large new development - why cant it be spread out and have a few extra houses in many villages?
- why not build a housing settlement on the edge of a town or city instead? . The infrastructure here wont cope. ~~It~~
- The health + well being of everyone here will be badly affected .
- The flooding will become worse .



new developments built from 'scratch' are always a bad idea. - ~~the~~ see Milton Keynes. If you want more houses then spread them out over many areas. that way you can minimise the adverse impacts. This area is already very over developed.

### on Policy EMP90

This is undemocratic - no body wants it here.

The land there provides a soak to absorb the rainwater - Diseworth already floods badly - this will make it intolerable.

why on earth would anyone think that right next to a village is a good place for a freeport? - its not.

- The biodiversity will be lost
- there will be noise, light pollution, traffic. This will ruin forever the heritage and character of Diseworth.
- increased traffic will be bad for the village and the school.
- ~~But~~ we are already surrounded by the motorways + Airport and a freeport would simply kill this village - it would no longer be rural but urban.
- why dont you put the freeports on Brawnfield sites or on the edges of pre existing industrial areas?!



## 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.

Signature

Date:

11/3/2024

### DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

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Planning Policy Team, NWLDC, PO Box 11051, Coalville LE67 0FW**

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## Local Plan North West Leicestershire

Mrs Nichola Miller

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

### Policy IW1

- The proposed site of the Isley Woodhouse new town would completely change the area's nature. The productive agricultural landscape sprinkled with small villages, hamlets, farms, and miles and miles of ancient hedgerows would become overcome by new housing and traffic. In these horrifyingly unstable times, we need all the fertile fields and farms to sustain our food production.
- The Plan is misleading in that it suggests around 640 houses will be built without making it clear from the start that there will be up to 5,000 houses and units by 2040, this is unacceptable.
- Diseworth is a small close-knit community. People who live here (and many families have been here for generations) chose to do so because they did not want to live in a town's hustle bustle and segregated lifestyle. Your plans take away this choice of lifestyle.
- Diseworth sits in a valley. Isley Woodhouse would concrete over acres of land that absorbs the rainfall and mitigates the level of flooding that the housing development would cause, as the water runs down the slopes. I note that the surveys have given it a Level 1 flood risk, which will be true for the new housing NOT FOR DISEWORTH.
- I spoke to a Planning Committee member who tried to assure me that builders have to, by law, put in strategies to deal with water runoff and said there would be holding tanks to release water into Diseworth Brook when appropriate. This is horrifying. EMA already do this from their runway runoff holding ponds. After flooding Diseworth and Long Whatton on several occasions they now have people monitoring the river in the village and keep phone contact as the water is released, telling the person on the other end when to open and shut the sluices. So this is going to be funded by the builders or county council for perpetuity in the case of the New Town and SEGRO?
- The destruction of the woods, old established trees, hedgerows and fields will have a devastating effect on the wildlife. The 1,000 new houses and the



warehousing developments around Castle Donington have already forced badgers and foxes out of their homes and into gardens and even the church graveyard in a desperate effort to find food or onto the roads where they are killed by traffic. We are constantly hearing about the loss of our native flora and fauna. I quote "North West Leicestershire recognises that it has a role to protect and support action on biodiversity in order to improve local environments." (From the District Council's website, under "Biodiversity"). You are certainly not meeting this statement with the New Town and SEGRO/MOTO/EMA developments.

- The road infrastructure struggles when there is an accident or delay on the M1 around Junctions 23, 23a and 24. All the roads around EMA airport come to standstill. Traffic jams can last for hours, as people try to circumnavigate the blockage. Every day, when people leave work for home there is a traffic jam from J23a to the Donington racetrack traffic lights. Add 10,000 more cars from the New Town and it will be impossible.
- With the added fumes from these vehicles plus the pollution from the airport, the noise of the aeroplanes night and day, the lorries loading and unloading from the Freeport warehouses and the light pollution, it will become intolerable to live in our village.
- Diseworth is a village judged by previous bodies to be worth conserving. There are many listed properties and over half the village is designated a conservation area. The community spirit, the care for neighbours and the huge array of activities that happen within our village make it an outstanding place to live. The Conservation area is strictly governed by rules about how we can modernise and upgrade our ancient, historical buildings, always in keeping with their old looks and building methods. The whole village has a building boundary and new builds and extensions must not extend from this. The Local Plan just rides rough shod over this. Towering modern warehouses and thousands of modern, double glazed, insulated houses can be built abutting our beautiful time capsule of a village.
- My mental health is being affected by the Local Plan, suddenly we are being attacked on all sides at the same time, it appears to be on purpose so that we are overpowered by the schemes. I love the countryside and the outstanding beauty of the area, I cannot bear the desecration that the developments will bring.

### **Freeport Development EMP90**

- What kind of country have we become that our government can dictate over local democracy? That they can look at a map and say: The Freeport goes on that land. No argument, it's got a red line drawn round it, we can rubber stamp it with no local say to the plans. That tiny village of Diseworth means nothing to us compared to the money we see shining from the project.



- The fields have been farmed by conquering Romans, the Viking settlers, the Saxons who built our church and through generations of farmers and small holders through the ages. The farm field tracks gave access to these small holders to their strip farms and still exist today. Long Holden leads off from the end of Clements Gate and Hyams Lane from Grimes Gate. They are dearly loved by Diseworth folks, used every day for dog walking, horse riding, bird spotting and exercise. Ancient hedges of hawthorn, black thorn, wild roses and more line the mud lane. There is no danger from traffic and children can run and play freely. **This is what the warehouses will be built over, England's inheritance.**
- At the moment the small barrier of fields surrounding the village are our green lungs. Half a mile from the busiest commercial distribution airport in the country and the only one allowed (for some reason) to work 24/7, and close to the busy M1/A42 interchange as well as the massive SEGRO warehouse development with it's huge freight train terminal and thousands of container lorries, we desperately need this partition for our health and sanity.
- Why more warehouses? Why put them on green fields? Put them on the Ratcliffe power station site when it's demolished in the near future. I cannot understand the thinking. Once our fields are concreted over they are gone for bad.
- Again, as with the New Town, the concreting over by warehouses will cause catastrophic flooding in Diseworth.
- The visual impact will be completely overwhelming. No amount of bunding will disguise the ugly 40 foot buildings as they march up the hill towering over us.
- The noise, light and pollution caused by the site will go on 24 hours a day. Would you want it in your back garden? It's going to be up to my son's garden fence, he lives in [REDACTED].
- Please, please listen to us.





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Please complete both Part A and Part B.

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*If you are responding on behalf of yourself, or your own organisation, please fill in all the 'Personal Details' fields. If an agent is appointed to act on your behalf, please complete only the Title, 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	Lucy	
Last Name	Agar	
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.

Proposed New Housing Settlement at Isley Woodhouse (Policy IW1)

I object to the above policy for the following reasons:

1. The location of proposed new settlement is wrong. It is too close to East Midlands Airport, the DHL depot, Donington Park racetrack and the village of Diseworth.
2. The brook which runs through Diseworth already carries the run-off from the airport and DHL and it cannot cope with any increase in the volume of water. The village already floods regularly following heavy rain. Building on land above the village which currently absorbs a lot of rainfall would make flooding more likely.
3. More houses in the area and a consequent increase in traffic would worsen the air quality in Diseworth and the surrounding area.
4. Much local wildlife would be lost if the fields, trees and hedgerows are removed.
5. Diseworth is a conservation village and its rural nature should be kept.

Potential location for the Freeport development (EMP90)

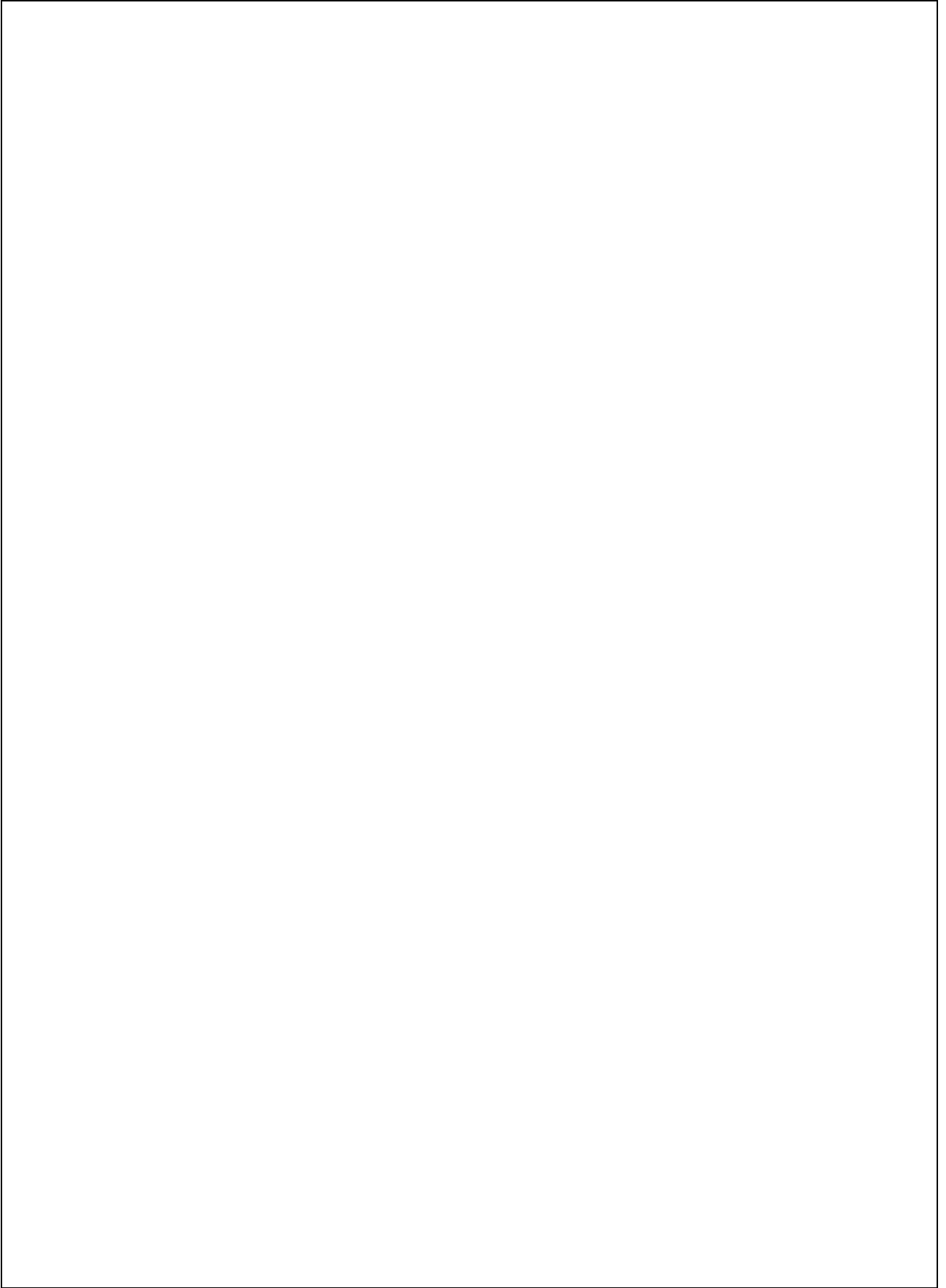
I object to the above development for the following reasons:

1. The proposed Freeport development is too close to Diseworth village. It would be on a hill above the village so the warehouses which would be built would totally overwhelm the village.



2. The village already suffers from flooding. Concreting over farmland uphill of Diseworth which currently absorbs much of the rainfall would increase flooding events.
3. East Midlands Airport and the M1 already affect air quality in Diseworth. Building large industrial units so close to the village would make this worse.
4. The constant movement of lorries and forklift trucks together with lighting required for 24/7 operation would adversely impact Diseworth residents.
5. Much local wildlife would be lost if the fields, trees and hedgerows are removed.







## 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: Lucy Agar

Date: 14/3/24

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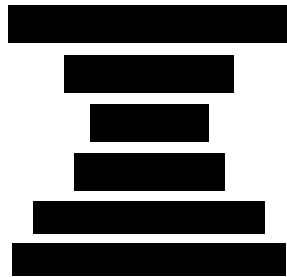
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17 March 2024

By email :-

[planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk)

Response from:- Jim Snee [Mr.]

## **Response to NWLDC Draft Local Plan 2020 - 2040**

### **Documents to which representations made.**

Proposed Policies.

Proposed housing and employment allocations.

### **General Representation**

As a resident of the conservation village of Diseworth I have particular concerns relating to four elements of the Draft Local Plan [DLP] and the [severe] adverse impacts that these will have on both the village of Diseworth and the local environment, as well as on the character of the local rural landscape, irrespective of any mitigation measures that might be employed, however thorough, should these subject concerns be included in the mature Local Plan. These are:-

1. The proposed development of the new settlement of 'Isley Woodhouse' [IW1], immediately to the west of the village of Diseworth.
2. The proposed development of the land south of the A453 [EMP90] at East Midlands Airport [EMA], immediately to the east of the village of Diseworth.
3. The interference, emanating from Central Government in the form of 'Designation' of the EMP90 [EMAGIC] site as a part of the East Midlands Freeport project - which disables NWLDC from being free to build sound planning policies, objectively fit to meet to the needs of the region over the next 15 years – and to instead, feel obliged to have to create policies that fulfil the demands of an illogical, unwanted and unnecessary party political aspiration.
4. The inherent dangers - and cost, not only monetary - of a significant burden being placed upon the District by an unnecessary and profligate over-supply of both housing and employment land as a consequence of poorly calculated requirements and



modelling, not least from Leicester City Council as well as LCC and other regional quasi-official agencies. These particularly further adversely impact the north of the District around East Midlands Airport and Junction 24, M1 [i.e. around the area of Diseworth – and other local villages].

## **Proposed Policies Document**

### **3. Background to the Local Plan.**

**Para 3.5.** Neither the proposed IW1 site, nor the EMP90 site is compliant with any of the three requirements stated in para. 3.5 – economic, social or environmental [as required by the National Planning Policy Framework [NPPF].

**NWLDC must ensure that full compliance with all regulations are followed.**

**Para 3.23.** The Strategic Growth Plan [SGP] and the Leicestershire International Gateway [LIG] are already responsible for uncontained, irresponsible and unsustainable growth in the immediate area around EMA and M1, Junction 24. It is wholly misguided to deliberately bias even more vastly disproportionate volumes of development into such a confined and restricted area. The present DLP fails to fairly distribute employment and housing opportunities over the rest of the District and it has led, and will continue to lead, to the area around EMA becoming impossibly overloaded in every aspect.

**If NWLDC follow the diktat of the SGP and the LIG then Diseworth and the other rural villages around EMA will become marooned in a sea of concrete, congestion and pollution.**

### **4. Strategies.**

**Para. 4.4.** The table listing the eleven plan objectives does not guard against over-development in any one area.

**NWLDC should ensure that this is remedied with a 12<sup>th</sup> objective that achieves the necessary protection.**

**Paras. 4.9 to 4.12** lay out a convoluted and desperate argument to justify the build of the Isley Woodhouse [IW1] settlement. These paragraphs fail at every strategic level to provide any logic that stands scrutiny for the project. The increase in annual house build from 481 to 686 p.a. cannot be realistically justified and requires review. The idea that the overspill from Leicester City can be seamlessly displaced to the north of the District makes no sense. The location of the development, on greenfield, agricultural land, ill served by all infrastructure, and in conflict with Policy Ec2(2), is ignored. Were it not for the fact that the landowners are willing to sell and developers are willing to buy, this proposed settlement would never have gained oxygen and would certainly not have been strategically designed by any planner. It is categorically the wrong settlement in the wrong place and cannot succeed as a sustainable project.



**NWLDC must recognise that to support this proposal is sheer folly and that IW1 needs to be abandoned. There is no imperative to build so many houses in the first place and certainly no imperative to build a new settlement so devoid of any suitable infrastructure and at the north end of the County where there is no immediate demand.**

**Paras. 4.13 to 4.15** expand on the perceived requirements for industrial employment land and Strategic Distribution warehousing [B8 sheds]. Much of this is speculative. Even so NWLDC is accepting that 104,000 sqm, 50% of the entire County requirement will be built in NWLDC. Having committed to this outrageously disproportionate volume, the issue is then left in the air pending reports from the “Leicester & Leicestershire Apportionment of Strategic Distribution Floorspace study”.

**This is highly unsatisfactory and must be re-visited by NWLDC.**

### **Draft Policy S1.**

As argued above, the validity of the claimed requirement for the need to build 686 houses p.a. is highly questionable. Equally, there is no more integrity in the quoted volumes of B8, B2 and C1 employment land required. Further comment on IW1 and EMP90 are made in my response within the Proposed Housing and Employment document.

**Policy S1 should be strengthened to ensure that nowhere in NWLDC should there be an area that suffers excessive loss of countryside, amenity, environment or quality of life and well-being by virtue of over-development.**

## **5. Creating Attractive Places.**

**Policy AP3. Renewable Energy [Strategic Policy].**

**NWLDC should implement a policy that requires all new-build, both domestic and industrial to include roof-mounted solar panels, other than by exception.**

**Policy AP5.** NWLDC should add a further action;-

**To protect individual areas and communities from over-development.**

## **6. Housing.**

The modelling that arrives at a figure of 686 houses per year being required in the District and the total destined to be set in the north of the county is open to serious question.

**NWLDC must review this modelling to confirm a more realistic total in nmore realistic and equable locations. Simply build where people want to live and work.**



## **7. The Economy.**

### **Para 7.7. East Midlands Freeport.**

I note the DLP explanation of the origins and purpose of the East Midlands Freeport, particularly the EMP90 EMAGIC site. The reality is that the EMP90 site, 'Designated' by Central Government through a far from transparent process, is an unnecessary development. It has become a distraction to allowing NWLDC to develop those optimum planning strategies best suited to meet the regional requirements over the next 15 years. One thing is absolutely clear, if EMA and Segro did not have access to the EMP90 land no development would have been proposed.

**No NWLDC Strategic Planner would have considered the inclusion of EMP90 land in any evolution of the new Local Plan when starting with a blank sheet of paper – which rather speaks for itself.**

## **10. Environment.**

### **Policy En 1 and En7**

There can be no question that if either IW1 or EMP90 are developed, neither can be built sustainably or be designed to achieve a net biodiversity gain of 10%, whatever mitigations might be employed.

The fact is that the northwest of the county, around EMA and J24, M1 has already been developed to its maximum sustainable capacity, arguably even beyond. To further develop the area with over a thousand acres of additional industrial and domestic building, on top of what has gone before, will completely destroy the entire ecology, ethos and character of the area, as well as create a mighty mess of urban and industrial sprawl where no-one would voluntarily choose to live or work.

**NWLDC must develop policies that prevent over-development in any one part of the District and which provide equal opportunity and quality of life for all within the NWLDC area. This must also include maximum use of brownfield land before greenfield is even considered, never mind promoted.**

## **Proposed Housing and Employment Allocations document**

### **Housing Completions and Commitments.**

**Para. 3.1** claims that 686 houses per year are required to achieve the [inflated] requirement of 13,720 by 2040 – [there is a typo in the para @ '..13,270..'].



## **4. Housing Allocations.**

**Para 4.5.** lists the sites on which the [disputed] calculated number of 5,693 houses [see table at 3.7] will be built by 2040. This includes 1,900 units at Isley Walton and 1,200 at Castle Donington, that is 3,100 houses or, 54% of the entire unmet District requirement – within, a one mile radius of EMA. This makes no sense at all. Not only is this designing significant over-development in that particular area, it is also a strategy that will deny the rest of the Districts population from an equal ability to acquire homes more suited to where they live and work. Further, the fact that only 1,900 homes from a projected 4,500 are expected to be built by 2040 [and I very much doubt that even this figure will be achieved such will be the over-supply] this make a nonsense of the promise to build schools, surgeries, social amenities, etc. **NWLDC should recognise the futility of pursuing a development that is impractical, unsustainable, cannot be supported without massive infrastructure investment and will fail in achieving any and all of the objectives set.**

### **New Settlement. Isley Woodhouse.**

**Paras. 4.101 – 4.116** Discuss the merits of developing the new settlement of Isley Woodhouse. Few of the claims and justifications for this settlement stand close examination.

Planning to build a new town on greenfield land immediately next to both a major regional airport and a major motorsport racetrack cannot be taken as a serious proposition. It is the easy availability of the site that attracts the planners, not the need for it, nor the location.

Planning to build industrial units between the airport/racetrack and the housing development to mitigate noise within the housing site is a joke. Jet aircraft will be on full power just after take-off and will be climbing. How tall are these industrial buildings going to be that they will reflect noise away from the settlement [without being a danger to aviation]?

The site is situated in designated countryside, cannot be developed sustainably and will not achieve any biodiversity net gain at all, quite the reverse will in fact be the case. The required 10% improvement in BNG will never be met. IW1 will fail all tests relating to environment, pollution, amenity, flood risk and, if the bland and soulless development on the west side of Castle Donington is any yardstick, it will also fail on quality of life for residents as well as aesthetics.

Neither will IW1 support the utopian design claims made for it. It will be no more than a miserable and humdrum failure of a dormitory town. It will blight the landscape and the local area and will provide an unwanted inheritance to those who follow on after 2040.

Neither the local road network, nor the local Strategic Road Network will support much more development. Both are already saturated and prone to congestion with the occurrence of even the smallest of incidents. The country roads around the proposed development feeding Diseworth and Long Whatton are now verging on becoming dangerous. Any development at Isley Woodhouse will turn the through roads in both of these villages [and others] into serious 'rat runs' that will be wholly unsustainable.



The villages of Diseworth and Long Whatton sit to the east of the proposed development, which will be built on a part of the water catchment area that feeds the streams that run through the two villages. These streams are small and leave both villages prone to significant flood threat. In recent years much constructive work has been done to successfully mitigate much of this flood risk. However, there is a delicate balance between brook capacity and the effects of climate change. Replacing much of the grass and woodland catchment area that feeds these streams with hardstanding will have a severe and adverse impact on flood prevention in Diseworth and Long Whatton. Again, further underlining the fact that the proposal is impractical, unsuitable and irresponsible - without massive [and costly] flood mitigation measures being put in place.

**NWLDC cannot allow this highly speculative, unwanted, unnecessary, environmentally damaging and ill-considered development to be included in the Regulation 19 Draft Local Plan.**

## **5. General Needs Employment Allocations**

**Paras. 5.1. – 5.4.** review the amount of office/light industrial warehousing estimated to be needed within the whole District up to 2040. Of the 127,710 sqm required we are advised that Castle Donington, Kegworth and Isley Woodhouse will absorb 86,450 sqm between them. That is 68% of the entire District need and all within a one mile radius of EMA and at the top end of the county.

This is plainly ridiculous and unsustainable for all the same reasons as those that apply to the proposed IW1 site. This proposal merely compounds the issues. The proposed over-development of the area will result in a concrete desert permanently overloaded with traffic, pollution, frustration and poor quality of life.

**NWLDC cannot put their name to such an ill-considered distribution. It will both destroy the local area, landscape and countryside as well as deny the rest of the district fair opportunity for local employment, betterment and reduced commuting.**

## **6. Potential Locations for Strategic Distribution.**

### **East Midlands Freeport.**

As stated at the beginning of this response, the fact is that if the DLP is to have integrity it must be based on best practice - with NWLDC planners given the freedom to develop strategies and policies that produce the optimum outcomes for the region over the life of the Plan. Strategy and policy should not be shaped or influenced by diktat from Central Government and/or other quasi-official agencies and bodies. It is clear that this DLP is compromised by the intervention from Government in the form of the Freeport [EMAGIC, EMP90] designation. It is highly unlikely that a speculative project by two sets of landowners would otherwise have been included in the DLP were it not for this Government intervention.



The only element of unfulfilled employment land requirement in the District is that for B8 sheds. The EMP90 site – with 400,000 sqm of availability would generate a massive oversupply of these monstrously unsightly warehouses on rural greenfield land immediately adjacent to the conservation village of Diseworth. It would completely destroy the local heritage of the area. Whatever words are written to try and justify it, these will stand no scrutiny. Further, no aspect of infrastructure or environment could survive this intrusion without massive damage and degradation of all and any considered parameters.

The adverse effects on Diseworth would be extreme, as it would be for Long Whatton. Loss of countryside amenity, 24 hour a day noise pollution, severe light pollution, significant air pollution, significant increase in through traffic, increased flood risk, the list goes on. There can be no effective mitigations and once the farmland is lost, it's gone for ever. And for what – warehousing for goods flown and shipped in from China to fulfil a J.I.T. consumer culture? Some fair exchange!

Even worse, this DLP reserves publication of any replacement for the present Policy Ec2(2) – which is entirely fit for purpose and requires no change - and also obfuscates over any clear and unequivocal indication of Strategic Distribution [B8 sheds] requirement. All this to compromise itself in a misguided attempt to justify development of the EMP90 Freeport project.

The claim in para 6.5 that very substantial direct and indirect economic and employment opportunities will be generated by EMAGIC Freeport is heavily disputed. Various employment figures are bandied about by LIG, LLSGP, etc, none of which are backed up with any empirical evidence. In any event, we effectively already have full employment in this area and have no need for yet more sheds. Further, B8 warehouses employ few people - but many robots.

NWLDC itself recognises the difficulties and compromises that will have to be made if this site is to be developed. That recognition must be highlighted and used to determine that the site is not suitable for the purposes intended. [see paras. 6.6 and 6.7].

**NWLDC should insist on best practice in planning for the region and confirm the unsuitability of the EMP90 site which breaks not only Policy Ec2(2) but virtually every other policy and guideline in the existing Local Plan, the NPPF and other related planning requirements – which it already knows. It should extend its own advice and reject the EMP90 proposal.**

Draft North West Leicestershire Local Plan 2020-2040 Consultation (February -March 2024)

Declaration

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**Signed:** Jim Snee

**Date:** 17/03/2024





## 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	Mrs	
First Name	Morwenna	
Last Name	Crespin	
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
	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.

As a resident of Diseworth and someone deeply connected to the well-being of our community, I am writing with a sense of urgency and concern about the proposed developments outlined in the planning applications for the Solar Farm at Donington Services (NWLDC Planning Reference: 23/01712/FULM), EMA's EIA for land south of A453 to Hyams Lane (NWLDC Planning Reference: 24/00072/EAS), and NWLDC's IEA for Isley Woodhouse New Town Proposal (NWLDC Planning Reference: 23/01697/EAS). These developments threaten to disrupt the very fabric of our village, endangering our environment, heritage, and way of life. It is imperative that we come together to oppose these plans and protect what matters most to us.

The areas earmarked for development are not just parcels of land; they are essential to our daily lives. Personally, I rely on these spaces for my exercise routine and mental well-being. They offer solace and tranquility, providing a sanctuary from the hustle and bustle of modern life. Moreover, they are home to a diverse array of wildlife, contributing to the rich tapestry of biodiversity that makes Diseworth so special.

The proposed Solar Farm at Donington Services threatens to erase a vital part of our natural heritage. This land was set aside to provide refuge to wildlife displaced during previous developments. To now see it targeted for further disruption is heartbreaking and goes against everything we stand for as stewards of our environment. We cannot allow short-term gains to come at the expense of our long-term well-being.

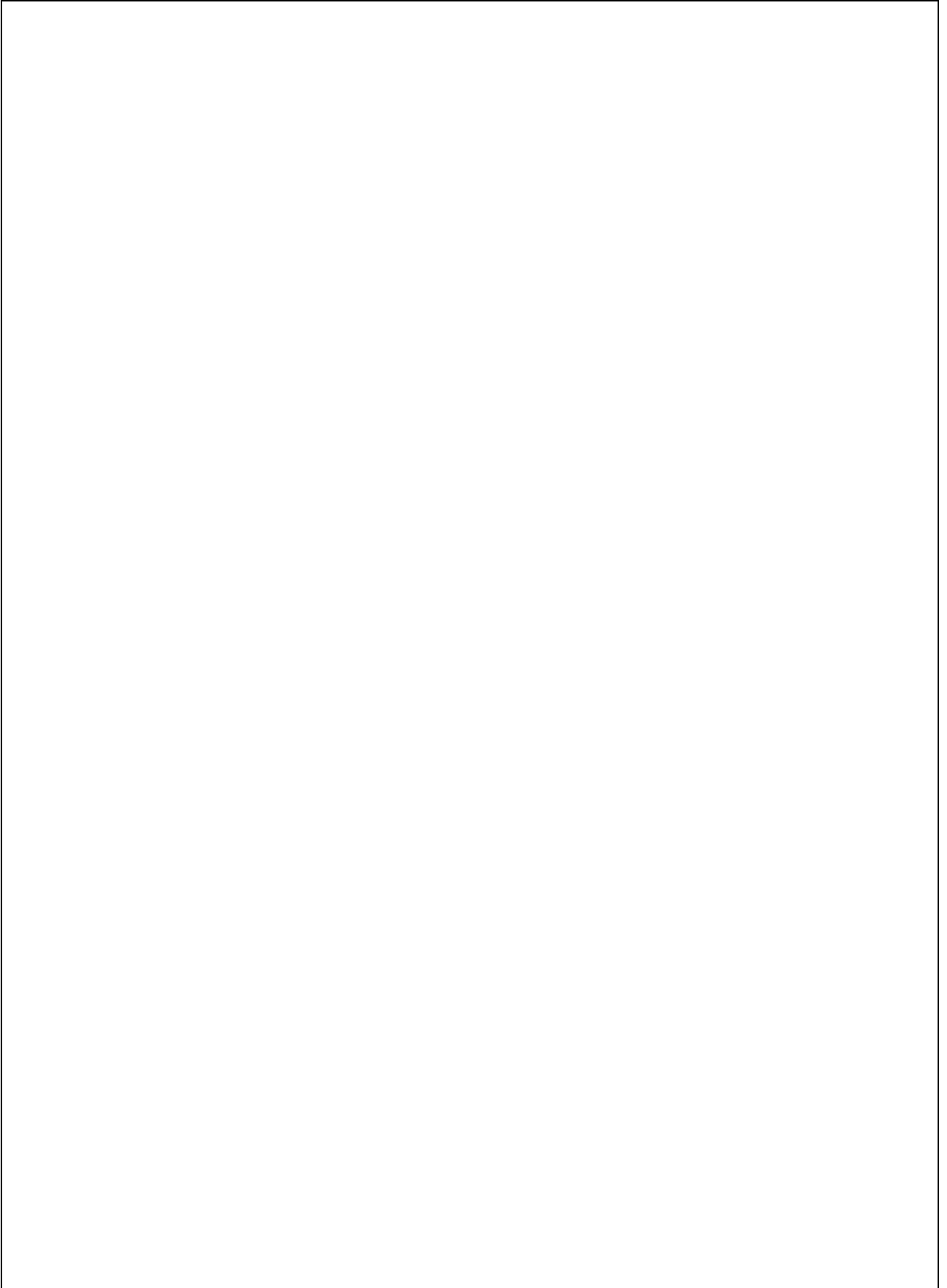
Recent incidents involving pollution from East Midlands Airport serve as a stark reminder of the environmental risks posed by unchecked development. We cannot afford to ignore the lessons of the past. These proposed developments would only exacerbate existing pollution concerns, introduce new sources of noise and traffic congestion, and undermine the very essence of our village.

In addition to the immediate threats to our environment, these developments also fly in the face of established government and local policies. They contravene the National Planning Policy Framework, the Wildlife and Countryside Act 1981, the Climate Change Act 2008, and our own Local Development Plan. It is clear that they do not align with our values or our vision for Diseworth's future.



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







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: 17/03/24

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

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



Please see photos attached of land behind [REDACTED] new Swannington also newts in garden.  
Leanne Flude





From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: Local Plan Response  
Date: 17 March 2024 21:49:48  
Attachments: [FS Local Plan Consultation Response 17.03.24.docx](#)

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Good afternoon,

Please see attached my response to the Local Plan Consultation for NW Leicestershire.

I would also like to raise, and it be recognised and discussed as part of the planning forum - that these consultations forms are very difficult to navigate, difficult to understand, and are not user friendly.

I am an experienced Children's Nurse and have great experience working with the general public, so I have to spend a great deal ensuring information is easily accessible and understood to those less able. These forms are not user friendly and I find these forms are very discriminatory.

I think there's a lot that needs to be changed to this process, to ensure that local residents have their voice heard.

Kind regards,  
Fern Sewell



## **NW Leicestershire Draft Local Plan Consultation Response**

### **Policies:**

#### **Houses in Multiple Occupation and Draft Policy H8 - Houses in Multiple Occupation in Kegworth**

I strongly support the Draft Policy H8. I welcome the car parking provision of one parking space per occupant of an HMO, as parking is a problem in the village already.

I have been a resident in this village all my life and have seen the growing trend of HMOs vastly increasing, to the growing demand of rental properties which in turn has had a negative impact due to the number of cars attached to the properties. There needs to be tighter controls, and believe this policy will assist in the planning process and needs to apply to all HMOs within the village. This will certainly help the parking problem within the village. I was a resident on Pritchard Drive for 10 years, and it became such an issue we made the decision to move because the number of cars saturated the road and became unbearable to live there. The number of cars nearly caused accidents, prevented emergency vehicles getting to houses and the refuse vehicles struggled to get up leading to occasions of rubbish not being collected because cars were blocking the way. It is not isolated to just Pritchard Drive, it has happened in other areas (i.e. New Street). Station Road and Side Ley are other examples – with the number of cars coming through, the double parking leading to near accidents, with frustrated drivers pushing through and again making it difficult for drivers to easily access through. At the very least, something needs investigating about the way in which HMO's are parking – double parking; blocking drives; private roads; etc., and it is time for residents to have a voice in making a change, as it seems it only benefits those making profit out of HMO's and not considering the residents of the village, who actually enjoy living in this area.

#### **East Midlands Airport: Public Safety Zones (Draft Policy Ec10)**

I am not in favour of the reduction of this safety zone. I support the maintaining of the current safety zone, when air traffic in and out of the Airport is increasing, particularly with the Freeport coming to the area.



## **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'm against the employment land allocations, above, as they are situated right at the entrance to Kegworth from the M1 J24 into the village of Kegworth.

The area has been significantly developed in the last few years, and the increase of traffic at Junction 24 causes daily issues due to the volume hitting that junction. There are warehouses being built just outside of Clifton (near Clifton South Tram Stop) which will already increase this traffic, so building even more developments in Kegworth is only going to saturate an already saturated Motorway island and cause major delays at peak times. We have already seen on many occasions in the recent years, the village being gridlocked due to issues at the island as a result of the volume of traffic.

These developments are only favouring those that are looking to make profit, and not considering the impact that it has on those that regularly use these roads and residents of the village. These proposals have not reflected the negative impact it has on the local and extending areas.

I am also unhappy about the area of these proposals being on flood risk areas. We have recently seen many areas being impacted by flooding around Kegworth, with both these proposed areas being hit by flooding. Have the proposals considered this, and looked in to how it would impact the developments being built there and again the impact it has on the extended area – as this just clearly increases the flooding risk to the local area and residents have bought houses knowing that their house was going to be safe, to which they won't be if this area is developed. The more is built on flood zones, there is less drainage and clearly a non-sensical development.

The appearance of the area will also be impacted. As a resident, what is so appealing living in Kegworth is there is good access to city areas, but you have an escape to the country with the view of the countryside surrounding busy links to the area. Continually



to develop on these areas, will only detract the charm of the village and we need to protect the green space of Kegworth.

## **PROPOSED HOUSING ALLOCATIONS:**

### **Local Service Centre**

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) •

This land already approved for housing, which I'm disappointed about with my points above of losing green areas and volume of traffic but the area would benefit from having additional services nearer than the 'town' centre of Kegworth and I would like to see the Computer Centre Site allocated for retail and leisure. The site itself should have a mix of housing, especially to cater for older people as the provision in Kegworth is poor, with new estates recently building no bungalows. There is a growing need for services, not just housing within the village.

## PROPOSED LIMITS TO DEVELOPMENT REVIEW (D3)

### **Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth**

I oppose the limits of development to include EMP73, as this will result in loss of greenspace and be detrimental to the entrance to the historic village of Kegworth.

### **Page 8 and 14**

### **Town Centre Topic Paper / Policy Paper Appendix A, 'Policy Maps'**

I am against reducing the existing village centre boundary, and feel it should be expanded to include High Street, Dragwell etc as Kegworth continues to grow.

### **Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth**

I would like to see this remain as a brownfield site and be used for retail and leisure.



Name: Fern Sewell

[Redacted]

[Redacted]

Signed:

[Redacted]

Date: 17.03.24





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

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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	KEVIN	
Last Name	WARD	
Job Title (where relevant)		
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)

EMP90.

We live in a village, feel free to look that up "Village".  
 If this freeport goes ahead then we will no longer be a village surrounded by rural land. The size of freeport will be x3 the size of the village.  
 We will merge as one. Our Green and pleasant land will be taken over by monstrous industrial buildings, possibly standing empty like many others that have been built over the years.



contd. from previous page .

Flooding I see as a problem, the amount of rain fall we have had the ground is saturated and the excess has no where to go other than towards the Village onto the brook which cannot cope as it is causing flooding in the Village .

As I live very close to the proposed Freeport I see the excess water coming off the fields and it makes its way down the lane and also into our garden, borders are flooded, the lawn is flooded we can't get on there even now to mow it so I dread to think what it will be like if this Freeport goes ahead .

The Noise will be another concern what if anything can you do to stop any noise. Any noise will be unacceptable .

Air pollution, air quality will suffer extra vehicles from staff, visitors- Heavy Goods Vehicles delivering and collecting all polluting making noise and at nights "lights" .

Lighting Pollution our sky will be lit up where once there was darkness . Only recently we have encountered strong brights lights from the airport which had been positioned wrong aiming straight towards the Village

This Freeport will be connected to the Village therefore so will its lights .



Traffic 24/7. Traffic movement in and around the freeport. Air quality, noise, light will all have an effect on the village. Extra Traffic through the village as workers commute to work, or delivery vans etc. What about the wildlife, the hedgerows, trees and plants all lost. What happened to preservation. Plant a tree the Council say but are quite happy to tear them all down. Therefore I am asking NWWDC not to include the EMP90 site for potential development.

Policy IW1

Again as mentioned for EMP90 I believe that Noise, Traffic, Flooding, Air Quality, Lighting, wildlife and the loss of good Farmland will have a very big impact on our village

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

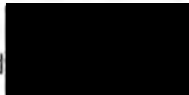


**Declaration**

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Signed



Date: 15<sup>TH</sup> 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: North West Leicestershire Local Plan Consultation  
Date: 17 March 2024 22:50:50

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Dear Sir / Madam,

I was assured by 2 different North West Leicestershire planning staff members at different times at the Local Plan Consultation events that new development and particularly large new development should improve and at least not leave anyone else worse affected by extra water leaving development and that new sites should keep the absorption and drainage characteristics of a "Greenfield" acting the same as before the development. Being local we are particularly interested who and how this is calculated and who and how it is checked that it has worked and who and how they continue to check and how they can change the situation to meet the no worse water run off rule. I would like to know the water drainage pathways for development near junction 11 M42 and close by villages and think representatives of South Derbyshire and Lichfield District councils should satisfy themselves that the proposals meet the "Greenfield" drainage test as these districts are very close and landscape and topography lead to local concerns. What has been the process for developments recently and what are the results and follow up to ensure the aims were met. I would expect the calculations to be very complicated but many people would like a model to demonstrate the calculations as computers aren't perfect as was shown by the "London Millennium Bridge" which came to be called The wibbly wobbly bridge when people actually used it and it became apparent that use caused far too much swaying and it had to be closed to make changes to be a success. When checked have drainage changes been made to development projects in North West Leicestershire. Local plan consultation S2 Settlement hierarchies. Some councils with very rural areas are using settlement sharing policies to include smaller with bigger settlement/s to effectively create a team to give a bit of development to these communities to keep all of them improving not at risk of deteriorating as highlighted In Country Landowner reports of rural community problems and their suggestions to improve them. Most of North West Leicestershire is only semi rural with many communities only a short walk away so these rural sharing policies would seem to be easier to implement here.

It's the rules but Leicester focussed dominance to decision making compared to much lesser weighting to often much closer but out of district areas frustrates many as it can make cohesion challenging locally.

Yours Faithfully

Robert Adey



From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: North West Leicestershire local plan consultation previous email Robert Adey lives Seal Fields Farm Netherseal Swadlincote Derbyshire  
Date: 17 March 2024 23:58:48

---

Hello

I Robert Adey submitted an email for the Local Plan Consulation but didn't put my address it is [REDACTED]

I hope this is all the information needed and you can pair the info in the emails as required.

thanks

Robert Adey



**Kirstyn Sewell**

[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**

I support Draft Policy H8. There is currently a high number of HMOs in the village and this needs to be regulated. This policy will assist in the planning process to reduce the numbers.

I welcome the car parking provision of one parking space per occupant of an HMO, as parking is a problem in the village already, with all residents agreeing this is the primary issue currently in the village. Some estates such as Pritchard Drive can be inaccessible and dangerous to drive around to due HMOs with inadequate parking space.

#### **East Midlands Airport: Public Safety Zones (Draft Policy Ec10)**

I am not in favour of the reduction of this safety zone. I was in Kegworth at the time of the Air Disaster in 1989 and would support the maintaining of the current safety zone, when air traffic in and out of the Airport is increasing.

### **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 the employment land allocations, above. Firstly, they are situated right at the entrance to Kegworth from the M1 J24 into the village of Kegworth, this will ruin



the aspect of a village already affected by SEGRO warehousing, along with the airport. J24 is already an extremely busy junction and this will only lead to increased traffic which will add to these issues.

This land is partly on flood zone 3 and spreads across the Trent Valley Washlands. Recently this land was visibly flooded from the increased rainfall. Building on this land will lead to flood water having nowhere to go which will gravitate towards the lower lying areas of Kegworth village. We have started to see increased flooding in Kegworth in Sideley, and Kegworth Gate as a result of increased building on these floodplains.

The village of Kegworth circa 4,000 population does not have an employment need for these warehouses and it would appear that over 50% of the employment allocation is not beneficial for the village. Again, this will lead to increased traffic to the village. Also, there will be over 7,000 jobs created at the Ratcliffe-on-Soar power station site which is in close proximity to the village of Kegworth.

## **PROPOSED HOUSING ALLOCATIONS:**

### **Local Service Centre**

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) •

This land already approved for housing would benefit from having additional services nearer than the 'town' centre of Kegworth and I would like to see the **Computer Centre Site** (Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth) allocated for retail and leisure. The site itself should have a mix of housing, especially to cater for older people as the provision in Kegworth is poor, with new estates recently building no bungalows.

I would like to see the original plan of sports pitches, a pavilion and allotments maintained in any new plans.



PROPOSED LIMITS TO DEVELOPMENT REVIEW (D3)

**Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth**

I oppose the limits of development to include EMP73, as this will result in loss of greenspace and be detrimental to the entrance to the historic village of Kegworth.

**Page 8 and 14**

**Town Centre Topic Paper / Policy Paper Appendix A, 'Policy Maps'**

I object to reducing the existing village centre boundary, and if anything, I would like to see it expanded to include the High Street as far as the Library, down Dragwell to include the shop and Doctor's Surgery and as far as the Parish Council Office on London Road, opposite the Market Place. Kegworth is growing and there will come a time when more retail premises are required.

**Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth**

I would like to see this remain as a brownfield site and be used for retail and leisure.





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Personal Details

Agent's Details (if applicable)



**Draft North West Leicestershire Local Plan 2020-2040 Consultation (February -March 2024)**

Title	Ms	
First Name	Annabel	
Last Name	McCrorie	
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:

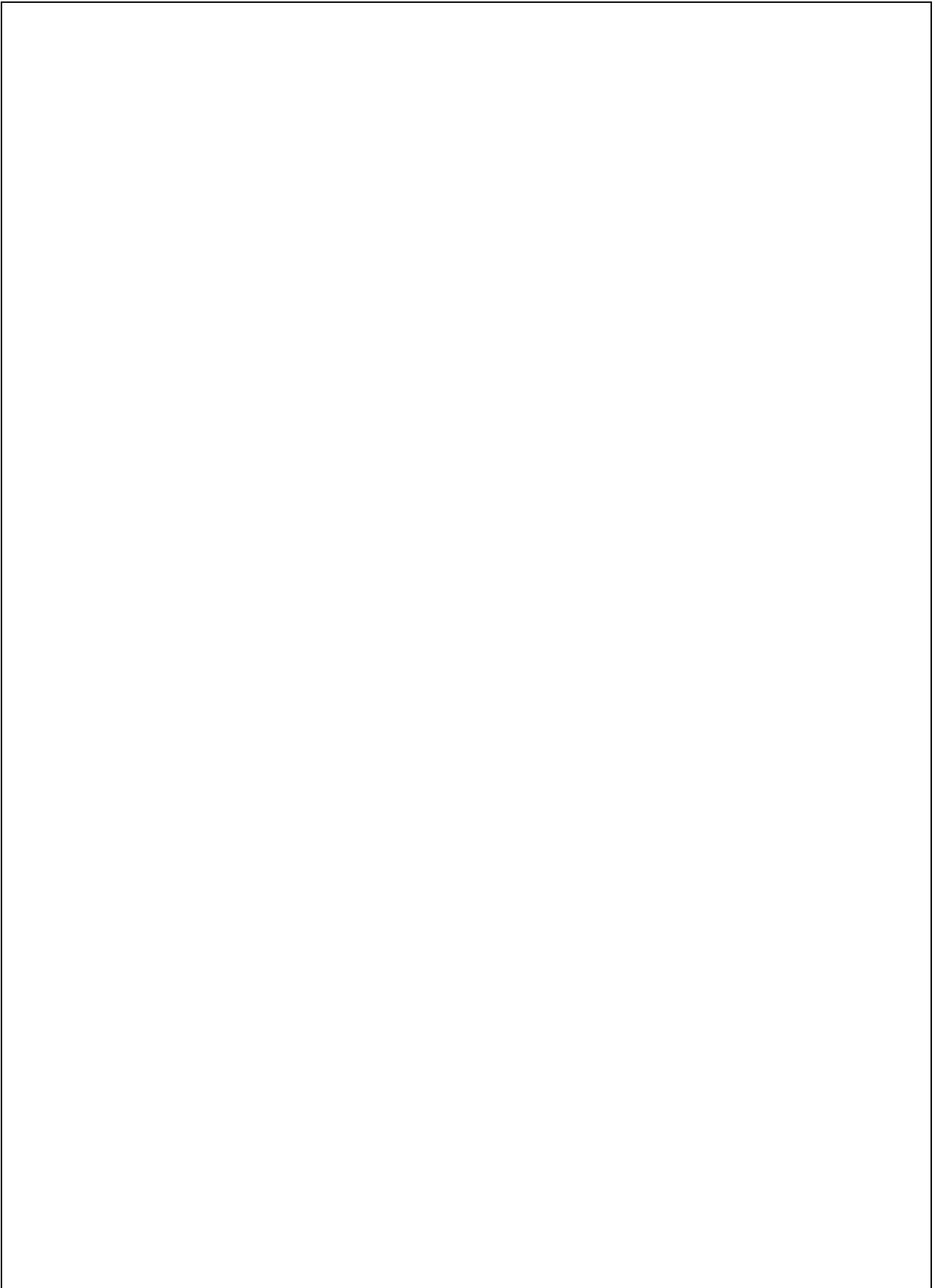
1. This site selection for NWLDC's housing allocation is ill-considered, in my opinion. Concentrating the entire allocation in one location seems an overly simplistic approach. While I understand that this density would support amenities like shops, medical offices, and schools, the proposal fails to address the needs of nearby villages or consider the local aesthetic. For example, Diseworth has conservation village status, which would likely suffer from a large, adjacent development. A more thoughtful distribution of housing units, factoring in impacts on surrounding communities, would be preferable.
2. Such a large development would be out of place in the local area, especially the historic villages of Diseworth, Wilson, Tonge, Breedon-on-the-Hill, Islay Walton, Worthington and Belton. It would have a detrimental impact on the aesthetics and character of the surrounding villages.
3. The proposed site sits at approximately 90m elevation, while nearby villages sit at lower elevations - Diseworth at about 60m, Wilson at 55m, and Long Whatton at 50m. Runoff from surrounding farmland, including the proposed site, and overflow from East Midlands Airport ponds feed into Diseworth Brook. Diseworth already struggles with flooding. The new settlement, along with other planned developments, could substantially impact Diseworth Brook. Significant infrastructure would be needed to prevent additional surface water from worsening the flooding.
4. The proposed development will significantly increase air, noise, and light pollution in the surrounding area. The airport already contributes substantial light pollution, comparable to a large town like Loughborough. Further expanding the site will exacerbate this issue. Sitting in a valley, Diseworth village will effectively be enclosed by light pollution. Construction over an extended timeframe will worsen air quality from equipment emissions and increased traffic. Long-term operations at the completed site will sustain higher traffic volumes, impacting air quality. Noise from construction equipment and traffic will also disturb nearby villages for years. Surrounding communities will likely experience more through-traffic as drivers use side roads as shortcuts to access the site.
5. The current road infrastructure cannot handle the expected increase in traffic to and from the proposed site. Turning the A453 into a dual-carriageway, as has been proposed, would mean Diseworth is surrounded on all sides by busy multi-lane roads, with the M1 and A42 already flanking the village. This change would likely worsen noise and air pollution in the community.
6. The development would destroy 750 acres of productive UK farmland and many miles of ancient hedgerows and trees. This valuable agricultural land not only produces critical food for the UK but also sequesters carbon, so its permanent loss would worsen the climate crisis.
7. Rather than one massive development, smaller developments that are sympathetically attached to existing villages have been proposed and may be more welcomed by the community.
8. The large scale proposed development could potentially increase crime in the area by attracting criminal activity as there are more people, dwellings, vehicles and in the run-up to completion, tools and plant on site that will attract criminals.
9. Ongoing large-scale development near small villages that clashes with the local aesthetic may negatively impact housing prices, as current residents could see significant

decreases in home values due to construction noise, elevated crime rates, and worsened 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. I am worried about the environmental impact this would have on Diseworth that already suffers from flooding. I feel that replacing fields with concrete would only increase the surface run off.
2. The increased noise, air and light pollution would have a detrimental impact on the village.
3. It'll be an eyesore. Diseworth is an historic village and having warehouses right next to it would ruin the rural nature of the village.
4. The increased amount of traffic not only required to build the development but also future traffic, I don't think the current road network would support this.
5. A lack of empathy towards nature. Acres of rich farmland and hedgerows will be completely destroyed having an impact on wildlife and biodiversity.
6. I don't believe this is needed as there are already empty warehouses in Castle Donington, what will building more achieve?
7. There are too many planning applications being proposed surrounding the village. If all of the were to go ahead then the village would seem to be swallowed up.
8. I'm worried the value of my house will be impacted.





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 McCrorie

Date: 13/03/24

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



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Please complete both Part A and Part B.

**PART A – Personal Details**

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	<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
Title	Mrs	
First Name	JACQUELINE	
Last Name	BUTTERWORTH	
Job Title (where relevant)	/	
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

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.

IWI and EMPAD

Use this box to set out your response.

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

I object to the IWI proposal on the following grounds:

- The irreplaceable loss of ancient hedgerows and agricultural land. Once they are gone, they are gone!
- There has been significant flooding + Disewate a long while in recent years with damage to property, a development of this magnitude can only increase this risk.
- Road infrastructure will not cope with a development on this scale.
- we currently suffer light pollution - from existing developments - airport / Donington Park / warehouse, this will increase with IWI.
- Disewate is a conservation village - ~~what~~ this development will have a detrimental impact on the rural environment of the village.



I object to the proposed Emp 90 development on the following grounds:-

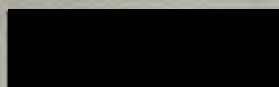
- This is an undemocratic process being imposed by central government with no regard to local residents.
- The freepoint will be a 24/7 facility causing light & noise pollution to the local environment. The size and scale is inappropriate for an uninhabited rural environment.
- There is currently significant traffic congestion at Junction 23A, which will be made significantly worse by the increase in heavy goods traffic. Current congestion results in traffic using the village as a shortcut which increases risks to residents and particularly the primary school children.
- Converting over Green fields can only result in exacerbating the level of flooding already experienced in Dismwater & Long Whattan.
- The impact on local heritage, landscape and amenities is unacceptable as stated in the local plan.

### 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: 16/03/24

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Planning Policy Team, NWLDC, PO Box 11051, Coalville LE67 0FW

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

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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	BUTTERWORTH	
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
	<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.

IWI and EMP90

Use this box to set out your response.

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

- Re IWI - I object to this development on the following grounds
- The development of a large residential area will produce unacceptable traffic congestion on the A453
  - The development will result in the loss of miles of hedgerow impacting on biodiversity
  - Replacing the 'sink' effect of open ground with concrete surface will add the risk of flooding in Duseworth and Long Whatton, villages where flooding is an annual issue.
  - 'The Green' and Main Street, Long Whatton, will become rat runs for traffic avoiding congestion on A453 resulting in increased risk of traffic collision at Long Whatton School



Re EMP90

I object to this development on the following grounds.

- The impact of construction and building work will result in loss of landscape, amenity and the rural environment for Areworth and Long Wharfedale.
- The development will result in ~~noise~~ unacceptable noise and light pollution throughout the 24 hour period.
- The development encroaches on the grounds of Areworth School - increased levels of pollution will have a direct negative impact on the health of children at the school - why bring industry in ~~the~~ close proximity to a primary school?
- The development removes the water sink effect of the natural fields and concretes over a gradient; the flooding risk for Areworth and Long Wharfedale will inevitably be increased.
- Local road infrastructure is wholly inadequate to accept increased heavy goods vehicle traffic - the development will result in unacceptable congestion at the services roundabout at junction 23A.
- Development of an industrial freepart bordering a conservation area is contrary to good sense - conservation areas are supposed to be conserved, not polluted.

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Signed: 

Date: 16/3/2024

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	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Susan	
Last Name	Fenny	
Job Title (where relevant)	Person Centred Therapeutic Counsellor	
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.**

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	X	Proposed housing and employment allocations
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Use this box to set out your response.

**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).**

### EMP90

I have a number of significant concerns regarding this development. It is in the wrong place!

Flooding – Diseworth already has need of a flood group and the group’s work over the past few years has reduced the amount of flooding in the village. This is partly due to cooperation with East Midlands Airport who release their balancing ponds into the brook which flows through Diseworth and Long Whatton. The brook is a very small waterway which already is overburdened and which will not cope with further water created by **EMP90**. Some of the housing developments already built eg along Hyams lane, have increased pressure on drains and caused further problems. **EMP90** is planned on a slope leading into the village and the water will take the path of least resistance. Furthermore we are all aware of the increased amount of flooding expected over the British Isles due to climate change. The village will be decimated. The cumulative effect of the recent developments **EMP90** and **IW1** will be devastating for the village.

Traffic – The lorries servicing **EMP90** will no doubt have a route along main roads to reach the warehouses but when there are hold ups drivers will find other routes to enable quick access and I have no doubt that a short cut through the village will be often used. In addition employees will often take a route through Diseworth on their way to and from work increasing traffic through the village at rush hour times and making the roads unsafe when those in a rush break the speed limit, an issue we already have to deal with to a lesser extent when workers for



East Midlands Airport use Diseworth as a “rat run”. We have a school on Grimesgate on a blind bend and I wonder how long it will be before we are dealing with the injuries or deaths of our young children due to careless drivers.

The fields around Diseworth are our “green lungs”. They keep a space between the air, noise and light pollution from East Midlands Airport. Not only will you take away this buffer but you will increase the amount of noise and light pollution 24 hours a day with the development of **EMP90**. How will people rest? I do not accept that on the slope into Diseworth any significant mitigation from the air, noise or light pollution can be achieved.

As a counsellor, I know how important clean air, walking in the countryside, good sleep, peace, quiet and tranquillity are for our mental health. I am very concerned that my own mental health and that of other villagers will be adversely affected by this development.

Diseworth village is a conservation area. It has a rich heritage which will be lost if **EMP90** goes ahead and Diseworth becomes part of a logistics park not a rural village. We will lose our village status and the many benefits this brings.

Loss of the agricultural land is a backwards step. Since Brexit we have all seen the need to become increasingly self-sufficient in food production. Removing this acreage from food production will be a negative step which the country will regret in the future as prices increase due to shortage of supply. This land is also rich in biodiversity which cannot ethically be offset, especially if the fields at the other side of the village are also developed if **IW1** goes ahead. Any claims that this is possible are greenwashing! Again the cumulative effects will be felt but do not seem to be acknowledged in the Draft Local Plan.

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” It therefore seems strange that you are including the very land that you KNOW is unacceptable! It is not possible to justify including the land when you provide the very arguments for not using it, surely? Please do not include this land!

**I am therefore asking NWLDC to remove EMP90 from the Draft Local Plan.**

**IW1**

I have a number of significant concerns regarding this development. It is in the wrong place as it is too close to East Midlands Airport, The race track and Diseworth.

Diseworth village is a conservation area. How will the conservation status be maintained **IW1** goes ahead and the village adjoins such a large housing development? The cumulative effect of both **IW1** and **EMP90** going ahead will sandwich the village between 2 massive developments and will totally destroy the rural nature of Diseworth.

**IW1** will have a significant impact on flooding in Diseworth. As mentioned above Diseworth has needed significant work to reduce flooding caused by building developments within the village. As the water table rises with the increased rainfall we see due to the climate crisis, a significant increase in flooding in the village due to run off water from the fields into The Bowley and some houses on The Green has occurred. If field acreage is reduced in the area with **IW1** this will continue to cause increasing flooding that Diseworth cannot tolerate.

Castle Donington and Diseworth have many residents who wait for long periods when needing doctor or dentist appointments. Such a large residential development as **IW1** will significantly increase pressure on these vital services.

**IW1** seems to put the whole of NWLDC housing needs in one place. In such a vast rural area as NWL surely the housing could be better distributed. **IW1** places thousands of extra families in an area that already has full employment. Surely the housing would be better placed nearer to local jobs or on the many brown field sites in Loughborough.

**IW1** will also be detrimental to the national biodiversity minimum net gain requirements as it will destroy 7.5 miles of hedgerows. Our flora and fauna are essential to the well being of the planet.

**IW1** will also create a huge increase in traffic which the A453 cannot cope with. There are already long delays at peak times around East Midlands Airport. This increase in traffic will also impact negatively on air quality in the area, noise and light pollution.

**I am therefore asking NWLDC to remove EMP90 from the Draft 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: 17<sup>th</sup> March 2024

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Personal Details

Agent's Details (if applicable)



Draft North West Leicestershire Local Plan 2020-2040 Consultation (February -March 2024)

Title	Mr	
First Name	David	
Last Name	Fenny	
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
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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.

**I wish to respond 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).**

Firstly, I think it is wrong to consider each of these developments as isolated cases. There is no doubt in my mind that if either is completed the impact on Diseworth will be significant and cause lasting damage to our village but the effects of both developments together would cause damage far greater than the sum of each.

It seems from the draft local plan that our corner of NWL is being considered for the bulk of the housing and industrial development for the whole county. This doesn't seem equitable either in terms of the loss of rural landscape around Diseworth or the lack of employment opportunities for the rest of the county.

The designation of this area as a Freeport zone seems to be driving the DLP but the Freeport zone extends well beyond our county boundaries and yet the bulk of the development is within NWL. Why aren't Derbyshire and Nottinghamshire shouldering some of the responsibility? Why not develop brown field sites i.e. Ratcliffe-on-Soar power station rather than fertile farmland?

Climate change is real and is happening in front of our eyes. The farmland around Diseworth provides a much needed filter to try and cleanse our atmosphere, green lungs if you will, and replacing these green fields with housing and warehouses would be devastating and irreversible. Further, it isn't just the loss of a carbon filter, the proposed developments would bring a significant increase in pollution, in particular exhaust fumes, noise and light and no amount of, alleged, offsetting would counteract this. Consensus seems to be that carbon offsetting is just a myth to greenwash people into accepting developments created simply to provide profits for large corporations.

Another factor in this is East Midlands Airport which is one mile to the north of the village and has its own expansion plans adding to the pollution problems for Diseworth. We have already witnessed the installation of very bright lights pointing towards Diseworth and these would be joined by 24/7 lighting at EMP90. No amount of screening will shield us from this.

EMA expansion will result in more waterways polluted by de-icing fluid as more aircraft depart. Indeed EMA are currently on trial for polluting the river Trent. There is already a problem with flooding in Diseworth which is becoming worse as our climate changes. This is exacerbated by the airport releasing large amounts of water from its balancing ponds which then uses the brook to escape. This often causes flooding both in Diseworth and subsequently in Long Whatton. This situation will only worsen when an area larger than our village is concreted over! I don't believe that any amount of engineering will prevent this water flowing into Diseworth. The water survey used in the DLP is out of date and takes no consideration of the climate today.

The roads around Diseworth are already very busy and whenever there is a delay on the M1 or A42 we become a diversion route. Our roads are not designed or built to accommodate such a volume of traffic. This will only get worse with the addition of 4000+ houses and a logistics park.

**EMP90**



Firstly, I don't believe that the need for so much B8 warehousing had been demonstrated. EMG is not fully occupied neither are the new units to the south of the A453 to Clifton. Indeed, every development of B8 sites I pass on our motorway has enormous amount of space to let. This is simply a 'tax break' development to generate profit at the cost of a rural lifestyle. We are currently a conservation village, but the development will make us part of a logistics park.

The A453 is not suitable for the volume of traffic and indeed for the size of vehicles that will be using it.

The designation of the Freeport status by central government seems undemocratic and NWLDC should be making strong representation to government about this rather than revising the DLP to include the devastation to our parish.

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 is this development in the DLP? As you say, it is unacceptable!

We are not an area of high unemployment so staff for these alleged new jobs will have to come to the area so why not build where unemployment is high?

I believe that both my mental and physical health will suffer as a result of this development.

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

#### **IW1**

Leicester city can't achieve its housing requirements and so NWL is being pressured to build on prime agricultural land to meet the county's targets. But this doesn't work as it is a 25 mile commute to Leicester, therefore we have thousands more cars on the M1 (and surrounding rural roads) as people commute. Therefore, pollution increase even more and people spend yet more time in their cars each day.

This development will add to the flooding issue in Diseworth.

This development will add to the congestion around the airport and Donington Park.

How can this development achieve biodiversity net gain when 750 acres of agricultural land and 7.5 miles of hedgerows are being destroyed?

The local doctors and dental surgeries are already struggling to cope and the recent developments in Castle Donington have exacerbated this shortfall. There doesn't seem to be a requirement for these to be included in the IW1 plan.

Surely it will only be a matter of time before the next DLP allows for IW2 and Diseworth disappears completely!

I believe that my quality of life will fall drastically with this development on my doorstep.

**Therefore, I am asking NWLDC not to include the IW1 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: 17<sup>th</sup> March 2024

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(2020 – 2040) Consultation - Response Form

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	Personal Details	Agent's Details (if applicable)
Title	MR	
First Name	ROGER	
Last Name	NICHOLLS	
Job Title (where relevant)	PARISH COUNCILLOR	
Organisation (where relevant)	CLIFTON CAMPVILLE WITH THORPE CONSTANTINE PATISH COUNCIL	
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
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Use this box to set out your response.

SECTION 5 CREATING ATTRACTIVE PLACES

POLICY AP7 "FLOOD RISK – (STRATEGIC POLICY) Page 41

The Parish Council is concerned that the Strategic Flood Risk Assessment prepared for NWLDC in 2015 has considerable shortcomings and welcomes the proposal to commission a new SFRA in conjunction with the New Local Plan. The Parish Council commends the reassurance that NWLDC "will take this into account at the next stage of the Local Plan".

The Parish Council therefore expects NWLDC to have full regard for Paragraph 165 of the NPPF ((2023 Edition) which states the following

**165. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime**

**without increasing flood risk elsewhere.**

The Parish Council, is particularly keen that NWLDC fully respects the extract highlighted.

NWLDC previous SFRA has failed to acknowledge the consequences of development within it's District. The upper catchment area for the River Mease is wholly with NWL District and is thus considerably impacted by development, yet adverse consequences to the River Mease occur outside the District within the Parishes of Clifton Campville, Harlaston and Edingale.

It is fortunate that an Environment Agency Measuring Station is located on the River Mease less than 2 miles from NWL District and the data collected provides valuable evidence relating to the upper Mease catchment.

The data relating to measured levels on the River Mease during recent years is quite alarming.

The "Average Level" of the Mease averaged for 4 winter months in 2019/2020, 2021/2022 and 2023/2024 has been **95% higher** than the winter periods of the remaining 7 years since 2014.

For 2023/2024 the averaged daily flow for those 4 winter months was 114% higher than the same winter months of the 7 years referred to above.

NWLDC's Detailed Water Cycle study 2012 made reference to ground water issues arising from disused coal working highlighting the mining areas that are located in the River Mease catchment. Perhaps these concerns should now be considered.

These high "Average" levels appear to result in noticeable increases to the maximum recorded levels which have been causing significant disruption within the Parishes referred to above. Residents of Edingale are now finding that during the flooding disruptions, they have very limited ability to get out of their village and there are high concerns that there may be risk to life due the inability of emergency services to reach the village or residents accessing medical care themselves.

Srah Edwards MP has convened a "Flooding Summit" in Tamworth, this month, and delegates from Edingale Parish Council will be attending and will represent all 3 Parish Councils.



PROPOSED HOUSING AND EMPLOYMENT ALLOCATIONS DOCUMENT

SECTION 6

POTENTIAL LOCATION FOR STRATEGIC DISTRIBUTION PAGE 79

Land north of J11 A/M42 (EMP82)

The Parish Council wishes to object to this change of use.

The 11 items that NWLDC have identified that “will need to be addressed” all concern the Parish Council, but it is Item (f) The provision of a Flood Risk Assessment that is the most profound – see concerns highlighted under Policy AP7 – Flood Risks.

The Parish Council is concerned that the Flood Risk Assessment and mitigation measures approved for the existing Mercia Park are less robust than was required for this extensive area of impermeable development.

Informal observations of the performance of the surface water attenuation arrangements suggest that they are not wholly effective and certainly the consequences for the lower Mease Valley have been a major concern. This was not addressed at all during the approval of the Planning Applications.

Paragraph 165 of the NPPF(2023) is very valid, especially the concluding sentence.

**165. Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future). Where development is necessary in such areas, the development should be made safe for its lifetime without increasing flood risk elsewhere.**

## 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: Roger Nicholls

Date: 17<sup>th</sup> March 2024

### **DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT**

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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	Dr	
First Name	Tim	
Last Name	Burrage	
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?	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.

“3.1 “it must be based on evidence” & 3.8 “underpinned by relevant evidence and up-to-date evidence”.  
No evidence has been provided to support the plan.

“3.5 “contribute to protecting and enhancing our natural...”

“making effective use of land”

“mitigating and adapting to climate change”

“moving to a low carbon economy”

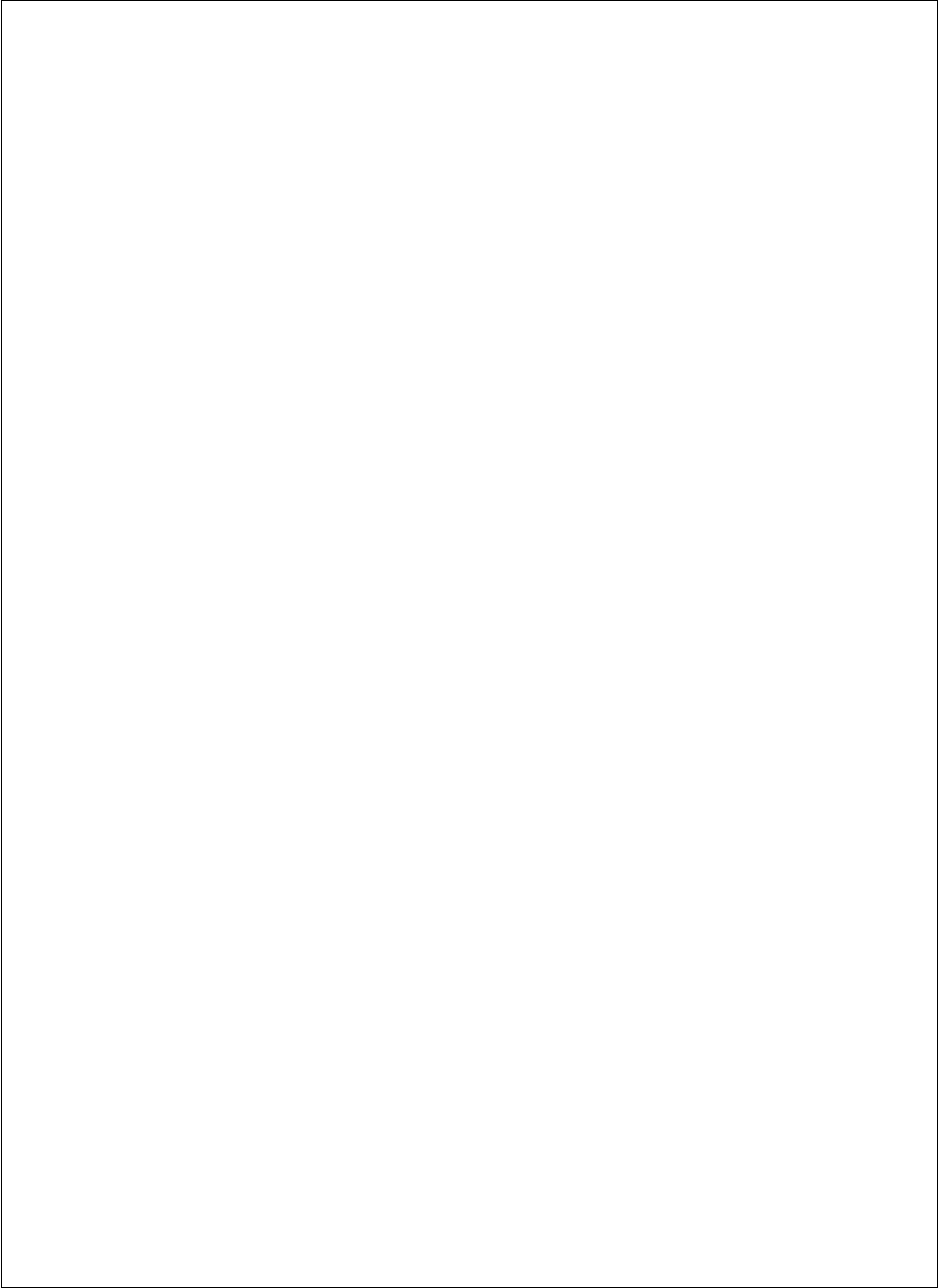
The proposed development of Isley Woodhouse would affect existing and productive farmland, therefore not protecting or enhancing; nor making effective use of land. The location from a water course point of view would exacerbate current flooding issues, thereby not mitigating or adapting to climate change.

"4.40" Isley Woodhouse is countryside, and the proposed development under Option 7b assigns 1,785 dwellings to "New Settlement" AKA Isley Woodhouse. However, none of the criteria under the NPPF for development in the countryside are met to support this development.

“4.26” The selection of Isley Woodhouse as the location of the New Settlement appears to have been driven by the assumed location of the "Leicestershire International Gateway", suggesting that it will form the main settlement for employment of the "LIG". This will cause a single source of commuting to the LIG, rather than a more reasonable distributed source of commuting from surrounding areas. Traffic flow analysis must be undertaken to support the practicality of a single source of commuting.



"4.24" refers to "Development Strategy and Policy Options" January 2022, where under 4.44, "Under Option 3b, growth would be more spread out" & "concerns about over concentration in a limited number of areas is less relevant" – the selection of a large "New Settlement" (aka Isley Woodhouse) is in direct contradiction to this "concerns about over concentration in a limited number of areas", it a an over concentration in a single area.





## Declaration

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

Signed:

Date:

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	Personal Details	Agent's Details (if applicable)
Title	Dr	
First Name	Tim	
Last Name	Burrage	
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.

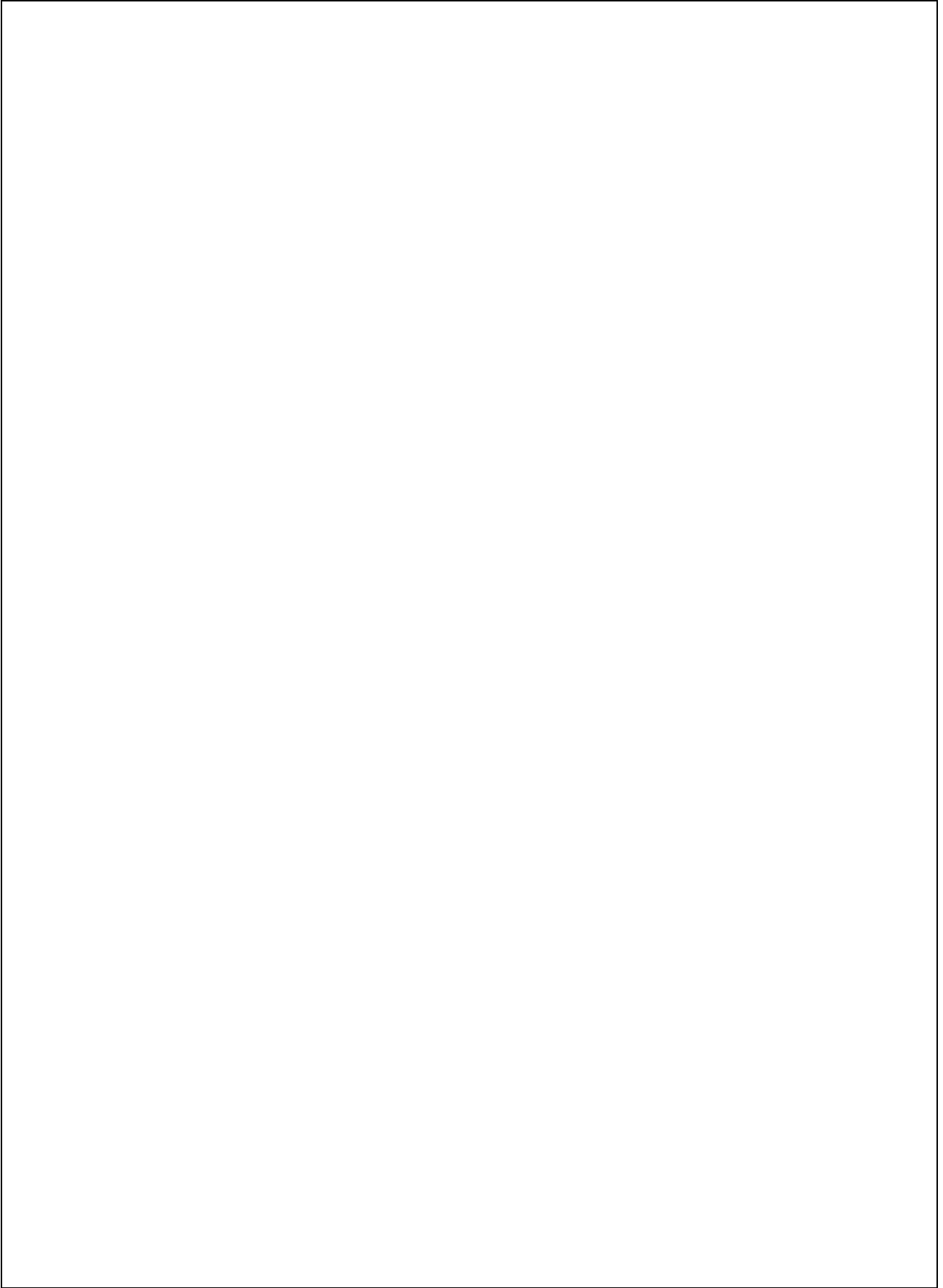
Use this box to set out your response.

“6.3” – Specifically, “Some 100Ha of land to the south of the A453/J23a of M1 and to the immediate east of Diseworth is included in the Freeport designation”. This designation does not follow any existing planning policies and does not refer to any evidence for the need for such a site.

“6.4” – Rapid development of the site to meet incentives suggests that the location is only being considered for these incentives and is not a natural location for a strategic development. No expediting of planning should be considered to circumvent existing planning policies and processes to meet arbitrary deadlines; resulting in inappropriate developments and a legacy of poor assessment of the merits of the site.

“6.6” The exact merits of the “economic designation” must be fully detailed to ensure there is justification for the deviation from existing planning policies and procedures. This should limit the nature of any activity on the site to that which was used to justify the economic benefits at the expense of a rigorous planning examination of such benefits.

“6.6” The economic benefits of the development must show that they exist in absence of the financial benefits received (see para 6.4). ie. the economic benefits must not be present simply due to financial incentives.





Declaration

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

Signed:

Date:

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From: [Hugglescote Parish Council](#)  
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: Local Plan 2020-2040 Consultation Response  
Date: 17 March 2024 20:54:03  
Attachments: [NWLDC Local Plan Consultation.29.02.024 Response.doc](#)

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## Team

In response to the request for consultation responses, the Parish Council has reviewed the Draft [Local Plan](#) 2020-2040 and a copy of our response is attached.

Members will be noting this response at our next meeting Council meeting on 21 March 2024, however if there are any additional comments to make, the Council request that these may be added to this submission.

Kind regards

***Simon***

**Simon Weaver**

**Clerk**

**Hugglescote & Donington Le Heath Parish Council**

**Tel Mobile** [REDACTED]

For more information relating to Hugglescote & Donington Le Heath Parish Council please visit our web site at : [www.huggdonpc.org.uk](http://www.huggdonpc.org.uk)



## **Hugglescote & Donington Le Heath Parish Council**

### **Response to the Local Plan Consultation**

The Parish Council has reviewed the Draft Local Plan consultation papers proposed by North West Leicestershire District Council, and our comments for your consideration are below.

#### **Proposed Housing and Employment Allocations**

##### **Site Ref: IB18 – Land off Leicester Road, Ibstock**

- I. The designated area, currently used for arable farming, has been earmarked to develop approximately 450 residential units and a primary school. However, the delineated red boundary encompasses a segment within the jurisdiction of the Hugglescote & Donington Parish.  
**We respectfully request a correction of this discrepancy and suggest a revision of the boundary as part of the consultation process.**
- II. The proposed development encroaches upon the Kelham Bridge Nature Reserve under the management of the Leicestershire and Rutland Wildlife Trust. The site incorporates a balancing pond of significant biodiversity value adjacent to the River Sence. The Hugglescote and Donington Le Heath Neighbourhood Plan Policy ENV.1 explicitly mandates the protection of Local Green Spaces, prohibiting developments that adversely affect these areas, barring exceptional circumstances. Given the ecological and historical significance of the IB18 site, we advocate for preserving its environmental features and historical integrity in alignment with NHP Policy ENV 2.

##### **Site Ref: E7 – Land between Midland Road and Leicester Road, Ellistown, and**

##### **Site Ref: EMP24 – East of Midland Road, Ellistown**

- I. The proposed housing development at E7 near Donington Le Heath and the adjacent EMP24 site, intended for industrial and warehousing purposes, raises stormwater and sewage management concerns. Past incidents of system overcapacity leading to flooding and environmental degradation underscore the necessity for a comprehensive plan to mitigate future risks. Inadequate drainage's adverse effects on Hugglescote Cemetery further exemplify the critical need for infrastructural enhancements to accommodate new developments.  
  
Recent storms have left various sewerage and sanitary products on the side of the river due to the system's failure. Residents have reported this to the Environment Agency, which is considering these discharges.
- II. Hugglescote Cemetery has been suffering for many years, with severe flooding affecting individual graves and distressing relatives. This is due to the capacity of the existing duct being insufficient. Future developments will only intensify this unless this is also addressed.

- III. The development of this site risks diminishing the visual and physical separation between Ellistown and Hugglescote. Any development must be meticulously designed to maintain this distinction, with a significant emphasis on high-quality design, layout, and landscaping to mitigate its impact on the surrounding countryside.

**Site Ref: C61 – Church View, Grange Road, Hugglescote**

- I. The Local Plan includes land with the potential for flooding, which necessitates a detailed topographical analysis to identify and address areas susceptible to flooding.

**Proposed Limits to Development**

**Site Ref: LtD/CUA/03 – Houses between Beveridge Lane and East Lane Bardon**

- I. This proposed extension of development limits requires careful planning to prevent increased surface water and sewage runoff into the river Sence and surrounding networks. It is crucial to devise strategies to mitigate the harm caused by potential flooding and sewage discharge.

**Site Ref: LtD/CUA/05 – Land to the rear of Berryhill Lane, Donington Le Heath**

- I. The Parish Council objects to developing the specified parcels of land, emphasising the importance of preserving green spaces between built environments and parish boundaries. Development of these areas risks infringing upon the village's natural environment and diminishing its openness.

**Site Ref: LtD/CUA/09 – Land south of Townsend Lane, Donington Le Heath**

- II. The Parish Council objects to developing the specified parcels of land, emphasising the importance of preserving green spaces between built environments and parish boundaries. Development of these areas risks infringing upon the village's natural environment and diminishing its openness.

Simon Weaver  
Clerk to the Parish Council  
March 2024



Grovelands Business Park,  
West Haddon Road,  
East Haddon,  
Northamptonshire,  
NN6 8FB

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

March 17<sup>th</sup> 2024

**RESPONSE TO NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL'S REGULATION 18 CONSULTATION ON THE NEW LOCAL PLAN (JANUARY- MARCH 2024)**

1. These representations have been prepared by Cora in response to the North West Leicestershire District Council (NWLDC) Draft Local Plan Regulation 18 consultation. The comments refer to the Proposed Housing and Employment Allocations and the Proposed Policies document.
2. The consultation document (Proposed Policies for Consultation) identifies Woodville as a new settlement to the Local Plan and also as a Sustainable Village, given the range of services and facilities available to meet the day to day needs of the local community (policy S2). Cora are promoting land north of Hepworth Road, Woodville, as a sustainable location to provide **up to 92** new dwellings. This site would form an extension to the existing settlement support the higher growth strategy in the provision of new housing within the Sustainable Villages.
3. Residents of Woodville have access to a range of facilities within the village, including a local convenience store, two primary schools and access to public transport. The area also includes a library, a GP surgery, a post office, a Methodist Church, three public houses, two recreational grounds, three local play and equipped areas and employment sites which are accessible within 2km of the village. There are close linkages to facilities further afield within Swadlincote, South Derbyshire's largest town. Cora considers the range of services and facilities available to meet local needs without having to travel elsewhere or when travelling elsewhere, such travel can be undertaken by using means other than a car. NWLDC are proposing two significant changes to the Sustainable Village tier, this includes the removal of Coleorton (Lower Moor Road) and the inclusion of Woodville. Sustainable Villages are defined as 'Settlements which have a limited range of services and facilities where a limited amount of growth will take place within the defined Limits to Development'. As a result of this a [REDACTED] boundary not being revised in response to the [REDACTED]

inclusion of Woodville as a settlement in NWDLC's new local plan, the proposed housing and employment allocations do not include any delivery within Woodville.

4. Cora object to this approach. Whilst the majority of Woodville, including a range of local services and facilities fall within South Derbyshire District, a significant recent expansion of Woodville has occurred within North West Leicestershire district and forms a cohesive expansion of the existing settlement. Within the context of sustainable area for development, Woodville's ability to support further development and contribute to housing need should not be underestimated. Within NWDLC's settlement study in 2021, Woodville is the highest scoring sustainable village, with the exception of Moira, which scored 14 total points to Woodville's 13, and Long Whatton and Ellistown which also scored 13.
5. Cora are promoting a site North of Hepworth Road, Woodville. The site is greenfield in nature, however part of the site currently benefits from the grant of permission for 30 self and custom building dwellings under planning permission 16/01191/OUTM. Reserved Matters for the approval of appearance, scale and landscaping (21/01380/REMM) has subsequently been approved. NWDLC issued a "Certificate of lawful proposed development" (reference 23/01616/CLP), and consequently the above planning applications will now remain extant and can be lawfully completed as per the awarded permissions. It is noted by Cora that despite the permission remaining extant, the site has not been included as a committed site within the Draft Local Plan.
6. The site also includes an area of land to the east of the above planning permissions which has previously been submitted to the Council and given reference WD2.
7. The site is relatively flat with minor undulations, it is located to the south of Woodville and to the north of Hepworth Road. It is currently located within the Countryside however, the Inspector found in the appeal against the decision to refuse application 16/01191/OUTM that the site provided little contribution to the countryside and that it does not contribute towards the area of separation between Woodville and Blackfordby. There are little to no constraints that would prevent development coming forward on the site as evident by the previous and ongoing planning applications and supporting technical assessments. The awarding of the above planning permissions clearly demonstrates that the site forms a sustainable location for development. It is the intention of Cora, as the interested developer and alongside the landowners, that a revised scheme including the parcel referenced as WD2 in the SHLAA will come forward and deliver up to 92 units and public open space. There is an ongoing planning application on the entirety of the site (23/00489/FULM).
8. The remainder of the site was previously submitted to the Council through the call for sites exercise and given reference WD2. The most recent proposed allocations have sieved this site out given it falls within the Blackfordby Neighbourhood Plan. The document references the site methodology when justifying this approach (footnote 14 on page 45). However, the site methodology gives no further justification or explanation for the decision to take this approach with allocations and made neighbour[redacted] [redacted] there is also no consideration of the age of the [redacted]



neighbourhood plans. Cora do not support this approach. The new local plan proposes to allocate land to meet housing need until 2040, far beyond the expiry date of the neighbourhood plan. In addition, the local plan will carry significant weight for a considerably longer period than the Blackfordby Neighbourhood Plan. The Local Development Scheme proposes to adopt the new Local Plan in Autumn 2026, therefore a local plan review will not be required until 2031. The Blackfordby Neighbourhood Plan was adopted in April 2022. Under the revised NPPF, the area covered by plan is therefore protected from speculative development until April 2027. As a result, the Blackfordby Neighbourhood Plan will become out of date during the New Local Plan period. The proposals within the draft local plan therefore fail to take into account the entirety of the plan period and rely on a Neighbourhood Plan which will fail to carry material weight beyond April 2027.

9. Furthermore, the Blackfordby Neighbourhood Plan does not take into account the significant changes to strategic housing assessments and local housing need. The Blackfordby Neighbourhood Plan was prepared in response to the current adopted Local Plan and bases housing need on a now outdated housing needs assessment. The short-sighted view that no further allocations are required within areas with a neighbourhood plan fails to take into account the most recently available housing needs data. Failure to re-assess these areas negates the intention of adopting a new and up to date local plan. It cannot be assumed that Blackfordby will update their neighbourhood plan once it becomes out of date, or that they will allocate any further sites if the plan is reviewed.
10. The neighbourhood plan was adopted prior to NWLDC's agreement to sign the Statement of Common Ground for Leicester and Leicestershire Housing Market Area (June 2022), which agrees that the housing requirement for North West Leicestershire is 686 dwellings each year, and 13,720 dwellings over the plan period of 2020-2040. The Blackfordby Neighbourhood Plan does not contribute in any way to meeting those requirements.
11. In conclusion, Cora do not agree with the omission of this site as a draft allocation. The location has been demonstrated to be sustainable for housing through the awarding of residential planning permission, a view which is supported through NWLDC's proposals to include Woodville in the Sustainable Villages tier of the settlement hierarchy. The site forms a logical extension to the settlement of Woodville and does not encroach into the Blackfordby area given the natural boundaries along the Eastern side of the parcel and the built settlements/ highways around the remainder of the site. Cora do not agree with the approach of excluding areas with made neighbourhood plans from site allocations, especially considering the significant amendments to strategic housing need since the adoption of the Blackfordby Local Plan.

Yours Faithfully,

**Michaela Corbett**  
Planning Manager  
Cora

[Redacted signature]



Meakin Drive

Wedgewood Way

South Street

Davenport Way

Spode Drive

Hepworth Road

Hepworth Road

Pond

Path (un)



From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: Thornborough Road Development  
Date: 15 March 2024 12:59:08

---

To Whom It May Concern,

My name is Daniel Wagstaff.

I live at [REDACTED].

I attended the meeting at Whitwick Park Hall this morning regarding the development on the west side of Thornborough Road.

I was asked to just send a message this week stating my objection and follow up by next week with a detailed response form.

I will get an online form submitted soon but for now please take this as my preliminary objection to any development on Thornborough Road.

Kind Regards,

Daniel Wagstaff



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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Daniel	
Last Name	Wagstaff	
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?  Whitwick and New Swannington development on Thornborough Road.		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.

Use this box to set out your response.

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

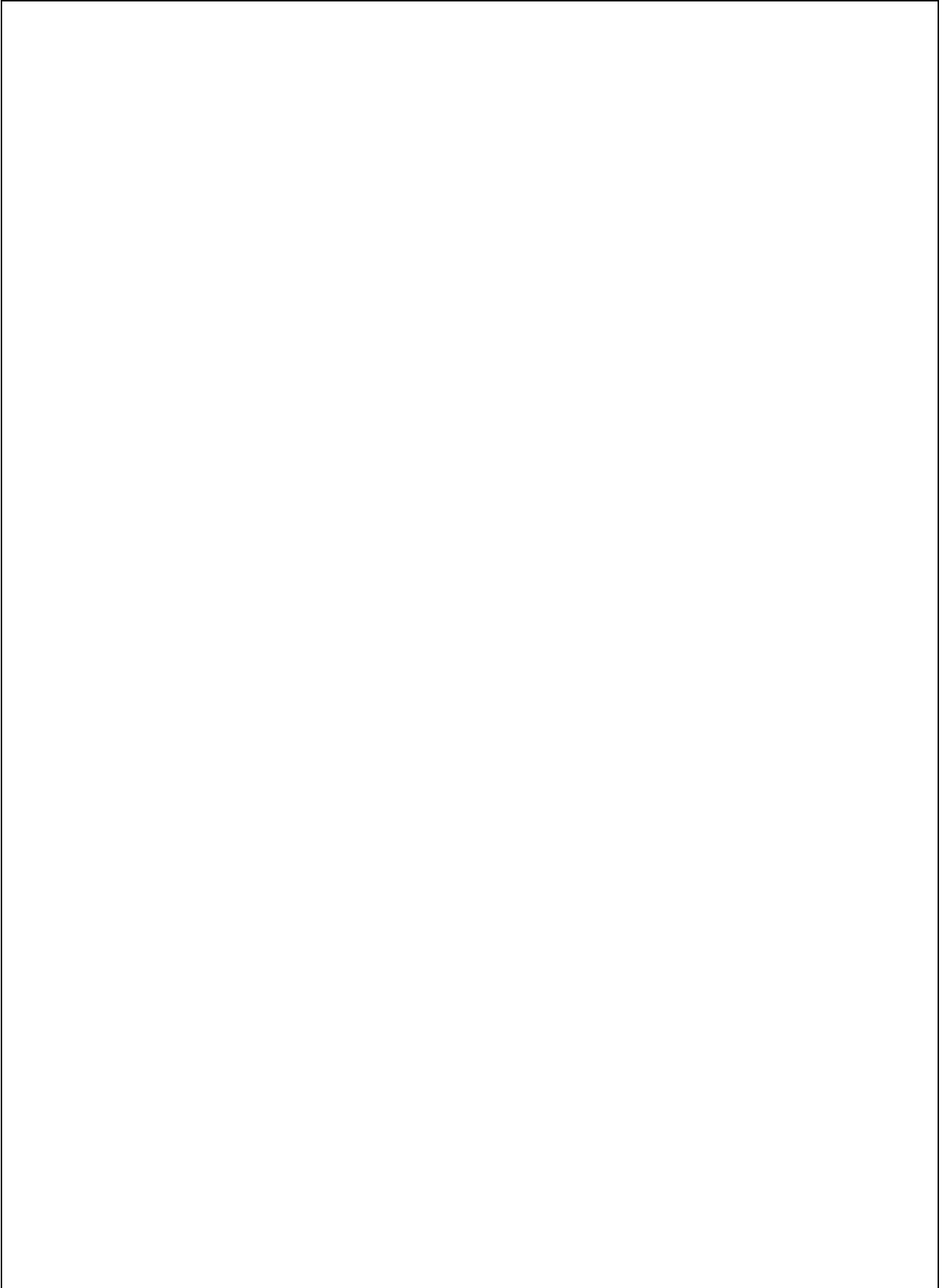
Page 11 relating to Thornborough Road, the Whitwick and New Swannington development proposal.

I am writing to state my objection to this development.

The reasons I can give are agreed upon by others I have spoken to in the area and these include but are not limited to:

Noise, pollution, traffic, flooding, infrastructure, doctors, schools and other local services. Thornborough Road is already busy enough with high levels of noise and traffic. The doctors are always full. The schools my kids go to are already busy.

My personal reasons would be the obstruction of the view from the front of my house. One of the main reasons I moved here was that it has an unobstructed view front and rear. I would rather that wasn't spoilt.





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: DWagstaff

Date: 19/03/24

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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: Contact message from North West Leicestershire District Council  
Date: 16 March 2024 15:06:11

---

The following form has been submitted via the North West Leicestershire District Council website.  
**When responding please ensure that your email is addressed** [REDACTED]

The nature  
of my  
contact is:

Complaint

Details:

Over-reliance on the A444, Overseal due to proposals to expand the industrial site at JA42/M42. Proper traffic assessments are needed and appropriate s106 funds needed to mitigate the impact on our village.

Title:

Mrs

First Name

Helen

/ Initial:

Last Name: MITCHELL

Do you  
require a  
reply?:

Yes

Email

Address:

Address Line 1:

Address Line 2:

Address Line 3:

Address:

Town / City:

County:

Postcode:

Country:

Telephone:

Mobile

Telephone:

May we

reply by

email?:

Yes



From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: Contact message from North West Leicestershire District Council  
Date: 16 March 2024 17:55:18

---

The following form has been submitted via the North West Leicestershire District Council website.  
**When responding please ensure that your email is addressed** [REDACTED]

The  
nature  
of my Complaint  
contact  
is:

Hello

I'm writing to lodge a complaint against the planned site for development of 500 houses behind Brooke's lane and 283 houses behind Thornborough road in Whitwick.

I live at the bottom of [REDACTED] and have wonderful views across the fields right across to Coloerton which would now be ruined, as would the walks which I and many others enjoy. Also I feel the infrastructure in particular is nowhere near adequate to handle the amount of traffic this site would generate. School times in the area are a real problem with the amount of traffic and would cause chaos, as well as the area around the new leisure centre on the A511 pretty much all of the time.

Details: I would be interested to know how many local residents are actually in favour of this development, please let me know if you can. I know of none and am at a loss as to the reason behind the enforcement of this ludicrous proposal which can only mean that the council is only seeing this as a boost in taxes and [redacted] to certain individuals with total a disregard to the concerns of local people or how this would affect the value of our homes. We also have the massive growth in sites at Coalville, Ellistown, Shepshed etc to contend with and just feel overwhelmed.

I expect this email and everyone else's to have absolutely no impact on any decision made by the council as believe it to be [redacted] I would like to be proved wrong but doubt it and have no choice but to jump through these petty hoops that are designed to make people think that their views actually mean anything.

Regards

Duncan White

Title: Mr  
First  
Name / Duncan  
Initial:  
Last  
Name: White  
Do you  
require a Yes  
reply?:

Email  
Address: [REDACTED]

Address Line 1: [REDACTED]  
Address Line 2: [REDACTED]  
Address: Town / City: [REDACTED]  
County: [REDACTED]  
Postcode: [REDACTED]  
Country: [REDACTED]

May we  
reply by Yes

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](http://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	Siobhan	
Last Name	Dillon	
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	y	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.

### **Overview**

Sustainability described by government covers social, economic and ecological factors. This plan describes provision for housing, economic development, mostly in the form of offices and warehousing, considerations for energy use, water use and impacts upon biodiversity. A key factor to sustainability that is not considered is access to good quality food other than in AP5 (2) (g) - provision of allotments. The agricultural sector which is the main source of our nutritional sustenance is given little consideration, relative to its importance of sustaining us. As this country has great dependency upon external food sources, at times of increased international turbulence and supply chain disruptions it seems that neglecting this a reasonably foreseeable potential disaster.

Climate change is at the forefront of most of the policies, with the assertion that this is being brought about by humanity's activities releasing carbon dioxide and some methane, our dutiful government has enshrined into law the need to reduce our carbon outputs by 100% of the 1990 levels, by 2050. This is not going to go well for most of humanity. I note that the Local Plan has key features based around the development of East midlands Airport and its associated activities and the Freeport. It is unlikely that such developments will be possible if we are to fulfil the Climate Change Act requirements. The UK Future Industrial Research Strategy group has produced a report in 2019 of how the country will be affected in different sectors, based upon the likelihood of efficiency actions and realistic availability of alternatives. (<https://www.repository.cam.ac.uk/bitstreams/75916920-51f6-4f9c-ade5-52cbf55d5e73/download>) It does not bode well for the aviation sector nor shipping. With goods entering this country being heavily restricted and the prospect of manufacturing looking more bleak, then the plans based around the East midlands Airport area may not be realistic.

### **Section 4**

The housing requirements for NWLDC have been considerably increased (nearly 90%) by the enforced co-operation policy with Leicester City Council. I note that recently Coventry City Council successfully



challenged the housing figures being imposed upon them by government. Have the underpinning assumptions been challenged to be sure that housing requirement calculations are correct? If housing is needed in Leicester City, then how does meeting that housing need in areas of different character and about 15-20 miles away necessarily help, especially if we use our agricultural land to provide this housing, and inconsideration of Net Zero targets.

Population growth is currently being driven by immigration, rather than indigenous birth rates. I am aware that the UN has a policy to encourage international migration, but will migrants always see the UK as attractive if we are unable to provide reliable food and energy and materials for development.

4.2 and 4.3

The sentence describing Sustainable villages is incomplete.

The hierarchy table is likely to lead to some confusion as villages are mentioned and the boundaries for these is not clear, unlike for example, Parish boundaries.

4.32 says that Local Housing needs Villages do not have limits to development, so understanding the boundaries for each village will be important here.

4.33 The 'undeveloped countryside' is a poor term for our vital agricultural land that produces our food. It is developed.

Section 5

This section seems confused and subjective at times as it covers quite a few topics. 5.3 highlights this as it could be interpreted as aiming to provide flooding.

I see the NPPF doesn't help here as the term **beautiful** is somewhat highlighted – beauty is in the eye of the beholder. (5.4) Tree lined streets are a lovely aspiration if the streets are wide enough, the trees are well chosen, and their management considered with respect to the lifespan of a tree outliving the lifespan of most policies. Greenspace planting should be encouraged – shrubs, bushes and hedges can meet many of the ecological enhancements of trees. Trees are good but they are not the only planting options that should be considered.

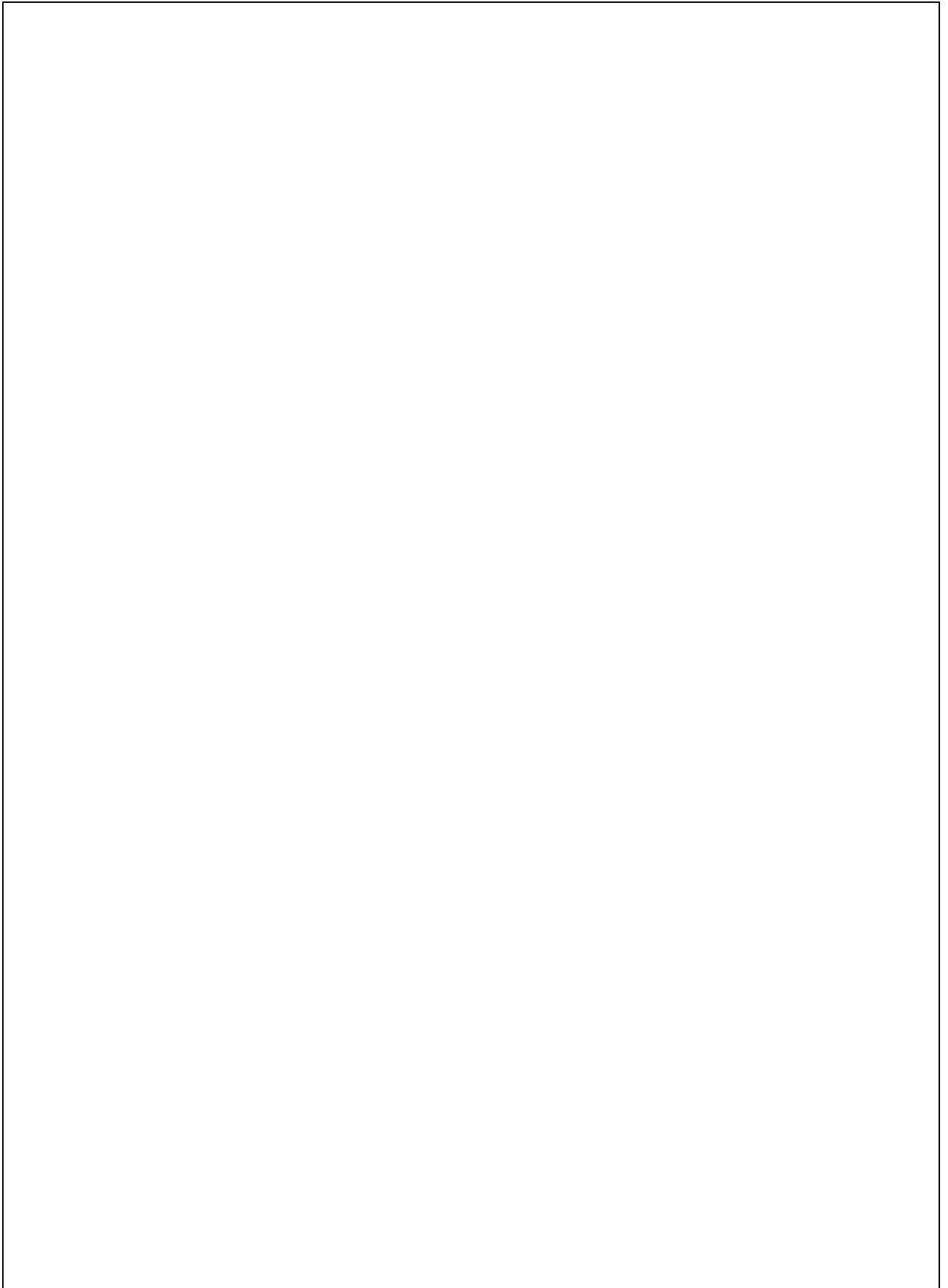
Amenity aspects:

5.9 Lighting – please can you also consider the spectrum of light being used being appropriate to the natural patterns Blue light is dominant from dawn till just past midday and then it changes to red light dominance at night. Night light should be more red-orange than the blue that is commonly used with LED lighting. LEDs can emit a range of colours now, and exposure to blue light at night has negative health effects for both humans and nature.

Renewable energy:

5.11 Renewable energy technologies use input energies and convert them to electrical energy. Examples include solar panels and wind turbines. Heat pumps need electricity to work and so are not a renewable energy technology; they are a low carbon technology. Confusing these ideas does not give confidence in the overall plan.





## 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: Siobhan Dillon

Date: 17<sup>th</sup> March 2024

### **DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT**

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Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk) or Planning Policy Team, NWLDC, 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: Arable land in NWLDC and additional Consultation Comments  
Date: 27 March 2024 15:57:06

---

Dear Sir,

Please can you tell me about the amount of agricultural land in NWLDC. Is the area available monitored and if so how and when?

My question is prompted by seeing that your Policies Planning consultation document states in 4.33 that the arable land of NWLDC is mostly arable. My perception within the area in which I live is that agricultural land is mostly pastureland and this is increasing.

If it is still possible to add a few more comments to the consultation then I add them below (they all relate to the Policies document):

- 4.33 States Agricultural land is mainly arable – how is this statement ascertained?

#### **AP9 Water Efficiency**

- 5.79 – Looking at the report, it seems a huge amount of the country is within the high water stressed category. This seems a ‘broad brush’ categorisation. Does Severn Trent provide a clearer understanding about how NWLDC is water stressed? Is this due to infrastructure failure, too much development or rainfall issues?

Is the use of BREEAM Wat 01 Calculator approved assessors providing another opportunity for scams/bribes/squeezing the small developers?

Should we be looking to understand the true reasons for the high water stress? Or even if the category is appropriate to NWLDC.

#### **H6 Affordable Housing Rural Exception Sites**

This appears as a laudable proposal. Please consider the criteria/guidance used very carefully so that this policy is not abused.

#### **H7 – Self Build/Custom Build**

Please bring more clarity about who can be on the register and how it is to work

- 6.61 – Self build register – following the definition highlighted in 6.59 that self-build/custom built houses are to be occupied by those individuals involved in building them:
  - do these people all have to live in the houses they get to build?
  - can one individual register for more than one home?  
(this does not seem to be the case currently)
- 6.62 – Who registers for self-builds plots? Individuals who wish to buy or developers? Is this section about matching those on the register with those that wish to build?
- 6.69 – Does this section encourage people to register as self-build when they have no real interest, therefore the site is left for a suitable period to then become a market property.
- **H7(3)** The plots should remain self-build and not be converted to market plots.

Yours faithfully,

Siobhan Dillon







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Please complete both Part A and Part B.

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	Personal Details	Agent's Details (if applicable)
Title	MRS	
First Name	PAT	
Last Name	MCCREYNOLDS	
Job Title (where relevant)	/	
Organisation (where relevant)	/	
House/Property Number or Name	[Redacted Address]	
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?  WEST OF WHITWICK. 500 Homes		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)

The above

also

South of Church Lane New Swainby C48

283 homes.

Open fields behind Brooks Lane + Thornborough Road

783 Extra homes ie 1600 extra cars

possibly.

The Roads are OVERLOADED now.

Queuing severely at 9 AM and 3 PM and 5-6 PM  
Could not possibly cope with more traffic



To build this amount of houses would be so detrimental to the environment.  
Newts found near of Brooks here where there are 4 ponds.

The fields where this proposal shows are constantly flooded!

But the main concern is the sewer road highways situation.

No way could these lanes cope with 1000 or less extra vehicles

and buses, doctors, delivery already overloaded

plus no improvements happen in Coalville to cope either. The queues up to be

Choc Tower ARE HORRENDOUS NOW  
Please reconsider the immense volume this would create.

## 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:

15/3/2024

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Planning Policy Team, NWLDC, PO Box 11051, Coalville LE67 0FW**

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



NB - EMAIL ADDRESS NOT ACCEPTING EMAILS

Draft North West Leicestershire Local Plan 2020-2040 Consultation (February - March 2024)

THIS DOCUMENT WAS HAND DELIVERED SUN 17/3/24



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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Richard	
Last Name	Derbyshire	
Job Title (where relevant)	Agronomist	
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.**

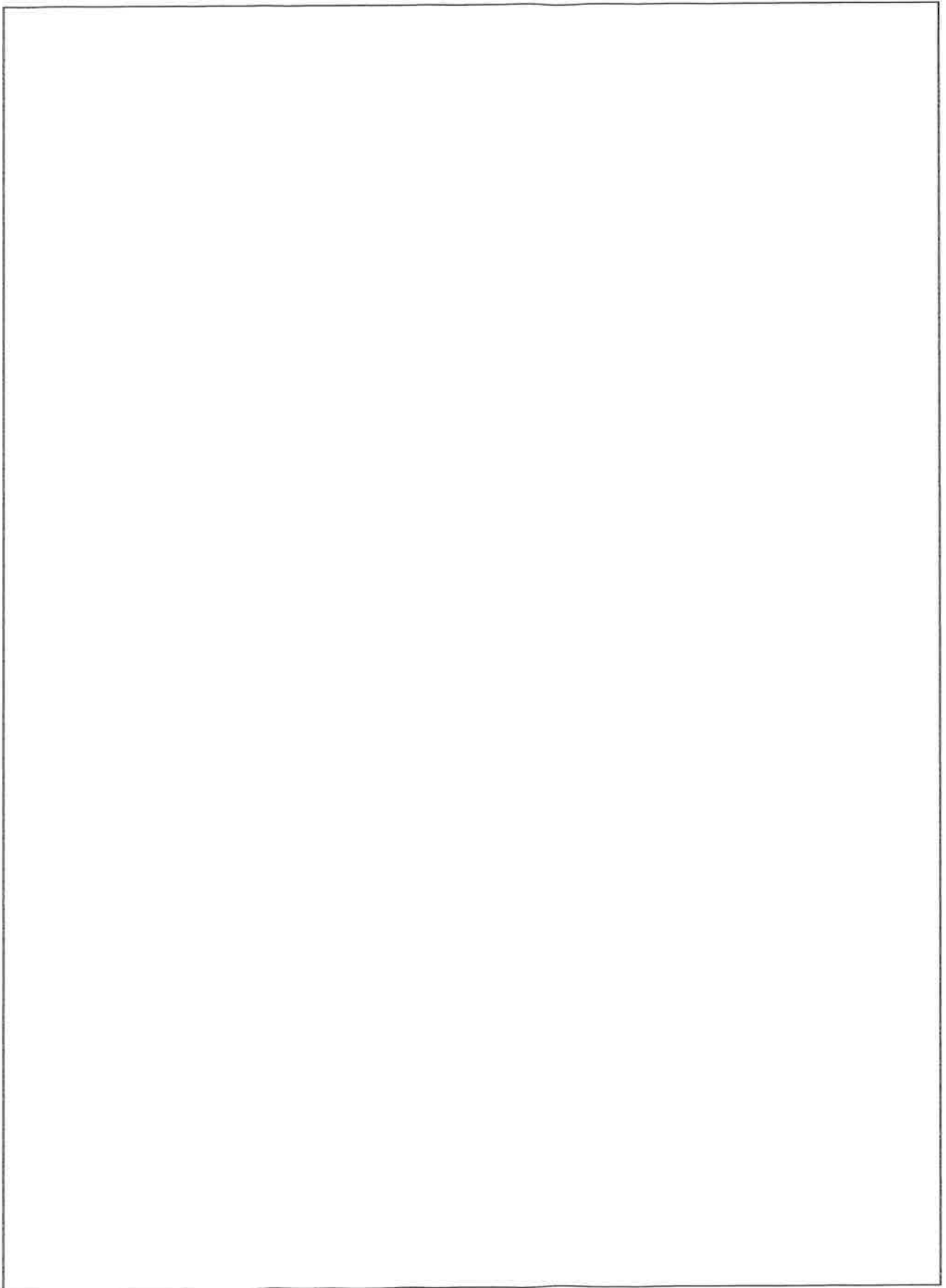
1. To which consultation document does this representation relate?		Proposed policies
	Y	Proposed housing and employment allocations
	Y	Proposed Limits to Development Review

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

Objection to development behind Thornborough Road and Brooks Lane, Whitwick, Leics

- Separation of Whitwick from Coalville – the development would mean the loss of the green space of agricultural land that separates the village of Whitwick from the town of Coalville.
- Drainage – the addition of 783 houses with the extra roofing, roads and hard landscaping would have a detrimental effect on the existing drainage system and the stream flowing down towards Grace Dieu woods.
- Loss of habitat – the loss of hedges, trees and agricultural land would negatively affect the wildlife we have in the area. We have seen deer, geese, buzzards, herons and all manner of native wildlife in the area that will have their habitat removed permanently.
- Extra traffic – the small road of Church Lane could not take the extra traffic involved with this development. The traffic now is terrible at school drop off and pick up time. Parking for those who drop off at school is very poor, the road is basically impassable in these busy periods, how will the roads cope with the extra traffic from 783 houses?
- Facilities – where are the extra places needed for the schools, doctors, playgrounds? We have seen our local doctors swamped in Hugglescote by the massive development in that area.
- Visual – the negative effect of adding 783 houses to what is now arable or grassland agricultural land will be massive. We will become an extension to the town of Coalville, not a separate village of Whitwick.



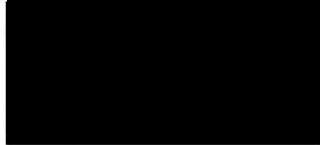


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I acknowledge that I have read and accept the information and terms specified under the Data Protection and Freedom of Information Statement.

Signed: R Derbyshire



Date: 17/3/24

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	Personal Details	Agent's Details (if applicable)
Title	Mrs	
First Name	Alexandra	
Last Name	Derbyshire	
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
	Y	Proposed housing and employment allocations
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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.

Objection to development behind Thornborough Road and Brooks Lane, Whitwick, Leics  
C48, C78, C81, C47, C77

- Damage to the environment – in the 21 years we have lived at this address we have seen much wildlife including hedgehogs, newts, deer, bats, geese, buzzards and herons. At night we used to hear owls ranging from screech owls to tawny owls. We have noticed that as there has been continued development and the loss of their habitats and hunting grounds we are seeing and hearing a significant decrease in the evidence of wildlife.
- Loss of an established wildlife habitat – area C78 was, in the last 20 years set up as a dedicated wildlife area with work completed by a local wildlife landscaper (Steven Brooks I believe). The area consists of wild grassy areas, mature trees and wildlife ponds. This is an area identified for building and would be to the devastation of the local wildlife.
- Drainage and flooding risk – if building is allowed to go ahead on this area the impact of hard landscaping, roofs, drives, roadways and the associated run-off and pollution will devastate the stream and local ponds. Additional drainage will of course be utilised but that just moves the problem further downstream and will then generate the need for further flood defences, a potentially avoidable cost.
- Separation of Whitwick from Coalville – the development would mean the loss of the green space of agricultural land that separates the village of Whitwick from the town of Coalville. As a population we are already living too closely together which in turn has a significant detrimental effect on the mental wellbeing of residents putting a further strain on our already creaking health and welfare provision.
- Extra traffic – the small road of Church Lane could not take the extra traffic involved with this development, even if it was built up over time. The traffic now is terrible at school drop off and pick up time. Parking for those who drop off at school is very poor, the road




is basically impassable in these busy periods, how will the roads cope with the extra traffic from 783 houses and to extend or widen the roads would further rip up hedges, fill up natural drainage ditches and annihilate valuable local eco-systems that take decades to establish.

- Visual – This area will become an extension to the town of Coalville, not a separate village of Whitwick or New Swannington. We are already reliant on grain and other foods to be shipped in from Europe and overseas. Ripping up farming land for building houses that hardly anyone can afford (yes, you are going to include some 'affordable' housing) is a shortsighted approach to a problem of over population that needs greater consideration. Keep farming land for producing food or (if it's poor ground consider solar panels under planted with wildflower mix to encourage and support wildlife and the local eco-system.

### **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 

Signed: A. Derbyshire 

Date: 17 March 2024 (14:45)

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Planning Policy Team, NWLDC, PO Box 11051, Coalville LE67 0FW**

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	<b>Personal Details</b>	<b>Agent's Details (if applicable)</b>
Title	MRS	
First Name	CHRISTINE	
Last Name	JORGENS	
Job Title (where relevant)		
Organisation (where relevant)		
House/Property Number or Name		
Street		
Town/Village		
Postcode		
Telephone		
Email address		



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Signed:

Date:

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Planning Policy Team, NWLDC, PO Box 11051, Coalville LE67 0FW**

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Dear Sirs / Madam.

I am writing to object to the proposal due listed on the next page.

This is not a good idea the roads can not handle any extra loads as per household all have 2 cars, these roads have not changed in twenty years.

There is no infrastructure in place, no extra doctors surgery's, no longer schools dentists, shops its absurd you should be even contemplating this. Try driving up

Thornborough Road at 8.45 am on weekdays

It took me 25 mins from Breckles Lane to

reach Coalville end that is new with volume of traffic same at 3.15. School is out at

New Swannington Lane is jammed with cars.

The drainage is always getting blocked because of Victorian piping. So NO

I cannot agree to this development.

More houses everywhere and Coalville has nothing to offer.

Regards. E. Jagers

PS. You held meeting in Whitwick March 15 and want response in by Mar 17. Not everyone has computers. So ridiculous. Think pensioners don't have computers



**PART B – Your Representation**

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		Proposed housing and employment allocations
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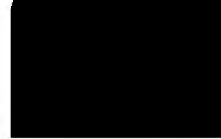
(Continue on a separate sheet /expand box if necessary)

Re: South of church lane  
New Swannington  
(C48)  
C 47  
C 77  
C 78  
C 86  
C 81

My Vote for all these is a 100.  
My Rates have gone up and I see nothing  
changing. Per. Year bin idea its ridiculous  
as to expense involved with that is so  
Refuge works are decay as they  
are.

NWLDC.  
PO Box 11051  
Belvoir road  
Coalville  
LE67 0FW

Mr Wykes



Planning Office

15.March.2024

Local Plan

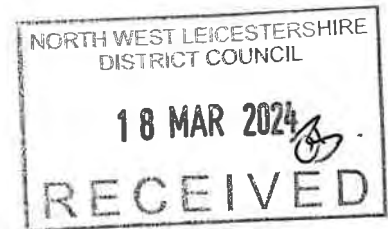
Dears Sirs,

In response to the Local Plan comments and concerns below.

This page and continuation page.

Awaiting your reply and thank you in advance.

Yours sincerely.



**Document:- Proposed Policies for Consultation [184 pages]**

- 3. Background to The Local Plan..... Paras. 3.5 & 3.23  
. Argue that over-development is suffocating us – both Freeport & Isley Woodhouse.
- 4. Strategy..... Paras. 4.4 – 4.17  
. Paras 4.4-4.12 Argue that 686 houses p.a. is unrealistic.  
. Paras 4.15-4.17 Argue that Strategic Distribution requirement is unrealistic
- 5. Creating Attractive Spaces.....[Renewable Energy].....Para. 5.33  
. Argue that new build must have solar panels on roofs.
- 6. Housing..... Para. 4.109  
. Argue that Isley Woodhouse wrong development. Wrong place.
- 7. The Economy.....Policy Ec1 & Ec2.....Paras. 7.19 & 7.20  
. Argue Policy Ec1 & 2 should not be changed [development in countryside]

**Document:- Proposed Housing and Employment Allocations For Consultation [90 pages]**

- 3. Housing Completions and Commitments..... Para. 3.7  
. Argue not logical to put so many houses in north of county.
- 4. Housing Allocations.....[Isley Woodhouse].....Paras. 4.101-4.116  
. Argue against Isley Woodhouse



5. General Needs Employment Allocations...[Small/medium warehouses]..... Para. 5.1. to 5.4  
. Argue not logical to build so many industrial units in north of county.
6. Potential Locations For Strategic Distribution.....[Big Sheds B8]..... Para. 6.1 – 6.10.  
. Argue against development of EMA/Segro/Freeport land.

**Document:- Draft Local Plan**

General Comments

Plan concentrates too much development around MI J24, 23A and EMA.  
Does not properly address issues of over-development.  
Does not properly consider adverse implications to infrastructure.  
Does not address issues of loss of farmland, food production or agriculture.  
Does not properly justify baseline modelling used to calculate housing and employment land requirements.  
Far too complicated for most people to easily navigate to make specific references.

**Isley Woodhouse**

Inappropriate Location [No separation from village]  
Cumulative Development Overwhelming around Diseworth  
Flood Risk  
Damage to Community. Quality of Life. Mental Health.  
Legacy:- Future generations.  
Loss of heritage, countryside, amenity and farmland.  
Pollution: Light. Noise. Air. Water.

Document. **Proposed Policies for Consultation.**

Refer to:- Section 4. 'Strategy', Policy S1 and Section 6, 'Housing', Policy H1.

Document. **Proposed Housing and Employment Allocations For Consultation.**

Section 4. 'Housing Allocations'.

**Freeport/EMA/Segro**

Document. **Proposed Policies for Consultation.**

Reference:- Section 4. 'Strategy'. paras. 4.15 to 4.17. and Section 7. Policy Ec2(2)

Document. **Proposed Housing and Employment Allocations.**

References:- Section 5. 'General Needs Employment Allocations'

Section 6. 'Potential Locations for Strategic Development'. Policy Ec2.

From: [REDACTED]  
To: [REDACTED]  
Subject: RE: EXTERNAL: Draft Local Plan public consultation response and objection  
Date: 22 March 2024 11:00:43  
Attachments: [nwleics02.jpg](#)  
[nwleics02.jpg](#)  
Letter - Draft Local Plan Consultation WPC Response 22.03.2024.pdf

Good morning,

Thank you for the email below and information regarding submitting our comments to the draft Local Plan consultation. Following our Full Council meeting last night, Whitwick Parish Council would like to submit the attached response for consideration within the consultation process. If you are able to confirm receipt, that would be appreciated.

Best regards,  
Sharon

**Sharon Kaye, Parish Manager**  
Whitwick Parish Council



Community Office, 3a Market Place, Whitwick, Leics LE67 5DT  
Tel: 01530 459527 [REDACTED] [www.whitwickpc.org.uk](http://www.whitwickpc.org.uk)

**Open on Wednesdays 1 – 4 pm & Thurs/Fridays 10 am – 1**

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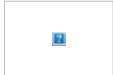
**From:** PLANNING POLICY <PLANNING.POLICY@NWLeicestershire.gov.uk>

**Sent:** 15 March 2024 16:42

**To:** clerk@whitwickpc.org

**Subject:** RE: EXTERNAL: Draft Local Plan public consultation response and objection

Thank you for your email and we note your intention to respond to the Local Plan consultation. Your response must reach us by 11:59pm on Friday 22 March. It must either be emailed to [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk) or posted to North West Leicestershire District Council, PO Box 11051, Coalville, LE67 0FW. **Please note that our online consultation response form will not be available past 11:59pm on Sunday 17 March (the official end of our six week consultation period).**



**Planning Policy and Land Charges Team**

[planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk) | [www.nwleics.gov.uk](http://www.nwleics.gov.uk)

**From:** clerk@whitwickpc.org <clerk@whitwickpc.org>

**Sent:** Friday, March 15, 2024 12:33 PM

**To:** PLANNING POLICY <PLANNING.POLICY@NWLeicestershire.gov.uk>

**Subject:** EXTERNAL: Draft Local Plan public consultation response and objection

Good afternoon,

I am writing to inform you that in response to the consultation, Whitwick Parish Council wish to comment on the local plan.

Further details will follow next week.

Best regards,

Sharon

**Sharon Kaye, Parish Manager**  
Whitwick Parish Council



Community Office, 3a Market Place, Whitwick, Leics LE67 5DT

Tel: 01530 459527 Mobile: 07787 588760 [www.whitwickpc.org.uk](http://www.whitwickpc.org.uk)

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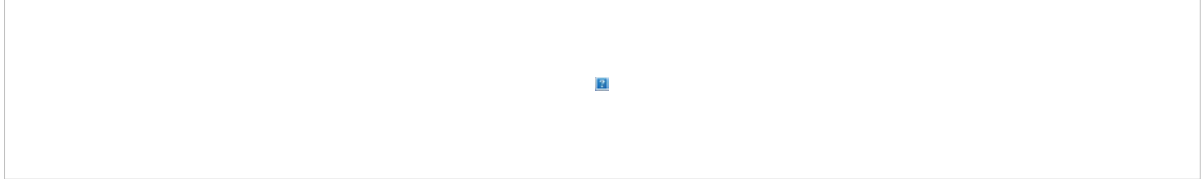


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*Parish Manager: Sharon Kaye,  
Community Office, 3A Market Place, Whitwick, Leics, LE67 5DT  
Tel: 01530 459527  
Email: [clerk@whitwickpc.org](mailto:clerk@whitwickpc.org) Website: [www.whitwickpc.org.uk](http://www.whitwickpc.org.uk)*

22<sup>nd</sup> March 2024

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

Dear Sir/Madam

### DRAFT LOCAL PLAN CONSULTATION FEEDBACK

Further to our email correspondence with you on Friday 15<sup>th</sup> March 2024 regarding the official Whitwick Parish Council **response to your 'Draft Local Plan'** consultation please find below our concerns about the proposals to develop the land for housing on the areas: -

C47, C77, C78, C81 and C86 - Broad Location West Whitwick and  
C48 - South of Church Lane, New Swannington

- The fields proposed retain significant amounts of flood water. Where will this go?
- The roads are unsuitable for heavy traffic.
- The school in New Swannington takes children from the local area but also from outside areas too.
- Church lane is extremely busy and also dangerous at school drop off and collection times.
- There is very little footpath and it would be impossible to make this safe for children to walk.
- Traffic travels along the lane far faster than the speed limit.
- The current infrastructure will not support 500 additional homes with an extra 300 proposed in C48.
- The lanes surrounding the areas are flooding on a regular basis, so already having an impact on the existing homes.

*Working For OUR Future*

- Where will this excess water go if 500+ homes and a further 300 in C48 area are built on already flooding areas?
- All sewage and waste water will travel down an already unsuitable system towards Osgathorpe. There are currently significant problems with sewage escape and flooding in the Grace Dieu Valley; this infrastructure will not cope with additional pressure.
- The Thringstone fault runs through a significant part of this area.
- There are disused mine shafts within these boundaries.
- The agricultural fields are prime arable land. Food security depends on us having sufficient arable and grazing land.
- The areas were designated countryside and offered enduring protection during the process for developing the current Local Plan. That plan was examined and passed by the Planning Inspectorate and so the proposed protections were robust.

#### C92 – Former Hermitage Leisure Centre, Silver Street, Whitwick

- The consultation and presentation to the residents of Whitwick were disingenuous to say the least.
- The car parking was given to residents and businesses in perpetuity as a buffer to the double yellow lines being introduced.
- This plan will leave very little parking. On match days, the car park is overflowing now. Once the new homes are built, residents and their visitors will utilise much of the available parking.
- **The residents were promised 'a few bungalows for old people'.** This has now **changed to 'around 32 homes'**. According to the allocation policies of NWLDC, these homes cannot be allocated as housing for the elderly as the points system in force means they go to those who fulfil the criteria and score the highest points.
- The leisure centre was designated a community asset; there is very little asset to another building site.

#### C46 – Broom Leys Farm

Whilst this development is on the border of our parish, it is of great significance.

- This forms part of the precious 'Eastern Green Wedge' which NWLDC spent tens of thousands of pounds of public money defending in the previous application for Stephenson Green. Any erosion of this protection would be viewed very seriously by the Parish Council, the residents of Whitwick and the members of Whitwick Action Group.
- This area of separation has been protected to the highest level with the decision going to Public Inquiry and Judicial Review. Therefore, the designation is very robust.



- The roads next to Broom Leys Farm are already overwhelmed. Where would a safe entrance and exit go? No traffic could go onto Broom Leys Road and turn right to join Stephenson Way; at peak times the queue is back to the hospital and the exit to the Buckingham Road estate is almost opposite.
- There have been accidents resulting in fatalities at the Broom Leys Road/Stephenson Way junction.
- Any further degradation of Stephenson Way by putting further entrance/exits onto it, would render it redundant as a bypass.
- This is also first grade agricultural land, threatening our food security and biodiversity.
- We also wish to reiterate that any waste water would travel down through our village, putting the Grace Dieu Valley at even greater risk of flooding.

The concerns expressed above were also shared by high numbers of residents from within our village that attended drop-in sessions we hosted in order to help members of our community understand the local plan document and consultation process.

Yours sincerely



Susan Colledge  
Chair of Whitwick Parish Council

From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: EXTERNAL: Draft Local Plan Consultation: Proposed Limits to Development for Consultation.  
Date: 22 March 2024 14:56:33

---

Re: Draft Local Plan Consultation: Proposed limits to Development for Consultation.

Firstly, I would like to raise my extreme disappointment about the way in which this consultation has been conducted. This Consultation was not conducted with Inclusivity in mind, which raises the question whether there was an ulterior motive for not wanting residents to voice their views. The Council needs to review its processes for engaging the public.

I would like to raise my objections to the proposed development of land which has previously been identified as 'areas of separation' or 'green wedge' land. NWLeicestershire are renegeing on its commitment to maintain these areas of separation.

In particular, I am opposed to the development of the fields off Thornborough Road. Nothing has changed from when there was a planning application for development by Gladmans in 2016/2017, which was refused. There are safety concerns regarding any proposed access via Spring Lane or Thornborough Road. Spring Lane is a narrow lane which would not be able to cope with additional traffic and would be a death trap. Thornborough Road is extremely busy, particularly at peak times. The road infrastructure in the vicinity is already stretched with traffic queuing along the A511, Spring Lane and Thornborough Road. The development of 200+ houses would be likely to create an extra 400-500 daily vehicle movements. This would be devastating for the local area as it will not be able to cope and there would be gridlock.

Flooding is a major concern. These fields, which are on a slope, flood on a regular basis during heavy rainfall and there is currently a lake of water at the back of the existing Thornborough Road houses as well as other pools long the boundaries of Thornborough Road. This will only be exacerbated by building on these fields. How would Severn Trent address these issues?

The loss of the countryside would be huge. The area currently provides the much-needed separation between Swannington, Coalville and Whitwick and should remain so. Such proposed development would join up all these areas. There has already been too much building around the Coalville area destroying the countryside. Residents do not want it, and there has to be a balance of open space and housing. Councillors are just temporary custodians of countryside and should respect residents opinions.

Susan Conti  
[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](http://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	Nick	
Last Name	Wakefield	
Job Title (where relevant)	Planning Specialist	
Organisation (where relevant)	The Environment Agency	
House/Property Number or Name	Trentside Offices	
Street	Scarrington Road	
Town/Village	Nottingham	
Postcode	NG5 2FA	
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.

In our response to the Local Plan Review: Development Strategy Options and Policy Options (DSO&PO) consultation (our letter dated 10 March 2022), we advised that the wording of **Objective 3 (page 9 of 'Proposed Polices for Consultation' (PPfC) document) be amended to read "Conserve ~~and~~, enhance and extend the districts natural environment...". This change has not been made and we advise again this is done to reflect the requirements of Biodiversity Net Gain (BNG).**

### Policy AP3 – Renewable Energy (Strategic Policy)

As stated in our response to the DSP&PO consultation we recognise that renewable energy is an important part of the solution to reducing greenhouse gas emissions and meeting future energy needs. We therefore fully support and welcome the inclusion of this policy.

In the previous consultation we stated our support for sustainable renewable policies, as long as they do not unacceptably impact the environment. Any policy should therefore consider the environmental requirements and support sustainable schemes ensuring that appropriate measures are in place to protect the local environment. We note that para 5.19 of the supporting commentary for Draft Policy AP3 recognises that the provision and benefit of medium and large-scale renewable energy schemes needs to be balanced against the environmental impacts of the proposals. However, this requirement is not included within the wording of Draft Policy AP3 and so we strongly recommend that a bullet point, (d) is added under section (3) to include this requirement.

We understand that the targets included within the DSP&PO consultation have now been updated to reflect the lifetime of the development.

### Policy AP4 – Reducing Carbon Emissions (Strategic Policy)

We strongly welcome and support the inclusion of this section. We recognise the rationale for not repeating in the Local Plan those issues covered by separate regulation. We welcome the order of the Energy hierarchy at para 5.33.



We note the proposed removing of the requirement for a Whole Life Cycle carbon assessment (para 5.29). We would strongly suggest that if at all possible (and as inferred in paras 5.39 & 5.40) this decision is kept under review while further work is undertaken with the aim of the need for such an assessment being required in the future.

#### Policy AP5 – Health and Wellbeing (Strategic Policy)

We welcome the inclusion of this section, particularly para 5.46: Pollution and Climate Change, and wording at section (2) (f) of the Draft Policy.

#### Policy AP7 – Flood Risk (Strategic Policy)

We welcome the inclusion of this section, including the Draft Policy.

Para 5.57. With the exception of the northern most area, large parts of the district lie within Flood Zone 1 and therefore from this respect not at particular risk of fluvial flooding. Therefore the greater part of the district may be at greater risk from surface water flooding, rather than from fluvial flooding.

Para 5.62. We welcome and support the decision to commission a new Strategic Flood Risk Assessment (SFRA). Information and guidance on writing SFRA's can be found in the Adept SFRA guidance [FRS18204 SFRA Good Practice Guide Final Nov2021.pdf](#).

For information, we have provided here the latest fluvial flood model data the Environment Agency holds for the district.

Derbyshire Trent 2021

Hemington, Lockington and Castle Donnington Brooks, JBA, 2022

Grace Dieu Brook, JBA, 2021 (Not yet represented on Flood Map for Planning)

Lower Soar and Tributaries JBA, 2012

Black Brook, Capita Symonds, 2006.

We consider that an additional point under (2) of the Draft Policy should be included and which states the following: "(d) Wherever possible the development helps to reduce flood risk elsewhere, **for example downstream of the development site**".

#### Policy AP9 – Water Efficiency

We welcome the inclusion of this section and are particularly supportive of the wording throughout. We suggest one way in which the supporting commentary could be strengthened would be for it to illustrate those benefits beyond the individual household level, for example:

- Water efficiency measures will contribute to a reduction in the per customer carbon footprint of the water industry which are incurred through the abstraction, treatment, and conveyance of clean and wastewater.
- Water efficiency measures will help ensure sustainable management of existing water network infrastructure by relieving capacity stresses.

Also, consideration should be given for any future version of the report to state that water efficiency measures are required to reduce the associated impact of a growing population accessing an already stressed resource.

Para 5.81. We are pleased to see that the optional standard of 110l/p/d for residential development has been recognised as being required for new residential dwellings in the district **since the area has been classed as 'seriously water stressed'**.

Para 5.86. We are pleased to see that water efficiency in non-residential development will be required to demonstrate that Excellent BREEAM credits for WAT 01 are being targeted.

We fully support the strong and prescriptive nature of the Draft Policy.

Policy Ec1 – Economic Strategy (Strategic Policy) and

Policy Ec2 – Employment Commitments (Strategic Policy)

Whilst not explicitly falling within the remit of the Environment Agency we note that these Policy's are to be included in the next version of the Local Plan. As this will be the Publication version (Regulation 19) we would enquire whether **consultee's will have opportunity to comment on or suggest changes to the Policy wording without the need to 'object' or find it 'unsound' as such.**

Policy IF3 - Green and Blue infrastructure (Strategic Policy)

We welcome the inclusion of this section and have the following comments to make.

We recommend the addition of a paragraph with wording to indicate that Green Infrastructure can be used to deliver BNG.

Para. 9.18. Open space can be used for Sustainable Drainage Schemes (SUDS) to manage surface water. Open spaces can also be used for Natural Flood Management (NFM) schemes to hold back flood water from natural watercourses, to reduce downstream flooding. NFM schemes can also be used for biodiversity benefits such as new wetland areas. Please consider specifically naming these two types of flood risk management for open spaces.

Draft Policy IF3

Whilst it is acknowledged within the supporting commentary that Blue Infrastructure falls within the definition of green infrastructure, it is still disappointing that Blue Infrastructure is not explicitly mentioned within the Draft Policy. A benefit of doing this would be that the following important benefit which *can* be facilitated by the planning regime could be included:

"Opportunities for weir removal and de-culverting should be sought where possible to improve the network of blue infrastructure".



### Policy En1 – Nature Conservation/Biodiversity Net Gain (Strategic Policy)

We welcome this section and have the following comments to make:

Para 10.29. January 2024 should be changed to February 2024 in order to reflect the mandatory go-live date.

**Para. 10.30. We recommend that the last sentence is amended to read: "...habitats will need to be secured, managed and monitored for at least 30 years".**

Para 10.31. We recommend the wording is amended to state the preference for and therefore encouragement for on-site gains.

### Draft Policy En1

We recommend the wording of subsection (b) **be changed to:** "Requiring that development follows the mitigation hierarchy of avoid, minimise, mitigate and as a last resort, compensate." **Doing this would make the requirement consistent with the NPPF.**

**The use of the wording "well located" in subsection (d) is a very generic term and does not give clear direction of what is trying to be achieved (e.g. is it about proximity or strategic significance?). "Well located" could be interpreted to meaning a site where delivery is cheap and easy, but not necessarily the most appropriate.**

Whilst we welcome the draft wording in subsection (e) to ensure that any biodiversity provision will be secured, managed and monitored in perpetuity, this is not consistent with wording in para **10.30, which states 'at least 30 years'.**

### Policy En2 – River Mease Special Area of Conservation (Strategic Policy)

We welcome and strongly support the inclusion of this Policy.

### Policy En6 – Land and Air Quality and Water Quality

We welcome the wording of this section with regards to the attention it gives to land and air quality.

We consider that this section should be expanded to give adequate attention to the issue of protecting/enhancing water quality.

Para 10.72 rightly points out that local planning policies and decisions should "Wherever possible, help to improve local environmental conditions such as air and water quality". Draft Policy EN6 rightly highlights the need to avoid adverse impacts on groundwater quality; however this is not extended to include other controlled waters (rivers, watercourses, and brooks). This is important not least because of the requirement of the Water Framework Directive, for which **LPA's have a statutory duty to deliver**, that development does not lead to the deterioration of the status class of a waterbody.

Water resources

We consider that specific reference to the issue of water resources should be included within this **document, at least within supporting commentary, or ideally within a Policy's wording** – we suggest an expansion of (2) (f) of Draft Policy IF1 would be an appropriate place for this addition.

**The NPPF's policies expect LPAs to adopt proactive strategies to adapt to climate change that** take full account of water supply and demand considerations. Early engagement between local planning authorities and water companies can help ensure the necessary water infrastructure is put in place to support new development.

Specific water resources focussed outcomes include that:

- . There is enough water for people and the environment, taking into account a changing climate.
- . There is early consideration of what water supply and sewerage infrastructure is needed to support climate resilient growth. For example through evidence/commitment of water companies to ensure adequate supply, water efficiency and treatment capacity is available and planned for.

We trust you find the above comments useful.

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: NJ Wakefield

Date: 16 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](mailto:planning.policy@nwleicestershire.gov.uk).

Please send completed forms to [planning.policy@nwleicestershire.gov.uk](mailto: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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	Personal Details	Agent's Details (if applicable)
Title	Mr	
First Name	Nick	
Last Name	Wakefield	
Job Title (where relevant)	Planning Specialist	
Organisation (where relevant)	The Environment Agency	
House/Property Number or Name	Trentside offices	
Street	Scarrington Road	
Town/Village	Nottingham	
Postcode	NG5 2FA	
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.

The Environment Agency has reviewed the proposed allocation sites from the perspective of those issues for which we have a remit. This includes whether, according to the best information available to us, a site may:

- be affected by flood risk. For areas identified in flood zones 2 and 3 this would require submission of a NPPF compliant Flood Risk Assessment being submitted as part of the planning application.
- be in proximity of a Main River of the Environment Agency. Any works within 8m of a Main River may require a Permit from the Environment Agency;
- susceptible to contamination such that redevelopment of the site could pose a risk to controlled waters, for example a historic landfill. Any planning submission would need to demonstrate how the works will not pose a risk of pollution to controlled waters;
- in proximity to a site operated under an Environmental Permit issued the Environment Agency such that the distance to the site may pose either amenity issues for the development or operational issues for the permitted site.

### Important Note regarding flood zones

Where a site has been identified as being within flood zones 2 and/or 3, this is with reference to the current Flood Map for Planning (FMfP). The Environment Agency is currently working on a project to improve our national flood and coastal erosion risk mapping products, one of which is FMfP. This project is known as National Flood Risk Assessment (NaFRA2) and is due to go live by the end of 2024. In preparation for NaFRA2 there is a current pause of FMfP being updated with any new, better modelling information the Environment Agency holds. The consequence of these 2 issues is that once NaFRA2 goes live the flood zones currently shown to be in flood zones 2 and/or 3 may be subject to change. Whilst it is not possible to show currently in map form how the site will be affected by the change in flood zone, we have provided an indication of how we

expect the zoning to change. Sites shown to currently lie within Flood Zone 1 are not expected to be affected by the outputs from NaFRA2.

#### Site allocations and Biodiversity Net Gain (BNG)

Local Planning Authorities should be looking to create a spatial strategy that also highlights opportunity for BNG. Whilst this is likely to be included in the Local Nature Recovery Strategy, any opportunity sites, *including allocation sites*, known at the time of writing the Local Plan should be included.

Once sites have been identified as development allocations, the plan should clearly set out habitats within the site to be protected, opportunities for biodiversity enhancement, and, if known, whether any off-site provision is likely to be necessary to meet proposed DP net gain policy, whilst also delivering the level of development anticipated within the site.

During the site appraisal stage and before selecting which sites to take forward as development allocations in the plan, the following checklist of questions can be considered to identify opportunities for biodiversity net gain:

- **Does the site present significant risks to biodiversity? For example, is it likely to have an impact on high value or irreplaceable habitats? If so, have alternative sites with lesser impacts been explored? Impact on species also needs to be considered.**
- **Has a baseline assessment of existing biodiversity on the site been undertaken including using the Biodiversity Metric?**
- **What development specifications are needed to follow the mitigation hierarchy and deliver biodiversity net gain? Have the types of habitat creation/enhancement that would be most appropriate and their location within the site been identified?**
- **Can the site accommodate on-site biodiversity net gain provision within the scale of development proposed or will off-site delivery be needed?**
- **Are any restrictions needed on the type of development that will be acceptable or parts of the site that should not be developed?**
- **Is there scope for delivering biodiversity net gain alongside other measures (e.g., green and blue infrastructure/sustainable urban drainage) and will such uses be compatible?**

The following are the Environment Agency's comments on the proposed site allocations, with sites for which we have specific comments being listed individually:

#### Land off Leicester Road, Ibstock (Ib18)

The site is immediately adjacent to a Pig farm (Blackberry Farm, grid ref of site entrance SK 41291165) JHE Livestock Ltd, Permit no. QP3336CD).

New development within 400 metres of an existing intensive pig or poultry farm could result in the nearby community being exposed to impacts including odour, noise, dust and flies. The severity of these impacts will depend on the size of the facility, the animals it houses and prevailing weather conditions.



Planning policy requirements (paragraph 193 of the National Planning Policy Framework) state that new development should integrate effectively with existing businesses and not place unreasonable restrictions upon them. Where the operation of an existing pig or poultry farm could have significant adverse effects on new development (including changes of use), the applicant should be required to provide suitable mitigation for these effects. Mitigation can be provided through the design of the new development to minimise exposure to the neighbouring pig or poultry farm and/or through financial contributions to the operator of the farm to support measures that minimise impacts.

Environmental Permitting Regulations require operators to demonstrate that they have taken all reasonable precautions to mitigate impacts of their operations. This is unlikely to eliminate all emissions and there is likely to be residual impacts. In some cases, these residual impacts may cause **resident's** concern. There are limits to the measures that the operator can take to prevent impacts to residents. Consequently, it is important that planning decisions take full account of paragraph 193 of the NPPF. When a new development is built near to an existing intensive pig or poultry farm this does not automatically trigger a review of the permit.

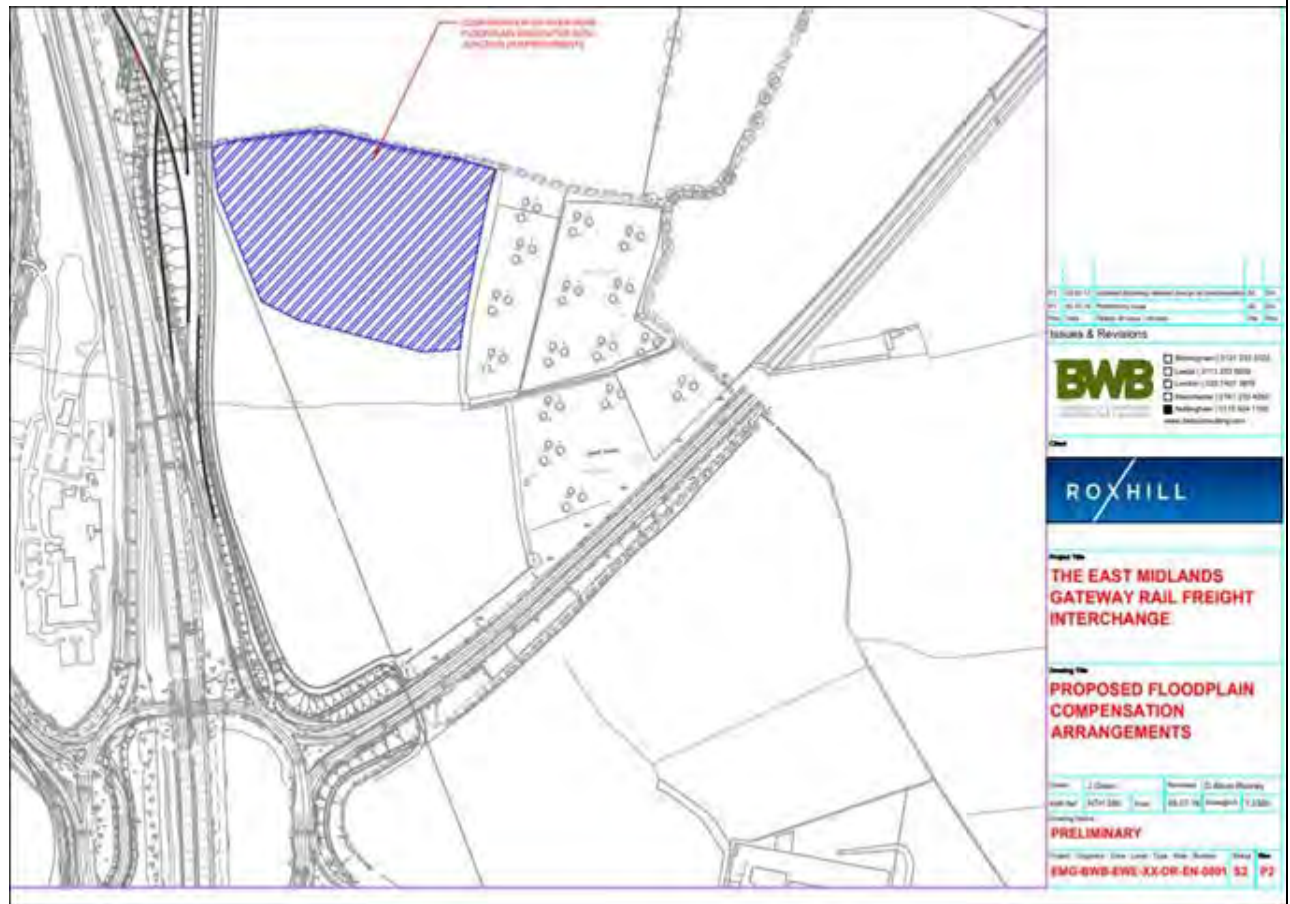
The site lies within Flood Zone 1, with Flood Zone 3 lying approximately 50m at its closest point at the most north-eastern corner of the site.

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

Whilst FMfP currently shows the northern section of the site to be in Flood Zone 3, the Environment Agency has recently accepted a flood map challenge which shows the site to be at lesser flood risk. After NaFRA2 most of the site will lie within Flood Zone 1.

This site includes an area which is an engineered flood storage area for the East Midlands Rail Freight Gateway. The flood storage area is for the River Soar. Whilst the Environment Agency have been unable to find detailed drawings of the flood storage area, we have found reference to it in a report on flood storage areas for the river Trent (please see accompanying document with this submission; page 10, titled "**APPENDIX A – EXTENT OF FLOODPLAIN COMPENSATION PROVISION**"). **The planning application was dealt with** as a Nationally Strategic Infrastructure Project (NSIP), reference IR/DA/NTH209/FPC; the documents are no longer available on the

NSIP website.



Land at Lily Bank (C74)

The Western most side of the site lies within Flood Zone 3 (within the floodplain of the Grace Dieu Brook, a Main River of the Environment Agency). This will remain the case once NaFRA2 goes live. The remainder of the site lies within Flood Zone 1.

New Settlement: Isley Woodhouse (IW1)

The western most edge of the site currently lies within Flood Zone 3. It is anticipated the extent of Flood Zone 3 will increase to a small extent once NaFRA2 goes live. There is also a small amount of land lying within Flood Zone 3 on the eastern edge of the site. There are ordinary watercourses within the site boundary. The rest of site is Flood Zone 1.

Church View, Grange Road, Hugglescote (C61)

A significant portion of the site, approximately half is currently shown to be within Flood Zones 3 and 2, and which is associated with an ordinary watercourse running through the site.

Appleby Magna (AP15, AP17)

Both these sites lie within Flood Zone 3 on their eastern-most edge.

Land off Ramscliffe Avenue, Donisthorpe (D8)

The site lies within Flood Zone 1. The site is identified as being underlain by an 'active' landfill, according to Environment Agency records. The landfill is referred to Church Road Landfill Site (Leicestershire CC) (A07: Industrial Waste Landfill (Factory curtilage)), License no:



EA/EPR/VP3796FA. As well as sites with on-going operations, an 'active' landfill is also the term used for a site which has ceased operations but the license for which has not been surrendered by the operator. We note that in response to a 2004 planning application the Environment Agency did refer to a landfill being on site. However, we do recommend that further enquiries are made to the Environment Agency regarding the status of this site prior to it being considered as a site for redevelopment.

North of Standard Hill, Coalville (C50)

This site has an ordinary watercourse along its western boundary. There is also a closed landfill on the western side of the site, and which is known to have taken road construction material.

Money Hill, Ashby-de-la-Zouch (A5)

The vast majority of this site lies within Flood Zone 1. The site appears to contain a small element of Flood Zone 2 along the western boundary and a historic landfill located approx. SK 36053 18359.

Former Hermitage Leisure Centre, Silver Street, Whitwick (C92)

The site lies with Flood Zone 1. The western edge of site appears to be underlain by a historic landfill.

The following sites lie within Flood Zone 1

Employment Allocations:

Land West of Hilltop Farm, Castle Donnington (EMP89)

Land to the East of Midland Road, Ellistown (EMP24)

Land at Burton Road, Oakthorpe (EMP60)

Housing Allocations:

Broom Leys Farm, Coalville (C46)

Land at Heather Road, Ravenstone (R12)

South of Church Lane, New Swannington (C48)

Land at junction of Wash Lane and Coalville Lane, Ravenstone (R17)

Land North of Park Lane (CD10)

Land South of Park Lane (CD10) – this site has an ordinary watercourse running through the it.

Land at School Lane, Oakthorpe (Oa5)

Burton Road, Ashby (A27)

Sweethill Lodge Farm, Moira (Mo8)

Land adjacent Sparkenhoe Estate, Heather (H3)

Land South of Normanton Rd, Packington (P4)

Lane at Leicester Road, Ellistown (E7)

Land at 186, 188 and 190 London Road, Coalville (C83)

Strategic B8 Sites:

Potential Locations for Strategic Distribution: Land north of J11 A/M42 (EMP82)

Potential Locations for Strategic Distribution: Land south of East Midlands Airport (EMP90(part))

Sites West of Whitwick (C77, C78, C81, C86)

Site West of Whitwick - this site has an ordinary watercourse running through the it.

#### 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: NJ Wakefield

Date: 16 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](mailto:planning.policy@nwleicestershire.gov.uk).

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

- 1.1 This report provides details of the floodplain compensation works that are proposed to serve the East Midlands Gateway (EMG) Strategic Rail Freight Interchange scheme.
- 1.2 This report is prepared in order to discharge Schedule 2 Requirement 18 of the Development Consent Order (DCO) in its entirety.
- 1.3 The Requirement states that any development within the floodplain such as the proposed rail freight connection and improvements to junction 24 of the M1 cannot commence until the appropriate floodplain compensation arrangements have been approved and implemented.

## 2.0 DCO APPLICATION

- 2.1 The floodplain compensation works submitted as part of the DCO application were detailed within the following documents:
  - Environmental Statement submitted as part of the DCO Application Documentation (Document no 5.2 - Chapter 8: Water Resources & Drainage). Appendices to this Chapter include the following documents:
    - Appendix 8.1 - Flood Risk Assessment by BWB Consulting (Ref: NTH/209/FRA Rev A)
    - Appendix 8.5 - Technical Note: Hydraulic Modelling by BWB Consulting (Ref: NTH/209/TN01 Rev A)
    - Appendix 8.6 - Technical Note: Hydraulic Modelling by BWB Consulting (Ref: NTH/209/TN03 Rev A)
  - Flood Risk Statement of Common Ground - Environment Agency (Document No 7.4 dated July 2014)
- 2.2 The above documents were agreed with the Environment Agency (EA) as confirmed in the Statement of Common Ground.
- 2.3 As per the original submission, the compensation works can be separated into proposed works that affect the River Trent floodplain and those that affect the River Soar floodplain. This report covers in detail the hydraulic modelling that has been carried out of the detailed design in support of the floodplain compensation works related to the River Trent floodplain.



### 3.0 FLOODPLAIN COMPENSATION – APPROVED SCHEME

#### Railway Embankment – River Trent Floodplain

- 3.1 The proposed railway infrastructure that will connect the rail-served warehousing on site to the existing rail freight line south of the A50 passes through an area of floodplain associated with the River Trent. The railway will be constructed on an embankment that will result in a loss of potential floodplain storage volume as shown in **Figure 3.1**.

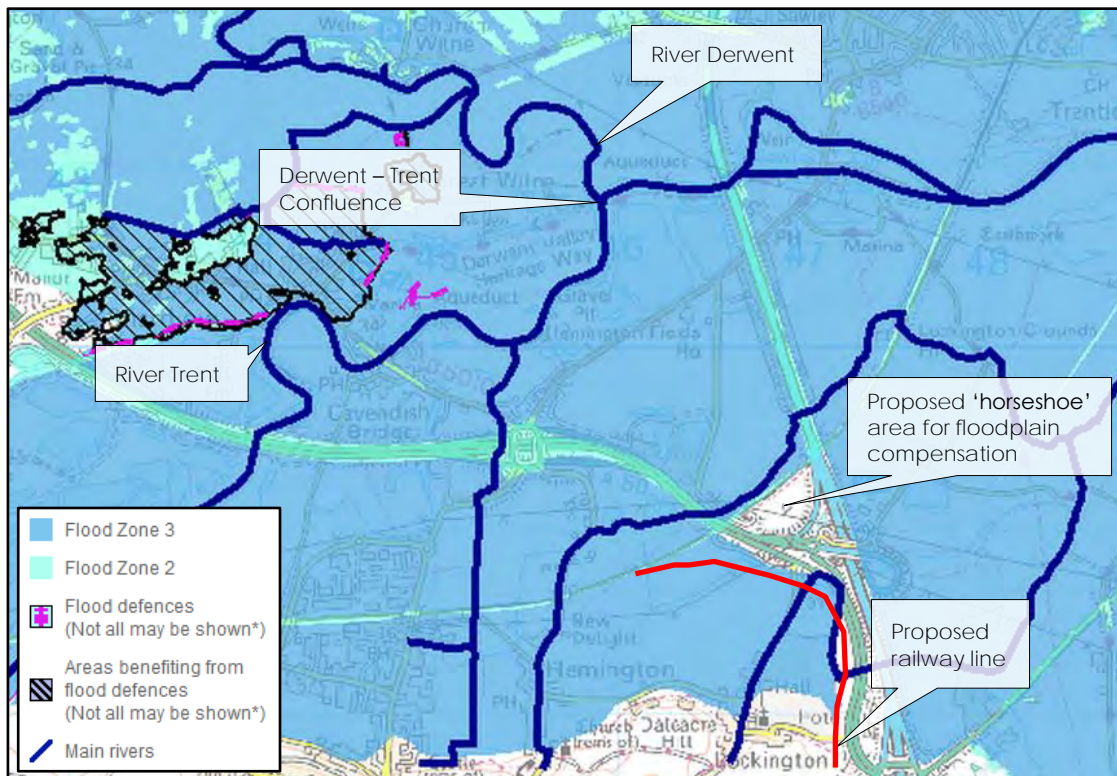


Figure 3.1 – Existing River Trent 100 Year (+20%) Floodplain Extent

- 3.2 The appropriate flood level for the 100 year (plus 20% for climate change) from the River Trent in the location of the proposed railway line is reported to be 32.3m AOD. The submitted floodplain compensation scheme was completed based on the principle of direct level-for-level floodplain compensation, replacing the volume displaced at 100mm slices. For lower elevations it was agreed that the only viable means of compensation was to lower areas of Lockington Park, which is already considered to be within the floodplain.
- 3.3 The main bulk of compensation was provided in an area outside of the floodplain north of the A50 and west of the M1 (referred to as the 'horseshoe' area in the submission and in Figure 3.1 above). Again, the principle of this was agreed as part of the statement of common ground.
- 3.4 The submitted volume of floodplain displaced by the outline proposals and the compensation offered as per the Flood Risk Assessment is summarised in **Table 3.1**.

Table 3.1 - Summary of Submitted River Trent Floodplain Compensation Arrangements

Depth Band (m)	Corresponding Levels (mAOD)	Volume in band (m3)		Difference (m <sup>3</sup> )
		Existing	Proposed	
0.0-0.1	32.3	3,738.3	11,224.7	+7,486.4
0.1-0.2	32.2	3,731.3	11,224.7	+7,493.4
0.2-0.3	32.1	3,719.1	11,224.7	+7,505.6
0.3-0.4	32.0	3,698.6	11,224.7	+7,526.1
0.4-0.5	31.9	3,675.8	11,039.7	+7,363.9
0.5-0.6	31.8	3,658.8	10,967.7	+7,308.9
0.6-0.7	31.7	3,642.8	10,901.5	+7,258.7
0.7-0.8	31.6	3,626.2	10,835.5	+7,209.3
0.8-0.9	31.5	3,607.7	10,764.9	+7,157.2
0.9-1.0	31.4	3,574.1	10,646.5	+7,072.4
1.0-1.1	31.3	3,506.8	10,456.3	+6,949.5
1.1-1.2	31.2	3,366.3	9,661.3	+6,295.0
1.2-1.3	31.1	3,137.0	8,996.5	+5,859.5
1.3-1.4	31.0	2,850.2	6,397.3	+3,547.1
1.4-1.5	30.9	2,438.2	4,700.8	+2,262.6
1.5-1.6	30.8	1,739.0	1,803.2	+64.2
1.6-1.7	30.7	1,094.5	1,905.9	+811.4
1.7-1.8	30.6	761.8	0	-761.8
1.8-1.9	30.5	285.8	527.9	+242.1
1.9-2.0	30.4	69.7	0	-69.7
>2.0	<30.3	46.5	0	-46.5
<b>TOTAL</b>		<b>55,968.5</b>	<b>154,504.0</b>	<b>+98,535.0</b>



## 4.0 FLOODPLAIN COMPENSATION – DETAILED DESIGN

4.1 Detailed design of the new railway line has now been completed, and as such, updated floodplain compensation calculations have been carried out, following those principles already agreed. The extent of floodplain compensation works carried out as part of the detailed design are included as **Appendix A**.

### Railway Embankment – River Trent Floodplain

4.2 As part of the detailed design, the overall cross sectional profile and route of the railway embankment have been amended slightly since the previous floodplain compensation arrangements. The volume of floodplain displaced varies from the original submission, and so a summary of the updated values have been included for reference as **Table 4.1**.

Table 4.1 - Summary of Existing Volume of River Trent Floodplain Displaced

Depth Band (m)	Corresponding Levels (mAOD)	Volume of Floodplain Displaced (m <sup>3</sup> )
0.0 - 0.1	32.3 - 32.2	4,062.8
0.1 - 0.2	32.2 - 32.1	4,057.0
0.2 - 0.3	32.1 - 32.0	4,046.0
0.3 - 0.4	32.0 - 31.9	4,025.7
0.4 - 0.5	31.9 - 31.8	4,000.8
0.5 - 0.6	31.8 - 31.7	3,966.8
0.6 - 0.7	31.7 - 31.6	3,917.0
0.7 - 0.8	31.6 - 31.5	3,864.1
0.8 - 0.9	31.5 - 31.4	3,778.3
0.9 - 1.0	31.4 - 31.3	3,678.5
1.0 - 1.1	31.3 - 31.2	3,550.9
1.1 - 1.2	31.2 - 31.1	3,298.0
1.2 - 1.3	31.1 - 31.0	2,904.6
1.3 - 1.4	31.0 - 30.9	2,506.5
1.4 - 1.5	30.9 - 30.8	2,116.6
1.5 - 1.6	30.8 - 30.7	1,532.6
1.6 - 1.7	30.7 - 30.6	964.3
1.7 - 1.8	30.6 - 30.5	665.4
1.8 - 1.9	30.5 - 30.4	244.4
<b>TOTAL</b>		<b>57,180.3</b>

4.3 The design of the compensation has been rationalised given the revised railway design and other elements included in the proposals such as the diversion of the Lockington Brook and Lockington Park Brook. The majority of the compensation remains within the horseshoe area, with some volume for the lower elevations provided in the confines of Lockington Park. Details are provided in **Appendix B**, with specific designs on how the area under the A50 will be modified to allow the horseshoe area to engage included as **Appendix C**.

4.4 During the detailed design process it became apparent that it is unnecessary to amend levels adjacent to Lockington Park Brook to achieve the required volumes, as the area adjacent to Lockington Brook provides adequate level-for-level volume compensation. This area will therefore remain as existing with the added benefit that no construction works are required to form floodplain compensation.

- 4.5 As before, the area designed for floodplain compensation will be allowed to drain down via the diverted Lockington Brook, and the floodplain either side of the railway embankment will be connected via a series of culverts installed under the railway embankment.
- 4.6 There were additional engineering constraints around the underpass of the A50 which meant levels could not be lowered to the original quoted level of 30.9m AOD. The bridge abutments require some level of protection, and through detailed investigations the top of the foundations were shown to be at 30.8m AOD. The proximity of the existing railway also meant that levels could not be reduced within the zone of influence of the embankment to avoid undermining the existing structure.
- 4.7 To this end, the design of the flood conveyance route through the underpass has been altered so that the base is set to 31.5m AOD and is no less than 4m wide. A low retaining feature has been provided to the northern side (railway side) to help retain the existing embankment, maximise the conveyance capacity of the area and minimise any scour effect. The southern side (abutment side) will be formed by the existing bridge abutment.
- 4.8 The revised floodplain compensation arrangements are summarised in **Table 4.2** demonstrating the same principles of direct level-for-level floodplain compensation have been adhered to. Detailed analysis demonstrates the horseshoe area provides significantly more floodplain storage volume than currently exists.
- 4.9 Hydraulic modelling has been used to demonstrate that the updated proposals still ensure that flood risk to the wider area is not detrimentally affected by the proposals. Details of the methodology and changes to the submitted model are summarised in Section 5.0 of this report.



Table 4.2 - Summary of Designed River Trent Floodplain Compensation Arrangements

Depth Band (m)	Corresponding Levels (mAOD)	Volume in band (m <sup>3</sup> )		Difference (m <sup>3</sup> )
		Existing	Proposed	
0.0-0.1	32.3 - 32.2	4,063	9,298	+5,235
0.1-0.2	32.2 - 32.1	4,057	9,298	+5,241
0.2-0.3	32.1 - 32.0	4,046	9,298	+5,252
0.3-0.4	32.0 - 31.9	4,026	9,298	+5,272
0.4-0.5	31.9 - 31.8	4,001	9,298	+5,297
0.5-0.6	31.8 - 31.7	3,967	9,297	+5,330
0.6-0.7	31.7 - 31.6	3,917	9,294	+5,377
0.7-0.8	31.6 - 31.5	3,864	9,290	+5,426
0.8-0.9	31.5 - 31.4	3,778	9,282	+5,504
0.9-1.0	31.4 - 31.3	3,679	9,242	+5,563
1.0-1.1	31.3 - 31.2	3,551	9,114	+5,563
1.1-1.2	31.2 - 31.1	3,298	8,489	+5,191
1.2-1.3	31.1 - 31.0	2,905	7,439	+4,534
1.3-1.4	31.0 - 30.9	2,506	5,960	+3,454
1.4-1.5	30.9 - 30.8	2,117	4,095	+1,978
1.5-1.6	30.8 - 30.7	1,533	2,890	+1,357
1.6-1.7	30.7 - 30.6	964	1,655	+691
1.7-1.8	30.6 - 30.5	665	811	+146
1.8-1.9	30.5 - 30.4	244	238	-6
1.9-2.0	30.4 - 30.3	-	14	+14
2.0-2.1	30.3 - 30.2	-	2	+2
2.1-2.2	30.2 - 30.1	-	1	+1
2.2-2.3	30.1 - 30.0	-	0.5	+0.5
2.3-2.4	30.0 - 29.9	-	0.05	+0.05
<b>TOTAL</b>		<b>57,181</b>	<b>133,604</b>	<b>+76,423</b>

## 5.0 FLOODPLAIN COMPENSATION – HYDRAULIC MODELLING

- 5.1 Details of the hydraulic modelling exercise carried out in support of the Development Consent Order application were outlined in the report titled “Technical Note: Hydraulic Modelling” ref NTH/209/TN01 dated July 2014 which formed Appendix 8.5 of the submitted Environmental Statement.
- 5.2 Accompanying the report were a series of hydraulic modelling files used to assess the original proposals. It is not the intention of this submission to re-state the original methodology or review and update the fundamental aspects of the model, but rather to use the same approach and principles to model the detailed designs and assess their impact.
- 5.3 As such, a summary is provided in **Table 5.1** of the key model layers used in the updated model and what they represent. Tuflow standard layers, or ones left unchanged between the baseline and proposed models are not referenced.

Table 5.1 - Key Layers Used in Hydraulic Model

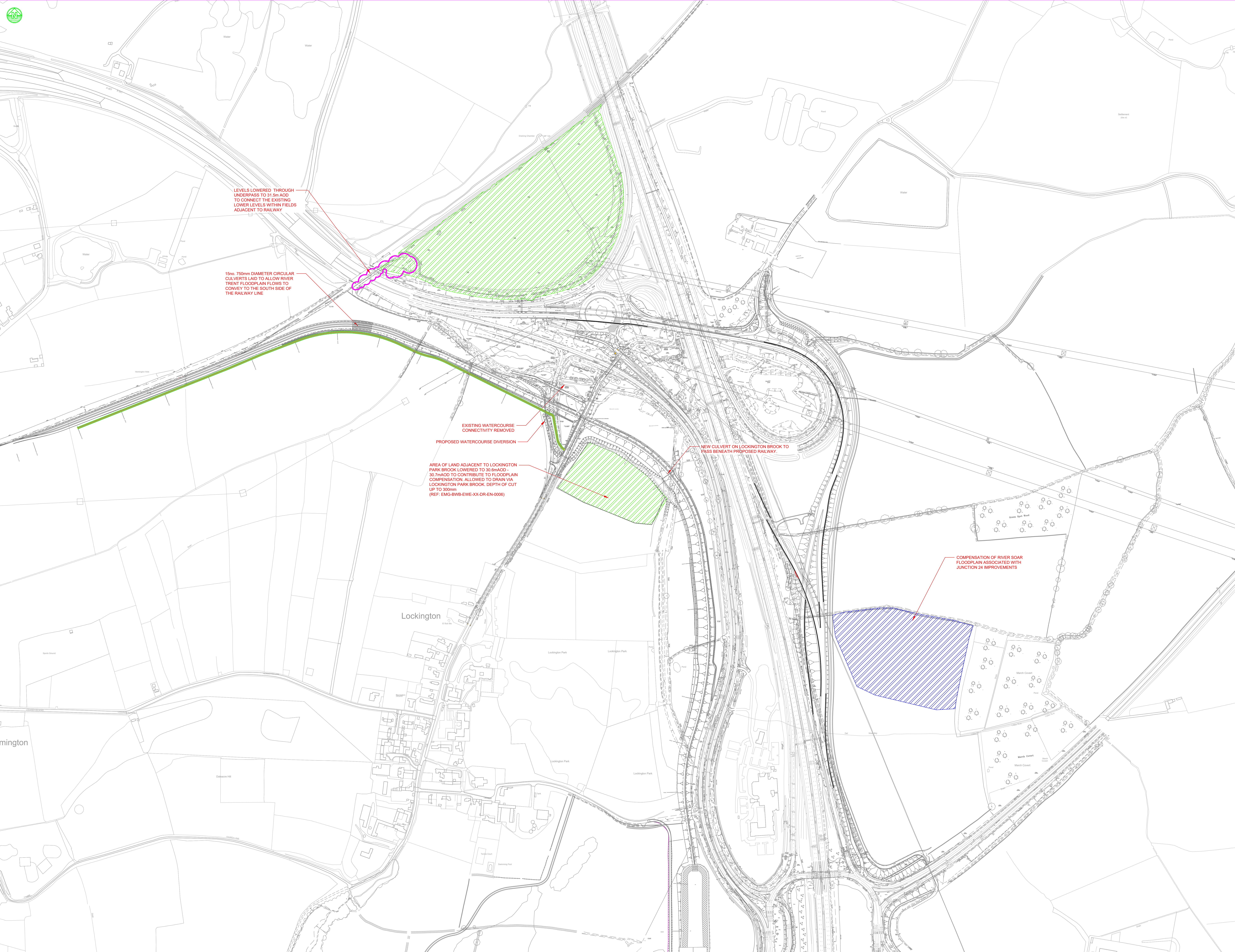
File	Layer	Representation
Tuflow Control File (.tcf)	1d_hw_a50_underpass_104.mif	Height-width type cross section information linked to network line for 'irregular' cross section. In combination these layers relate to the designed underpass feature by adding the invert level (from nwke) then the dimensions of the irregular cross section i.e. the conveyance route, as designed.
	1d_nwke_a50_underpass_104.mif	
	1d_nwk_railwayculv_007.mif	Represents series of culverts under proposed railway embankment to allow floodplain to equalise.
Tuflow Boundary control file (.tbc)	161103_ProposedDTM.asc	Digital ground model generated from detailed earthworks model of proposals. Includes diverted Lockington Brook course, Lockington Park floodplain compensation measures and proposed railway embankment.
	2d_zsh_Flow_Routes_002.mif	Z-line used to reinforce flow routes through major embankments. Part of original EA Derwent-Trent model but updated to reflect flow routes in extended model layer and remove those from truncated section.
	2d_zsh_STWLandBund_01.MIF	Proposed bund located around Severn Trent Water compound in horseshoe area.



- 5.4 All other parameters in the model remain unchanged from the previously submitted model, or the baseline model used to define current flood risk.
- 5.5 The results of the proposed scenario are included for reference as **Appendix D**. In short, the proposals demonstrate a reduction in flood risk posed to the wider area through a reduction in peak flood depths and minor contraction of the floodplain at its southern extent around Hemington and Lockington. This is as a result of engaging the horseshoe area to provide floodplain storage as the propagation of the flooding from the Trent overtops the existing railway embankment.
- 5.6 Inspection of the results through the underpass demonstrates a peak flow rate of 1.2m<sup>3</sup>/s with peak velocities reported as 0.65m/s<sup>-1</sup>. The peak water level is reported at 32.17m AOD, equating to a depth of 670mm. This presents a realistic and achievable conveyance route whilst also minimising the flood hazard rating. The previous solution would have resulted in significant flood depths greater than 1.2m making the underpass entirely impassable.
- 5.7 The culvert arrangement under the proposed railway embankment was modelled as a series of 15no. 750mm diameter circular culverts at regular intervals at the apex of the turn. This places them at the closest point to the floodplain propagation as it overtops the existing railway line. The invert levels of the culverts were set at or slightly above existing ground levels but in general are lower than the inlet of the underpass. Nevertheless, the slight impediment to the floodplain offered by the embankment does not result in a significant backing up of flows behind the structure to cause an increase in flooding elsewhere. Furthermore, some of the proposed railway embankment is overtopped during the simulated flood event due to the constraint of tying in to existing railway levels.
- 5.8 As such, it can be considered the final design of the scheme accords with the principles set out in the Development Consent Order application details, and therefore meets the criteria of Requirement 18 with reference to provision of floodplain compensation for works within the River Trent floodplain.

## **APPENDIX A – EXTENT OF FLOODPLAIN COMPENSATION PROVISION**





LEVELS LOWERED THROUGH UNDERPASS TO 31.5m AOD TO CONNECT THE EXISTING LOWER LEVELS WITHIN FIELDS ADJACENT TO RAILWAY

15no. 750mm DIAMETER CIRCULAR CULVERTS LAID TO ALLOW RIVER TRENT FLOODPLAIN FLOWS TO CONVEY TO THE SOUTH SIDE OF THE RAILWAY LINE

EXISTING WATERCOURSE CONNECTIVITY REMOVED  
PROPOSED WATERCOURSE DIVERSION

AREA OF LAND ADJACENT TO LOCKINGTON PARK BROOK LOWERED TO 30.6m AOD - 30.7m AOD TO CONTRIBUTE TO FLOODPLAIN COMPENSATION. ALLOWED TO DRAIN VIA LOCKINGTON PARK BROOK. DEPTH OF CUT UP TO 300mm (REF: EMG-BWB-EWE-XX-DR-EN-0006)

NEW CULVERT ON LOCKINGTON BROOK TO PASS BENEATH PROPOSED RAILWAY

COMPENSATION OF RIVER SOAR FLOODPLAIN ASSOCIATED WITH JUNCTION 24 IMPROVEMENTS

- Notes**
1. Do not scale this drawing. All dimensions must be checked/verified on site. If in doubt ask.
  2. This drawing is to be read in conjunction with all relevant architects, engineers and specialist drawings and specifications.
  3. All dimensions in millimetres unless noted otherwise. All levels in metres unless noted otherwise.
  4. Any discrepancies noted on site are to be reported to the engineer immediately.

- Legend**
- FLOODPLAIN COMPENSATION (RIVER TRENT)
  - FLOODPLAIN COMPENSATION (RIVER SOAR)

P2	03.02.17	Updated following detailed design of compensation	JG	DA
P1	05.07.16	Preliminary Issue	JG	DA
Rev	Date	Details of issue / revision	JG	DA

**Issues & Revisions**

**BWB**  
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- Leeds | 0113 233 3000
- London | 020 7407 3879
- Manchester | 0161 233 4260
- Nottingham | 0115 924 1100

www.bwbconsulting.com



**Project Title**  
**THE EAST MIDLANDS GATEWAY RAIL FREIGHT INTERCHANGE**

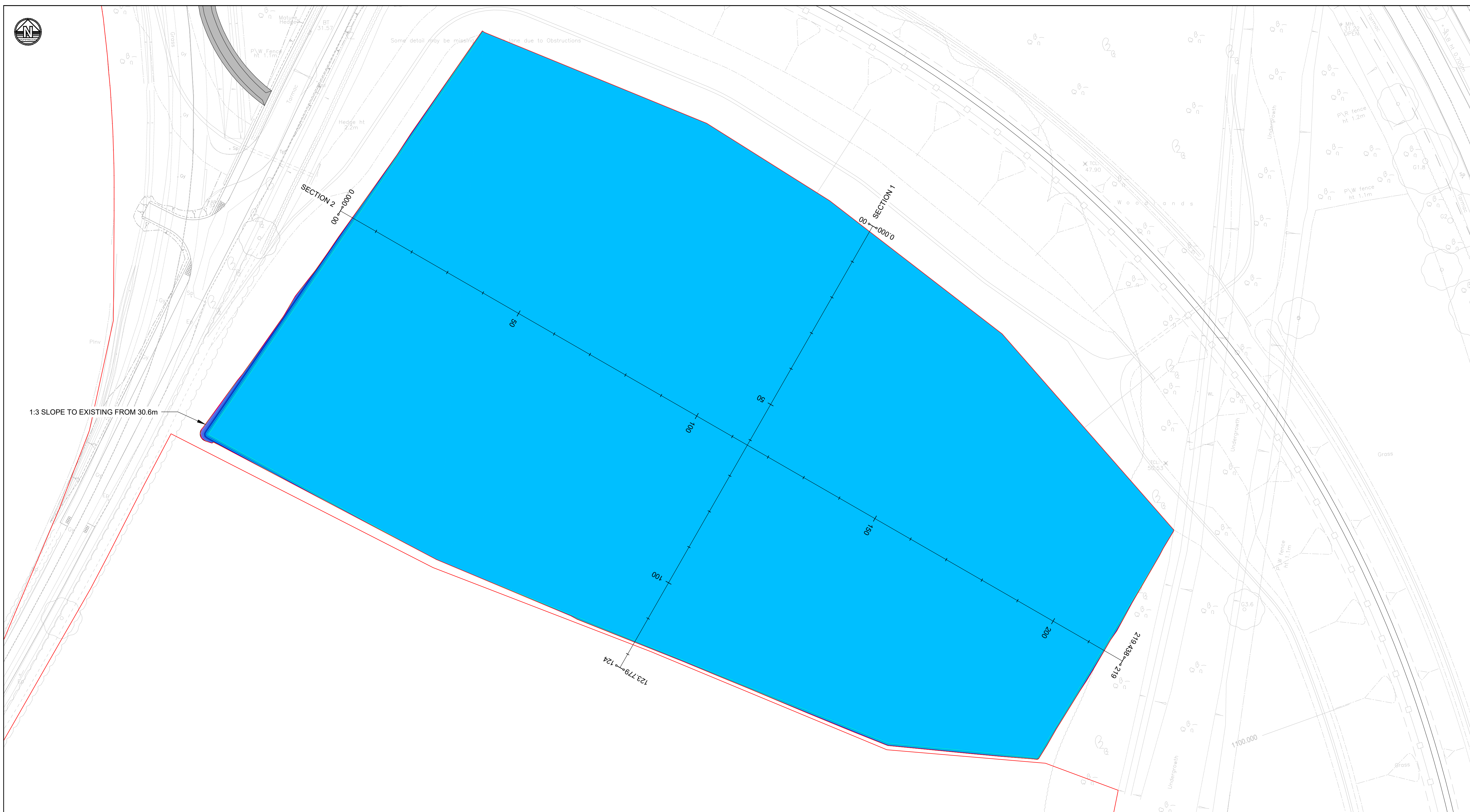
**Drawing Title**  
**PROPOSED FLOODPLAIN COMPENSATION ARRANGEMENTS**

Drawn:	J.Green	Reviewed:	D.Allum-Rooney
BWB Ref:	NTH 209	Date:	05.07.16
Scale:	Scale@A0	Scale:	1:2500
<b>PRELIMINARY</b>			
Project - Originator - Zone - Level - Type - Role - Number	EMG-BWB-EWE-XX-DR-EN-0001	Status	P2



## **APPENDIX B – PROPOSED FLOODPLAIN COMPENSATION WORKS – LOCKINGTON PARK**





- Notes**
- Do not scale this drawing. All dimensions must be checked/ verified on site. If in doubt ask.
  - This drawing is to be read in conjunction with all relevant architects, engineers and specialists drawings and specifications.
  - All dimensions in millimetres unless noted otherwise. All levels in metres unless noted otherwise.
  - Any discrepancies noted on site are to be reported to the engineer immediately.

**Legend**

SURFACE LEVEL DATA			
NUMBER	MINIMUM LEVEL	MAXIMUM LEVEL	COLOUR
1	30.60	30.70	<span style="background-color: blue; color: white;"> </span>

\*Current model is showing flood plain compensation as follows:  
 30.6 - 30.7 = 1700m<sup>3</sup>  
 30.7 - 30.8 = 2160m<sup>3</sup>  
 Above 30.8 there may be a small amount of storage available but the compensation area north of the A50 engages at this level.

1:3 SLOPE TO EXISTING FROM 30.6m

Rev	Date	Details of issue / revision	Drw	Rev
P1	05.07.16	Preliminary Issue	JG	DA

**Issues & Revisions**

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- London | 020 7407 3879
- Manchester | 0161 233 4260
- Nottingham | 0115 924 1100

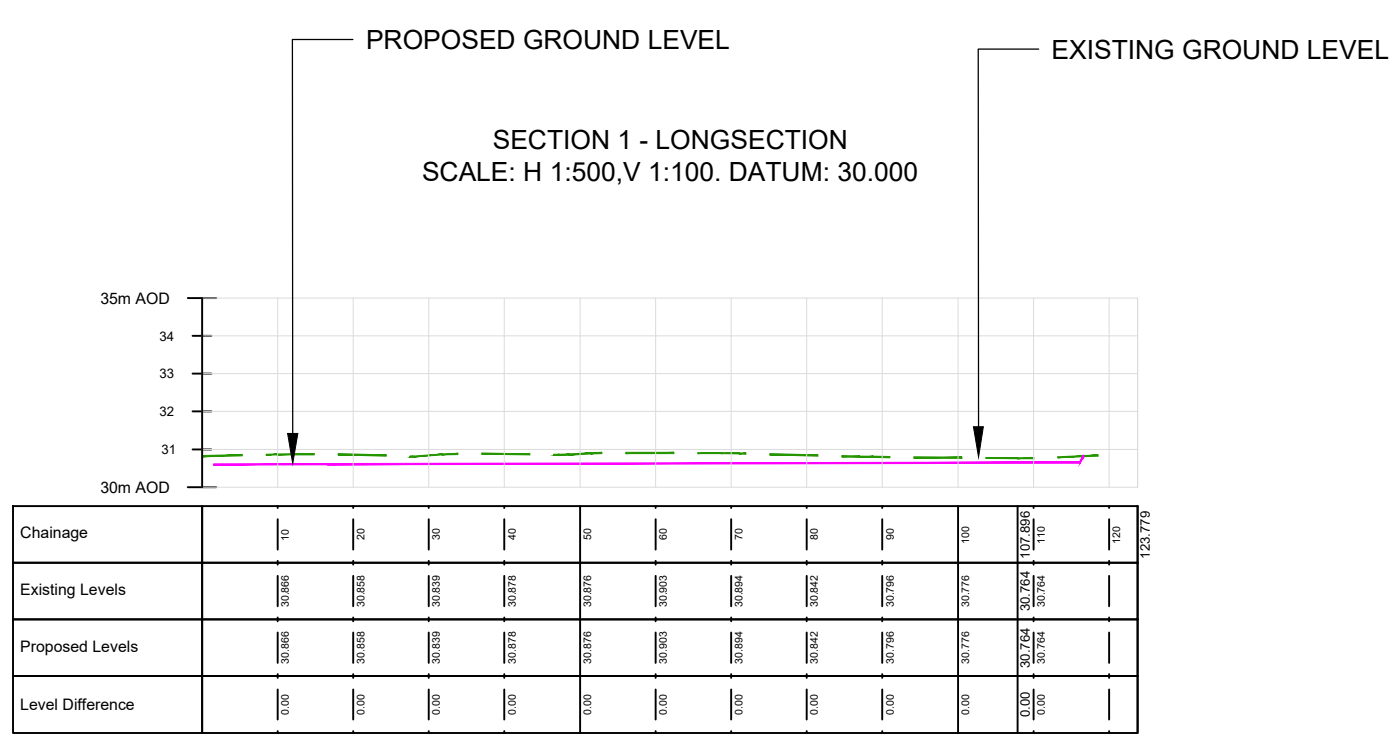
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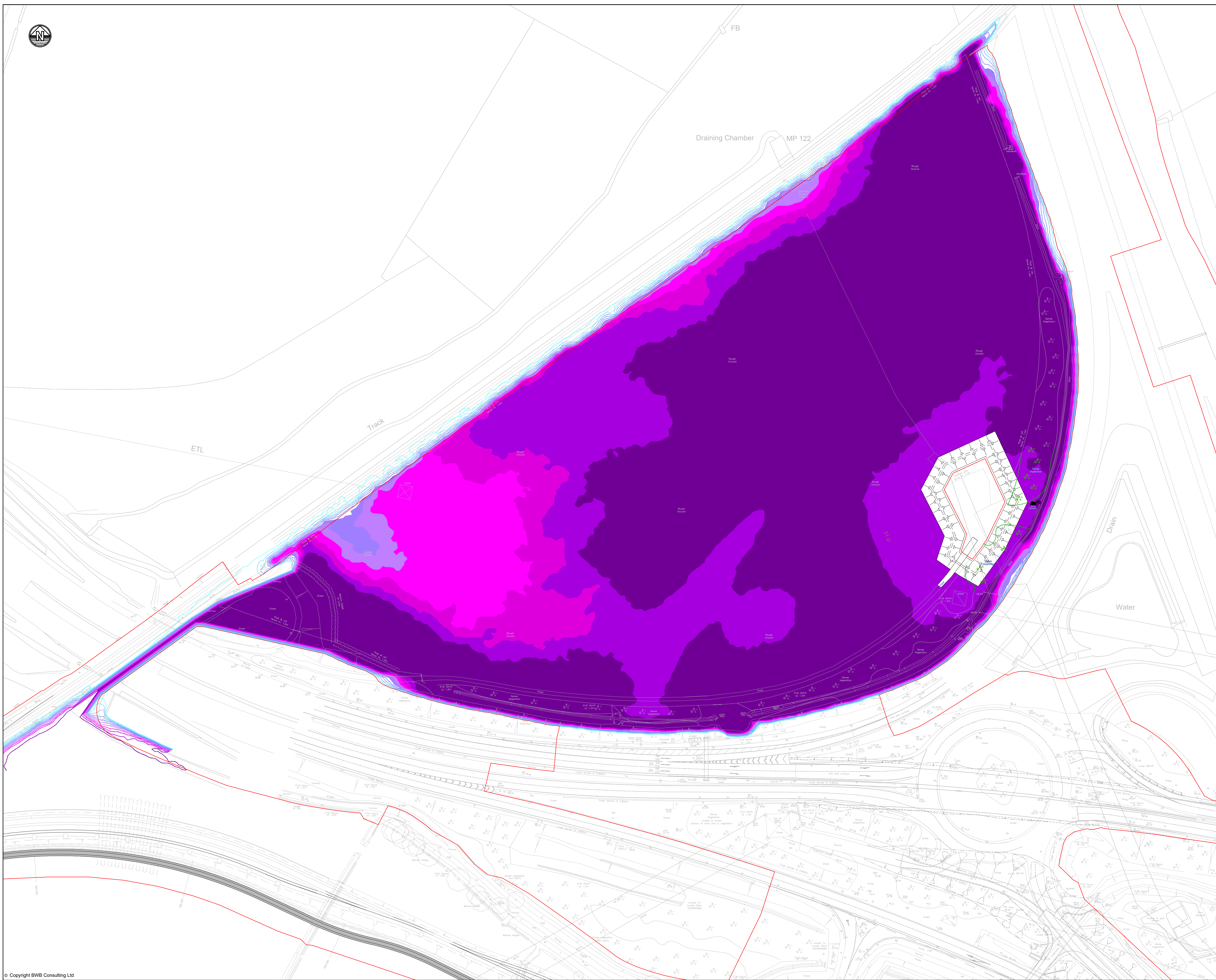
Project Title  
**THE EAST MIDLANDS  
 GATEWAY RAIL FREIGHT  
 INTERCHANGE**

Drawing Title  
**FLOODPLAIN  
 COMPENSATION -  
 RIVER TRENT DETAILS  
 (SHEET 1 OF 2)**

Drawn:	J.Green	Reviewed:	D.Allum-Rooney
BWB Ref:	NTH209	Date:	05.07.16
Scale:	@A1: 1:500		
<b>PRELIMINARY</b>			
Project - Originator - Zone - Level - Type - Role - Number	Status	Rev	
EMG-BWB-EWE-XX-DR-EN-0004	S2	P1	



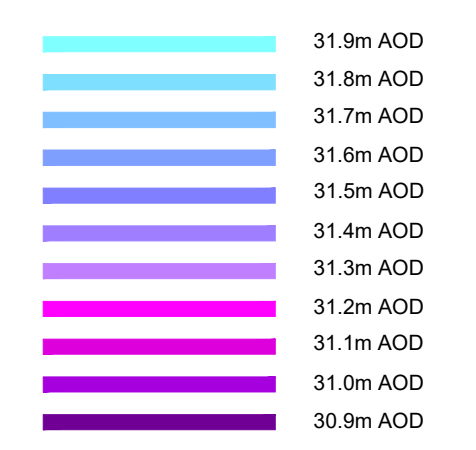




Notes

1. Do not scale this drawing. All dimensions must be checked/ verified on site. If in doubt ask.
2. This drawing is to be read in conjunction with all relevant architects, engineers and specialists drawings and specifications.
3. All dimensions in millimetres unless noted otherwise. All levels in metres unless noted otherwise.
4. Any discrepancies noted on site are to be reported to the engineer immediately.

Legend



P1	05.07.16	Preliminary Issue	JG	DA
Rev	Date	Details of issue / revision	Drw	Rev

Issues & Revisions

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Project Title  
**THE EAST MIDLANDS  
GATEWAY RAIL FREIGHT  
INTERCHANGE**

Drawing Title  
**FLOODPLAIN  
COMPENSATION -  
RIVER TRENT DETAILS  
(SHEET 2 OF 2)**

Drawn:	J.Green	Reviewed:	D.Allum-Rooney
BWB Ref:	NTH209	Date:	05.07.16
Scale:	@A1:	Scale:	1:1000

Drawing Status  
**PRELIMINARY**

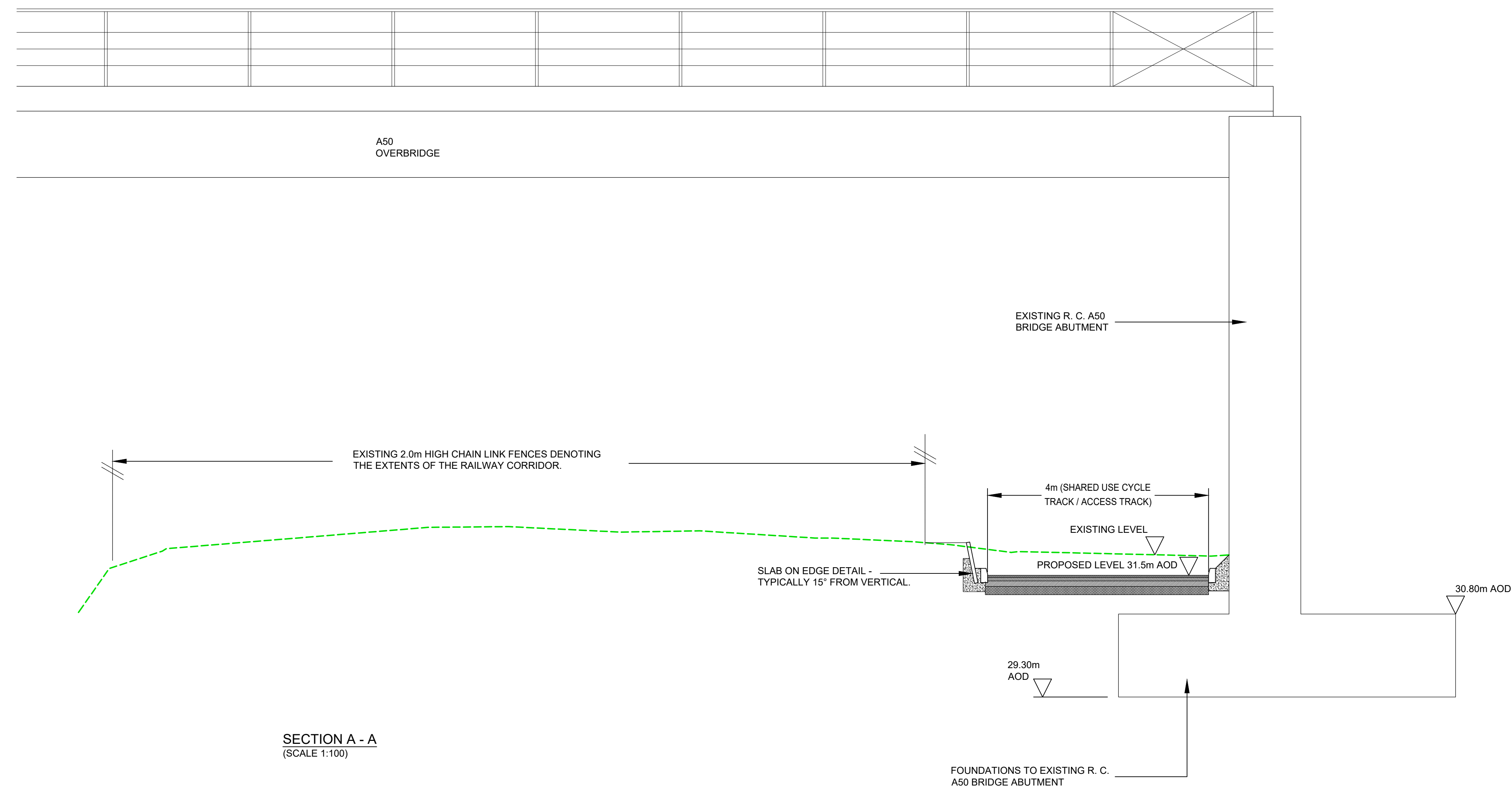
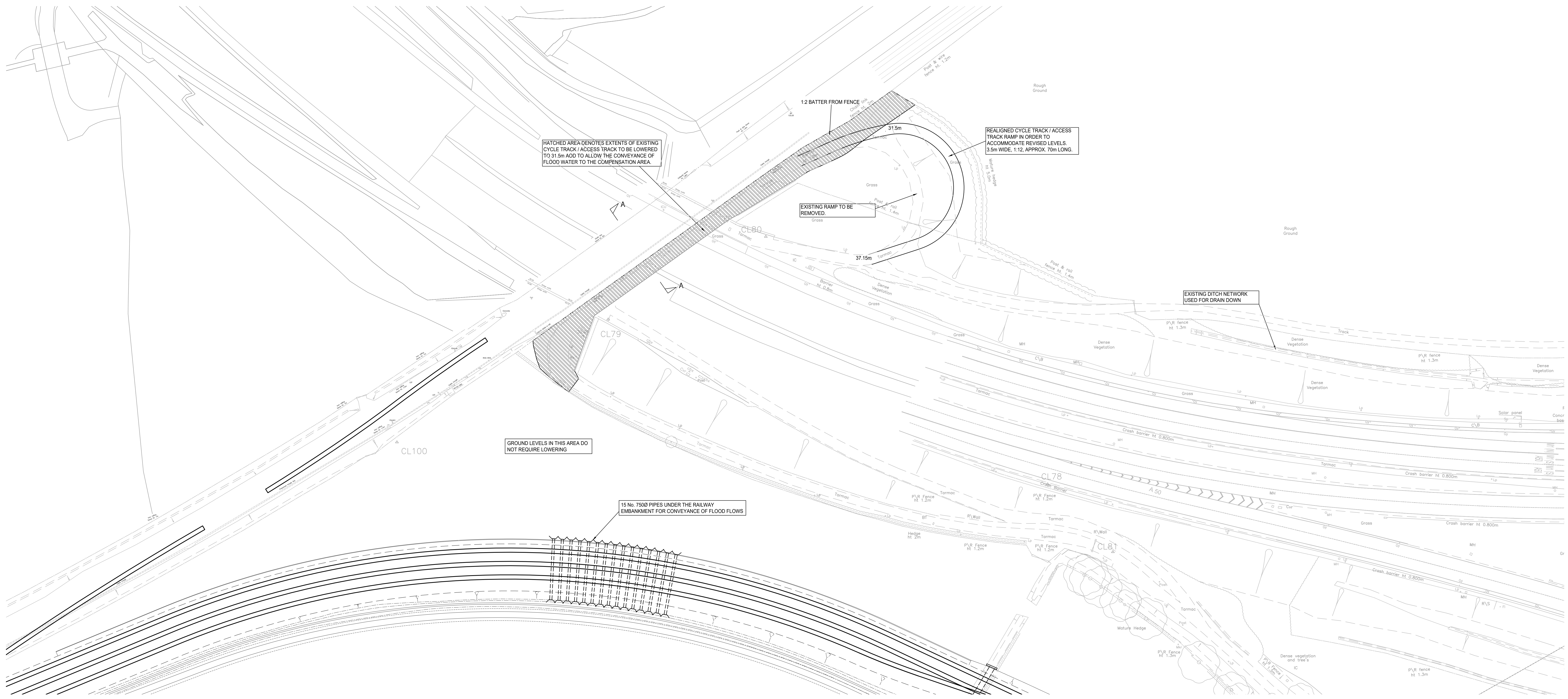
Project - Originator - Zone - Level - Type - Role - Number	Status	Rev
EMG-BWB-EWE-XX-DR-EN-0005	S2	P1





## **APPENDIX C – MODIFICATIONS TO FOOTPATH UNDER A50**





- NOTES**
1. DO NOT SCALE THIS DRAWING. ALL DIMENSIONS MUST BE CHECKED / VERIFIED ON SITE IF IN DOUBT. ASK
  2. THIS DRAWING IS TO BE READ IN CONJUNCTION WITH ALL RELEVANT ARCHITECTS, ENGINEERS AND SPECIALISTS DRAWINGS AND SPECIFICATIONS.
  3. ALL DIMENSIONS IN MILLIMETRES UNLESS NOTED OTHERWISE. ALL LEVELS IN METRES UNLESS NOTED OTHERWISE.
  4. ANY DISCREPANCIES NOTED ON SITE ARE TO BE REPORTED TO THE ENGINEER IMMEDIATELY.

P2	23.01.17	UPDATED FOLLOWING DETAILED MODELLING	SRH	SRH
P1	23.10.14	PRELIMINARY ISSUE	LM	SRH

Rev	Date	Details of issue / revision	Dwn	Rev
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**ISSUES & REVISIONS**

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Nottingham | 0115 924 1100  
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**Client**  
**ROXHILL**

Project Title  
**EAST MIDLANDS GATEWAY STRATEGIC RAIL FREIGHT INTERCHANGE**

Drawing Title  
**FLOOD COMPENSATION WORKS - A50 OVERBRIDGE**

Scale	1:500	Drawn	L. Mills
Size	A0	Reviewed	S. Hilditch

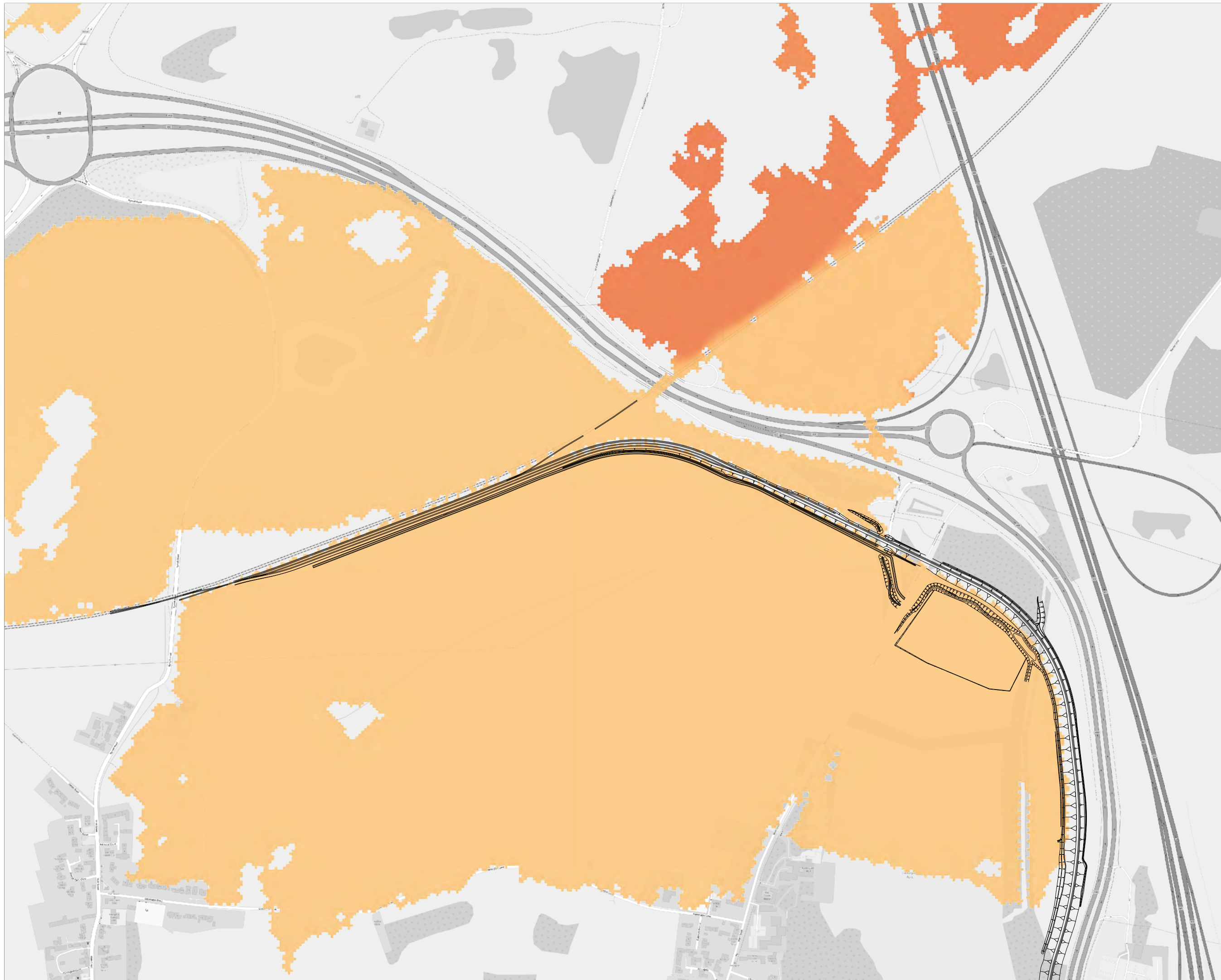
Drawing Status  
**PRELIMINARY**

Drawing No. <b>NTH/209/SK148</b>	Revision <b>P2</b>
-------------------------------------	-----------------------



## **APPENDIX D – HYDRAULIC MODELLING OUTPUTS**





**NOTES**

1. DO NOT SCALE THIS DRAWING. ALL DIMENSIONS MUST BE CHECKED/ VERIFIED ON SITE. IF IN DOUBT ASK.
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4. ANY DISCREPANCIES NOTED ON SITE ARE TO BE REPORTED TO THE ENGINEER IMMEDIATELY.

**KEY**

**Peak Flood Level (mAOD)**

29.5
30.0
30.5
31.0
31.5
32.0
32.5
33.0
33.5
34.0
34.5
35.0
35.5
36.0
36.5
37.0
37.5

P1	03.02.17	PRELIMINARY ISSUE	DNR	CMD
Rev	Date	Details of issues/ revision	Dw	Rev

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Project Title  
**EAST MIDLANDS GATEWAY  
 STRATEGIC RAIL FREIGHT  
 INTERCHANGE**

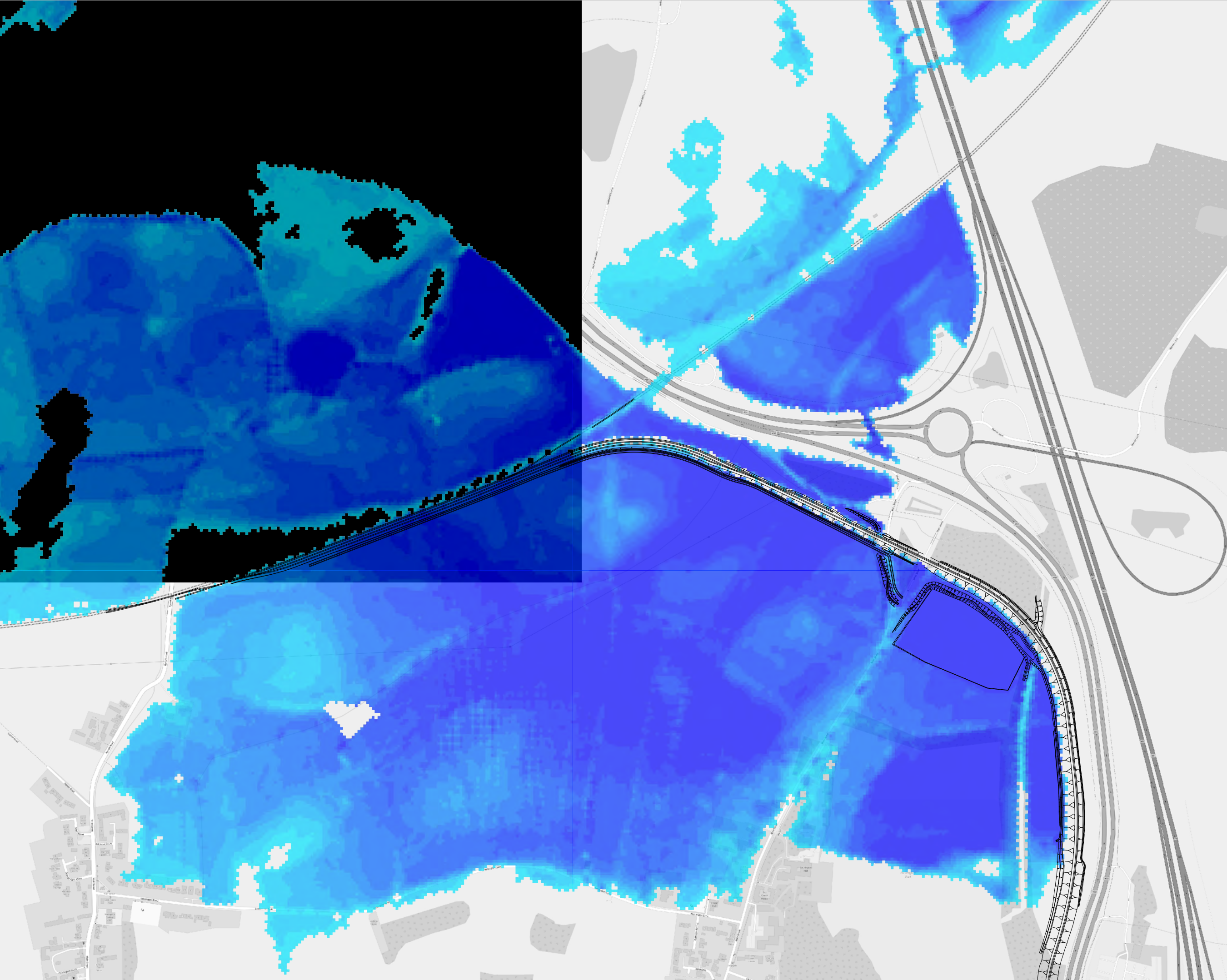
Drawing Title  
**PROPOSED SCENARIO -  
 PEAK FLOOD LEVELS &  
 EXTENT - 100 YEAR +20%  
 EVENT**

Scale	1:10,000	Drawn	D.Allum-Rooney
Size	A3	Reviewed	C. Dodd

Drawing Status  
**PRELIMINARY**

Drawing No.	Status	Revision
<b>EMG-BWB-EWE-XX-DR-EN-0601</b>	<b>S2</b>	<b>P1</b>





**NOTES**

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4. ANY DISCREPANCIES NOTED ON SITE ARE TO BE REPORTED TO THE ENGINEER IMMEDIATELY.

**KEY**

**Peak Flood Depth (m)**

0.00
0.15
0.30
0.45
0.60
0.75
0.90
1.05
1.20
1.35
1.50
>1.50

P1	03.02.17	PRELIMINARY ISSUE	DNR	CMD
Rev	Date	Details of issues/ revision	Dw	Rev

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Client

Project Title  
**EAST MIDLANDS GATEWAY  
 STRATEGIC RAIL FREIGHT  
 INTERCHANGE**

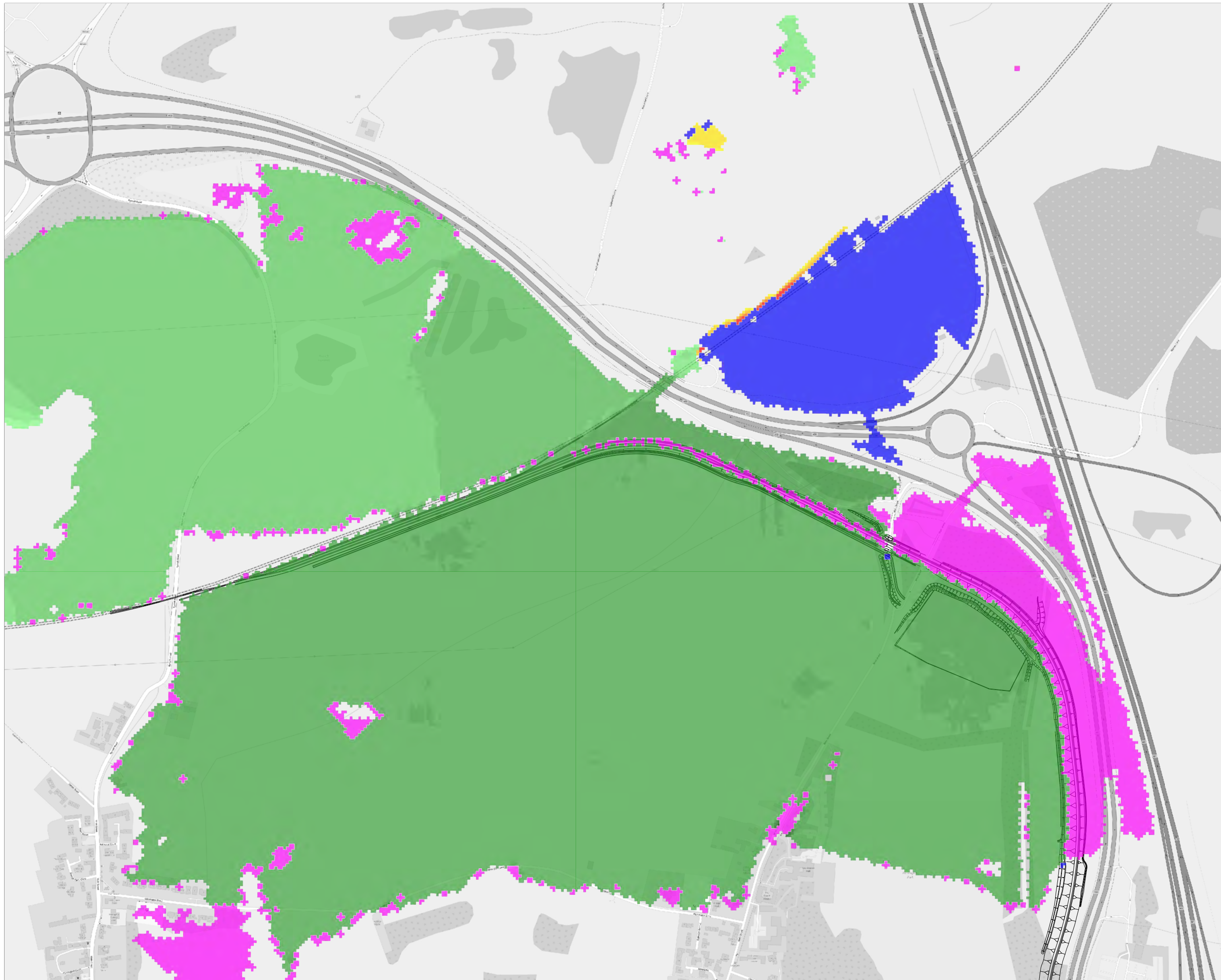
Drawing Title  
**PROPOSED SCENARIO -  
 PEAK FLOOD DEPTHS - 100  
 YEAR +20% EVENT**

Scale	1:10,000	Drawn	D. Allum-Rooney
Size	A3	Reviewed	C. Dodd

Drawing Status  
**PRELIMINARY**

Drawing No.	Status	Revision
EMG-BWB-EWE-XX-DR-EN-0602	S2	P1





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- ANY DISCREPANCIES NOTED ON SITE ARE TO BE REPORTED TO THE ENGINEER IMMEDIATELY.

**KEY**

**Difference (m)**

- < -0.18
- 0.18 to -0.16
- 0.16 to -0.14
- 0.14 to -0.12
- 0.12 to -0.10
- 0.10 to -0.08
- 0.08 to -0.06
- 0.06 to -0.04
- 0.04 to -0.02
- 0.02 to -0.01
- NO CHANGE
- 0.01 to 0.02
- 0.02 to 0.04
- 0.04 to 0.06
- 0.06 to 0.08
- 0.08 to 0.10
- 0.10 to 0.12
- 0.12 to 0.14
- 0.14 to 0.16
- 0.16 to 0.18
- > 0.180
- Former Wet Areas Now Dry
- Former Dry Areas Now Wet

PI	Date	Details of issues/ revision	DNR	CMD
P1	03.02.17	PRELIMINARY ISSUE		

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Project Title  
**EAST MIDLANDS GATEWAY  
 STRATEGIC RAIL FREIGHT  
 INTERCHANGE**

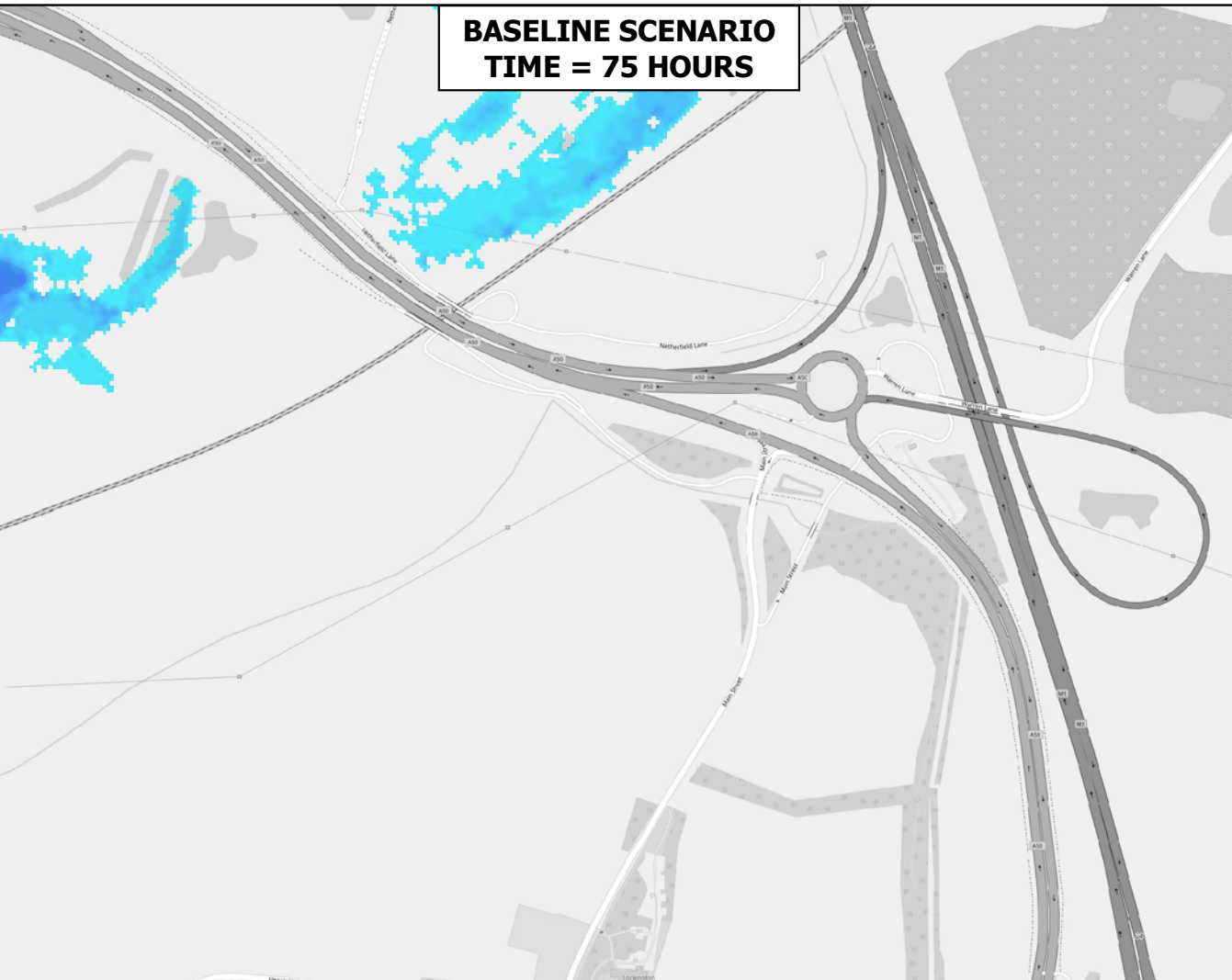
Drawing Title  
**PROPOSED SCENARIO -  
 CHANGE IN LEVEL FROM  
 BASELINE**

Scale	1:10,000	Drawn	D. Allum-Rooney
Size	A3	Reviewed	C. Dodd

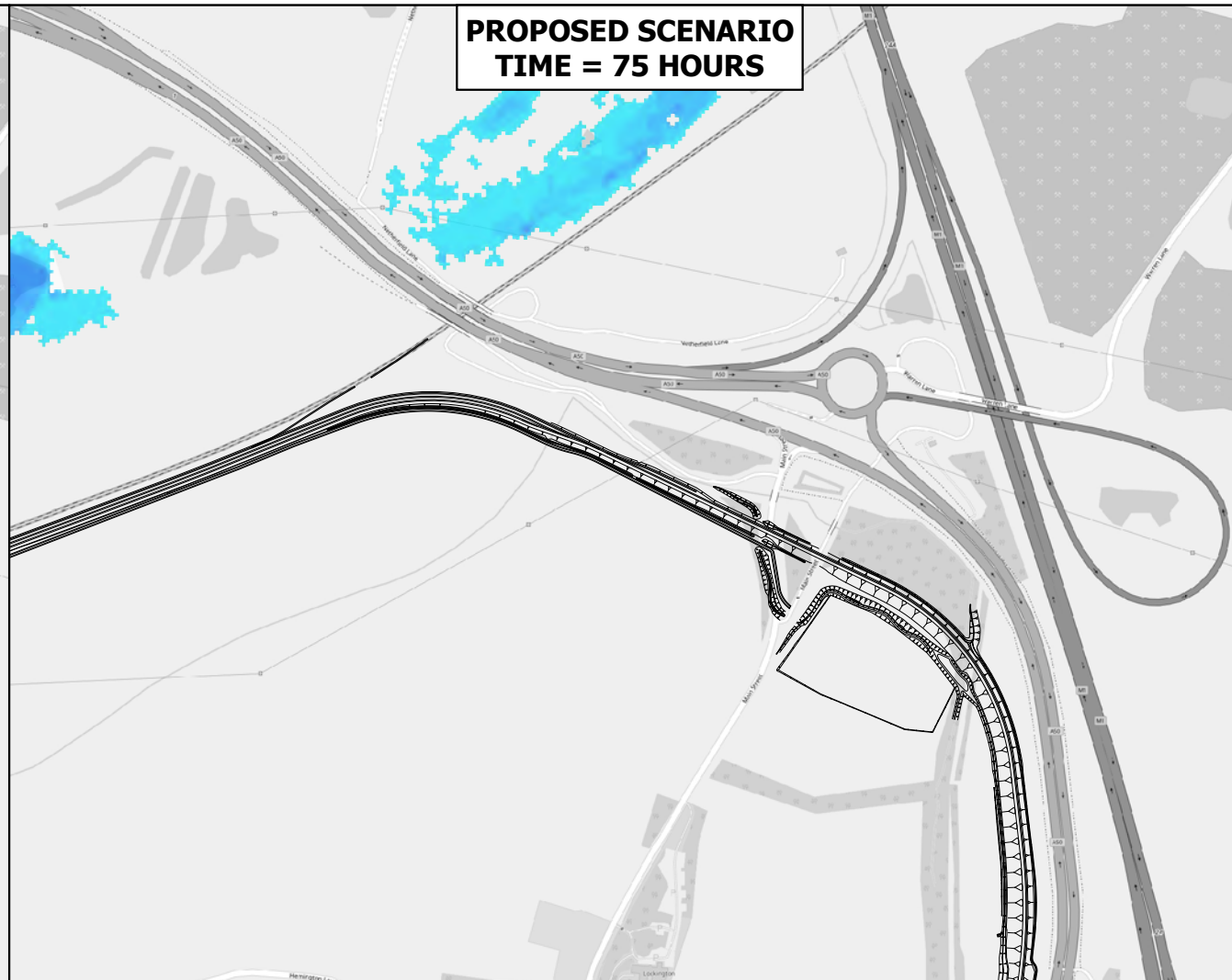
Drawing Status  
**PRELIMINARY**

Drawing No.	Status	Revision
EMG-BWB-EWE-XX-DR-EN-0603	S2	P1

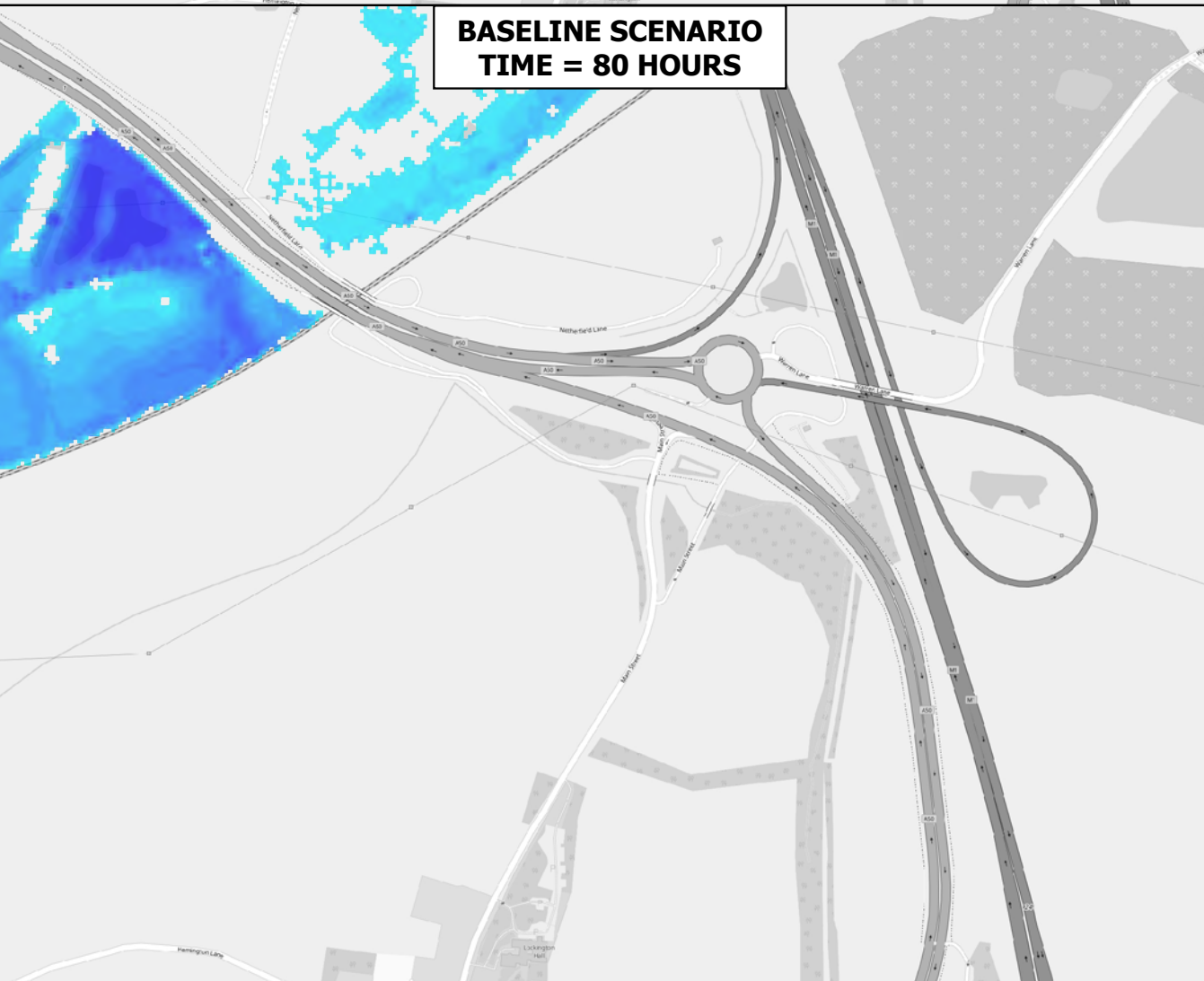




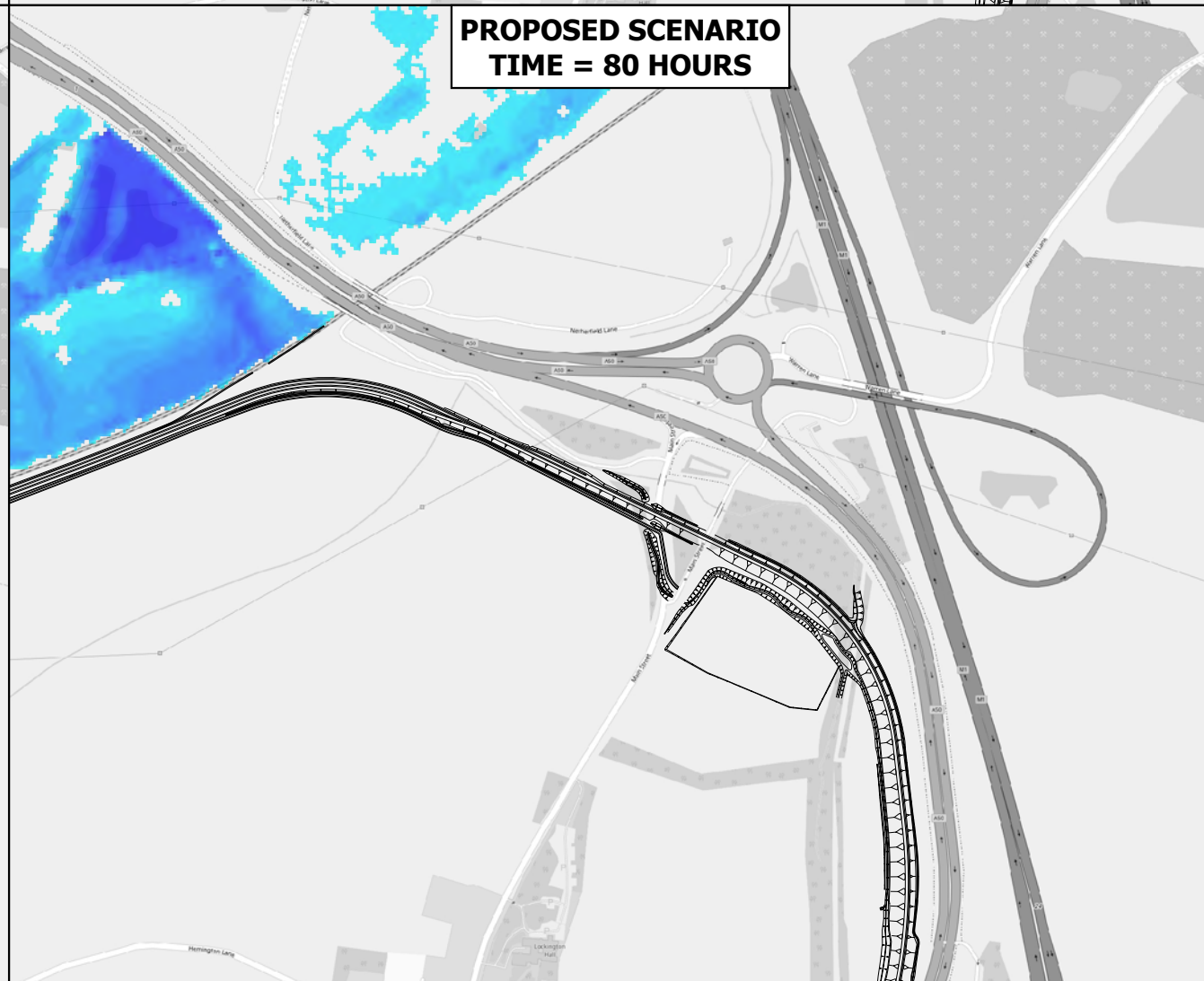
**BASELINE SCENARIO  
TIME = 75 HOURS**



**PROPOSED SCENARIO  
TIME = 75 HOURS**



**BASELINE SCENARIO  
TIME = 80 HOURS**



**PROPOSED SCENARIO  
TIME = 80 HOURS**

**NOTES**

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4. ANY DISCREPANCIES NOTED ON SITE ARE TO BE REPORTED TO THE ENGINEER IMMEDIATELY.

**KEY**

**Flood Depth @ Time (m)**

0.00
0.15
0.30
0.45
0.60
0.75
0.90
1.05
1.20
1.35
1.50
>1.50

P1	03.02.17	PRELIMINARY ISSUE	DNR	CMD
Rev	Date	Details of issues/ revision	Drw	Rev

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Client

Project Title  
**EAST MIDLANDS GATEWAY  
STRATEGIC RAIL FREIGHT  
INTERCHANGE**

Drawing Title  
**PROPOSED SCENARIO -  
FLOOD DEPTH & EXTENT  
AT KEY TIMES**

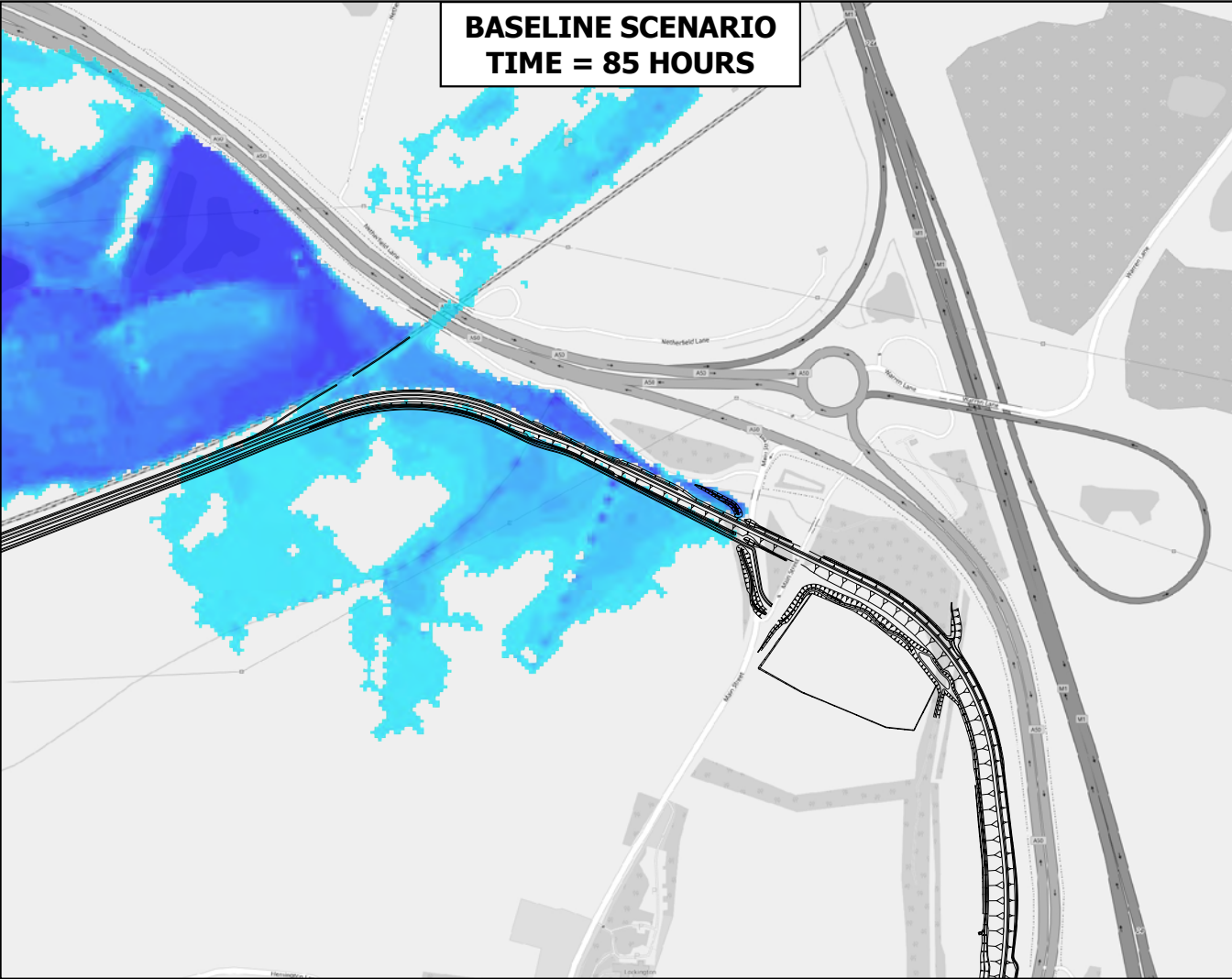
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Size	A3	Reviewed	C. Dodd

Drawing Status  
**PRELIMINARY**

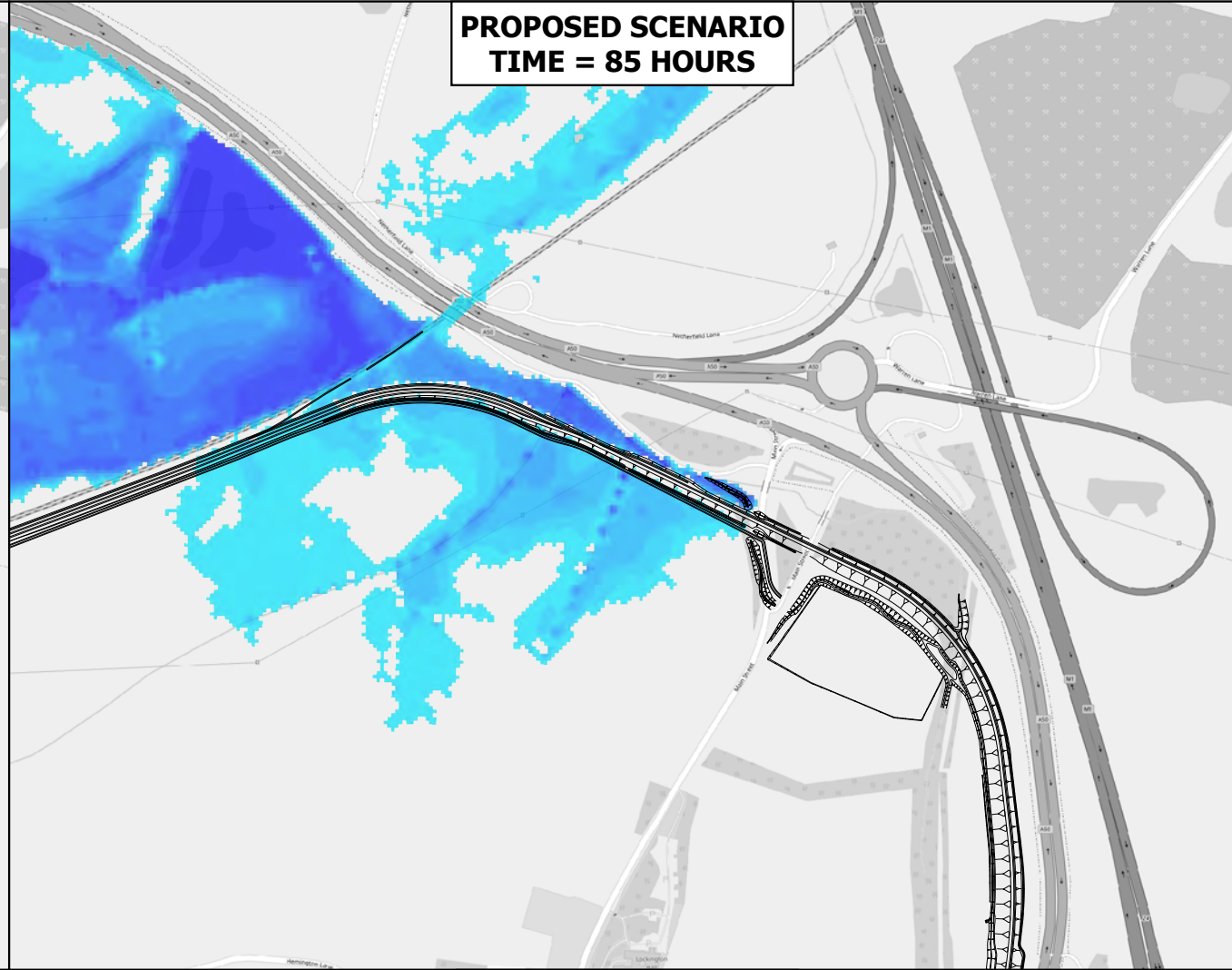
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EMG-BWB-EWE-XX-DR-EN-0604	S2	P1



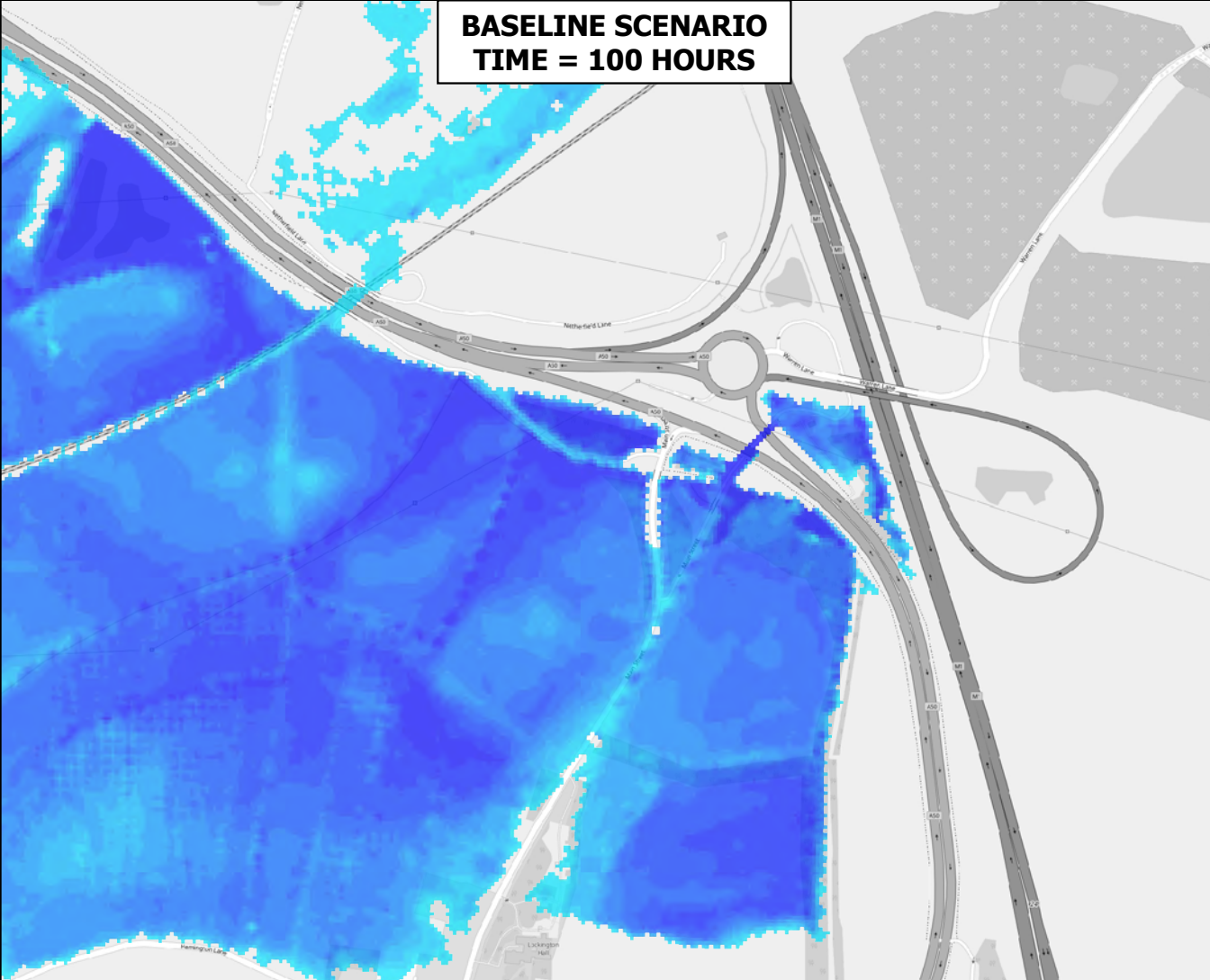
**BASELINE SCENARIO  
TIME = 85 HOURS**



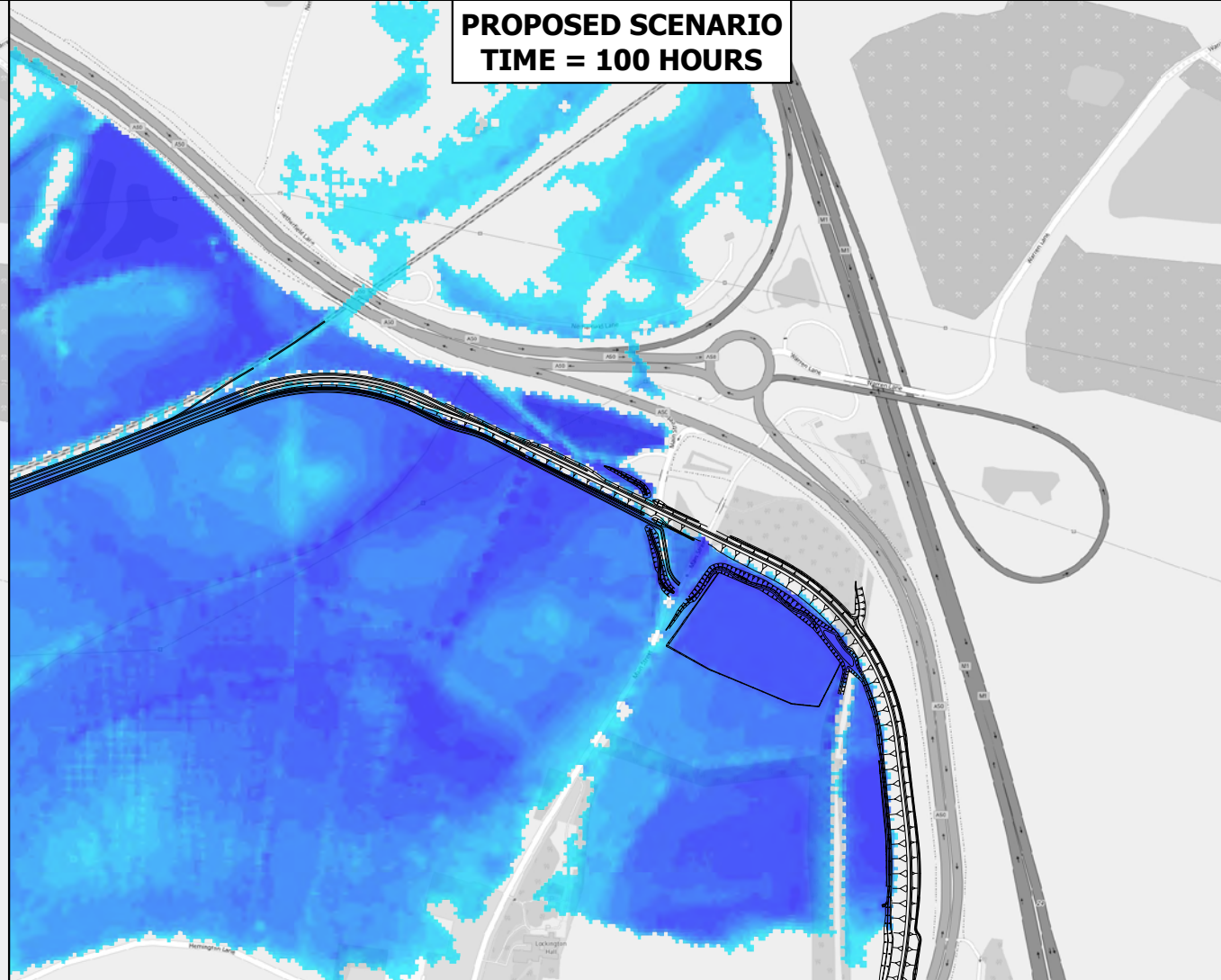
**PROPOSED SCENARIO  
TIME = 85 HOURS**



**BASELINE SCENARIO  
TIME = 100 HOURS**



**PROPOSED SCENARIO  
TIME = 100 HOURS**



- NOTES**
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**KEY**

**Flood Depth @ Time (m)**

0.00
0.15
0.30
0.45
0.60
0.75
0.90
1.05
1.20
1.35
1.50
>1.50

P1	03.02.17	PRELIMINARY ISSUE	DNR	CMD
Rev	Date	Details of issues/ revision	Dw	Rev

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Client

**ROXHILL**

Project Title

**EAST MIDLANDS GATEWAY  
STRATEGIC RAIL FREIGHT  
INTERCHANGE**

Drawing Title

**PROPOSED SCENARIO -  
FLOOD DEPTH & EXTENT  
AT KEY TIMES**

Scale	1:15,000	Drawn	D.Allum-Rooney
Size	A3	Reviewed	C. Dodd

Drawing Status

**PRELIMINARY**

Drawing No.	Status	Revision
<b>EMG-BWB-EWE-XX-DR-EN-0605</b>	<b>S2</b>	<b>P1</b>

From: [REDACTED]  
To: [PLANNING POLICY](#)  
Subject: RE: Draft Local Plan Regulation 18 consultation  
Date: 19 March 2024 06:51:02  
Attachments: [Diseworth Support.docx](#)  
[PD Local Plan 2024 Final \(002\).docx](#)

---

Ian and Local Plan colleagues

As promised, attached is a late joint response from eight district and parish councillors. The joint and composite response is in addition to and in support of the 'Protect Diseworth' response: both attachments must be taken together. The full list of councillor signatories is included in the relevant attachment

With Good wishes

Cllr Ray Sutton

Kegworth ward

[REDACTED]

---

**From:** CLLR R SUTTON

**Sent:** Sunday, March 17, 2024 4:59 PM

**To:** PLANNING POLICY <PLANNING.POLICY@NWLeicestershire.gov.uk>

**Subject:** Draft Local Plan Regulation 18 consultation

Hello

I have prepared a response and I know the deadline is midnight today.

Because I have given other councillors the opportunity to make it a joint response, I have had to give them an extra 24 hours to get back to me. I hope it will be ok to get it to you by midnight Monday (18<sup>th</sup>)?

With Good wishes

Cllr Ray Sutton

Kegworth ward

[REDACTED]



**NWLDC Draft Local Plan 2020-40 (Regulation 18 consultation)**

**A joint councillor response form the ‘Northern Parishes’ March 18th 2024**

We the undersigned ‘Northern Parishes’ councillors wish to endorse in full the ‘Protect Diseworth’/WINGS Communities Ltd response to the Draft Local Plan Consultation.

We are joined by a number of Parish Council chairs acting as a sample of supporting residents *acting here in a personal capacity rather than as representatives of their council’s views.*

- Cllr Ray Sutton (NWLDC Kegworth Ward).....
- Cllr Carol Sewell (NWLDC Daleacre Hill Ward).....
- Cllr Andrew Priestley Kegworth Parish Council Chair).....
- Cllr John McLelland (Hemington and Lockington Parish Council Chair).....
- Cllr Leonora Cope (Castle Donington Parish Council Chair).....
- Cllr Mark Rogers (Castle Donington Parish Council Planning Chair).....
- Cllr Nick Rushton (NWLDC Valley inc Long Whatton, Diseworth, Belton).....
- Cllr David Bamford (Long Whatton and Diseworth Parish Council Chair).....

**Context and our key concerns**

- The Draft Local Plan documents and the manner of presentation are complex, even for ourselves, and therefore especially for residents who are supposed to be co-producers of the Plan. We have struggled to support residents as they have sought to make responses and we do not consider that is our role. We hope and assume that, for transparency, all responses have been acknowledged as received and that all will be published in full in due course.
- The pace of the process and the scale of development envisaged feel like an imposition to many in our communities. The ‘Protect Diseworth’ response captures some of the detailed cross referencing that we think is vital to all residents in the ‘Northern Parishes’ who comprise approaching 20% of the District population.
- The ‘Protect Diseworth’ response identifies serious incompleteness, compromising, and even contradictory, wording due to the pressure of the overarching strategic drivers for implementation , whether originating in County Hall or Westminster. Allegations that policies like H2 and Ec2 are presented as blank cheques and that overall objectives are not already being followed through in our communities are hard to refute.
- Amidst the volatility of a general election year, deadlines set for a Freeport with its main hub peripheral to both our District and County needs to be challenged. We recognise the candour of section 6 of the Site Allocation document entitled ‘Potential Locations for Strategic Distribution’ but that does not mean, per se, that the Draft Plan meets sustainable development requirements envisaged in the NPPF.

- The proposed developments, if implemented, would follow hard on the trauma of the creation of SEGRO/EMAGIC. NWLDC should not be hurrying through a Draft Plan containing few assurances that further far-reaching development, particularly at 'Islay Woodhouse', will not simply be waved through.
- The Draft Plan as it stands may be open to legal challenge by reference to several of the points listed in NPPF section 3 paragraph 16.
- Across our parishes we share heritage and rural and village environments that are in danger of being swallowed up in urbanisation and commercial development as part of the Leicestershire International Gateway.
- The evidence base of the Local Plan fails to take into account changes in local demand for housing and what is often low-paid employment in logistics hubs. Generally, the evidence base does not take into account the socio-economic events and impacts, global and specific to the UK, since the overarching Strategy was agreed in 2018, including technological change, global conflict and the Covid pandemic, all of which point to anomalies in what makes sustainability.
- No timescale is given for the completion of Infrastructure Delivery Plan Part 2. We consider such a plan to be an a priori requirement. The last such Plan for the District is dated June 2016. The most recent infrastructure evidence paper, 'Part 1', dated 2022 is inadequate. The accompanying 'Annex A Infrastructure longlist' tabulation rather pointedly purports to have a column headed 'Confirmed Funding, yet in the table the word 'Confirmed' is omitted and individual entries either consign key infrastructure such as Education and Healthcare to 'Developer contributions' or they indicate public funding sources that are 'TBC', sometimes in the relatively distant future.
- The reply to Cllr Sutton's question to Council on Feb 22nd regarding Infrastructure funding suggests an undue reliance on the vagaries of developer-led funding and Section 106, without guarantees that future governments or local government will be able to assure sustainability as envisaged in the NPPF. This uncertainty is confirmed for the lifetime of the Draft Plan in the East Midlands Councils recent 'Levelling Up' return entitled 'Missions: Impossible?'. That is not a good basis for agreeing a Local Plan which unlocks the final destruction of the historic communities that formed a ring around what is now the Freeport Leicestershire site.
- Given the focus and scale of development on the North West extremity of Leicestershire around M1 J24 there is little to no evidence of the kind of cross boundary planning envisaged in NPPF paragraphs 24-27, 'Maintaining Effective Cooperation, for example there are no Statements of Common Ground with either Nottinghamshire or Derbyshire at this Regulation 18 Stage.

ENDS



# 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.

### Index.

<b>Document</b>	<b>Our Para.</b>
Protect Diseworth Summary.....	Paras. A - M
<b>NWLDC Document:- Proposed Policies for Consultation.....</b>	<b>Paras. 1 – 22</b>
Background To The Local Plan.....	Para. 1
Strategy.....	Para. 2 – 13
Creating Attractive Spaces.....	Paras. 14 – 16
Housing.....	Paras. 17 – 18
The Economy.....	Paras. 19 - 22
<b>NWLDC Document:-Proposed Housing and Employment Allocations.....</b>	<b>Paras. 23 – 54</b>
Housing Completions and Commitments.....	Para. 23
Housing Allocations.....	Para. 24 – 39
General Needs Employment Allocations.....	Para. 40 - 42
Potential Locations for Strategic Distribution.....	Para. 43 – 57
Environment.....	Para. 58

## 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 12<sup>th</sup>. 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](#)  
Subject: Re: EXTERNAL: Local plan comments  
Date: 22 March 2024 18:51:01

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### Area of Separation (AoS) Policy En5 and proposed housing allocation for the AoS

The Area of Separation (Formally Green Wedge) should be increased not depleted.

- a. The land identified in the Area of Separation Study as Area A Unit 14 should be included within policy En5 AoS. The land plays an important role in maintaining physical separation, protects identity and prevents coalescence and serves as the gateway for the public to access the land beyond. The public foot path which runs through the plot is a widely used amenity and gives access the newly planted National Forest areas and paths that weave through Area A.

Planning permission was granted on the site in 2009. The Developers have not used the permission for 14 years. I believe that if the site was sustainable and would yield a profit it would have been in a hurry to develop it years and years ago. In many walks of life if you don't use something it – you lose it!

- b. Broom Leys Farm Area A C46

Currently part of the AoS and the National Forest. This area should not lose its designation of AoS or be built upon. Developing this area would have a detrimental effect on the open landscapes that enrich people's lives. People are currently able to connect with the countryside, residents from Whitwick access the area via the public foot paths that weave across the area. Residents from Coalville can safely cross over the road via the foot bridge. This currently gives immediate access to the countryside. If the land is developed people will walk along the public foot path and find houses not the open aspect that is currently greatly appreciated.

The roads at the Broom Leys Junction are already congested and a greater number of vehicles would without doubt compromise the air quality further.

We do need new housing within the district, including much needed genuinely affordable housing. This should be delivered in the right places and in line with local need. Depleting the Area of Separation is not the right place for housing development nor is it a sequentially preferable location.

### Proposed development of C92, C48, C47, C77, C78, C81 and C86 (Formally Green Wedge)

There is not sufficient infrastructure to cope with the huge proposed housing number for these sites. The surrounding roads are already congested. There has been flooding in the area and existing homes have been affected.

The allocation of any housing proposed for Whitwick should be sustainable, in line with local need and proportional. This is not proportional or with local need.

Countryside along with the Area of Separation should not be considered for development, its value once lost can never be recovered.

The new local plan should recognise that Whitwick is a sustainable village in its own right. It should not anymore be considered as part of the Coalville Urban Area.

On 18 Mar 2024, at 11:05, PLANNING POLICY  
<[PLANNING.POLICY@nwleicestershire.gov.uk](mailto:PLANNING.POLICY@nwleicestershire.gov.uk)> wrote:

Thank you for your email and we note your intention to respond to the Local Plan consultation. Your response must reach us by 11:59pm on Friday 22 March. It must either be emailed to [planning.policy@nwleicestershire.gov.uk](mailto:planning.policy@nwleicestershire.gov.uk) or posted to North West Leicestershire District Council, PO Box 11051, Coalville, LE67 0FW. Please note that our online consultation response form will not be available past 11:59pm on Sunday 17 March (the official end of



our six week consultation period).

-----Original Message-----

From: [REDACTED]  
Sent: Saturday, March 16, 2024 3:20 PM  
To: PLANNING POLICY  
<PLANNING.POLICY@NWLeicestershire.gov.uk>  
Subject: EXTERNAL: Local plan comments

Hi

I understand that I am able comment next week on the local plan if I send you my details. I intend to respond next week.

Thank you

Jo Straw

Planning Policy & Land Charges Team,  
North West Leicestershire District Council.  
P O Box 11051  
Coalville  
LE67 0FW

22<sup>nd</sup> March 2024

To The Planning Policy & Land Charges Team,

**Re:- Hermitage Leisure Centre Whitwick (C92)**  
**South of Church Lane Swannington (C48)**  
**Broom Leys Farm ( (C46)**  
**West of Whitwick ( Broad Location)**  
**Land at Lily Bank, Thringstone (C74)**

I live in Whitwick in beautiful Charnwood Forest. The area I live in is susceptible to flooding and fortunately since 2002 no longer under the remit of North West Leicestershire District Council, but thankfully under the dutiful care of the Environment Agency.

However, North West Leicestershire District Council has a duty of care to each and every resident, particularly when granting planning permission.

The landscape of Charnwood Forest is defined by granite topped hills, wooded valleys, heathlands and grasslands and everything should be done to manage the character, biodiversity, geodiversity, cultural and industrial heritage of the area.

The increased demand for housing means that more and more land on the rural-urban fringes is being developed on, increasing the flood risk there. This building of houses means that land can no longer absorb rainfall if it is built over, instead, water runs off impermeable surfaces into drains which can become overwhelmed, and into rivers, **increasing the flood risk in multiple areas.**

Flood risk is increased with new housing built in vulnerable areas and experts and MPs warn that a lack of resources and time and weak planning rules mean developments are getting the green light despite warnings about flood risk.

Also, I refer you to Gov.Uk Guidance Fact Sheet 5: New Homes and School Places :-  
This document makes many relevant points and confirms that evidence shows that new housing tends to attract more young families and therefore more demand for school places.

Continued/2.....



2/continuation.....

Also, I refer you to UK Parliament Hansard Volume 711 29th March 2022 regarding general doctor practices and housing developments:-

A comment made there to be borne in mind - ' The planners did not have the vision or the strategy to see how important it was / is to have a better surgery and a better clinic? Where is the planners vision?

Another big issues is the sustainability of wildlife in the area under threat of building. Surely there are brown field sites that could be developed before NWLDC allows the carving up of the countryside?

I doubt for one minute that any of my views will even be considered but I am of the opinion that NWLDC should give due time, consideration and acknowledgment to all residents and that the district council has a duty of care to every resident and advise that the planning committee is being scrutinised very carefully.

Yours Faithfully,

  
**Mrs Angela Burr**