

Proposed Housing and Employment Allocations [D2]

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

[D2] 5.11-5.15

Land North of Remembrance Way (A453), Kegworth (EMP73 (part))

[D2] 5.16-5.20

Kegworth Parish Council has strong objections to the employment land allocations EPM73 (*Land North of Derby Road (A6), Kegworth* and *Land North of Remembrance Way (A453), Kegworth*) for the reasons set out in the document below.

Kegworth is a distinct and well-defined village location and is long and well-established village being recorded in the Domesday Book in 1086. The Land North of the Derby Road represents the last green space at this village boundary and keeps the Village distinct from the extensive Highway network (M1, M50, A453). In permitting this land allocation, the primary access to the village from M1 J24, we will be greeted by a large industrial area that runs seamlessly into our Historic village centre. This will cause significant harm, changing the character of our village and making it an integral part of an urban sprawl, including EMG, EMA and Castle Donington. Councillors also note that the proposed extension of the limit of development of Kegworth includes the Land North of the A6 but does not include the land North of Remembrance way. Given that the sites are contiguous, linked by the access road and also given most of this land is within the boundary of Kegworth Parish that would seem to be an error. This does, however, highlight that the development sprawls from Kegworth into the adjacent Parish.

To quote from 'Draft Policy Ec4 – Employment Uses on Unidentified Sites' we note that sites are suitable *where these do not have an unacceptable adverse impact on the amenities of any nearby residential properties or the wider environment and the local highway network*. Given the site across Derby Road is approved for new housing the adverse impact on residents well being due to loss of green space, heavy traffic and parking issues should be considered. It is clear that this site does create significant harm and adverse impact on our community.

The Employment land allocation is driven by a need to create opportunity for new employment. We note that in the table of section 5.2, there are six employment sites proposed totalling 127,710 sqm of building, of which 70,000 (55%) will fall within the enlarged village boundary of Kegworth. May we remind you that at the last census Kegworth had a population of 4,290. Clearly this site is not satisfying a local employment need. There are many thousands of existing employment opportunities at EMG, EMA and the various local distribution warehouse sites that far exceeds the local population. Within the wider context of NWL and the County of Leicester we contend that you have chosen the location with **the absolute least need** for extensive new employment opportunities. The Freeport and other development at the Ratcliffe on Soar site, is also very close by. This is a 265-hectare site and once fully occupied the redeveloped site claims the creation of between 7,000 and 8,000 jobs. The Fairham site North of Ratcliffe on Soar is providing an additional 100,000sqm of employment space. We find it hard to envisage there is convincing evidence that there

is a current and significant requirement for the development being proposed in this location.

The adjacent Highway infrastructure the (M1 J23A, J24, J24A) also serving the A453 and A50 is already highly stressed and has been continuously redeveloped over the last 30 years. The developments discussed above across the border in Rushcliffe are already causing concern about the additional stress on the highway network. This proposed land allocation exacerbates this problem and constrains potential solutions. Highway problems already have an impact on the quality of life for many Kegworth residents.

We also consider it imprudent to allocate land for development on top of the Derwent Valley Aqueduct (DVA). The DVA is a critical piece of vital national infrastructure that provides water for Loughborough and Leicester.

The site is on “Trent Valley Washlands” as denoted on Inset Map 15. The HS2 plans clearly showed this land is within the 100-year flood contour and is thus unsuitable for development. Hydrological changes within the last 10 years will have undoubtedly increased the flood risk for this area, certainly not decreased it. These sites will create more rapid surface run-off and remove volume from the flood plain. It is difficult to conceive of any mitigation that can be made on these sites. Effective detention ponds are not possible as the ponds would be on existing flood plain and indeed the lack of elevation above the Soar/Trent water table would also make proper mitigation impractical. This will increase flood risk in Kegworth and will have detrimental downstream effects and some limited upstream effects.

Councillors did note that the plan should have included possible access to the rear curtilage to Refresco which would allow HGVs to avoid the residential areas of Sideley.

Proposed Limits to Development Review [D3]

Kegworth Parish Council has the following comments on the document detailed above:

The changes *LtD/K/01 Refresco* and *LtD/K/02 New Brickyard Lane* shown in Inset Maps 15 and detail maps generally make sense and are supported.

As is detailed under employment land allocations, councillors are opposed to the loss of greenspace and other community impacts of the expansion to the North of Derby Road (emp73). We also believe this change is not shown correctly on the plans as it does not include the land within our Parish North of Remembrance Way which is contiguous, and which has common highway access within the village boundary. When this is included, this development then goes beyond our Parish boundary, sprawling into the next Parish.

Proposed Existing Employment Areas Draft Policy [Ec5] - Computer Centre Site, Kegworth

The Council believes that this site is an exception on account of its anomalous location in the overall Local Plan proposals regardless of 'reasonable demand to use the premises for the uses in Table 5 (E(g), B2 and B8)'.

In the case of Kegworth, policies Ec5 and H5 cannot safely be taken in isolation if the integrity of the village is to be maintained.

It is noted that the existing soft drinks factory and the proposed new Employment sites are all to the East of Derby Road. The Computer Centre site is to the West, potentially creating an urban rather than rural feel across that part of Derby Road and impinging on existing and new residential areas.

This is effectively a brownfield site. It is sandwiched between existing housing areas (Pritchard Drive/Munnmoore Close/Suthers Road) and committed housing areas (policy H5). Unless the employment created here were complementary to residential use to enhance and strengthen the facilities of a Local Service Centre, e.g. to include a supermarket or leisure centre, it would create not only a physical barrier and potentially a visual or environmental barrier. It would reduce the chances of the new 141 home development by M1J24 being integrated into Kegworth.

If the HS2 embargo is lifted, there is a one-off opportunity to replace a piecemeal approach development on the West side of Kegworth with something resembling an integrated community development. This can only happen if a sensitive approach is taken to including the Computer Centre site in both Housing and Employment considerations.

Houses in Multiple Occupation Topic Paper and Draft Policy H8 - Houses in Multiple Occupation in Kegworth

The Parish Council supports the rationale for the Draft Policy which is set out in the document topic paper and welcomes Policy H8.

Topic Paper para. 3.4: we note that the work to identify and map HMOs in Kegworth is a work in progress and suggest that 14.0% is almost certainly an underestimate.

Topic Paper para 3.8: we suggest that any policy that is adopted will be subject to challenge at the planning application stage while there is no licensing scheme in place at NWLDC to cover HMOs of occupancy 3 or 4. We have researched the matter and note that many local authorities have used their discretionary right, established under the Housing Act 2004 to go beyond the now mandatory licensing of HMOs of occupancy 5 or more. It is imperative that an Additional Licensing Scheme or some registration scheme be introduced for the whole district or for the parish of Kegworth as a matter of urgency so that policy H8 will be workable.

Topic Paper para 5.2: we believe that the number of HMOs, and maybe also the percentage of properties that are HMOs, will continue to increase. Given that 14% could be an underestimate, that Article 4 proved to be insufficient to slow the increase, a commitment to an annual review of the policy's operation and effectiveness based on sound data, improved monitoring and control across the relevant Council departments and Kegworth Parish Council is required, building on the openness that Appendix A represents.

Topic Paper para 5.2: in order to limit unnecessary growth both within the terms of the new policy and, we hope, as a result of having comprehensive data by the time the policy becomes effective, we suggest a separate clause and appropriate policy measure to require planning permission to continue as an HMO when an existing HMO is sold.

Policy H8 para 6.74: we note that 14.6% would be better stated as 'at least 14%' to reflect the, as yet, incomplete data.

Policy H8 para 6.79: we note that if records of HMOs are not comprehensive, that will not only be a disadvantage, but will also be a weakness, rendering the policy less effective and fair. An Additional Licensing Scheme for HMOs of 3 or 4 occupants and some other enforceable registration scheme will be essential and should be introduced ahead of the Local Plan process.

Car Parking Provision (6.84-6.86): the parish council strongly supports this section and the proposal at H8(c) for the provision of off-street parking of one space per occupant. The parish council wishes to see a similar car parking rule for self-contained apartments in Kegworth. either in a separate policy or in an amendment to the Leicestershire Highway Design Guide.

Wording: at 6.73 the word 'smaller' should be removed – it is larger HMOs, 4-bed and more, that predominate.

Town Centre Topic Paper / Policy Paper Appendix A, 'Policy Maps'

The area proposed for removal on High Street, Kegworth has traditionally been occupied by shops of similar development. The proposal is opposed. Whilst current economics make residential development more financially attractive to owners, the village is still growing in size, and we believe that proposals for future retail/commercial applications within this area should still be looked on favourably.

We suggest that an expansion of the Town/Village Centre boundary is needed, not a contraction. This is to compensate for the trauma of Covid 2020-22, felt in every commercial and community centre, but also the protracted and difficult Public Realm Project (2018 – present and ongoing). In the High Street, central community facilities extend as far as the Community Library and the Heritage Centre. In London Road as far as the Parish Office. In Dragwell as far as Orchard Surgery. These expanded limits should be reflected in the boundary.

We suggest that for Kegworth Town/Village Centre the diversity of facilities and infrastructure is limited for a fast growing 'Local Service Centre' located close to a Freeport and a central hub of the national road network. Bus services are good, but car parking is limited. There are no NWLDC/LCC owned car parks and the Parish Council needs support to improve this situation and expand car parking as soon as possible. If the Town Centre boundary is expanded as we suggest, options and opportunities for community asset acquisition and development will increase. To that end, the expanded boundary should include all the back land of properties in High Street, Derby Road, Dragwell, Church Gate, Market Place included in our suggested expansion.

East Midlands Airport (Draft Policy Ec8):
Land and air quality (Draft Policy En 6)
Donington Park Circuit (Draft Policy Ec 11)

para 7.50/7.53 The continuing ambition and expansion of the Airport outlined at para 7.50 and the emergence of the Freeport make the admission in 7.53, that the last Sustainable Development Plan was dated as long ago as 2015, concerning. The next Airport Sustainable Development Plan will certainly have implications for this Local Plan and the wording of 7.53 should be tightened to ensure proper scrutiny and adequate consideration by the Airport of the objectives, policies and allocations in the Draft Local Plan.

The relationship of Policy Ec8 to the Freeport's jurisdiction and to policy IF1 (Development and Infrastructure) and IF5 (Transport Infrastructure and New Development) both need to be clarified.

Clause (3)(d) expands upon the unrestricted support for Airport growth in Clause (1): Noise: Kegworth Parish Council applauds the Airport Noise Action Plan process but feels that the cumulative effect of noise from the Airport/aircraft, Donington Park Circuit, the M1, and the EMAGIC railhead is not properly acknowledged here or elsewhere in the Local Plan.

Clause (3)(b) fails to define 'local' in relation to Air Quality and is vague in relation to scientific monitoring. Proven links between Air Quality and Health, the reinstatement of Housing sites in Kegworth adjacent to the M1, and the latest focus on Fine Particulate Matter all suggest that the removal of all monitors in the Kegworth area was premature. At least one up to date device should be reinstated.

Clause (3)(d) seems to imply that the reduction of airport-generated road traffic is an effect of improved public transport but fails to say clearly that improved road infrastructure is a prerequisite of growth given the pressures on M1 J24 and the A453.

Clause (3) of Draft Policy En (6) is inadequate in the light of the significant obligations placed on the District and described in paragraphs 10.76 onwards. Self-assessment will only be effective if continuous air quality monitoring takes place and if precise limits are laid down, to be used at the planning stage and post development.

East Midlands Airport: Safeguarding (Draft Policy Ec 9)

Kegworth Parish Council supports this policy, not least because memories remain of the Kegworth Air Disaster. We wish to see land South of the Development Boundary remain as valuable agricultural land. We believe that the Melbourne Parklands designation fits the intention of this policy. In particular we support clause (2)(g) and suggest that large scale solar arrays can be best concentrated on the EMAGIC or other Freeport sites.

East Midlands Airport: Public Safety Zones (Draft Policy Ec10)

The reduction in the area and size of the PSZs described at 7.64 is unwelcome in a community where memories remain of the Kegworth Air Disaster. The proximity of the M1 was a high-risk factor in 1989 and remains so. As well as requesting a review of the 1 in 100000 risk contour East of the M1, we request that no unnecessary increases of activity are permitted. We regard that the use of words and phrases like 'low density' 'very few' and 'reasonable expectation of low intensity use' are subjective and unhelpful when it comes to deciding planning applications.

Housing Policy H2 (Housing Commitments)

(Land adjoining 90 Ashby Road, Land Adjacent to Computer Centre and J24)

We note that this policy is to be updated, particularly to cover any lapse of planning permission. This is pertinent to our two housing sites, both having Reserved Matters approved but delayed because of HS2. We request that special provision be made, as far as possible within planning law, for a review of the following before implementation of existing plans for the two Kegworth sites which will represent a 10% increase in population during the lifetime of the Plan:

- Measures in plans to ensure integration into other built and planned development sites with the rest of Kegworth ie connectivity for pedestrians, cyclists and cars. This is especially important for Social Cohesion, Health and Well Being, and the growth and viability of commercial sites in the Village/Town Centre.
- The provision of public open space and leisure and sport facilities, in particular full-size pitches and team facilities per head of population in Kegworth given the growth in population by 16% in the ten years to 2021 alone. The nearest leisure centre in the district is Coalville and we know of no cross-boundary arrangements with other districts.
- New overall noise and air quality assessments, including the adequacy of monitoring to take into account the cumulative effect of continuing growth and development since Reserved Matters were approved. Contributors to noise and air quality in Kegworth, M1, Donington Park, the Airport, EMAGIC and its railhead and the growth and development plans of the Freeport sites. Prevailing westerly winds increase the cumulative impact.
- The adequacy of supermarket floor space in Kegworth per head of population.

Housing Policy H4 (Housing Types and Mix) and related policies **Housing Policy H11 (Adapted Housing)**

We are pleased to see this new policy which we believe should be applied to the two Committed sites in Kegworth. We are in broad agreement with the references to Affordable Rents but the policy preamble is not reflected in the proposed wording and falls short completely on 'Housing for Older People'.

There is an overall shortage in Kegworth of the accommodation types listed at 6.16, including Adapted Housing (Policy H11). However, given the strong evidence base for this policy in the HEDNA, the APR and the HENA , and the long period of time elapsed since both initial planning applications and 'reserved matters' on our sites we consider that the selection of a 'criteria-based approach' leaves too many loopholes and, unless the obligation on developers is tightened, the need in Kegworth, in particular, will not be met as a result.

Clause 4 of proposed Policy H4 is inadequate to close the gap that has opened up across all the accommodation types listed at para 6.16. The clause 4 statement

'Developments which include housing suitable for older people will be supported' makes no suggestion that schemes that do not include such housing for older people will not be supported. Continuing, the use of 'a proportion' renders this useless in ensuring extra provision for older people and belies both the policy heading and the subsection devoted to this group.