



Scan the code above or visit www.nwleics.gov.uk/meetings
for a full copy of the agenda.

Meeting	LOCAL PLAN COMMITTEE
Time/Day/Date	6.00 pm on Tuesday, 12 July 2022
Location	Council Chamber, Council Offices, Coalville
Officer to contact	Democratic Services 01530 454512

AGENDA

Item		Pages
1	APOLOGIES FOR ABSENCE	
2	DECLARATION OF INTERESTS	
	Under the Code of Conduct members are reminded that in declaring interests you should make clear the nature of that interest and whether it is a disclosable pecuniary interest, registerable interest or other interest.	
3	PUBLIC QUESTION AND ANSWER SESSION	
	To receive questions from members of the public under rule no.10 of the Council Procedure Rules.	
4	MINUTES	
	To confirm and sign the minutes of the meeting held on 25 May 2022.	3 - 4
5	LOCAL PLAN REVIEW - RESPONSE TO CONSULTATION	
	Report of the Head of Planning and Infrastructure	5 - 72

Circulation:

Councillor J Bridges (Chairman)
Councillor J G Simmons (Deputy Chairman)
Councillor D Bigby
Councillor D Everitt
Councillor D Harrison
Councillor J Houlton
Councillor J Legrys
Councillor R L Morris
Councillor A C Saffell

Councillor N Smith
Councillor M B Wyatt
Councillor R Ashman (Portfolio Holder)
Councillor K Merrie MBE (Portfolio Holder)

MINUTES of a meeting of the LOCAL PLAN COMMITTEE held in the Council Chamber, Council Offices, Coalville on WEDNESDAY, 25 MAY 2022

Present: Councillor J Bridges (Chairman)

Councillors J G Simmons, D Harrison, J Hoult, J Legrys, R L Morris, N Smith, R Johnson (Substitute for Councillor D Bigby) and C A Sewell (Substitute for Councillor D Everitt)

Officers: Mr I Nelson, Mr C Elston, Mrs C Hammond and Mr S Smith

1 APOLOGIES FOR ABSENCE

Apologies were received from Councillors D Bigby, D Everitt and M B Wyatt.

2 DECLARATION OF INTERESTS

There were no interests declared.

3 PUBLIC QUESTION AND ANSWER SESSION

There were no questions received.

4 MINUTES

Consideration was given to the minutes of the meeting held on 23 March 2022.

It was moved by Councillor J Legrys, seconded by Councillor J Hoult and

RESOLVED THAT:

The minutes of the meeting held on 23 March 2022 be approved and signed by the Chairman as a correct record.

5 LEICESTER & LEICESTERSHIRE STATEMENT OF COMMON GROUND ON HOUSING AND EMPLOYMENT NEED (APRIL 2022)

The Planning Policy and Land Charges Team Manager presented the report to members, which was accompanied by a presentation. He advised members that some errors had been noted in the Housing and Economic Needs Assessment, on the employment side, in relation to plot ratios. He informed the committee that the consultants had provided the Local Authorities with an updated assessment and highlighted that it did not relate to the housing side and that it did not change the figure of unmet need for Leicester, but it was not clear yet whether or not the Statement of Common Ground would need to go back to the Member Advisory Group for consideration.

A member stated that there was a public perception that the statement and figures before the committee had been reached without democratic input and questions had been raised as to why the total figure that Leicester could not meet had not been split equally amongst the seven District and Borough Councils. The member also noted that the calculations were based on the 2011 census and that in 18 months' time, when the figures from the 2021 census would be available, the numbers in front of the Committee could all change.

Members noted the duty to co-operate, even though the district did not neighbour the city and felt that co-operation worked both ways and, as such, NWL should approach Leicester City to request support for improvements to the infrastructure provision, such as

the Ivanhoe line, health services and education, as an acknowledgement of the district taking the additional homes to assist the city.

A number of members raised concerns over the impact the level of growth would have on the already over-burdened infrastructure of the district, with there needing to be sufficient infrastructure in place before development began, that serious consideration to the location of any development would need to be given due to the limited functional relationship between the district and Leicester City, and that, whatever housing was to be built, was of a type appropriate to meet the needs of the community it may be built in, including more affordable dwellings.

It was noted by all that the concerns that had been raised would be considered as part of the Local Plan Review and that all Council was being asked to agree was its position on the Statement of Common Ground and not where development should go.

It was moved by Councillor D Harrison, seconded by Councillor J Legrys and

RESOLVED THAT:

1. The Statement of Common Ground which addresses the issue of unmet housing and employment needs from Leicester City be noted.
2. The views of the Local Plan Committee on the Statement of Common Ground be forwarded to Council for it to have regard to when determining the Council's position and
3. The Council's position on whether or not to support the Statement of Common Ground will be formally agreed at the meeting of Council on 21 June 2022 be noted.

The meeting commenced at 6.00 pm

The Chairman closed the meeting at 7.16 pm

LOCAL PLAN COMMITTEE – 12 JULY 2022

Title of Report	LOCAL PLAN REVIEW – RESPONSE TO CONSULTATION	
Presented by	Councillor Keith Merrie 07596 112270 Keith.merrie@nwleicestershire.gov.uk	
Background Papers	Responses to consultation Development strategy Options and Policy Options consultation – January to March 2022 Sustainability Appraisal of general employment strategy options Statement of Common Ground (2022) Housing and Economic Needs Assessment (June 2022) Housing and Economic Needs Assessment – Housing Distribution Housing and Economic Needs Assessment – Employment distribution National Planning Policy Framework Planning Practice Guidance Report to Local Plan Committee 26 June 2019 Report to Local Plan Committee 27 October 2021	Public Report: Yes
		Key Decision: Yes
Financial Implications	The cost of the substantive Local Plan Review is met through existing budgets.	
	Signed off by the Section 151 Officer: Yes	
Legal Implications	Legal implications considered in the preparation of this report and any potential issues highlighted.	
	Signed off by the Monitoring Officer: Yes	
Staffing and Corporate Implications	No staffing implications associated with the specific content of this report. Links with the Council's Priorities are set out at the end of the report.	

	Signed off by the Head of Paid Service: Yes
Purpose of Report	<p>To consider the comments received in response to consultation undertaken in January -March 2022 on the emerging Local Plan in respect of:</p> <ul style="list-style-type: none"> • Local Plan objectives • Settlement hierarchy • Development strategy options for housing • Development strategy options for employment
Recommendations	<p>THAT THE LOCAL PLAN COMMITTEE:</p> <p>(I) NOTES THE RESPONSES TO THE CONSULTATION;</p> <p>(II) AGREES TO AMEND OBJECTIVES 2,4,5, 8, 9 AND 10 AS SET OUT AT PARAGRAPH 3.5 OF THIS REPORT;</p> <p>(III) AGREES THE REVISIONS TO THE SETTLEMENT HIERARCHY SET OUT AT PARAGRAPH 4.6 OF THIS REPORT AND APPENDIX C</p> <p>(IV) AGREES THE REVISIONS TO THE PROPOSED LOCAL HOUSING NEEDS POLICY SET OUT AT PARAGRAPH 4.11 OF THIS REPORT AND APPENDIX D</p> <p>(V) AGREES TO A HOUSING REQUIREMNT OF 686 DWELLINGS EACH YEAR AS SET OUT AT PARAGRAPH 5.2.29 OF THIS REPORT (SUBJECT TO THE COUNCIL AGREEING THE PROPOSED STATEMENT OF COMMON GROUND IN RESPECT OF HOUSING AND EMPLOYMENT NEEDS);</p> <p>(VI) AGREES TO EXTEND THE PLAN PERIOD TO 2040 AS SET OUT AT PARGRAPH 5.2.33 OF THIS REPORT;</p> <p>(VII) NOTE THE UPDATED HOUSING PROVISION AS AT APRIL 2021 AS SET OUT AT TABLE 1 OF THIS REPORT;</p> <p>(VIII) AGREES A FLEXIBILITY ALLOWANCE OF 10% OF THE RESIDUAL HOUSING REQUIREMENT FOR 2021-40 AS SET OUT AT PARGRAPH 5.2.41 OF THIS REPORT;</p> <p>(IX) NOTE THAT LAND NEEDS TO BE IDENTIFIED FOR A MINIMUM OF 6,693 DWELLINGS AS SET OUT AT PARGRAPH 5.2.41 OF THIS REPORT;</p> <p>(X) NOTE THE PROPOSAL TO TEST A FURTHER HOUSING DISTRIBUTION OPTION (OPTION 9C) AS SET OUT AT PARAGRAPH 5.3.28 OF THIS REPORT;</p> <p>(XI) THAT THE STANTEC STUDY PROVIDE THE PRIMARY EVDIENCE BASE FOR FUTURE GENERAL EMPLOYMENT NEEDS AS SET OUT AT PARAGRAPH 6.4.16 OF THIS REPORT;</p> <p>(XII) NOTES THE GENERAL EMPLOYMENT LAND NEEDS AS AT APRIL 2021 AS SET OUT AT TABLES 5 AND 6</p>

	<p>OF THIS REPORT;</p> <p>(XIII) NOTE THE PROPOSAL TO TEST A FURTHER EMPLOYMENT DISTRIBUTION OPTION (OPTION 2a) AS SET OUT AT PARAGRAPH 6.5.30 OF THIS REPORT;</p> <p>(XIV) AGREES A WORKING PROVISIONAL FIGURE FOR STRATEGIC DISTRIBUTION OF 100,700 SQM AS SET OUT AT PARAGRAPH 6.6.6 OF THIS REPORT (SUBJECT TO AGREEING TO EXTENDING THE PLAN PERIOD TO 2040) PENDING THE OUTCOME OF ANY AGREEMENT WITH THE OTHER LEICESTER AND LEICESTERSHIRE AUTHORITIES IN RESPECT OF THE DISTRIBUTION OF THE RESIDUAL REQUIREMNT IDENTIFIED IN THE STRATEGIC WAREHOUSING STUDY;</p> <p>(XV) NOTES THE INTENTION TO COMMISSION ADDITIONAL EVIDENCE IN RESPECT OF LANDSCAPE AND HERITAGE ISSUES IN RELATION TO THE PROPOSED FREEPORT SITE SOUTH OF THE A453 AND EAST MIDLANDS AIRPORT</p>
--	---

1. BACKGROUND

- 1.1 Members will recall that a number of reports have been considered at previous meetings of this committee in respect of emerging options as part of the review of the Local Plan. These issues were then the subject of consultation between 17 January and 14 March 2022.
- 1.2 The [Development Strategy and Policy Options consultation document](#) covered the following issues and included a series of questions to help guide responses:
- Local Plan objectives
 - Settlement hierarchy
 - Development strategy options for housing
 - Housing
 - Development strategy options for employment
 - Employment
 - Health & wellbeing
 - Renewables and low carbon
- 1.3 A total of 414 responses were received to the consultation, broken down as follows by category of responder:
- 309 individuals
 - 59 developers/agents/landowners
 - 15 organisations (e.g. residents groups, local environmental groups, single interest groups)
 - 15 statutory consultees
 - 8 district/borough/county councils
 - 6 parish/town councils
 - 2 NWLDC internal
- 1.4 In addition, a petition was received signed by 44 individuals along with 153 number of standard tear off slips, both concerned with a potential housing site off Meadow Lane Coalville (SHELAA site C76).
- 1.5 Copies of all responses can be viewed from this [link](#).

- 1.6 The specific questions included in the consultation, together with the number of responses to each question is set out at Appendix A of this report.

2 STRUCTURE OF THIS REPORT

- 2.1 The purpose of this report is to consider the comments received in respect of the following matters and to determine the Council's approach:
- Local Plan objectives
 - Settlement hierarchy
 - Development strategy options for housing
 - Development strategy options for employment
- 2.2 The issues raised in response to the consultation are summarised in the report and/or supporting appendices, followed by a consideration of the issues and how the Council should respond.
- 2.3 The remaining issues consulted upon (for example the possible use of national housing technical standards, self and custom build and climate change issues) and the comments received will be considered at a future meeting of this committee.

3 LOCAL PLAN OBJECTIVES

Background

- 3.1 The consultation sought views on the proposed objectives that the plan should seek to address.
- 3.2 The following question was asked (question1) –
- “Do you agree with these Local Plan Review Objectives? If not, why not?”

Summary of Responses

- 3.3 There was a total of 106 responses to this question.
- 26 respondents agree or broadly agree with the objectives without further comment
 - 35 respondents make specific comments about individual objectives/s (18 of these also express support for the objectives generally)
 - 42 respondents object to the prospect of new development. 22 of these refer to potential development the Castle Donington/Diseworth/Isley Walton areas, 2 to Ashby de la Zouch and 2 to the Coalville urban area.
 - 3 respondents did not understand the question/could not answer the question/could not locate the relevant consultation documents.

Considerations

- 3.4 A summary of the comments received and officer responses are set out in Appendix B. This consideration has resulted in recommended changes to Objectives 2, 4, 5, 8, 9 and 10.
- 3.5 The revised set of Objectives showing the proposed changes are listed below with additions in *italics underlined* and deletions ~~struck through underlined~~. A summary of the reason/s for the proposed change are in brackets beneath. It is recommended that these be agreed for future inclusion in the Local Plan Review.

Objective 1 - Enable the health and wellbeing of the district's population.

Objective 2 - Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of number, size, tenure and type.

[Reason: for accuracy]

Objective 3 - Achieve high quality development which is sustainable, which responds positively to local character and which creates safe places to live, work and travel.

Objective 4 - Reduce the need to travel by private car and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure.

[Reason: for clarity]

Objective 5 - Support the district's economy, including its rural economy, by providing for a range of employment opportunities and sufficient new sites which respond to the needs of businesses and local workers.

[Reason: for accuracy]

Objective 6 - Enhance the vitality and viability of the district's town and local centres which have an important role serving our local communities with a particular focus on the regeneration of Coalville.

Objective 7 - Ensure new development mitigates for and adapts to climate change, including reducing vulnerability to flooding, and contributes to reduced net greenhouse gas emissions to support the district becoming carbon neutral by 2050.

Objective 8 - Conserve or enhance the district's built, cultural, industrial and rural heritage and heritage assets and their setting.

[Reason: for accuracy]

Objective 9 - Conserve and enhance the district's natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the River Mease Special Area of Conservation, the National Forest and Charnwood Forest as well as its other valued landscapes and pursue opportunities for biodiversity net gains.

[Reason: for accuracy and to reflect Government guidance]

Objective 10 - Ensure the efficient use of natural resources brownfield land, in particular brownfield land, control pollution and facilitate the sustainable use and management of minerals and the minimisation of waste.

[Reason: for accuracy and clarity]

Objective 11 - Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way.

4 SETTLEMENT HIERARCHY

Background

4.1 The consultation set out a proposed settlement hierarchy and a proposed local connection test in respect of potential development in Local Housing Needs villages.

4.2 In terms of the settlement hierarchy the following question was asked (question 2):

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

Summary of Responses

4.3 There was a total of 109 responses to this question.

- 23 respondents agreed with the hierarchy
- 5 respondents disagreed with the hierarchy with no further comment
- 22 respondents agreed with the position of specific settlements in the hierarchy
- 6 respondents broadly agreed with the hierarchy but suggested that some settlements were better placed to take more growth than others
- 23 disagreed with the position of a particular settlement in the hierarchy / suggested changes to the hierarchy
- 21 respondents agreed with the position of specific settlements in the proposed hierarchy
- 8 respondents commented on the methodology of the Settlement Study
- 18 respondents used the question to comment on growth strategy issues / to object to new development/highlight concerns about the loss of countryside/loss of separation as a result of potential development around Isley Walton/Diseworth, Coalville, Castle Donington and Ashby.
- 1 respondent used the question to support new growth
- 8 respondents did not understand the question / could not answer the question / could not locate the relevant consultation documents.

Please note the above breakdown of responses totals 135. This is because some respondents had different views about different settlements or commented on several different issues.

4.4 A summary of the comments received and officer responses are set out in Appendix C.

Considerations

4.5 Having considered the various responses a change is recommended in respect of Coleorton.

4.6 In terms of the recommendation to no longer classify Coleorton (Lower Moor Road) as a Sustainable Village, it should be noted that this will not preclude all development. Instead, there will still be opportunities for housing growth in Coleorton, but this would be in line with the requirements of the proposed Local Housing Needs Villages policy.

4.7 In terms of the criteria for local needs housing the following question was asked (question 3):

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

Summary of Responses

4.8 There was a total of 71 responses to this question.

- 26 respondents agreed with the proposed approach to Local Housing Needs Villages
- 8 respondent disagreed with the proposed approach to Local Housing Needs Villages
- 2 respondents queried why certain settlements were/weren't Local Housing Needs Villages
- 9 respondents commented on the proposed criteria for establishing a demonstrable local need
- 2 respondents said that growth should be communicated with the villages and towns affected
- 1 respondent said growth in the Local Housing Needs Villages should be matched by new infrastructure
- 4 respondents provided general comments on the Council's growth strategy
- 17 respondents used the question to generally object to new development which would result in the loss of greenfield land, primarily at the proposed New Settlement and Castle Donington
- 2 respondents could not answer / locate the relevant consultation documents.

4.9 A summary of the comments received and officer responses are set out in Appendix D.

Considerations

4.10 Notwithstanding the number of comments made in respect of the proposed criteria to be applied to demonstrate a local connection, only relatively minor wording changes are proposed.

4.11 The most significant change is the proposal to remove criterion c). On reflection officers consider that this criterion would represent a potential risk in terms of managing growth in these settlements. Furthermore, whilst recognising that there may be circumstances in which an existing resident requires some care, this does not necessarily require that the carer live in the same settlement as the person being cared for. Bearing in mind that there are larger settlements not that far from all Local Needs Housing Villages, there will still be opportunities to either move to an existing property or, potentially, to build a new property in these larger settlements (subject to normal policy considerations).

5 DEVELOPMENT STRATEGY OPTIONS FOR HOUSING

5.1 Under this section of the consultation two specific aspects were considered:

- the overall amount of new housing that needs to be provided for; and
- where should new housing be located?

Each of these is considered below.

5.2 How much housing should be provided for?

Background

5.2.1 The following options for how much housing should be provided for per year were developed.

- 368 dwellings (this is the result from the standard method) – referred to as Low scenario

- 448 dwellings (this is based on an assessment of housing needs for Leicester and Leicestershire in the Housing and Economic Development Needs Assessment 2017 (HEDNA)) – referred to as Medium scenario
- 512 dwellings (this is the figure from the Leicester and Leicestershire Strategic Growth Plan) – referred to as High 1 scenario
- 730 dwellings (this is based on the 2018 household projections with an allowance for vacancy rates in dwellings) – referred to as High 2 scenario

The High 1 and High 2 scenarios were identified as the preferred options.

5.2.2 The following question (question 4) was asked:

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

Responses

5.2.3 There were 123 responses to this question.

42 responses were from developers or landowners or agents acting on behalf of developers or landowners

4 were parish or town councils

59 were individuals

8 were from organisations

7 local authorities

3 statutory consultees

The responses are summarised below by category of responder.

Summary of responses

Developers/landowners

- 5.2.4 Overwhelming support for the High 2 scenario having regard to latest household and population forecasts; the strong economic growth in the district, including the Freeport at East Midlands Airport; the need to provide affordable housing and recent housing growth in excess of the requirement in the adopted Local Plan. Some suggestion that the requirement should be more than the High 2 scenario.
- 5.2.5 One representation suggested that growth should be no more than that set out in the strategic growth plan (512 dwellings each year) and that to do otherwise would prejudice the ‘cities first’ approach advocated in the Planning Practice Guidance and the delivery of previously developed land. One representor also stated that the Council should not identify preferred growth strategy in advance of the issue of unmet need from Leicester City being resolved. One representor pointed to the outcome from the 2018-household projections from the Office for National statistics which identified a figure of 752 dwellings each year to 2039.
- 5.2.6 Other comments noted that any figures should be treated as minimum, with a number suggesting that a flexibility allowance is required with suggestions of 15-20% suggested as being appropriate. Also, some suggestion that the plan period should be extended to 2040 (from the currently proposed 2039).

Parish and Town Councils

- 5.2.7 Preferred the High 1 scenario. It was noted that any unmet need from Leicester City should be met close to the City. It was also suggested that no exceptional circumstances had been demonstrated as to why market signals and demographic trends should be used and that recent high housing growth was because the Council was not able to demonstrate a 5-year supply of housing land and so the growth rate was exceptional.

Other local authorities

- 5.2.8 Six Leicestershire authorities responded, all of whom supported the proposed approach as being suitable until such time as the redistribution of unmet need from Leicester City has been resolved. One non-Leicestershire authority also supported the proposed approach.

Organisations

- 5.2.9 There was some support for the High 1 scenario which exceeds the standard method, whilst others considered that the standard method was appropriate (the low scenario). Notwithstanding support for the High 1 scenario, there were significant concerns expressed about the potential impact of growth on the environment and how growth and sustainability need to be balanced. Also need to include a windfall allowance and encourage development of previously developed land.

Statutory consultees

- 5.2.10 Two did not express an opinion as to which scenario was appropriate, but noted the need to ensure that sufficient infrastructure is provided and that there is no adverse impact upon environmental assets. One respondent considered that the High 1 and High 2 options represented an appropriate approach subject to agreement regarding unmet need in Leicester City.

Individuals

- 5.2.11 The vast majority of respondents expressed concern at the level of housing growth being suggested, whether High 1 or High 2. Of those who did express a preference, High 1 was preferred. The concerns expressed included:
- Impact upon local environment through loss of greenfield sites;
 - Loss of countryside and agricultural land;
 - Impact upon natural environment;
 - Lack of infrastructure and consequent impact upon existing residents;
 - Likely to see less immigration in the future so question need;
 - Significant housing growth has already taken place or is proposed;
 - Should use brownfield land before greenfield;
 - Why does unmet need from Leicester need to be directed towards North West Leicestershire?
- 5.2.12 It was also suggested that no exceptional circumstances had been demonstrated as to why market signals and demographic trends should be used and that recent high housing growth was because the Council was not able to demonstrate a 5-year supply of housing land and so the growth rate was exceptional.

Considerations

Amount to be planned for

- 5.2.13 Since undertaking the consultation, work has progressed significantly in respect of the issue of unmet need from Leicester City which up until now has been the single biggest

issue that needed to be resolved to enable the Council to establish a housing requirement. A draft Statement of Common Ground (SoCG) which addresses the issue of unmet housing and employment need from Leicester City was considered at the meeting of Local Plan Committee on 25 May 2022. It was due to be considered by Cabinet in June. However, an error was identified in respect of the employment evidence which informed the SoCG. Therefore, sign off by each authority has now been put back slightly and is now due to be considered by Council at its meeting in September.

- 5.2.14 As noted above, the error only relates to employment and does not impact upon the housing unmet need issue. Therefore, the following comments are made on the basis that Council agrees the SoCG when it is considered in September. If they do not, then this issue will need to be reconsidered.
- 5.2.25 The draft SoCG identifies a figure for North West Leicestershire of 686 dwellings per annum. This is within the range of High 1 and High 2 (512 and 730 dwellings respectively) which was the subject of the latest consultation, albeit towards the top end.
- 5.2.26 In preparing the SoCG regard has been had to other potential distributions of housing growth across the authorities. All of the options were assessed for their potential environmental, economic and social impacts through a Sustainability Appraisal. This found that the preferred approach performs as well or better than the alternatives for most sustainability topics, and there are no clear indications that suggest a different approach should be taken in the SoCG.
- 5.2.27 Notwithstanding the fact that SA has been undertaken in support of the SoCG, the options put forward as part of the consultation were the subject of a separate SA which informed the choice of the preferred options. It is the case that the lower growth options scored fewer negative impacts and more positive impacts than either the High1 or High 2 options. This is to be expected because of the scale of growth. However, there is nothing in the SA which suggest that the impacts of High 1 or High 2 cannot be satisfactorily mitigated.
- 5.2.28 The preferred approach in the SoCG has had regard to the functional relationship between each authority and the City but also other factors including the balance between jobs and homes. It is the latter that has most influenced the housing figure in the SoCG for North West Leicestershire.
- 5.2.29 The issue of balance between jobs and homes is something that would have to be considered as part of agreeing a housing requirement figure for the Local Plan. The fact that it has been addressed as part of the draft SoCG and in the context of the wider Leicester and Leicestershire Housing Market Area represents a robust approach and therefore, as allowed for in recommendation (v) the Local Plan housing requirement is proposed to be set at 686 dwellings per annum.

Plan period

- 5.2.30 The NPPF requires that strategic policies (those which set out an overall strategy for the pattern, scale and quality of development) should look ahead over a minimum 15-year period from the date of adoption. This is currently anticipated to be in 2024 which does provide a 15-year period from adoption. Therefore, on the face of it there is no reason to revise the proposed plan period at this time. However, any slippage in the timetable for the review could put this in jeopardy and so represents a risk to the plan.
- 5.2.31 Whilst it is not considered that this risk would necessarily result in the plan being found unsound, it could result in the need to do additional work later on (for example, to identify additional sites to address any further years housing requirement). This is an issue at a current Examination in Maidstone. The plan has an end date of 2037 but adoption is now

not likely before 31 March 2023 (as proposed in the Local development Scheme). The Inspector has advised the local authority that “*I would recommend that the Council looks at a scenario of extending the plan period to 2038 and to be in a position to advise the Examination by the first set of hearings what the implications of that would mean*”.

- 5.2.32 On the other hand, government has embarked upon making reforms to the planning system, which includes a commitment to issue a new NPPF. It has also made it clear that it expects plans to be reviewed every 5 years which would raise the question of whether a 15-year period post adoption would be necessary. Therefore, it is not guaranteed that current NPPFs 15-year requirement will be continued in an updated version.
- 5.2.33 If the plan period were to be extended this may have implications for the evidence base. Of the current evidence base the Employment Land Study goes to 2039 and so would need to be extended. In terms of housing, the recently completed Housing and Economic Needs Assessment (HENA) goes to 2041. The remainder of the evidence base either does not have an end date or that currently being prepared (e.g. Infrastructure Delivery Plan) can accommodate an extended period. On balance, it is considered that it would be prudent to extend the plan period to 2040.
- 5.2.34 Taking account of an extended plan period, this would result in a housing requirement of 13,720 dwellings for the plan period 2020-40.

Update to base date

- 5.2.35 Having established a housing requirement and the plan period, it is considered that it would be appropriate to update the base date from 2020 to 2021 (data for 2022 is not yet available) before identifying the residual amount that needs to be provided for through allocations. Table 1 below provides an updated position taking account of completions 2020-21 and having regard to the most up to date housing trajectory which is based on data as at April 2021.

Table 1 – Housing requirement as at April 2021

Annual requirement	686 dwellings	A
Total requirement 2020-40 (A x 20)	13,720	B
Completions 2020-21	702	C
Remaining as at April 2021(B – C)	13,018	D
Projected completions 2021-31	5,004	E
Projected completions 2031-40	2,623	F
Total projected completions 2021-40 (E + F)	7,627	G
Remaining provision required (D – G)	5,391	

- 5.2.36 On the basis of the above, the plan will need to allocate enough land to accommodate at least 5,391 dwellings.

Need for flexibility

- 5.2.37 A number of representors from the development industry suggest that the plan should include a flexibility allowance. This was an issue considered at the meeting of this Committee on 26 June 2019. The report can be viewed from this [link](#).
- 5.2.38 At that time, it was agreed that the plan should include a buffer of 15%. The buffer (or flexibility allowance) is a tool whereby more land is allocated than required so as to ensure that in the event of sites either being built at a slower rate than anticipated or not coming forward at all, that the overall requirement is met by the end of the plan period.
- 5.2.39 Whilst such allowances are generally supported by Inspectors, there is no hard and fast rule regarding the amount of any allowance.

- 5.2.40 Since this issue was last considered by Committee, 3 years have elapsed and the annual build rate has remained above both the adopted Local plan requirement (481 dwellings) and the requirement from the SoCG. Furthermore, there is no evidence that a significant number of permissions have lapsed, particularly on large sites (i.e. 10 or more dwellings) which will make up site allocations. In addition, consistent with the approach adopted in the current local plan, it is not proposed to make a specific allowance for windfall sites (i.e. unforeseen sites whether more than or less than 10 dwellings but which come forward for development). The reality is such sites will continue to come forward, although it is not possible to predict with any certainty how many, and so will therefore, bolster the supply over and above allocated sites.
- 5.2.41 It is, therefore, suggested, that whilst a flexibility allowance should be made this should be set at 10% of the remaining requirement for the period 2021-40 (13,018 from table 1). This has the effect of increasing the amount that needs to be allocated (in addition to projected completions) by 1,302 dwellings to 6,693 dwellings (i.e. 5,391 from table 1 + 1,302).

Infrastructure issues

- 5.2.42 A number of representatives raise concerns about the potential impact upon infrastructure arising from the scale of growth. The exact impact will be influenced not just by the scale of growth, but also where growth occurs. To this end an Infrastructure Delivery Plan has been commissioned to support the Local Plan which will identify what additional infrastructure is required.

5.3 Where should new housing be located?

Background

- 5.3.1 The consultation set out 15 different options for how growth might be distributed across the district, depending upon the overall scale of growth. Further details about the options can be found in the consultation document.

The two preferred options were:

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

- 5.3.2 The following question was asked (question 5):

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

Responses

- 5.3.3 There were 132 responses to this question.

46 responses were from developers or landowners or agents acting on behalf of developers or landowners

4 were parish or town councils

58 were individuals

11 were from organisations

6 local authorities

7 statutory consultees

The responses are summarised below by category of responder.

Summary of responses

Developers/landowners

- 5.3.4 The majority of those who expressed an opinion about the options, supported option 7b. A significant number of representors suggested that more growth needed to be directed towards the sustainable villages as these could support services and facilities and help to address social and economic needs.
- 5.3.5 There was concern that too much emphasis was being placed upon the new settlement and that instead there was a need for a range of sites. Such sites could help to support small builders, as well as delivering affordable housing and would ensure continuity of supply until any new settlement comes on stream
- 5.3.6 A number of representors suggested that a further option should be considered whereby growth should be met through the existing settlement hierarchy rather than including a new settlement.
- 5.3.7 Whilst some suggested there was a need for more development in Coalville as the district largest town, others favoured more growth in Ashby de la Zouch and Castle Donington, whilst other supported more growth in the local service centres. In addition, a potential new settlement in conjunction with land in Hinckley and Bosworth was highlighted as having potential, although no specific site was identified.

Organisations

- 5.3.8 No overwhelming consensus regarding the most appropriate option. There was some support for a new settlement, either as a standalone option or as part of hierarchy, as it would help relieve pressure from development elsewhere and would link to employment growth. However, others considered that it was inappropriate due to the impact upon rural area (such as noise, pollution and traffic), impact upon CO2 emissions and the fact that it would not address unmet needs in Leicester. Any new settlement would need to include high quality public transport from the outset. The extension of the tram from Clifton to the East Midlands Parkway and beyond should be planned.
- 5.3.9 Some considered that there was no need for any additional development having regard to potential windfall sites and redevelopment of brownfield sites. There is also need to consider relationship of settlements to Leicester and sustainable transport connectivity to the city.
- 5.3.10 Development in sustainable villages should be proportionate to their size and avoid situation where a sustainable village has more growth than a Local Service Centre.

Parish and Town Councils

- 5.3.11 There was support for option 8 (New settlement) as this would reduce pressure for development elsewhere, but also put pressure on developers to undertake development already committed in those settlements and so remove planning blight from those areas. In addition, such an approach would hasten the provision of new infrastructure.

- 5.3.12 Of the other options there was some support for options 3a, 4a, 4b and 7b, but no general consensus.

Local authorities

- 5.3.13 Some concern that too much development in sustainable villages could put pressure on areas outside of North West Leicestershire. Development in such locations should be limited having regard to needs for local or affordable housing.
- 5.3.14 A number of authorities consider that the proposed approach provides a suitable basis for planning, although need to ensure that all the transport implications are assessed.

Statutory consultees

- 5.3.15 None of the respondents expressed an opinion as to which scenario was appropriate. However, it was noted that there is a need to ensure that sufficient infrastructure is provided, that there is no adverse impact upon environmental assets, that impact upon the historic environment is addressed as are issues relating to flood risk and also noise from East Midlands Airport.
- 5.3.16 One respondent considered it important that a diverse range of sites is provided to ensure a 5-year supply of housing on an ongoing basis.

Individuals

- 5.3.17 There was no overall consensus.
- 5.3.18 A number of respondents expressed concerns regarding a possible new settlement south of East Midlands Airport as it would result in the loss of countryside, increase carbon emissions and pollution as a result of traffic and adversely impact wildlife. It would also become a commuter town for the likes of Derby, Nottingham and Leicester. Question whether a new settlement plus more employment near airport would be a reasonable approach.
- 5.3.19 However, there was support for option 8 (New settlement) as this would reduce pressure for development elsewhere, but also put pressure on developers to undertake development already committed in those settlements and so remove planning blight from those areas. In addition, such an approach would hasten the provision of new infrastructure. A further suggestion was to increase the amount of development under option 7b for the new settlement.
- 5.3.20 Some supported directing more development to larger settlements such as Coalville building at a higher density on brownfield sites and so reducing the loss of greenfield sites. This would also make better use of existing services and facilities which can also be expanded. Conversely, some suggested that places like Coalville had seen enough development and that it should be directed to areas of economic growth such at Castle Donington and East Midlands Airport. There was also some support for directing more growth to areas around Leicester as that is where the unmet need is.
- 5.3.22 There was a suggestion that Ibstock should be utilised for more development, whilst some considered that Option 9b appears to be reasonable as it would allow development to be spread around and would provide more opportunities for small builders, consistent with the NPPF.
- 5.3.23 Some considered that the overall amount of development was too high and that should wait to see how economic circumstances change and/or that infrastructure should be provided before development.

Considerations

- 5.3.24 Across all categories of responder, there is no overall consensus as to which of the 15 options developed is the most appropriate.
- 5.3.25 Whilst there is support amongst parish and town councils and individuals for a new settlement option only (option 8), for the reasons previously considered in the report to Local Plan Committee on 27 October 2021 (paragraphs 4.63 to 4.65), such an approach would not be appropriate. In summary such an approach would be contrary to the NPPF in respect of deliverability and failure to provide a variety of sites and would put all the long-term future supply on one site; such a strategy would be very high risk and is considered to be inappropriate.
- 5.3.26 The assumption in Option 7b regarding the amount of development in the plan period is considered to be a prudent assessment based on current information and so increasing the amount of development in the new settlement would not be appropriate.
- 5.3.27 Whichever option is chosen it will be necessary to consider the impact upon infrastructure and to identify future requirements. As already noted, to this end an Infrastructure Delivery Plan has been commissioned. This work will also need to consider the issue of when infrastructure is to be provided, but it should be appreciated that in most cases this will not in advance of development commencing.
- 5.3.28 The suggestion that an alternative option which involves a continuation of the approach taken in the adopted local plan, with no new settlement, was considered under the low and medium scenario as a baseline option. However, it was not considered under the High1 or High 2 option. There is a requirement as part of the Sustainability Appraisal process to consider all reasonable alternatives. It is considered that a further option which rolls forward the development strategy in the adopted Local Plan would be a reasonable alternative. Therefore, the following option has been developed which is based on the proportions of development that are projected from the adopted Local Plan by settlement category. To be consistent with the previous assessment the residual requirement has been left at 5,100 dwellings rather than the higher residual outlined above. It also excludes small villages as this would run counter to the proposed development strategy which seeks to limit development in such settlements to local needs only.

Option 9c	Principal Town (2,056 dwellings), KSC (1,741 dwellings), LSC (771 dwellings) and Sustainable Villages (532 dwellings)
-----------	---

- 5.3.29 The Council's consultants have been asked to undertake an assessment of this option which will be option 9c.
- 5.3.30 This option would put more development in to all settlement categories, including both Coalville as the Principal Town and the Sustainable Villages as suggested by a number of responses.
- 5.3.31 A decision on which option to pursue has implications for which and how many sites are then proposed for development. It has not been possible to complete the SA assessment of the new option 9c in time for consideration as part of this report. Therefore, consideration of what the development strategy should be is proposed to be deferred for consideration to the Local Plan Committee on 27 September 2022 when it is also hoped to present proposed allocations.

6 DEVELOPMENT STRATEGY OPTIONS FOR EMPLOYMENT

- 6.1 The consultation sought views in respect of:

- How to ensure a continuity of supply of employment land;
- Strategy options for general employment land;
- The approach to strategic warehousing;
- Possible changes to existing policy Ec2(2) and
- How to address the need for space for start-up businesses

6.2 This report considers those matters underlined. The remainder will be considered in a future report to this Committee.

6.3 Before considering these matters, the issue of the actual employment land requirements will be addressed, as this provides the basis for any subsequent strategy. In addition, consideration is given to the potential implications of the government's announcement regarding the inclusion of land south of the A453 and East Midlands Airport as part of the Freeport.

6.4 **Employment Land Requirements**

Background

6.4.1 The [Leicester & Leicestershire Housing & Economic Needs Assessment](#) (HENA), provides an assessment of the quality and type of employment land needed in the Leicester and Leicestershire area and is intended to inform the preparation of local and strategic plans across the area. The HENA presents its findings on both a Leicester and Leicestershire-wide basis and at individual district/borough level.

6.4.2 The council had already commissioned and published its own assessment of employment land requirements, the '[North West Leicestershire – The Need for Employment Land](#)' (November 2020) study, undertaken by the consultants Stantec ('the Stantec study') as part of the evidence base for the Local Plan Review. The study findings were reported to this Committee on [27 January 2021](#).

6.4.3 The HENA and Stantec studies both deal with 'general employment' requirements (i.e. offices, industrial and smaller warehousing units (up to 9,000sqm). Strategic warehousing requirements (units 9,000+sqm) are covered in the [Strategic Warehousing Study](#) (April 2021) prepared by Iceni.

HENA and Stantec studies: comparison

6.4.4 The Stantec study and the HENA both consider alternative ways to assess future general employment needs, including sources of information and reach different conclusions on the most appropriate approach. The selected approaches for the different types of employment floorspace are summarised below.

Table 2- comparison of information base for Stantec and HENA

	HENA	Stantec
Offices	Labour demand growth forecast (Cambridge Econometrics)	Labour demand forecast (Experian)
R&D	Gross completions trend	
Industrial	Gross completions trend	Output forecast (Experian)
Small distribution	Gross completions trend	

6.4.5 The studies also take different approaches to allowances and adjustments for considerations such as need for flexibility, and vacancy rates. They also cover different time periods. All in all, this makes direct comparison of the findings difficult. Nonetheless

the findings have been converted to per annum figures in the table below to provide the Committee with an understanding of the broad scale of need identified in each study.

Table 3 - comparison of findings from Stantec study and HENA

	Offices	Industrial/smaller warehousing
Stantec (2017-39) (22 years)	57,000 sqm (max)	187,000 sqm (min)
Stantec/annum	2,590 sqm (0.41 Ha)	8,500 sqm (2.14 Ha)
HENA (2021-41) (20 years)	39,700 sqm	152,900 sqm
HENA/annum	1,985 sqm (0.57Ha)	7,645 sqm (1.91Ha)

6.4.6 Some observations:

- The Stantec floorspace findings are higher on a per annum basis. The office requirement is some 30% above the HENA figure and 11% higher for industrial/smaller warehousing.
- Both studies highlight the uncertainty about the extent to which homeworking will impact on the future need for office space. To address this the HENA applies a 30% reduction to the requirement figure to account for increased agile working and the figure above includes this adjustment. There is no particular foundation for the 30% figure, rather the consultants have made a reasonable adjustment using their professional judgement. Stantec deal with the same uncertainty by recommending that the office requirement is treated as a maximum figure.
- The demand for strategic warehousing in the district has been such that the competition for land may have suppressed the delivery of industrial/small distribution uses. For this reason, Stantec use a longer time series than Iceni (19 years compared with 8 years) to decide the proportional split between non-strategic space and strategic space and they also check it against Valuation Office Agency (VOA) data.
- Stantec uses a jobs to sqm conversion rate based on VOA data which is more locally-specific to NWL than the Leicestershire-wide rate applied in the HENA.

Summary of responses

- 6.4.7 Whilst there was not a specific question regarding the issue of employment land requirements, a number of responses did refer to the issue. These responses included comments on the Stantec study and the Strategic Warehousing Study findings. (The HENA had not been published at the time of the consultation). These comments can be viewed at Appendix F
- 6.4.8 As part of their submissions, Segro and St Modwen submitted an alternative employment land assessment by the firm Savills. The document can be viewed from this [link](#) (representation number 153 or 240). This assessment deals with the need for industrial and warehousing (it excludes offices) and concludes that the combined requirement for strategic and non-strategic industry and warehousing in the district should be very significantly higher than the council's evidence shows. To illustrate, the table below compares the Savills findings and Council's evidence base (the Stantec study plus the Strategic Warehousing Study, assuming 50% of the Leicester and Leicestershire

requirement will be met in North West Leicestershire) on a per annum basis. The scale of the difference between the two is stark.

Table 4 – comparison of employment land requirements from North West Leicestershire evidence base and Savills methodology

	Requirement (excluding supply)
Stantec	2.14 Ha/annum
Strategic Warehousing Study	10.0 Ha/annum
NWL evidence base	12.14 Ha/annum
Savills	26.7 – 54.9 Ha/annum

- 6.4.9 In addition to detailed methodological points, their main challenges are that:
- a lack of building stock has suppressed demand in the past and
 - the growth in on-line retailing have not been sufficiently accounted for in the studies' findings.
- 6.4.10 The Savills' approach is being promoted nationally by the British Property Federation amongst others.
- 6.4.11 The Stantec study acknowledges that land supply has been constrained for such a long time making it difficult to establish the 'true' level of demand in an unconstrained market. Stantec advise that the requirement figure for industrial/small distribution should, therefore, be treated as a minimum.
- 6.4.12 For strategic distribution, Savills conclude that the Leicester and Leicestershire requirement for strategic distribution is nearly double that found by G L Hearn (now Icen). This appears to be an exceptionally high requirement although officers understand that market demand of strategic warehousing has been particularly high in the period since the Strategic Warehousing study was commissioned. If the work were repeated now, it is feasible that a higher requirement would result.
- 6.4.13 Other developer submissions emphasised the strength of the strategic warehousing market in North West Leicestershire, the overall lack of supply and scepticism that rail-based freight will increase to the levels assumed in the Strategic Warehousing study with the consequence that the road-served requirement should be higher.
- 6.4.14 In contrast, the consortium of northern parishes argues that the study over-estimates demand in a number of ways and more cautious assumptions should be applied. In particular, the consortium questions the study's assumptions about the lifespan of buildings and how the inclusion of a replacement allowance for outmoded premises increases the floorspace requirement significantly. The study does consider the approach to the replacement of existing buildings in depth. Older buildings become functionally obsolete because of changes in mechanisation and changing requirements including for larger premises to enable the consolidation of operations. Many units are let rather owner-occupied so businesses re-locate to newer, fit-for-purpose premises, releasing the existing building for refurbishment which cannot be done while it is occupied. The consultants apply a 30 year replacement rate citing the large growth rates in on-line retailing using the modern automated picking, handling and packaging systems which cannot be retrofitted into older buildings.
- 6.4.15 Policy Ec3 of the adopted Local Plan designates industrial estates and other employment sites in the district as 'existing employment areas' for office, industrial and warehousing

uses. The policy aims to control other uses which would diminish the overall amount of good quality premises in the district, albeit that national changes to the Use Classes Order mean some changes do not require planning consent. The Local Plan Review

could consider including strategic warehousing sites (e.g. East Midlands Gateway, East Midlands Distribution Centre and others) in a similar type of policy so that these sites are secured as strategic distribution sites and are not lost to other uses, driving re-provision elsewhere.

- 6.4.16 A fuller response to the consortium's comments is included in Appendix F.

Considerations

- 6.4.17 There is no single way to undertake an assessment of employment land requirements or one 'correct' answer for the amount of additional employment floorspace which will be needed. Fundamentally, forecasting future economic performance and hence implications for land requirements is inherently beset by uncertainty.
- 6.4.18 The Stantec study and the HENA have both been undertaken by expert consultants and are considered to be appropriate and robust. With the caveat that the figures have been reached using different forecasts and with different approaches to allowances and adjustments, there is some welcome alignment between the studies' findings. This gives some confidence that the requirements are broadly of the right order.
- 6.4.19 The Stantec study is more detailed and locally specific than the HENA and it is recommended that it be used as the primary evidence of general employment needs for the Local Plan Review. This is allowed for in recommendation (xi) above. As the findings are the higher of the two studies, issues of undercutting the county-wide figures do not arise.
- 6.4.20 Using the Stantec figures, the resulting requirement is set out below. This replicates the April 2021 position set out in the consultation document and takes account of supply from completions, permissions and allocations and also includes an allowance for losses and a flexibility margin to help account for uncertainty. It is recommended that the residual requirement figures (line I in the table) are used as the working figures for site selection. Noting that the industrial/smaller warehousing figure is expressed as a minimum and not a cap, it should not be viewed as an absolute figure such that it would mean allocating parts of sites rather than breaching the overall requirement figure.

Table 5 – General Employment Land Need/Supply balance at April 2021

		Offices	Industrial/ smaller warehousing
A	<i>Stantec Requirement (2017 – 39)</i>	<i>57,000 sqm</i>	<i>187,000 sqm</i>
B	<i>Losses allowance (2023 – 39)</i>	<i>2,400 sqm</i>	<i>72,800 sqm</i>
C	<i>Flexibility Margin</i>	<i>11,285 sqm</i>	<i>25,484 sqm</i>
D	Total Requirement [A+B+C]	70,685 sqm	285,284 sqm
E	<i>Net completions (2017 – 2021)</i>	<i>12,784 sqm</i>	<i>2,990 sqm</i>
F	<i>Net permissions at 31/03/2021</i>	<i>23,986 sqm</i>	<i>73,910 sqm</i>
G	<i>Allocation (Money Hill)</i>	<i>31,980 sqm</i>	<i>42,640 sqm</i>
H	Total Supply [E+F+G]	68,750 sqm	119,540 sqm
I	Residual requirement (2021-39) [H-D]	Up to 1,935 sqm/ 0.3 Ha*	At least 165,744 sqm /41.4Ha*

* land areas have been calculated using same conversion factors ('plot ratios') as used in the Stantec study.

- 6.4.21 If the plan period were extended to 2040 (as recommended above at paragraph 5.2.33), the figures in lines A, B and then D would all increase meaning the residual requirement (line I) would also increase. We have provided the figures on a simple roll-forward basis

to give Members an understanding of what the plan period change could mean for employment land requirements.

Table 6 - Indicative employment land requirement 2021-40.

		Offices	Industrial/ smaller warehousing
I	Residual requirement (2021-40)	Up to 4,675 sqm/ 0.78 Ha	At least 178,794 sqm /44.7 Ha

6.4.22 In respect of strategic warehousing, we need to know if the issues raised in the Savills approach impact on the findings of the Strategic Distribution Study. Officers have had some discussions with the study's authors and the Council may need to commission a further piece of work for in this respect. Based on recent market activity in this sector, Members should expect any such exercise to result in no change or an increase in the requirement figures, and not a decrease.

6.4.23 In the meantime, it is recommended that the existing Strategic Distribution Study findings continue as the basis for the Local Plan Review, including site selection.

6.5 Strategy for the distribution of general employment land

Background

6.5.1 The consultation set out 4 different options for how growth might be distributed across the district, depending upon the overall scale of growth. Further details about the options can be found in the consultation document.

6.5.2 The following question was asked (question 11):

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

6.5.3 The distribution options the question refers to are;

Option 1 A continuation of the adopted Local Plan distribution. General employment land allocations would be principally at Coalville, Ashby and Castle Donington (i.e. the settlements at the top of the settlement hierarchy)

Option 2 Allocate employment land at Coalville, Ashby and Castle Donington (like Option 1) and also at Measham/Appleby Magna as a 'new', expanding employment location

Option 3 A more widespread distribution of employment land, including to locations which are currently less well provided for such as the Local Service Centres – Ibstock, Kegworth, Measham – and, potentially, Sustainable Villages.

Option 4 Allocate land in a single/new location for a high quality, mixed-use business park.

Summary of responses

6.5.4 There were 62 responses to this question although not everyone identified the option they preferred. The key issues raised are set out below and a more detailed summary of the comments with officer responses is included in Appendix E.

6.5.5 **Option 1** was preferred by 13 respondents (environmental group x2, developer/agents x8, individuals x2, council x1), 3 of which favoured Options 1 and 2. The following reasons were given:

- it will capitalise on existing, established location
- it relates to the most sustainable settlements which are at the top of the settlement hierarchy and/or ensure a strong relationship between new homes and jobs.
- locations are close to workforce
- it recognises the Freeport
- Options 1 and 2 bring greatest certainty to employment land delivery

6.5.6 The more significant criticisms of Option 1 were:

- Options 1 and 2 focus on existing over-stretched areas and the scale of development is unlikely to be enough to fund corresponding infrastructure improvements
- Options 1, 2 and 4 would prevent opportunities for villages and local businesses to grow and thrive

6.5.7 **Option 2** was favoured by 7 respondents (individual x3, developer x4,) of which 3 favoured Options 1 and 2. The following reasons were given:

- It provides a reasonable choice of sites but limited enough to ensure critical mass and visibility
- the locations have the infrastructure to support industry and housing growth.
- It enables capitalisation of the success of Mercia Park and can make use of the additional infrastructure serving it.
- Options 1 and 2 bring greatest certainty to employment land delivery
- It strikes a sensible balance in terms of concentrating employment near to existing concentrations of workers.
- It is the best option for both general employment and for strategic distribution needs
- The Measham/Appleby Magna area can make a greater contribution to future strategic and non-strategic requirements compared with what has happened in the past
- Castle Donington area has key advantages as a location for strategic distribution and these are recognised by the market
- Employment development in the Measham and Appleby Magna area can serve less affluent parts of the district

6.5.8 The more significant criticisms of Option 2 were:

- From a transport perspective, development in the A/M42 J11 area is likely to be less sustainable and is impacted by HS2 (LCC Highways).
- Options 1 and 2 focus on existing over-stretched areas and the scale of development unlikely to be enough to fund corresponding infrastructure improvements
- Measham and Appleby Magna are distinct, separate settlements, Mercia Park is not well related to Measham. Measham has existing employment sites and sustainable transport links to jobs in Ashby and Coalville.
- Options 1, 2 and 4 would prevent opportunities for villages and local businesses to grow and thrive

6.5.9 **Option 3** was favoured by 11 respondents (1x residents association, 6 x individuals; 2 x developer; 2 x parish council/consortium) for the following reasons:

- It is the best option for sites near where people live/where new housing is to reduce commuting/travelling/emissions and to help support local services

- It provides a range of sites to meet different requirements and meet local needs including at Sustainable Villages
- It enables sites that will match the need of smaller businesses.

6.5.10 The more significant criticisms of Option 3 were:

- In transport terms, it is not an attractive option (LCC Highways)
- Option 3 is the least sustainable of the 4 options

6.5.11 **Option 4** was favoured by 2 respondents (2x individuals) with no specific reasons given.

The more significant criticisms of Option 4 were:

- Employment would be localised to serve the inherent needs and demands of the new settlement itself.
- Options 1, 2 and 4 would prevent opportunities for villages and local businesses to grow and thrive
- Option 4 would not deliver balanced growth and is unlikely to be sustainable.

Interim Sustainability Appraisal

6.5.12 The strategy options have been tested through an interim Sustainability Appraisal (SA) (this can be viewed from this [link](#)). Members will recall that similar exercise was undertaken to inform a decision regarding the preferred housing strategy.

6.5.13 The SA is a high-level approach to compare the likely sustainability effects of the options using a consistent framework, the same as that used to assess the housing options. The employment options were tested against the 15 sustainability objectives.

6.5.14 The options were populated using sites from the SHELAA. There has been no site selection at this stage; all the sites in the SHELAA (excluding those with planning permission) are included in one or more of the options.

6.5.15 The table below summarises the number of potential significant positive and significant negative effects for each option.

Table 7 - number of potential significant positive and significant negative effects for each option

	Number of significant Positive effects	Number of significant Negative effects
Option 1: continue Local Plan distribution	0	5
Option 2: Local Plan distribution + Measham/ Appleby Magna area	3	6
Option 3: Lower tier settlements	0	6
Option 4: new location	0	6

6.5.16 Other key points from the SA were:

- All the options scored significant negative for light/air/noise (SA9) because of the potential sites' proximity to Kegworth AQMA and/or East Midlands Airport, for biodiversity (SA12) because sites are in or close to nature conservation designations and Land Use (SA14) because some potential sites coincide with Coal Authority High Risk areas or are higher quality agricultural land.
- Option 1 showed no potential significant positive effects. In addition to SA9, SA12 and SA14, it was found to have potential significant negative effects for climate

change (SA11) as some potential sites are located in Flood Zone 3 and heritage (SA15) because of some sites' proximity to heritage assets

- Option 2 has potential significant positive effects for economy (SA5), town/local centres (SA6) and employment (SA7) linked to the more dispersed pattern and in

different sizes of settlements, providing a choice of sites well related to labour supply. Option 2 has the same potential significant negative effects as Option 1 and additionally landscape/townscape (SA13), particularly because of the landscape and character change in the Measham/Appleby Magna area.

- Option 3 has no potential significant positive effects.
- In addition to SA9, SA12 and SA14, Option 3 has potential significant negative effects for climate change (SA11) because some potential sites are at risk from flooding, landscape/townscape (SA13) because the sites are located in more rural locations where the effect on existing character is likely to be greater. and for reducing the need to travel (SA8) because the potential sites are in locations where public transport links are poor and not as frequent or accessible compared with other options which focus development at the Principal Town and/or the Key Service Centres.
- Option 4 has no potential significant positive effects.
- In addition to SA9, SA12 and SA14 Option 4 has potentially significant negative effects for landscape/townscape (SA13) because the scale of development in a single location will significantly change the character of the area, sustainable travel (SA8) as transport links will not be as accessible or as frequent compared with other options focused at the Principal Town and/or the Key Service Centres, and health (SA1) because of poor access to recreation facilities.

Considerations

- 6.5.17 Overall Option 2 performs the best in the SA assessment, particularly as it has the most significant positive effects, although all options have a mix of potential positive and potential negative effects. This is not unusual for an SA of such high-level options, as ultimate outcomes will be strongly related to which sites are ultimately chosen as allocations. Notably, Option 2 scored the best of all the options for Economy (SA5) and Employment (SA7).
- 6.5.18 There was some support for each of the distribution options from those who responded to the consultation question, with Options 1 and 3 proving most popular. Developers' preferences strongly correlated with the locations of the sites they are promoting.
- 6.5.19 In some instances, negative effects identified in the SA could be avoided through site selection (not allocating sites in flood risk zones for example) or possibly mitigated through site-specific measures. The adverse finding for Option 3 concerning sustainable transport (SA8) is considered to be more fundamental because, in relative terms, the more rural locations have more limited public and sustainable transport options and this is unlikely to change substantially as services will need to be commercially viable which is difficult to achieve in rural areas. The highway authority also identified this option as unattractive in transport terms. Option 4 also scored significant negative on this measure although it is possible that development at scale in a single location would generate sufficient demand for additional and improved bus services.
- 6.5.20 The Council's Strategic and Economic Land Availability Assessment (SHELAA) sites which correspond to Option 3 are shown in the SA (figure 4-13, page 38). Excluding Money Hill, which features in all options, this shows:
- Some clustering of sites around Measham/Appleby Magna, Albert Village, Langley Priory area and Kegworth; and
 - Prevalence of relatively small sites of less than 5Ha

- 6.5.21 Whilst in theory this option could enable sites to be located close to local communities, the actual pattern of potential sites from the SHELAA is patchy meaning that it would not correspond that well with where people live.
- 6.5.22 In respect of the prevalence of smaller sites, the Stantec study identifies that "to rely on small sites is not an effective solution, because piecemeal development does not create the quality and scale of accommodation that occupiers require, especially in high-value activities that serve national and international markets. As our consultees have emphasised, to seize market opportunities requires sizeable new sites, providing critical mass and an attractive environment, and where businesses can take the amount of space they need, rather than fitting in between existing buildings" (paragraph 5.104). Option 3 may be more likely to result in a reliance on smaller sites, contrary to this advice.
- 6.5.23 Stantec also identify that "the district has three major industrial areas, at Coalville / Bardon, Ashby and Castle Donington / East Midlands Airport. The greatest choice of units and the best-quality modern stock is concentrated in these areas, which are well connected to the M1 and A42/M42. The rest of the district's industrial areas are secondary by comparison" (paragraph 5.38). Once again Option 3 as presented would fail to provide new sites in these primary areas.
- 6.5.24 Furthermore, as identified in the consultation document, more rural locations are unlikely to be as attractive to the market compared with Coalville, Ashby and the Castle Donington area which could raise questions regarding deliverability.
- 6.5.25 Taking these matters in the round, it is considered that option 3 should not be taken forward.
- 6.5.26 Of the other options, Option 4 is an 'eggs in one basket' approach which could bring significant risks in terms of site delivery. The supply of employment land in terms of both quantity and timing will be tied to a single or very limited number of sites. This could be a significant delivery risk for the Local Plan Review in terms of the overall amount of employment land available, the timing of land coming forward (in particular if the employment land is linked to a new settlement) and a reliance on a small number of controlling landowners/developers. This option would also result in very limited market choice for businesses needing new premises. In the face of alternative options, the risks of relying on such a limited choice of sites is considered too high. It is therefore, recommended that Option 4 not be taken forward.
- 6.5.27 Option 1 would be a continuation of the current strategy and would see new employment allocations focussed at Coalville, Ashby de la Zouch and the wider Castle Donington area to include East Midlands Airport. It reflects the comments in the Stantec study noted above although it would limit development to a small number of locations, which may pose some risk to deliverability (although not as significant as Option 4). Option 1 would support the locations where the market is already strong but would do little to serve local markets elsewhere. Option 2 on the other hand would broaden out the number of locations to a degree, better supporting both choice and delivery.
- 6.5.28 What neither option 1 nor 2 do is address needs in rural areas. The NPPF identifies that "planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport" (paragraph 85). There could be a justification to allow for limited, small scale rural employment sites.
- 6.5.29 Having regard to the outcome from the SA, the consultation and the above observations, officers consider that there may be merit in a revised option brings together the elements of Options 2 and 3. This would recognise the importance of Coalville, Ashby and the

Castle Donington area from an economic point of view, whilst also recognising the needs of more rural areas and the emergence of new areas that are attractive to the market (for example the J11 of the A42).

6.5.30 Option 2a would, therefore, be:

Allocate employment land at Coalville, Ashby and Castle Donington/East Midlands Airport, at the Local Service Centres and at a 'new', expanding employment location at J11 M42

6.5.31 The intention is to assess this revised option through the SA and then to present the findings at the September meeting of this Committee to enable Members to decide on the employment strategy to pursue.

6.5.32 It is important to note that whether land is actually allocated in each of the locations will depend upon the consideration of a range of factors, including the overall requirement for employment land and how individual sites compare.

6.5.33 It should also be noted that the above relate to general employment needs. As discussed in the next section of this report, sites for strategic warehousing will also be needed and the Areas of Opportunity identified in the Strategic Warehousing Study provide a framework for which broad locations will be suitable. There could be some sites which provide a mix of both strategic and general employment floorspace like the Netherfield Lane, Sawley site granted outline permission in October 2021 (20/00316/OUTM).

6.6 Strategic Distribution

Background

6.6.1 The consultation document put forward the suggestion that 50% of the outstanding requirement for road-served strategic distribution floorspace across Leicester and Leicestershire that is identified in the Strategic Distribution Study could be met in North West Leicestershire. This would equate to around 106,000sqm (to 2041). This becomes approximately 95,400sqm when adjusted to correspond with the Local Plan Review end date of 2039 (or 100,700sqm for an end date of 2040).

6.6.2 The following question was asked (question 12):

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

Summary of responses

6.6.4 There was a total of 69 responses to this question. A summary of the comments with officer responses is included in Appendix F. Regarding the overall Leicester and Leicestershire need figure for strategic warehousing;

- 15 respondents agree with/welcome the initial policy option
- 8 respondents disagree with the 50% proposition or think it is too high
- 5 respondents criticise the Strategic Warehousing Study, saying it over-estimates or under-estimates need. This is discussed earlier in the report.
- 25 respondents object to strategic warehousing in principle and/or think that NWL has had enough/there shouldn't be any more.
- 9 respondents are concerned about the planning impacts of strategic warehousing
- 2 responses relate to the proposed Hinckley Strategic Rail Freight Interchange
- 3 responses support the allocation of sites
- 1 response welcomes the inter-authority joint-working on this matter
- 1 respondent could not find the consultation document

Considerations

- 6.6.5 The option was presented as preliminary option and does not signal the council's commitment or agreement to take a particular share of the remaining Leicester and Leicestershire need. The option was included in the consultation pending joint work with the Leicester and Leicestershire authorities on how the overall strategic warehousing requirement should be distributed between the authorities. Officers from the Leicester and Leicestershire authorities are in current discussions about the process for setting a distribution, including whether external expertise may be needed. However, if any Leicestershire-wide work is not completed promptly or if agreement cannot be reached between the authorities on the distribution, the council will have to take a unilateral decision on the approach to take.
- 6.6.6 In the meantime, it is recommended that the initial policy option be retained as a working figure so that site identification can progress. Taking account of the revised plan period to 2040, this equates to 100,700 sqm (approximately 28.8Ha).
- 6.7 Freeport site**
- 6.7.1 Members will be aware that a site of some 100Ha, to the south of East Midlands Airport has been designated as a Freeport Tax site by the Government. The Freeport status is something that would attract weight when preparing the Local Plan.
- 6.7.2 The site has also been put forward as a potential employment site as part of the Council's SHELAA.
- 6.7.3 The promoters of the Freeport site have advised that they envisage that in addition to strategic warehousing, general employment uses would also form part of a future development mix. They currently envisage an 80:20 split. Therefore, the site could meet variety of the overall employment requirements identified in this report and not just strategic warehousing.
- 6.7.4 This is a large site, on elevated land with some prominence in longer-range views which would be developed at scale. On this basis, landscape impact will be one of the key issues determining the suitability or otherwise of the site for allocation. Officers will commission landscape specialists to provide an assessment of the nature and severity of landscape impacts and the scope for reducing and/or mitigating the likely harm.
- 6.7.5 In the same vein, heritage specialists will be appointed to identify impacts on listed buildings, Diseworth Conservation Area, other heritage assets and their settings, to advise on the severity of any harm and whether/how it can be avoided or reduced.
- 6.7.6 The outcomes of this advice will be incorporated into future reports to the Committee when potential site allocations are being considered.

Policies and other considerations, as appropriate	
Council Priorities:	Developing a clean and green district Local people live in high quality, affordable homes Our communities are safe, healthy and connected
Policy Considerations:	None
Safeguarding:	No issues identified
Equalities/Diversity:	An Equalities Impact Assessment of the Local Plan

	review will be undertaken as part of the Sustainability Appraisal.
Customer Impact:	No issues identified
Economic and Social Impact:	The decision, of itself, will have no specific impact. The Substantive Local Plan Review as a whole will Aim to deliver positive economic and social impacts and these will be recorded through the Sustainability Appraisal
Environment and Climate Change:	The decision, of itself, will have no specific impact. The Substantive Local Plan Review as a whole will Aim to deliver positive environmental and climate change benefits and these will be recorded through the Sustainability Appraisal.
Consultation/Community Engagement:	The report considers those responses made to the latest round of public consultation. Further consultations will be undertaken as the Local Plan progresses. The consultation arrangements will be governed by requirements in the Statement of Community Involvement
Risks:	A risk assessment for the Local Plan Review has been prepared and is kept up to date. As far as possible control measures have been put in place to minimise risks, including regular Project Board meetings where risk is reviewed.
Officer Contact	Ian Nelson Planning Policy and Land Charges Team Manager 01530 454677 ian.nelson@nwleicestershire.gov.uk

APPENDIX A

APPENDIX B

APPENDIX C

APPENDIX D

APPENDIX E

APPENDIX F

This page is intentionally left blank

Regulation 18 Consultation: Number of responses to each question

Topic	Question Number	Question	Number of responses
Objectives	Q1	Do you agree with these Local Plan Review Objectives? If not, why not?	106
Settlement Hierarchy	Q2	Do you agree with the proposed settlement hierarchy? If not, why not?	109
	Q3	Do you agree with the approach to Local Housing Needs Villages? If not, why not?	71
Housing Strategy	Q4	Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.	123
	Q5	Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant	132
Housing	Q6	Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?	132
	Q7	Do you agree with the proposed policy on Space Standards? If not, why not?	90
	Q8	Do you agree with the proposed policy on accessible and adaptable housing? If not, why not?	78
	Q9	Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not, why not?	72
Employment Strategy	Q10	Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered?	78
	Q11	Which general employment land strategy option do you prefer? Is there a different option which should be considered?	62
	Q12	Do you agree with the initial policy option for strategic warehousing? If not, why not?	69
	Q13	Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered?	75

Employment	Q14	Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?	58
	Q15	Which policy option for local employment do you prefer? Is there a different option which should be considered?	54
Health and Wellbeing	Q16	Do you agree with the proposed health and wellbeing policy? If not, why not?	85
	Q17	Do you agree with the proposed Health Impact Assessment policy? If not, why not?	88
	Q18	Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?	72
Renewables and Low Carbon	Q19	Do you agree with the proposed renewable energy policy? If not, why not?	78
	Q20	Do you agree with the preferred policy approach for energy efficiency? If not, why not?	81
	Q21	Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?	74
	Q22	Do you agree with the preferred policy approach for overheating? If not, why not?	66
	Q23	Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?	68
	Q24	Do you agree with the proposed policy for reducing carbon emissions? If not, why not?	65
	Q25	Do you agree with the proposed policy for water efficiency standards? If not, why not?	75
Other	Q26	What additional comments do you have about the Local Plan Review not covered by the preceding questions?	111

LOCAL PLAN REVIEW

DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS - JANUARY TO MARCH 2022

SUMMARY OF RESPONSES TO Q1

Q1 – DO YOU AGREE WITH THESE LOCAL PLAN REVIEW OBJECTIVES? IF NOT, WHY NOT?

Comments on specific objectives are as follows.

Objective 1 - Enable the health and wellbeing of the district's population.

Comments	NWL officer response
Objective 1 should be more aspirational and deal with health inequalities. (LCC)	The wording is considered to reflect the realistic role and influence that the Local Plan will have on health and wellbeing. No change proposed.

Objective 2 - Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type.

Comments	NWL officer response
<p>Amendment the objective to reflect the need for the L&L authorities to assist Leicester City in meeting its unmet needs in full as follows; "Ensure the needs of the Housing Market Area can be met in full through the delivery of additional housing, above local demographic needs, to meet unmet needs from Leicester City."</p> <p>Another respondent proposes the following; "Ensuring the delivery of new homes, including affordable housing, which meets local housing needs in terms of quantum, size, tenure and type; whilst also making an appropriate contribution towards the unmet housing needs that are arising from Leicester City Council"</p> <p>Remove the word 'local' from Objective 2.</p> <p>Objective 2 could refer to meeting neighbouring needs, as North West Leicestershire will be required to address some unmet need from Leicester City. It could also address the nationwide need to significantly boost the supply of housing.</p>	<p>Compared with when the objectives were drafted, there is now more certainty about the scale of Leicester City's unmet need and the council's contribution towards meeting that need, if agreed. An adjustment is considered to be justified;</p> <p>Objective 2 - Ensure the delivery of new homes, including affordable housing, which meet <u>local</u> housing needs including in terms of <u>number</u>, size, tenure and type.</p> <p>The NPPF objective to boost housing supply is achieved through the use of the Government's standard method to calculate local housing need. Reference to boosting housing supply in the objective is not considered critical in this case.</p>
Expand Objective 2 to include that the delivery of new homes must also meet local needs with sufficient choice in a variety of locations and settlements	This is considered to be a matter for the plan's spatial strategy, rather than an objective in itself. No change proposed.

(including a significant proportion to Sustainable Villages).	
---	--

Objective 3 - Achieve high quality development which is sustainable, which responds positively to local character and which creates safe places to live, work and travel.

Comments	NWL officer response
Objective 3 could address the sustainability of new housing in terms of locating developments next to existing services and facilities, which would benefit both the community and the sustained provision of local amenities.	This is considered to be a matter for the plan's spatial strategy, rather than an objective in itself and, in any event, is broadly covered in Objective 4. No change proposed.

Objective 4 - Reduce the need to travel and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure.

Comments	NWL officer response
The role of Green Infrastructure could be mentioned within this objective, especially considering the GI Study for the district which is currently underway. This would encompass opportunities to create green links, enhance PRoW and public access to nature and the countryside (Natural England)	The aim is to keep the objectives succinct where possible. The suggested amendments refer to the qualities of good sustainable links and are considered too detailed for inclusion. Also, access to green space is covered in Objective 11. No change proposed.
Objective 4 should also recognise the need to protect and maintain services and facilities within settlements to ensure continued levels of sustainability	It is considered that this is adequately covered in Objective 11. No change proposed.
Amend with the addition of the text in []; "Reduce the need to travel [by private car] and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure,[including multifunctional green infrastructure corridors].	Reducing private car use is the nub of the issue and it is recommended that this change be made. Adding specific reference to multifunctional greenspace is considered to be too detailed for an objective. Amend Objective 4 to read "Reduce the need to travel <u>by private car</u> and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure."

Objective 5 - Support the district's economy, including its rural economy, by providing for a range of employment opportunities which respond to the needs of businesses and local workers.

Comments	NWL officer response
Objective 5 should be more positively framed; the Local Plan should "meet",	On reflection, this objective could be more specific about making adequate provision of

rather than “respond to”, the needs of businesses and local workers.	employment land. ‘Sufficient provision’ is the term the NPPF uses. Amend Objective 5 to read “Support the district’s economy, including its rural economy, by providing for a range of employment opportunities <u>and sufficient new sites</u> which respond to the needs of businesses and local workers.”
Objective 5 should also recognise the importance of a joined-up strategy in balancing the delivery of housing and job creation to assist in achieving sustainable travel patterns.	This is considered to be a matter for the plan’s spatial strategy, rather than an objective in itself and, in any event, is broadly covered in Objective 4. No change proposed.
Amend objective 5 to read “the rural economy, as well as the services and facilities available in rural areas ”.	This is sufficiently covered by Objective 11. No change proposed.

Objective 6 - Enhance the vitality and viability of the district’s town and local centres which have an important role serving our local communities with a particular focus on the regeneration of Coalville.

Comments	NWL officer response
Objective 6 should specify areas which will be supported, including new housing within and close to town centres.	This particular objective is more concerned with services and facilities and commercial activity in town and local centres. Delivering housing in/close to these centres would contribute to Objectives 2 and 4. No change proposed.
Objective 6 places too much emphasis on and therefore resources being allocated to Coalville. This should not be to the disadvantage of other settlements and Ashby de la Zouch in particular which has had very substantial residential growth, but without the necessary improvements to infrastructure and services.	Supporting Coalville is an objective in the Council’s latest Delivery Plan and it is right to reflect this in the Local Plan Review objectives. No change proposed.
The vitality and viability of the district’s lower level settlements, including the identified Sustainable Villages, should also be recognised.	Supporting services generally is covered in Objective 11. No change proposed.

Objective 7 - Ensure new development mitigates for and adapts to climate change, including reducing vulnerability to flooding, and contributes to reduced net greenhouse gas emissions to support the district becoming carbon neutral by 2050.

Comments	NWL officer response
Suggest that the importance of nature-based solutions could be referenced within the objective. (Natural England)	There are likely to be a broad range of relevant measures so specific reference to nature-based solutions is not considered appropriate. No change proposed.

Objective 7 should have a target date of 2045 (LCC)	2050 is the target in the Zero Carbon Roadmap and Action Plan. No change proposed.
Add specific references to the need to incorporate SuDS and water efficiency into objectives 7, 9 or 10 (Severn Trent)	This is considered to be too specific and detailed for inclusion in the objectives. No change proposed.
Objective 7 could address new housing, employment and services being located in sustainable locations to reduce the need to travel. This would support the objective of reducing carbon emissions and adapting to climate change through changed behaviours.	This is considered to be a matter for the plan's spatial strategy, rather than an objective in itself and, in any event, is broadly covered in Objective 4. No change proposed.

Objective 8 - Conserve and enhance the district's built, cultural, industrial and rural heritage and heritage assets.

Comments	NWL officer response
Include reference to setting in order that NPPF requirements for the historic environment can be addressed; "Conserve or enhance the district's built, cultural, industrial and rural heritage and heritage assets <u>and their setting.</u> " (Historic England)	Agreed. Impact on setting is a planning consideration (NPPF paragraph 200 and elsewhere). Amend objective 8 to read "Conserve or enhance the district's built, cultural, industrial and rural heritage and heritage assets <u>and their setting.</u> "
Should include mention of Conservation Areas.	'Heritage assets' include Conservation Areas. No change proposed.

Objective 9 - Conserve and enhance the district's natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the National Forest and Charnwood Forest as well as its other valued landscapes.

Comments	NWL officer response
We advise that inclusion of wording regarding enhancing habitat connectivity and/or contributing to the wider Nature Recovery Network, a key part of the government's 25-year environment plan, would be beneficial here. We also suggest that another notable area which could be mentioned is the River Mease SAC, due to its European designation. (Natural England)	The work on Nature Recovery Networks is considered to be broadly encompassed in the wording of the objective. The River Mease SAC is a significant designation and its inclusion within the objective appears appropriate. Amend Objective 9 to read "Conserve and enhance the district's natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably <u>the River Mease Special Area of Conservation,</u> the National Forest and Charnwood Forest as well as its other valued landscapes."
This should be more proactive and strategic in its approach to biodiversity and ecological networks which should be conserved, protected and enhanced.	In this context, 'protect' and 'conserve' convey similar things and the adding the former would not improve the objective's meaning. No change proposed.
Amend Objective 9 to read: "Conserve and, enhance and extend the district's natural environment, including its biodiversity, geodiversity, water	The NPPF uses the term 'biodiversity net gain' and incorporating this phrase into the Objective would address the point raised.

environments and landscape character, notably the National Forest and Charnwood Forest as well as its other valued landscapes.” In line with the NPPF and the emerging Environment Bill, the requirements of biodiversity net gain include the need to increase the amount of biodiversity as development is brought forward, rather than merely enhance the existing biodiversity. (Environment Agency)	Amend Objective 9 to read “Conserve and enhance the district’s natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the <u>River Mease Special Area of Conservation</u> , the National Forest and Charnwood Forest as well as its other valued landscapes. <u>Pursue opportunities for biodiversity net gains.</u> ”
Amend with the addition of the text in []; “Conserve, [enhance, and improve access to] the district’s natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the National Forest and Charnwood Forest as well as its other valued landscapes”.	Access to green space is covered in Objective 11. No change proposed.
What is the definition of a valued landscape?	This is the term used in the NPPF. The Local Plan Review evidence base provides an analysis of the visual and landscape value of parts of the district. No change proposed.

Objective 10 - Ensure the efficient use of natural resources and brownfield land, control pollution and facilitate the sustainable use and management of minerals and waste.

Comments	NWL officer response
<p>Brownfield land should be prioritized but is downgraded to ‘efficient use’ of in Objective 10.</p> <p>Amend Objective 10 to the efficient use of land generally rather than just previously developed land to be in line with the NPPF’s approach to this topic.</p> <p>Clarify that ALL land should be used efficiently, and that development of brownfield land should be prioritised.</p>	<p>The NPPF refers to ‘the effective use of land’ and also ‘using land efficiently’. In respect of brownfield land it talks about ‘promoting and supporting the development of under-utilised land and buildings’ and ‘making as much use as possible of such land’.</p> <p>Amend Objective 10 to “Ensure the efficient use of natural resources and brownfield land, <u>in particular brownfield land</u>, control pollution and facilitate the sustainable use and management of minerals and waste.”</p>
Objective 10 should deal with minimising waste and resource efficiency (LCC)	<p>Agreed. Minimising waste is one of the aspects planning’s environmental objective (NPPF paragraph 8c).</p> <p>Amend Objective 10 to read; “Ensure the efficient use of natural resources and [from above] brownfield land, <u>in particular brownfield land</u>, control pollution and facilitate the sustainable use and management of minerals and <u>the minimisation of waste.</u>”</p>

Objective 11 - Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way.

Comments	NWL officer response
Objective 11 should include libraries (LCC).	Libraries are encompassed in 'cultural facilities'. No change proposed.

Omissions

Comments	NWL officer response
Matters the objectives should cover are; a) the transition to the L&L Strategic Growth Plan; b) the infrastructure needed to support growth; c) stronger re climate change; d) tourism; e) Freeport/EMA expansion; f) best start in life (LCC)	a) a review of the Strategic Growth Plan fed into the drafting of the objectives in the first place. The Growth Plan and its significance will be referenced in relevant sections of the plan itself. b) this is covered in Objective 11 c) Objective 7 covers this matter clearly and at an appropriate level d) this is encompassed in Objective 5 e) this is a location-specific proposal to be addressed in the relevant sections of the plan f) this is covered generically under Objectives 1 and 11. No changes proposed.
No objective for 'efficient use' of greenfield land or density requirements which should be remedied in the submitted plan.	See the proposed amendment to Objective 10 above. Density is a detailed matter for the plan.
There should be an overarching objective to reach Net-Zero Emissions which should include an assessment of location.	This is covered in Objective 7.
It is appropriate to define the period of time for delivery because currently only the district target of carbon neutrality by 2050 states a period of time and this is beyond the proposed period for the local plan.	The plan period (to 2039) will be set out elsewhere in the plan.
Objectives to be strengthened to give stronger protection for the countryside, local green space and valued landscapes. Include measures to protect character of settlements.	The Objectives are not policies in themselves. The matters listed will be considered as part of the plan itself.

General comments

Comments	NWL officer response
Some of the objectives are contradictory, for example it is not possible to achieve objectives 2, 3, 4 and 5 if you are going to achieve objectives 8, 9, 10 and 11.	Noted. The objectives should not be applied as blanket requirements and successful planning means finding an appropriate balance between completing aims. The overarching objectives are useful as context

	for the detailed matters in the plan which follow.
Objectives should be specific and measurable. They are too vague.	The objectives are intended to be overarching in nature. A specific monitoring framework will be included in the final draft Plan to measure the Plan's implementation

This page is intentionally left blank

LOCAL PLAN REVIEW

DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS - JANUARY TO MARCH 2022

SUMMARY OF RESPONSES TO Q2

Q2 – DO YOU AGREE WITH THE PROPOSED SETTLEMENT HIERARCHY? IF NOT, WHY NOT?

Comments made in relation to specific settlements are as follows:

Summary of Comments	NWL Planning Policy Officer Response
Donington-le-Heath, Hugglescote, Snibston, Thringstone and Whitwick should not form part of the Coalville Urban Area / Principal Town. They should be regarded as separate settlements / Sustainable Villages.	Coalville, Donington-le-Heath, Greenhill, Hugglescote, Snibston, Thringstone, Whitwick and the Bardon Employment Area is considered to function as one urban area and this is the approach which has been adopted in the 2017 Local Plan (and found sound by an independent Planning Inspector). There have not been any changes in circumstances which would warrant departing from this approach. No change recommended
The plan should recognise that the further away from the main centre and facilities parts of the Coalville Urban Area are, the more travel is needed to access services.	The distance to facilities and services is an important component of the site assessment work currently being undertaken by planning policy officers. It is recommended that these comments are noted but that accessibility to frequent public transport and the opportunity to cycle via safe routes are also important considerations when deciding where growth should be allocated.
Ashby should be the principal settlement as it has more to offer than Coalville .	The Coalville Urban Area has been identified as the Principal Town because it has the largest population and widest range of services and facilities / access to jobs. No change recommended
Ashby has a higher level of services and facilities than Castle Donington and should be moved higher up the hierarchy (or acknowledged in the supporting text). It could be identified as the Market Town or Main Town. Some consultees put forward an alternative scoring methodology for consideration. This suggested scoring settlements based on the total number of facilities in each category (for example 5 primary schools = 5 points). The consultees suggested that if this method was applied, Ashby	Whilst two or more settlements may be in the same tier of the hierarchy, this does not mean that there are no differences between them. Settlements are grouped which, when looked at in the round, are broadly comparable in sustainability terms. The Settlement Study 2021 provides a baseline for comparing settlements. However, officers have also had to make a qualitative planning judgement when comparing settlements and grouping them in tiers. With regards to the identification of Ashby and Castle Donington as Key Service Centres, it is acknowledged that Ashby has a larger and more varied retail offer than Castle Donington (as well as a 'town centre' compared to a 'local centre'). However, there are more employment opportunities in and

<p>would score considerably higher than Castle Donington and this would justify moving Ashby higher up the hierarchy.</p>	<p>around Castle Donington, which are expected to increase as a result of the Freeport designation at East Midlands Airport. Castle Donington also has a better public transport offer than Ashby (in terms of number of services, destinations, frequency and times of day). On balance, it is considered appropriate to place Castle Donington and Ashby in the same tier.</p> <p>In terms of the alternative scoring methodology put forward, the quantum of schools, GP surgeries, pharmacies, dentists etc. in any given settlement is largely a reflection of the population size. The alternative methodology doesn't consider access to jobs or public transport.</p> <p>No change recommended</p>
<p>Castle Donington should be moved higher up the hierarchy and called 'Key Strategic Growth Location' to reflect its status as a focus for significant strategic growth.</p>	<p>The explanation above sets out why Castle Donington has been identified as a Key Service Centre and in the same tier as Ashby. Whilst Castle Donington does benefit from better access to jobs and is located in the Leicestershire International Gateway, it is smaller than Ashby and has a smaller (local) centre and a less varied retail offer.</p> <p>No change recommended</p>
<p>Ibstock should be moved higher up the hierarchy as it is more sustainable than the other Local Service Centres. From September 2022, Ibstock Community College will transition to an 11-16 school.</p> <p>It also has an extensive sports centre, something that Measham/Kegworth do not have. It is comparable to Castle Donington and only scores worse because of its convenience store provision.</p>	<p>The transition of Ibstock Community College to an 11-16 school is an important consideration and whilst this does not impact on the education scores in the Settlement Study 2021 (Ibstock scores a 2 regardless), it is something which sets Ibstock apart from Measham and Kegworth. Proximity to education will be a consideration for the site assessment work officers are currently undertaking</p> <p>Whilst similar in terms of scores, after undertaking a qualitative planning judgement, officers are of the opinion that Castle Donington is more sustainable given its public transport links and significantly better access to employment opportunities.</p> <p>Whilst Ibstock has a leisure facility (something which isn't mapped in the Settlement Study) this is part of the Community College and is dual access. Measham also has a sports centre and Kegworth has a good range of outdoor formal sports facilities.</p> <p>On balance, it is not considered reasonable to put Ibstock and Castle Donington in the same tier of the hierarchy.</p> <p>No change recommended</p> <p>The Settlement Study will be updated to make clear that Ibstock Leisure Complex (at Ibstock Community College) is available for use by local residents.</p>

<p>Measham and Appleby Magna's relationship with Mercia Park (and the resulting growth in jobs) should be given greater weight.</p>	<p>Mercia Park (currently under construction) is not identified in the Settlement Study 2021. However, its proximity to both Measham and Appleby Magna would not change the overall scoring in the Settlement Study.</p> <p>Looking at these settlements in the round, the presence of Mercia Park is not considered sufficient to move Measham or Appleby Magna up the hierarchy. Access to employment opportunities is just one element of what makes a settlement sustainable. The fact that Measham does not have a secondary school and has access to just one frequent (hourly) bus service are also important considerations. Similarly, Appleby Magna doesn't have a local shop and only has access to an infrequent bus service.</p> <p>Based on the above considerations no change recommended</p>
<p>Breedon-on-the-Hill should either move up the hierarchy or take more development than the other Sustainable Villages because it is located in the Leicestershire International Gateway.</p>	<p>The location of Breedon in the northern part of the district and its proximity to the Leicestershire International Gateway is just one consideration. When considering in the round, the level of facilities and services in Breedon-on-the-Hill does not warrant it being moved further up the hierarchy. It has a level of facilities for day to day use but travel outside of the settlement is required to access employment (aside from the quarry), supermarkets, secondary education, GP surgery, pharmacy and formal recreation. Furthermore, Breedon is only served by an infrequent bus service.</p> <p>As a rural village, Breedon is not considered an appropriate location to meet the growth aspirations of the Leicestershire International Gateway.</p> <p>Based on the above considerations no change recommended</p>
<p>Coleorton (Lower Moor Road) should be reclassified as an 'Other Village/Settlement' on the basis that the post office/shop has recently closed, there is no church, the buses are infrequent and not at times suitable for commuting to work.</p>	<p>It is acknowledged that the church has closed and so it will be removed from the Settlement Study. However, it should be noted that the church was only included on the map for Coleorton and was not included as part of the scoring process.</p> <p>It is noted that since the Settlement Study (2021) was prepared, the village shop and post office on Lower Moor Road has closed.</p> <p>This changes the scoring for the settlement as follows: Convenience Shop (0) Education (1) Employment (1) Connectivity (3) Service and Facilities (1)</p>

	<p>Total (6)</p> <p>The area of Coleorton (including not just the area of Lower Moor Road but also The Moor and areas towards Griffydham/Peggs Green and Swannington) is characterised by pockets of development rather than one continuous settlement. There is also a dispersed provision of services and facilities across the Coleorton area generally.</p> <p>In terms of the Lower Moor Road Area (that proposed as a Sustainable Village) the closure of the shop means that there are now no key facilities within the existing Limits to Development. Furthermore, whilst there is employment within 2km, this is a straight-line measurement so in reality it is much further. Having regard to all the above, it is considered that it would not be appropriate to retain Coleorton (Lower Moor Road) as a Sustainable Village. Instead, it is recommended that all of Coleorton be identified as a Local Housing Needs Village.</p>
<p>The high level of services and facilities in Ellistown and its relationship with Coalville should be taken into account when considering where growth should be directed.</p>	<p>Whilst Ellistown is located close to the Coalville Urban Area, it is a distinct settlement in its own right.</p> <p>Distances to facilities and services and proximity to public transport are considerations of the site assessment work which NWL planning policy officers are currently undertaking.</p> <p>Based on the above considerations no change recommended</p>
<p>The access to employment score for Heather should be increased to 2. Whilst the employment site falls outside the current Limits to Development it forms part of the built-up area of the settlement, is contiguous with the Limit to Development and is connected to the village via an existing footway.</p>	<p>It is agreed that a distinction between 'adjoining' the settlement and 'outside' could have been made. It is recommended that the assessment for employment at paragraph 3.21 of the Settlement Study is changed to 'Employment sites within <u>or adjoining</u> Limits to Development'.</p> <p>This means that Heather would score 2 under this category, increasing the total from 9 to 10. However, this would not however result in a change from its position in the hierarchy (i.e. it would stay as a Sustainable Village).</p> <p>Having reviewed all other settlements it is noted that Lockington (which is identified as a Local Housing Needs Village) would also score 1 under this criteria. However, there would not result in a change to its designation as a a Local Housing Needs Village.</p>
<p>Ravenstone should be moved up the hierarchy or receive more growth than the other Sustainable Villages because it is more</p>	<p>Whilst Ravenstone is located close to the Coalville Urban Area, it is a distinct settlement in its own right.</p>

<p>sustainable than the other Sustainable Villages and has a good relationship with Coalville.</p>	<p>In line with the Settlement Study (2021) methodology, Ravenstone has been identified as a sustainable settlement because it has a convenience shop and a primary school in the limits to development and it is served by an hourly bus service (15, serving Coalville and Ibstock). However, unlike settlements higher up the hierarchy, it does not have a range of employment opportunities or a local centre in the limits to development.</p> <p>The scoring in the Settlement Study 2021 shows that Ravenstone is on a par with villages such as Packington and Donisthorpe.</p> <p>The distance to facilities and services is an important component of the site assessment work currently being undertaken by planning policy officers.</p> <p>Based on the above considerations no change recommended</p>
<p>It is queried why Swannington is identified as a Sustainable Village.</p>	<p>In line with the methodology set out in the Settlement Study (2021), Swannington has been identified as a Sustainable Village because:</p> <ul style="list-style-type: none"> • It has a primary school • There are employment sites within 2km of the settlement • It is served by the 29 Arriva Midlands service which is hourly / every 30 minutes during peak hours and provides access to the higher order settlements of Coalville, Ashby, Swadlincote and Leicester. <p>It also has 4 out of the 9 other services and facilities (a community venue, public houses, place of worship and informal recreation) within the limits to development.</p> <p>Based on the above considerations no change recommended</p>
<p>Identifying Woodville as a Sustainable Village fails to regard the settlement as a whole and is at odds with the fact it is classed as an Urban Area in the South Derbyshire Local Plan.</p>	<p>As a result of recent developments, the area of Woodville has extended into North West Leicestershire. The vast majority of Woodville, including its services and facilities are located in South Derbyshire.</p> <p>Woodville is identified as part of the Swadlincote Urban Area in the adopted South Derbyshire Local Plan.</p> <p>Whilst some growth on the edge of Woodville and within the boundary of North West Leicestershire may be appropriate to take account of the fact that it is part of a larger urban area, growth in Woodville will</p>

	<p>predominantly take place in South Derbyshire and be directed by the South Derbyshire Local Plan. Notwithstanding the status of Woodville in the South Derbyshire Local Plan, it would be inappropriate to identify Woodville any higher in the North West Leicestershire Local Plan settlement hierarchy.</p> <p>Based on the above considerations no change is recommended</p>
Excluding Boundary from the settlement hierarchy fails to recognise its relationship with the Urban Area of Woodville.	<p>Boundary is a cluster of dwellings positioned either side of the A511 and along the west side of Heath Lane. The area to the south is located in North West Leicestershire and the remainder is in South Derbyshire. There are very few residential dwellings in Boundary and whilst it has access to a frequent bus service, the availability of services and facilities in the settlement itself are limited to a pub. It is separated from Woodville by an open gap and so does not read as part of Woodville.</p> <p>Based on the above considerations no change recommended</p> <p>It is recommended that no further changes are made in respect of Boundary's position in the settlement hierarchy.</p>
Acresford should have a higher settlement hierarchy ranking because it adjoins South Derbyshire/shares similar locational advantages that attracted the Mercia Park developers.	<p>Mercia Park was considered a suitable site for strategic employment uses given its location adjacent to the A42/M42.</p> <p>The settlement hierarchy considers the sustainability of settlements. Under the adopted Local Plan, Acresford falls under the definition of hamlet. In line with the Settlement Study (2021) methodology, Acresford is not regarded as a sustainable settlement because it does not have a primary school or a convenience shop and on the whole has limited facilities and services.</p> <p>Based on the above considerations no change recommended</p>
Whilst Normanton le Heath has been included in the list of in the table at paragraph 3.11, it is not referenced in the list of changes to the settlement hierarchy under paragraph 3.12. Normanton le Heath is currently not in the settlement hierarchy under Policy S2 in the adopted Local Plan and so its addition to the list of Local Housing Needs Villages is a	<p>Normanton le Heath was inadvertently missed off the list of settlements identified as Small Villages in policy S3, but the supporting text (correctly) did include it as a Small Village.</p> <p>Comments are noted</p>

change to the settlement hierarchy.	
If the New Settlement is pursued, this will need to go into the settlement hierarchy, either as a Sustainable Village or its own category.	It is recommended that these comments are noted and considered at a later date once there is more certainty on the proposed growth strategy.

Comments challenging elements of the Settlement Study methodology are as follows:

Summary of Comments	NWL Planning Policy Officer Response
Coalville comprises 7 settlements so the findings of the Settlement Study are distorted.	As set out above, the Coalville Urban Area is deemed to function as one area. This is a sound approach given it is adopted in the Local Plan (2017).
Whilst the study takes account of the number of convenience stores available within each settlement, the number and level of choice for the other services and facilities is not taken into account. All settlements should be reassessed to fully take account of the number of each service available, as well the types of services in order to fully understand the role of individual settlements.	As set out above, the numbers of different types of facilities and services is largely a reflection of the size of population. This suggested approach is not considered preferable to the one used to define the settlement hierarchy.
The hierarchy should align with the [Leicester and Leicestershire] Strategic Growth Plan 'International Gateway'	The identification in the Strategic Growth Plan of the northern part of the district as part of the Leicestershire International Gateway is acknowledged. There is no suggestion that this requires a bespoke policy approach, although it is something which can influence the overall distribution strategy.
Where a settlement is classed as a 'Sustainable Village' this does not necessarily mean that it is a location suitable for all types of development from a highways and transport perspective, nor that developer contributions would not be required towards the enhancement of sustainable transport measures	These comments are noted. Highways considerations form part of the site assessment work currently being undertaken by policy officers.
Disagree with the term 'other settlements' as it is dismissive	This tier is currently called 'Hamlets' in the adopted Local Plan. On reflection, it is considered that settlements falling under the "Other villages/settlements" category should be reclassified as "Small villages or hamlets in the countryside".

<p>This hierarchy considers only services and amenities . The hierarchy does not consider important environmental issues.</p>	<p>The focus of the settlement hierarchy is access to facilities and services as this gives the opportunity to focus development at locations which limit the need to travel and offer genuine choice of transport modes (NPPF 105).</p> <p>Environmental considerations will be taken into account as part of the Local Plan Sustainability Appraisal. They will also form part of the site assessment work currently being undertaken by policy officers.</p> <p>Based on the above considerations no change recommended</p>
<p>The scoring concept is flawed in that it merely scores whether there is some type of provision without giving any consideration as to whether it is of a scale or type that will actually make the settlement and its inhabitants sustainable.</p> <p>One of the responses received suggested that more detailed work should be done, for example on the scale, type of employment on offer matched against the size or skills of the settlement's population or whether the bus services in a particular settlement go to places at which residents want to shop or work.</p>	<p>The scoring of settlements provides a means of comparing the relative sustainability merits of settlements, whilst recognising that not all settlements in the same tier will necessarily benefit from exactly the same level of provision. This is then supplemented by a planning judgement.</p> <p>The NPPF (2021) states that in order to be justified (one of the soundness tests) it should be based on <u>proportionate</u> evidence. The suggested approach in this instance is not proportionate and in some cases would be difficult to source. Furthermore, it would be snap shot in time which would very quickly become dated as people move in and out of settlements. The approach followed (scoring + planning judgement) is considered to be proportionate and sound.</p> <p>Based on the above considerations no change recommended</p>

LOCAL PLAN REVIEW

DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS - JANUARY TO MARCH 2022

SUMMARY OF RESPONSES TO Q3

Q3 - DO YOU AGREE WITH THE APPROACH TO LOCAL HOUSING NEEDS VILLAGES? IF NOT, WHY NOT?

A summary of the other comments received are set out below:

Comments	NWL Officer Response
The approach to defining local housing need in paragraph 3.10 of the emerging plan seems at odds with the definition in the Objectives section. This is confusing for users of the plan.	<p>Objective 2 as consulted seeks to “Ensure the delivery of new homes, including affordable housing, which meet <u>local housing needs</u> including in terms of size, tenure and type.”</p> <p>At paragraph 3.10 of the consultation document it is stated that “In terms of <u>Local Housing Needs Villages</u>, housing development in these would be restricted to those that meet the needs of somebody with a demonstrable local connection to the settlement concerned.”</p> <p>As confirmed at paragraph 3.5 of this report , it is proposed to delete the word ‘local’ from objective 2.</p>
Agree with the approach as it would help current residents whose accommodation is no longer suitable to stay in the area.	Comments are noted.
<p>Local Housing Needs Villages are unsustainable locations and rural housing should be directed to the Sustainable Villages.</p> <p>The character of local housing needs villages should be preserved and housing should go to the larger settlements.</p>	<p>The majority of rural housing (i.e. outside of Coalville, Ashby, Castle Donington, Ibstock, Kegworth & Measham) will be directed to the Sustainable Villages. Officers are currently undertaking site assessment work to identify suitable housing allocations in the Sustainable Villages.</p> <p>The concept of Local Housing Needs Villages is to provide the opportunity to those with a demonstrable local connection to one of these settlements to build and occupy housing. Any development in such locations will be limited.</p>
There is apparently serious pressure on housing needs in the area so appropriate development should be considered in any existing settlement	<p>The Local Plan will identify the housing need for the District and set out how and where this need will be met over the plan period. Allowing development in all settlements across the district would fail to accord with national planning policy and the principles of sustainability.</p> <p>Based on the above considerations no change recommended</p>
It is not clear whether the development permitted in ‘Local Housing Need Villages’ would be for market sale, for affordable	<p>The purpose of the policy is to enable people who want to build in a Local Housing Needs Village to do so, subject to them meeting the proposed criteria. The policy is not intended to encourage speculative</p>

housing provision, or for self-build plots.	developers to build in the LHNV's; the primary consideration will be whether the applicant can demonstrate a sufficient local connection.
Development in the Local Housing Needs Villages should be matched with appropriate infrastructure.	Given the local needs criteria proposed, the scale of development likely to come forward in the Local Housing Needs Villages is expected to be limited. It is unlikely to be of a significant quantum to generate infrastructure requirements from any proposed development.
It is not clear from the text whether the proposal applies to the 'Other Villages/Settlements' as well.	<p>The criteria is not intended to apply the 'Other Villages/Settlements' (now proposed to be retitled "Small villages or hamlets in the countryside") and this will be made clear when the policy/supporting text is consulted on in full at Regulation 19 stage.</p> <p>Based on the above considerations no change recommended</p>
<p>Local needs housing should be allowed on greenfield sites in all settlements.</p> <p>Local needs housing criteria should apply to all settlements.</p>	<p>All settlements in the top four tiers of the hierarchy (Principal Town, Key Service Centres, Local Service Centres & Sustainable Villages) have Limits to Development. Proposals for housing in the Limits to Development are acceptable in principle regardless of local needs housing criteria.</p> <p>As the District's housing needs cannot be met within the existing Limits to Development / on brownfield sites, the Local Plan will allocate additional greenfield sites in the top four tiers of the hierarchy. This will ensure housing comes forward in the most sustainable locations. Local needs housing criteria is not therefore specifically required in the top four tiers of the hierarchy.</p> <p>Local needs housing is not applied to the 'other villages/settlements' because they are not considered to be sustainable enough to support additional 'market' orientated growth.</p> <p>Based on the above considerations no change recommended</p>
Development [in the LHN Villages] shouldn't be restricted to local needs, more needs to be done to rebalance the age profile in these settlements.	<p>The approach to Local Housing Needs Village is less restrictive than the adopted Local Plan, which restricts development in the Small Villages to conversions of existing buildings or the redevelopment of previously developed land. It is considered an appropriate mechanism to allow a limited amount of development for those with a local connection.</p> <p>Based on the above considerations no change recommended</p>
The 10 year residence requirement (criteria a), b), c), and e) is too onerous	10 years is considered a sufficient period to ensure that there is a local connection without being too onerous.

	Based on the above considerations no change recommended
New-build applications could be open to abuse where life expectancy of those requiring care is very short.	<p>Criterion b) is considered important as it has the potential to affect somebody's way of life.</p> <p>However, this comment does raise an important issue about how criterion c) would be monitored and managed and whether it is necessary.</p> <p>Having considered this matter further, it is recommended that criterion c) is removed from the policy.</p>
<p>Criteria e) could potentially restrict people who lived in a LHN Village for the first 18 years of their life from being able to move back later in life.</p> <p>This could easily be resolved by allowing local needs dwellings for anyone who is currently or has previously resided in the parish for a period of 10 years or more.</p>	<p>This is considered to be a reasonable point and as such it is recommended that the reference to 'within the last 20 years' is removed from criterion e).</p>
<p>Are there any instances where a parish boundary crosses a village and how would the policy deal with this issue?</p> <p>Consideration should be given to whether the policy would work better with a clause that required the occupier to have previously resided within X miles of the village for a period of 10 years.</p>	<p>There are instances where parish boundaries cross the Local Housing Needs Villages (for example, Lount, Sinope and Coleorton). As a result (and having regard to the comments above regarding a 20 year period), it is recommended that criteria a) and e) are amended to read:</p> <p>a) Existing resident in the parish <u>or the Local Housing Needs Village in</u> which the application is located for a continuous period of at least 10 years prior to an application being submitted;</p> <p>e) No longer resident in the parish <u>or the Local Housing Needs Village in</u> which the application is located but has previously resided in the parish <u>or the Local Housing Needs Village</u> for a period of at least 10 years within the last twenty years</p> <p>It is not considered appropriate to potentially widen the definition of local connection by incorporating a distance into the criteria. Parishes are a recognised geographical entity in their own right and so are an appropriate reference point for a local connection test.</p>
It is not clear whether under clauses a & e previous residency is intended to apply to people who lived in these villages as children. If so the demand could far exceed the ability of these villages to absorb.	<p>It is considered appropriate to give people who lived in the LHNV as children the opportunity to move back. However, it is considered unlikely that the scenario outlined would be realised in reality.</p>

<p>The policy needs to be clear whether/how the local needs dwelling will be retained in perpetuity.</p> <p>Would the Policy require the local needs dwelling to be retained for a certain period of time or for perpetuity? If the requirement is for perpetuity then how does this relate to those dwellings where permission is granted on the basis of ill health/care and that situation no longer arises?</p>	<p>The dwellings permitted in LHNV's should be retained in perpetuity. However, it is recognised there may be issues with re-selling or re-mortgaging these properties. Other Local Planning Authorities have dealt with this issue by relaxing the rules after specific time periods. It is recommended that policy officers look into this matter when finalising the policy wording.</p>
<p>The proposals limiting development to specific local needs criteria are acceptable but should be caveated in a way that allows small scale infill development within the limits of development to be brought forward on an opportunity basis where no local identifiable local need exists</p>	<p>This proposed caveat would broaden the scope for speculative development and goes against the aims of the policy. It is not recommended that such a caveat is included (in any event, the LHNV's do not have limits to development).</p> <p>Based on the above considerations no change recommended</p>
<p>The policy should be clearer on what would happen if a/to e can't be met.</p>	<p>If a proposal does not meet the criteria at a) to e) then it would be contrary to the development plan and would warrant refusal on this basis. This will be made clear in the final policy wording.</p>
<p>The criteria should be identified as aspiration in the supporting text rather than policy wording.</p>	<p>Identifying the criteria in the supporting text as aspirational is considered to go against the aims of the policy and broadens the scope for speculative development.</p>
<p>People with no previous association with the village should not be precluded from having the opportunity to purchase a new home.</p>	<p>The policy would not preclude somebody with no previous association with a specific village from being able to move in to existing housing, but the suggestion would go against the aims of the policy and broadens the scope for speculative development.</p>
<p>Presumably the wording of Policy S2 will be amended to include reference to the only housing being permitted in Local Housing Needs Villages is those that meet the local connection criteria proposed at paragraph 3.10, and presumably these local connection criteria will form part of a new policy to give them policy support, rather than being supporting text only, which would make it harder to ensure compliance with these criteria.</p>	<p>This will be made clear in the final policy wording.</p>

LOCAL PLAN REVIEW

DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS - JANUARY TO MARCH 2022

SUMMARY OF RESPONSES TO Q11

Q11 – WHICH GENERAL EMPLOYMENT LAND STRATEGY DO YOU PREFER? IS THERE A DIFFERENT OPTION WHICH SHOULD BE CONSIDERED?

The comments and criticisms given for Option 1 are:

Comment/criticism	NWL officer response
Option 1 should be expanded to focus more employment land development at Castle Donington, recognising the new Freeport status of the area and the Development Corporation plans to create 84,000 jobs and 10,000 homes by 2045.	The respective roles of the locations in Option 1 (if selected) will be further considered taking account of, amongst other things, site assessment outcomes, infrastructure capacity and other relevant factors which would include the Freeport designation.
Options 1 and 2 focus on existing over-stretched areas and the scale of development unlikely to be enough to fund corresponding infrastructure improvements	At this stage, we are not aware of any infrastructure 'showstoppers' that mean either/both of these options should be rejected. Work is on-going on infrastructure capacity and requirements and the infrastructure implications of the selected option will be further assessed as part of the iterative process of preparing the Local Plan Review.
Option 1 could result in unknown sites coming forward where allocated sites are insufficient or not delivered, which may be a risk to providing sewerage longer term capacity solutions as it cannot be accounted for within current plans, resulting in more reactive capacity improvements. However, it does maintain confidence in current allocations when developing the infrastructure in a particular area. (Severn Trent)	Whilst we do not necessarily share the view that Option 1 would result in significantly more planning applications on unidentified sites, we will continue to work with infrastructure providers (including Severn Trent) to understand and plan for the infrastructure implications of the selected option.
Options 1, 2 and 4 would prevent opportunities for villages to grow and thrive (paragraph 79 of the Framework), would not help to create the conditions in which businesses can invest, expand and adapt and take into account both local business needs (paragraph 81 of the Framework) or allow recognition of the specific locational requirements of different sectors (paragraph 82). As a result, there would be some doubt that significant weight was being placed on the need to support economic growth and productivity.	Option 3 would result in a more widespread distribution of sites, away from the main settlements. However it is not accepted that the other options will prevent acceptable development elsewhere as is implied. Other policies will govern employment development in the rural areas (for example, the current Policy S3(i)&(k) in the adopted Local Plan) and in established employment areas (Policy Ec3)).

The comments and criticisms given for Option 2 are:

Comment/criticism	NWL officer response
From a transport perspective, development in the A/M42 J11 area (Option 2) is likely to be less sustainable and is impacted by HS2 (LCC Highways).	Noted. The transport implications of the selected option will be further assessed in collaboration with the Highways Authority and National Highways. This will include the scope for improvements, such as upgraded public and sustainable transport connections.
Options 1 and 2 focuses on existing over-stretched areas and the scale of development unlikely to be enough to fund corresponding infrastructure improvements	At this stage, we are not aware of any infrastructure 'showstoppers' that mean either/both options should be rejected. Work is on-going on infrastructure capacity and requirements and the infrastructure implications of the selected option will be further assessed as part of the iterative process of preparing the Local Plan Review.
Measham and Appleby Magna are distinct, separate settlements, Mercia Park is not well related to Measham and Measham has existing employment sites and residents can use sustainable transport to get to jobs in Ashby and Coalville.	To clarify, this option would see new employment development focused at J11 M/A42. It does not envisage the coalescence of the two villages within a wider developed area. It could nonetheless give some Measham and Appleby Magna residents the opportunity to work closer to where they live.
Option 2 would support the longer-term planning of sewer resilience whilst removing some confidence in the short-term development of individual sites. A balanced decision will need to be made on this aspect. This option does support the principles of Drainage and Wastewater Management Plan and enable more proactive working to be considered rather than the current reactive approach used to meet the needs of Option 1 (Severn Trent).	Noted. We will continue to work with infrastructure providers (including Severn Trent) to understand and plan for the infrastructure implications of the selected option.
Options 1, 2 and 4 would prevent opportunities for villages to grow and thrive (paragraph 79 of the Framework), would not help to create the conditions in which businesses can invest, expand and adapt and take into account both local business needs (paragraph 81 of the Framework) or allow recognition of the specific locational requirements of different sectors (paragraph 82). As a result, there would be some doubt that significant weight was being placed on the need to support economic growth and productivity.	Option 3 would result in a more widespread distribution of sites, away from the main settlements. However it is not accepted that the other options will prevent acceptable development elsewhere as is implied. Other policies will govern employment development in the rural areas (like Policy S3(i)&(k) in the adopted Local Plan) and in established employment areas (Policy Ec3) for example.
Policy can be formulated to require a mix of employment space (strategic and non-strategic) on any site.	Noted.

The criticisms/comments given for Option 3 are:

Comment/criticism	NWL officer response
Could be targeted at areas where unemployment is highest and low cost commuting is easiest.	Noted although unemployment rates can be highly variable and are not, on their own, a sound basis for site selection. Sustainable transport connections will be considered as part of the site assessment work and as part of the Sustainability Appraisal of the employment strategic options.
It is an illogical approach and would damage rural areas.	Noted.
In transport terms, it is not an attractive option (LCC Highways)	Noted. The transport implications of the selected option will be further assessed in collaboration with the Highways Authority and National Highways. This will include the scope for improvements, such as upgraded public and sustainable transport connections.
Option 3 could result in new flows into the sewerage system across a wider area of NWLDC this will make the undeliverability in terms of project promotion/timing and certainty of development more difficult potentially delaying any infrastructure improvement works. (Severn Trent)	Noted. We will continue to work with infrastructure providers (including Severn Trent) to understand and plan for the infrastructure implications of the selected option.
Option 3 is the least sustainable of the 4 options	Noted.

The criticisms/comments given for Option 4 are:

Comment/criticism	NWL officer response
Whilst a New Settlement could deliver some employment, this would essentially be localised employment to serve the inherent needs and demands of the New Settlement itself. Quantity will depend on the needs of the settlement.	Including employment uses as part of a new settlement or urban extension can be an important way to improve the sustainability of the location by enabling some residents to be able to work close to where they live. However, it is feasible that the employment element could be of a scale to serve more general and/or strategic needs which is one of the concepts included in this option.
Whilst there are risks in terms of provision of sewerage capacity in time for the development at a new location, it would result in a focused area for work to be designed and progressed. The cost of this would however be likely to be significant and may impact on development viability. (Severn Trent)	Noted. We will continue to work with infrastructure providers (including Severn Trent) to understand and plan for the infrastructure implications of the selected option.

Currently there is insufficient information about what is proposed to make a fully informed comment.	Noted. The options are conceptual at this stage.
Options 1, 2 and 4 would prevent opportunities for villages to grow and thrive (paragraph 79 of the Framework), would not help to create the conditions in which businesses can invest, expand and adapt and take into account both local business needs (paragraph 81 of the Framework) or allow recognition of the specific locational requirements of different sectors (paragraph 82). As a result, there would be some doubt that significant weight was being placed on the need to support economic growth and productivity.	Option 3 would result in a more widespread distribution of sites, away from the main settlements. However it is not accepted that the other options will prevent acceptable development elsewhere as is implied. Other policies will govern employment development in the rural areas (like Policy S3(i)&(k) in the adopted Local Plan) and in established employment areas (Policy Ec3) for example.
Option 4 would not deliver balanced growth and is unlikely to be sustainable.	Noted.

A number of more general comments were made in response to this question.

Comment	NWL officer response
Brownfield sites and existing unoccupied buildings should be used before greenfield sites. Repurpose brownfield industrial sites rather than using them for housing.	Agreed that brownfield sites should be repurposed where possible and brought into use for employment or for housing. Some sites will be more suited to housing and others to business use. However, there are not enough brownfield sites for all the new housing and employment land that is needed; greenfield sites will need to be developed as well.
Note the overall growth proposed [<i>housing and employment</i>] and it is important that new development is facilitated through the delivery of the necessary infrastructure to accommodate the growth plans. Welcome the preparation of an Infrastructure Delivery Plan. Encourage engagement and to continue to develop transport evidence, including working with neighbouring authorities to better understand the impact upon the Strategic Road Network. (National Highways)	Noted. The transport implications of the selected option will be further assessed in collaboration with the Highways Authority and National Highways. This will include the scope for improvements, such as upgraded public and sustainable transport connections.
All new development will need to be sustainable from an environmental perspective and this means locating development where; a) it is at least flood risk and where the development would not increase flood risk elsewhere; b) where the necessary infrastructure is in place such that the development would not cause a risk to water quality; c) in the case of development on potentially contaminated land that the necessary remediation works are undertaken	Noted. These are factors to be considered as part of the site assessment process.

<p>to ensure there is no pollution risk to controlled waters.</p> <p>The proximity of regulated process sites (i.e. those which operate with a Permit from the Environment Agency), e.g. Landfills, Incinerators, composting sites, waste transfer stations will need to be carefully considered when deciding the location of new sensitive receptor development, e.g. housing. (Environment Agency)</p>	
<p>The relationship between homes and jobs should be considered as part of the assessment and selection of site allocations for housing and employment to reduce cost and environmental impacts of commuting.</p>	<p>Agreed. Access to workforce (for employment sites) and access to employment (for housing sites) will be part of the site assessment process. At the strategy level, these factors will feed into the comparison of options in the Sustainability Appraisal.</p>
<p>The historic environment needs to be considered as potential site allocations are assessed and recommend that the five assessment steps set out in HEAN 3 are followed as part of that work. (Historic England)</p>	<p>Agreed. Heritage impacts are part of the site assessment process.</p>
<p>Consider whether a policy supporting the expansion of the Segro site for rail-served freight is appropriate. (LCC)</p>	<p>The proposed Hinkley National Rail Freight Interchange, if permitted, will largely accommodate the future need for rail-served strategic distribution space to 2041. This being the case, current evidence of rail-served needs does not appear support additional floorspace at the Segro Gateway site for the Local Plan Review plan period. We have not received representations from Segro seeking such an approach.</p>
<p>Proposed employment sites should be situated where there are strong transport links, recognising the importance of access locally, regionally, nationally and internationally by multiple modes. The area around East Midland Airport has strong advantages for employment development.</p>	<p>Noted.</p>
<p>The respondent questions whether Money Hill can be relied upon. Its non-implementation should not be a barrier to development elsewhere.</p>	<p>The Money Hill allocation has been found to be acceptable through the Local Plan process and the respondent has not supplied evidence that demonstrates the site is either unsuitable or undeliverable. The starting point is that the site is part of our employment land supply and we will review the allocation as part of the Local Plan Review and consider making adjustments to the allocation if this is merited by updated information.</p>

Road-related transport, haulage and associated small-scale storage uses should also follow this general strategy with a preference for sites that are well-related to the strategic road-network	Noted.
<p>The potential highways and other infrastructure implications, contributions and necessary mitigation measures must be identified. Specifically;</p> <ul style="list-style-type: none"> • impacts on North Warwickshire, particularly around Junction 11 / M42 and the A444 and B5493 (North Warwickshire District Council) • impacts on the local and strategic road network in Blaby in particular on M1 (Blaby District Council) 	The transport implications of the selected option will be further assessed through transport modelling. This will factor in the traffic coming in/out of the district from neighbouring authority areas and should reveal any implications for key junctions in neighbouring areas.
Any policy for employment land distribution needs to contain flexibility in order to ensure that it remains sustainable and appropriate throughout the Plan period. The Plan needs to be flexible to respond to market demand and unforeseen changes e.g. increased demand for logistics and warehouse space, accelerated by the pandemic, is likely to remain.	Noted. The consultation document considered flexibility in terms of the amount of land to be allocated and whether/how to achieve a continuity of supply. In addition an Ec2(2)-type policy approach, if included in the Local Plan Review, would provide some flexibility to deal with the types of changing circumstances the respondent mentions.
It would be appropriate to identify a range of land including at locations beyond Coalville, Ashby and Castle Donington.	Comment noted.
Kegworth should be bracketed within a broader strategic area of search centred on Junction 24 of the M1 rather than 'Elsewhere'. It is an appealing location for companies requiring strategic distribution links. The Freeport designation recognises the strategic importance of this location.	Noted. It is agreed that land between J24 M1 and Kegworth is potentially well connected to the strategic highway network and falls within the broad Area of Opportunity 3 (A50/M1) identified in the Strategic Distribution study. Officers will consider this further.
No further employment development. None of the options benefit the local area. Coalville has enough employment land. There is no need for more.	Evidential studies show that new employment land will be needed over the plan period. Failing to address this brings a very high risk of the Local Plan Review being found unsound at Examination.
Locate employment development near the strategic road network. Avoid locations which encourages traffic through residential areas.	Noted. Access to transport routes will be considered as part of the site assessment process.
Warehousing is overcrowding housing areas and resulting in the loss of valuable greenspaces.	Noted. Residential amenity and ecology/ landscape considerations are part of the site assessment process.
Meeting Leicester City's unmet employment need elsewhere in the county will impact on traffic levels and emissions. Public transport is insufficient.	Noted. As it stands, the city's unmet employment land needs are set to be met in Charnwood borough.
Mix of employment site sizes is important.	Noted.
We would also note that Money Hill drains into the Packington WwTW which outfalls to the River Mease, there are limitations on the	Noted. The Money Hill development is included in the agreed Developer Contribution Scheme. The implications of

flows that the WwTW can receive and treat to protect the watercourse. Whilst we are looking at solutions to this issue, the delivery of a solution may not be aligned with new growth if additional growth is allocated at this time. (Severn Trent)

additional development on phosphorus levels in the River Mease catchment will be considered and addressed through the Local Plan Review process.

This page is intentionally left blank

LOCAL PLAN REVIEW

DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS - JANUARY TO MARCH 2022

SUMMARY OF RESPONSES TO Q12

Q12 – DO YOU AGREE WITH THE INITIAL POLICY OPTION FOR STRATEGIC WAREHOUSING? IF NOT, WHY NOT?

Comment/criticism	NWL officer response
Further low skilled, low paid jobs are not needed	Noted. There is variety in the skills requirements in the warehousing sector; the jobs are not exclusively low paid and low skilled.
Need to allocate sites to prevent speculative development on unidentified sites	Agreed. Allocating appropriate site/s is a key way to ensure future development is plan-led and to demonstrate that the Local Plan has been positively prepared.
Concern about site specific impacts of such developments, including on; <ul style="list-style-type: none"> • Designated nature conservation sites • Best and most valuable agricultural land • Air quality Sites must have sustainable transport links for the workforce to be able to use.	Noted. These are matters to be considered as part of the site assessment process.
Locations elsewhere in the county are suitable for additional strategic warehousing with similarly good connections and close to centres of population	Noted. The intention of the initial policy option is that NWL would provide for a proportion of the outstanding need; the balance will be met elsewhere in Leicester and Leicestershire.
The airport and proximity to Derbyshire/Nottinghamshire make the area around East Midlands Airport particularly attractive for strategic warehousing.	Noted.
Welcome the recognition of the evidence and joint working between the L&L authorities on this matter	Noted.
Need to consider the implications of the Freeport for the need assessment and in site selection	Noted. This matter is addressed in the covering committee report (section 6.7)
Re proposed Hinkley National Rail Freight Interchange (NRFI): a) it does not have permission and b) if permitted, the site occupiers are unlikely to be obligated to use the rail freight services.	a) Noted b) Noted
North Warwickshire BC Local Plan Inspector required an additional strategic policy on meeting wider than local need for warehousing.	Noted. The Inspector identified that there was no clear evidence about what level of strategic storage and distribution should be delivered in the borough as opposed to elsewhere in the West Midlands. He also noted that the demand for large scale space is particularly intense along M42 belt. In

	response he required the incorporation of an Ec2(2)-style policy “to provide a clear basis for decision-taking where there is evidence of immediate needs for employment land within WMSESS (West Midlands Strategic Employment Sites Study) Area A”.
Use brownfield sites	It is agreed that brownfield sites should be repurposed where possible and brought into use for employment or for housing. Some brownfield sites will be more suited to housing and others to business use. However, there are not enough brownfield sites for all the new housing and employment land that is needed; greenfield sites will need to be developed as well.
No more strategic warehousing in the a) Castle Donington area; b) the Coalville area; c) Appleby Magna/Measham area	Noted, however the Local Plan Review will need to identify site/s to address a proportion of the Leicester and Leicestershire need for additional strategic warehousing. Making no/minimal provision for strategic distribution would be unrealistic in view of the large scale requirements from this sector which is responding to customer demands.
A shift from road-based to more rail-based freight in NWL should be encouraged.	Noted. The Strategic Distribution Study assumes an increase to some 43% of goods will be transported by rail. NWL has existing rail-served sites but there are no known potential rail-served sites at this point. The proposed Hinckley NRFI has the potential to provide a substantial amount of rail served floorspace if permitted.
The proposed requirement is based on double-counting including over-supply at the Hinckley National Rail Freight terminal. When that is properly accounted for the 50% figure amounts to no more than 16 hectares which may be too small for a viable scheme. The justification for any further allocation is weak and there appears to be too little joint analysis with other local authorities. Further work is needed.	The Strategic Warehousing Study has been found to be a robust piece of evidence by the Leicester and Leicestershire authorities who commissioned it. There is no indication of double counting in the methodology. Further joint work with the other authorities is underway to decide how the outstanding requirement should be distributed.
The need to replace outmoded buildings and the recent rapid increase in demand for logistics space may not have been fully reflected in the Strategic Warehousing Study. The council should aim for the upper space requirement outlined in the consultation document to provide greater	Noted. Replacement rates and recent demand trends were assessed and reflected in the Strategic Warehousing Study's findings.

flexibility to the market and reflect most recent build out rates.	
<p>The Strategic Warehousing study over-estimates demand in a number of ways and more cautious assumptions should be applied.</p> <ul style="list-style-type: none"> a) The requirement should be adjusted to 2039 rather than 2041, making the outstanding road-based requirement for the Leicester and Leicestershire authorities 72,000 sqm and rail-based requirement 613,000sqm b) The flexibility margin of 5 years completions is not justified because of the uncertainty about future requirements owing to the pandemic. The proposed figure is equivalent to 33% of the replacement element of the model. c) Some 1.62m sqm (84%) of the demand to 2041 comes from an assumption that strategic warehouses on reaching a 30-year life will no longer be suitable for re-use. In practice, the warehouses would be renewed on their current site. Following this approach would drive a spiral of land allocation to new sites at less and less appropriate locations. There must be some objective data assessment to ascertain how much of this already allocated land could be re-used. The outputs appear sensitive to changing the assumptions on this point. <p>Using the consortium's figures, there would be a surplus of road-served sites to 2036. No immediate decisions to allocate more land for strategic warehousing in this plan are necessary.</p> <p>Professional advice should be taken to look at applying a sensible approach to the risk margins to be applied and on what elements of the forecast. We do not believe that the current methodology is proportionate or logical nor would represent best industry practice.</p>	<ul style="list-style-type: none"> a) It is agreed that the initial policy requirement should be adjusted to match the Local Plan Review timeframe. However, the consortium's calculation is different from that used by all the Leicester & Leicestershire authorities and which has been agreed in the Statement of Common Ground on Strategic B8. Adjusting for a 2039 end-date results in a residual requirement for road-served sites of some 95,400sqm (Leicester & Leicestershire). b) Including a flexibility margin based on 5 years' worth of completions is widespread practice in employment land studies. Market signals suggest that demand will continue, or increase, rather than reduce. c) The study considers the approach to the replacement of existing buildings in depth. It notes that older buildings can become functionally obsolete because of changes in mechanisation and changing requirements including for larger premises to enable the consolidation of operations. Many units are let rather owner-occupied so businesses will re-locate to newer, fit-for-purpose premises, releasing the existing building for refurbishment which cannot be done while it is occupied. The consultants apply a higher replacement rate (30 years) citing the large growth rates in on-line retailing using the modern automated picking, handling and packaging systems which cannot be retrofitted into older buildings. <p>The Local Plan Review could consider designating existing, good quality strategic B8 sites in an Ec3-type policy to maintain the best stock and so that these sites are not lost to other uses, driving re-provision elsewhere.</p> <p>The expert consultants who prepared the Strategic Warehousing Study comprehensively compared a variety of assessment approaches. The study</p>

	<p>findings have been signed off by all the Leicester and Leicestershire authorities. Overall, this gives some comfort that the study is both reasoned and robust. Whilst individual assumptions can be debated, taking the report as a whole there is no evidence that its findings are a significant over-estimate of demand.</p>
--	---