

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
<p>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).</p>	<p>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.</p>
<p>Options 1 and 2 focuses on existing over-stretched areas and the scale of development unlikely to be enough to fund corresponding infrastructure improvements</p>	<p>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.</p>
<p>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.</p>	<p>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.</p>
<p>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).</p>	<p>Noted. We will continue to work with infrastructure providers (including Severn Trent) to understand and plan for the infrastructure implications of the selected option.</p>
<p>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.</p>	<p>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.</p>
<p>Policy can be formulated to require a mix of employment space (strategic and non-strategic) on any site.</p>	<p>Noted.</p>

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.
The potential highways and other infrastructure implications, contributions and necessary mitigation measures must be identified. Specifically; <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

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